

**Environmental Assessment
Determinations and Compliance Findings
for HUD-assisted Projects
24 CFR Part 58**

Project Information

Project Name: CFK-Big-Pine-Key

HEROS Number: 900000010373851

Start Date: 01/04/2024

Responsible Entity (RE): Monroe County, Key Largo FL,

RE Preparer: Michael Roberts

State / Local Identifier:

Certifying Officer: Christine Hurley

Grant Recipient (if different than Responsible Entity): The College of the Florida Keys

PHA Code:

Point of Contact: Beren Lindenber

Consultant (if applicable):

Point of Contact:

40 CFR 1506.5(b)(4): The lead agency or, where appropriate, a cooperating agency shall prepare a disclosure statement for the contractor's execution specifying that the contractor has no financial or other interest in the outcome of the action. Such statement need not include privileged or confidential trade secrets or other confidential business information.

- ✓ By checking this box, I attest that as a preparer, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

Project Location: 450 Key Deer Blvd, Big Pine Key, FL 33043

Additional Location Information:

The property is located at Latitude (North): 24.6752850 - 24° 40' 31.02", Longitude (West): 81.3612700 - 81° 21' 40.57" Universal Transverse Mercator: Zone 17, UTM X (Meters): 463448.3 UTM Y (Meters): 2728885. With an overall average flood plain ground height of elevation of 2 ft. above sea level. The property consists of sixteen (16) unoccupied one-story buildings constructed in as early as 1958, according to tax records with additional ancillary structures built in 1976 and 1977. This former FLDOC prison included structures designated for different occupancies including a laundry room, pump room, generator house, cells, bathrooms, chapel, barbershop, gym, etc. A hard surface asphalt paved parking area is provided on the eastern portion of the subject property. Domestic water and sanitary sewer service is provided by Florida Keys Aqueduct Authority.

Direct Comments to: roberts-michael@monroecounty-fl.gov

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The 2023 Community Project Funding project consists of the demolition of existing buildings, site cleanup, and construction of a 400 ft by 400 ft concrete pad. The pad will facilitate training in various degree and certificate programs, including motor vehicular tactical training for the College's Institute for Public Safety and Commercial Driver's License (CDL) training classes. An initial project activity will be examining how the land was used and exploring options for reuse that optimize prior infrastructure investments, acute site improvements include repairs to fencing, removal of trash and derelict vehicles, cutting down overgrowth of vegetation, and performing a site assessment. The site assessment will help the College maximize the existing infrastructure while minimizing environmental impacts. A second project activity will be the construction of a multipurpose vehicle operation training track. The project will support economic recovery and diversification by developing vacant land for educational purposes, including developing a multipurpose vehicle operations training track. The Florida Department of Corrections correctional facility on Big Pine Key in Monroe County was listed as "state surplus" on February 4, 2020, and leased to The College of the Florida Keys (CFK) on November 23, 2021. The now-closed former prison property represents an important community asset that CFK will utilize to add value to residents in and around Big Pine Key.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The project will support economic recovery and diversification by developing vacant land for educational purposes, including developing a multipurpose vehicle operations

training track. The Florida Department of Corrections correctional facility on Big Pine Key in Monroe County was listed as "state surplus" on February 4, 2020, and leased to The College of the Florida Keys (CFK) on November 23, 2021. The now-closed former prison property represents an important community asset that CFK will utilize to add value to residents in and around Big Pine Key. As noted in the South Florida Regional Planning Council's 2022-2027 Comprehensive Economic Development Strategy, CFK is preparing to repurpose the land to support a workforce training facility and a site for CFK's marine resource research, conservation, and restoration activities. The 2023 Community Project Funding project consists of demolishing existing buildings, site cleanup, and constructing a 400 ft by 400 ft concrete pad. The pad will facilitate training in various degree and certificate programs, including motor vehicular tactical training for the College's Institute for Public Safety and Commercial Driver's License (CDL) training classes. The initial project activity will be examining how the land was used and exploring options for reuse that optimize prior infrastructure investments. Acute site improvements include repairs to fencing, removal of trash and derelict vehicles, cutting down vegetation overgrowth, and performing a site assessment. The site assessment will help the College maximize the existing infrastructure while minimizing environmental impacts. The College of the Florida Keys proposes to use the land for educational purposes, including: Commercial Driver's License (CDL) training classes, motor vehicular tactical training for the Institute for Public Safety offered by the College, a possible substation for the Monroe County Sheriff's Office, space for the Boys and Girls Club to provide educational and after-school programming, a small sporting complex (track and multi-use field) for use by CFK athletes, and space to offer programs and services to residents. The design will also allow for sufficient open space that can be used for temporary storage of debris in the event of a natural disaster.

Existing Conditions and Trends [24 CFR 58.40(a)]:

The Florida Department of Corrections Correctional Facility located between Sandy Circle and Key Deer Blvd. (Figure 1) was listed as "state surplus" on February 4, 2020 and leased to The College of the Florida Keys (CFK) on November 23, 2021. The land on which the now closed prison property sits, represents an important community asset that should be used in a manner that adds value to economic recovery and diversification for residents in Big Pine Key and Monroe County. By assigning this property to The College of the Florida Keys, the State will be relieved of maintaining a decaying obsolete property and facilitate a repurposing that fosters education, recreation, and disaster relief resources to benefit its citizens. The College of the Florida Keys will work to maximize the land use for the greatest good of all segments of our local population, with a primary focus on the College's mission of providing high-quality post-secondary education. The College will accomplish this goal in collaboration with strategic partners and with resources from a variety of partners and with our own capital planning. In the absence of this project, the land would likely

continue to remain obsolete and of little use to community residents. Structures on the property would likely continue to decay and remain obsolete.

Maps, photographs, and other documentation of project location and description:

[450 KEY DEER BLVD - Survey 93024.pdf](#)

Determination:

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

Approval Documents:

[Environmental Review Record.pdf](#)

7015.15 certified by Certifying Officer

on:

7015.16 certified by Authorizing Officer

on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
B23CPFL0407	Community Planning and Development (CPD)	Community Project Funding (CPF) Grants	\$2,000,000.00

Estimated Total HUD Funded, Assisted or Insured Amount: \$2,000,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$2,000,000.00

Compliance with 24 CFR §50.4, §58.5 and §58.6 Laws and Authorities

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
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STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
<p>Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. A Google search indicated that the nearest civilian airport is Summerland Key Airport, 6.1 miles from the site. The nearest military airport is Naval Air Station Key West is 28.1 miles from the Big Pine Key site.</p>
<p>Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act. 450 Key Deer Blvd. was reviewed on the FWS Coastal Barrier Resource System Mapper, https://fwsprimary.wim.usgs.gov/CBRS Mapper-v2/</p>
<p>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>The structure or insurable property is located in a FEMA-designated Special Flood Hazard Area. The community is participating in the National Flood Insurance Program. For loans, loan insurance or guarantees, the amount of flood insurance coverage must at least equal the outstanding principal balance of the loan or the maximum limit of coverage made available under the National Flood Insurance Program, whichever is less. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must at least equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less. With flood insurance the project is in compliance with flood insurance requirements.</p>
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		

<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act. The county in which the acquisitions will occur is not located in a designated "Nonattainment" area according to the National Ambient Air Quality Standards. This information was determined by review of the NAAQS Table and review of prior Environmental Assessments performed by Monroe County.</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>This project is located in a Coastal Zone, but it has been determined to be consistent with the State Coastal Management Program. The State Clearinghouse was contacted. Their response is included. They did not select the project for review and provided clearance to proceed with the project.</p>
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. Radon testing indicated radon levels below 4.0 pCi/L. The project is in compliance with contamination and toxic substances requirements.</p>
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>This project was found Likely to Adversely Affect listed species, and formal consultation was conducted. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act.</p>
<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.</p>

Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in the FFRMS floodplain. The 8-Step or 5-Step Process is required. With the 8-Step or 5-Step Process the project will be in compliance with Executive Orders 11988 and 13690.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description, and consultation of the Section 106 Agreement Database and Disaster Recovery Programmatic Agreements Database, it has been determined that this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is not located on a sole source aquifer area. The address was crosschecked with EPA website https://www.epa.gov/dwssa/map-sole-source-aquifer-locations . The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project as proposed May Affect, but is not likely to Adversely Affect (MANLAA) endangered species. This determination does not impact low

		income or minority communities. Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. The project is in compliance with Executive Order 12898.
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Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.

(1) Minor beneficial impact

(2) No impact anticipated

(3) Minor Adverse Impact – May require mitigation

(4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environment al Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	Acute site improvement include repair to fencing, removal of trash and derelict vehicles, cutting down overgrowth of vegetation and performing a site assessment. All buildings require Level 3 alteration and use of the facility buildings in their current state with the intent of extensive renovation and alteration would be cost prohibited given current construction cost matrices.	N/A
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	1	During the site visit visual observations were made of the surrounding terrain, landscaping, and pavement. No drainage ponds or lagoons were identified. Storm water is transferred by sheet flow to the adjacent roadway and on-site storm drains. The asphalt paved areas have been sloped to divert storm water to these areas where it can be mitigated by the municipal storm water system. Storm water is transferred from the roof of the buildings by roof drains. No recognized environmental conditions are indicated by the terrain and landscaping. It is not anticipated that existing soil conditions will be incompatible with the project. The predominate flow of the Biscayne	N/A

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>Aquifer is east to southeast; however, precipitation and surface water run off have an affect on the direction. The Biscayne Aquifer is designated as G-II by the Florida Department of Environmental Regulation. G-II contains potable water with a total of dissolved solids of not more than 10,000 m/l. Groundwater is at an approximate depth of six to eight feet BSG. (US Geological Survey Report 90-4108, SFWMD, 1991). Actual local groundwater flow direction can be influenced by factors such as nearby surface waters (base flow to or from canals), surface topography, underground structures, seasonal fluctuations in rainfall, soil and bedrock geology, and production wells. Groundwater tends to follow topography and tends to flow to the east or southeast in this area unless otherwise influenced. All demolition will go through required regulatory review and permitting by all entities with jurisdiction. Monroe County will require appropriate site grading, storm-water and sediment erosion controls consistent with LDC Chapter 114-3 (available at https://library.municode.com/fl/monroe_county). It is the intent of this section to establish guidelines and criteria for the safe management and disposal of storm-water runoff from developed areas that will minimize or eliminate any resultant adverse impacts on the surface water, groundwater, and other natural resources of the county. These procedures are intended to assist in protection of the vital water resources of the Florida Keys, including the reservoir of freshwater on Big Pine Key and the near shore waters of the Gulf of America, Florida Bay and the Atlantic Ocean.</p>	
Hazards and Nuisances including Site Safety and Site-Generated Noise	3	<p>The project is subject to Natural hazards, including, but not limited to Potential Hurricane damage (wind and/or flood). The project is not subject to Air pollution generators. Man-made site hazards, including, but not limited to Hazards in vacant lots. The project will result in the removal of vacant and derelict buildings which have been determined to be substantially damaged or unsafe. The project will</p>	<p>The College will follow Florida Building Code and State Requirements for</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>result in removal of persistent and unsightly overgrowth. The project will develop a CDL training track which will produce noise during certain hours, in accordance with all relevant legislation.</p>	<p>Educational Facilities (SREF) guidelines. The Monroe County Code Sec. 17-128-9 define allowable hours of operation for construction and demolition as 8:00 a.m. to 7:00 p.m. daily. Customary sleeping hours are defined as commencing at 10:00 p.m. and ending at 8:00 a.m. the following morning, except that on Friday and Saturday nights, the period shall commence at 11:00 p.m. rather than 10:00 p.m. On the</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
			New Year's Eve holiday, the period shall not commence until 1:00 a.m. on January 1. The College will work in accordance with all County Code requirements applicable to the project.
SOCIOECONOMIC			
Employment and Income Patterns	1	The project will result in a workforce training site that will reskill residents and prepare them for employment in higher wage jobs currently available in the area. The construction of the facility will include temporary construction jobs and a full time equivalency job to manage the facility and training schedule upon completion.	N/A
Demographic Character Changes / Displacement	2	The project is limited in size and scope and is not anticipated to alter county demographics. The community will be enhanced through the construction of a workforce training center.	N/A
Environmental Justice EA Factor	2	The College of the Florida Keys is an open-access, educational institution dedicated to serving the intellectual, diverse, cultural, and occupational needs of the Florida Keys as well as the global community. The College is committed to student-centric academic programs and services, workforce development, continuing education, diverse partnerships, electronically delivered instruction, and sustainable practices that prepare students for personal success and responsible citizenship.	N/A
COMMUNITY FACILITIES AND SERVICES			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Educational and Cultural Facilities (Access and Capacity)	2	The workforce development project will increase the number of students on the property. The project will not target school aged children but existing community members who are upskilling and reskilling. The College maintains a close relationship with the Monroe County School District and will coordinate with them on the project, when appropriate.	N/A
Commercial Facilities (Access and Proximity)	2	The project does not involve or impact any commercial facilities or properties.	N/A
Health Care / Social Services (Access and Capacity)	2	There will be no increase in the need for health care or social services as a result of this project.	N/A
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	Permits will be acquired for any construction that takes place. The permits will require proper disposal of waste and construction debris, per the Monroe County Code of Ordinances Chapter 21 (available at https://library.municode.com/fl/monroe_county). Appropriate measures will be applied to handle garbage collection as needed for the allowable future uses of the property.	N/A
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The subject property is reportedly connected to the municipal sewer system and does not have any onsite septic systems. Sanitary sewer service is provided by Florida Keys Aqueduct Authority.	N/A
Water Supply (Feasibility and Capacity)	2	There will be a minor increase in the need for water supply services as a result of the project. The facility is located on property that has historically had water and is serviced by the Florida Keys Aqueduct Authority.	N/A
Public Safety - Police, Fire and Emergency Medical	2	There will be no increase in the need for police, fire, and emergency medical services as a result of the project.	N/A

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Parks, Open Space and Recreation (Access and Capacity)	2	The project will serve as workforce training facility and will be located near parks, open spaces and recreational facilities on Big Pike Key.	N/A
Transportation and Accessibility (Access and Capacity)	2	There is no expectation of a need to increase transportation or accessibility services as a result of the project.	For any potential issue, the College would work with the County and local transit authority.
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	This land parcel does not include unique natural features as defined by the HUD Exchange e-guide found here: https://www.hudexchange.info/programs/environmental-review/environmental-assessment/guide/natural-features/unique-natural-features/ local landmark. No existing unique natural features such as geologic evolution or paleontological history to include: Sand dunes Waterfalls Unique rock outcroppings Caves (especially those with limestone or gypsum deposits) Canyons Fossil beds/petrified forests Endemic (i.e., localized) plant/animal communities Disjunct (i.e., outside of normal range) communities Coral reefs Unique stands of trees (such as ancient redwood stands) Unique colonies of animals (such as a prairie dog town) As support, the College provides the CFK BPK Condition Report, Historic Places Correspondence with Monroe County, Wetlands Map, Florida Department of Environmental Protection's Geological Map, and Historic Places map for the proposed land parcel.	N/A
Vegetation / Wildlife (Introduction, Modification,	2	The facility is located in a critical habitat location for the Bartram's Hairstreak Butterfly and the Florida Leafwing Butterfly Anaea. Both species feed exclusively on the pineland croton. This plant	CFK contacted FWS.gov via the online

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Removal, Disruption, etc.)		species was surveyed for during February 2025 and no individual plants were found. The effects determination for the Bartram's hairstreak butterfly is "no effect".	project site (IPaC) and was assigned a main POC, Lisa Yarbrough, Fish and Wildlife Biologist on detail with NRCS as State Biologist Florida Ecological Services Field Office. The College was directed to have a consultant survey the land parcel for the host plant of the butterfly species. Survey completed and no crotons were found. See attached "Vegetation Survey February 2025"
Other Factors 1			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Other Factors 2			
CLIMATE AND ENERGY			
Climate Change	2	Monroe County is susceptible to natural hazards affected by climate change.	The College will follow Florida Building Code and State Requirements for Educational Facilities (SREF) guidelines.
Energy Efficiency	2	There will be no anticipated impact from this project.	N/A

Supporting documentation

[May Affect Determination - 450 Key Deer Blvd - Big Pine Key - College of the Florida Keys - 14May25\(1\).pdf](#)

[Monroe County ECR\(1\).pdf](#)

[Species List Florida Ecological Services Field Office april 21 2025.pdf](#)

[Geological Map - Miami Limestone.pdf](#)

[Historic Places Correspondence Monroe County.pdf](#)

[Historic Places map\(1\).pdf](#)

[Wetlands Map\(1\).pdf](#)

[Vegetation survey February 2025.pdf](#)

[CFK Big Pine Key Report Condition Assessment Signed 12-12-2022\(1\).pdf](#)

Additional Studies Performed:

Vegetation analysis of portion of land parcel - facilitated by Special Projects Administrator - Environmental Resources, Monroe County, Julie Cheon ESA May Affect: Devin Hughes, Hughes Eco Assessments for the critical habitats identified by FWS.

[Monroe County ECR.pdf](#)

[May Affect Determination - 450 Key Deer Blvd - Big Pine Key - College of the Florida Keys - 14May25.pdf](#)

Field Inspection [Optional]: Date and completed

by:

Eric A. Issacs

9/25/2024 12:00:00 AM

[450 KEY DEER BLVD - Survey 93024.pdf](#)**List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:**

National Register for Historic Places, Assistant Supervisor, Chris Fowler Monroe County Planning & Environmental Resources Department, Assistant Director, Michael Roberts Monroe County Planning & Environmental Resources Department, Acquisition Manager, Cynthia Guerra M.T. Causley, LLC , Contract Building Code Administrator, Otto J. Letzelter State of Florida Clearinghouse, Chris Stahl Huckleberry Environmental Services, Mike Finn PhD and ESA Certified Senior Ecologist Lisa Yarbrough, Fish and Wildlife Biologist on detail with NRCS as State Biologist Florida Ecological Services Field Office Location: Panama City Office 1601 Balboa Ave, Panama City FL 850-273-4584 (office) 850-640-8383 (cell) Devin M, Hughes, Hughes Eco Assessments, LLC 305-395-0833 Florida Department of Environmental Protection, Maps, Florida Geological Survey

[IPaC Consultation Package Builder.pdf](#)[State Clearinghouse Coastal Mgmt approval\(2\).pdf](#)[IPaC Regulatory review - BPK HUD Grant Workforce Training Center.pdf](#)[Monroe County ECR\(2\).pdf](#)[May Affect Determination - 450 Key Deer Blvd - Big Pine Key - College of the Florida Keys - 14May25\(2\).pdf](#)[Geological Map - Miami Limestone\(1\).pdf](#)[Veg Consultants 2024.pdf](#)[State Clearinghouse Coastal Mgmt approval\(1\).pdf](#)[Species List Florida Ecological Services Field Office 2025\(1\).pdf](#)**List of Permits Obtained:**

The College of the Florida Keys is a self-permitting institution.

Public Outreach [24 CFR 58.43]:

PUBLIC MEETINGS: CFK with the help of the Lower Keys Chamber has already hosted two community forums to receive ideas and feedback from residents. More than 40 residents of all ages attended the hour-long sessions held at the Big Pine Academy. Some of the ideas proposed included: a community swimming pool that can be used for physical rehabilitation and SCUBA certification, a senior center, a Monroe County Sheriff substation, and facility for historic boat restoration. While there have been conversations that included the Monroe County Commission and specifically Commissioner Coldiron who represented the Big Pine District. Through revitalizing

this site CFK seeks to strengthen community involvement and strategic partnerships while building inclusive community education opportunities for residents of Big Pine Key and the County at large.

Cumulative Impact Analysis [24 CFR 58.32]:

Based upon the site assessment, there is no reason to believe that potentially hazardous or toxic materials have been introduced to the soils and/or groundwater of the subject property due to historical owner/occupant or offsite activities. The College has had a contractor perform a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527 of Former Big Pine Road Prison Property at 450 Key Deer Boulevard, the property. This assessment has revealed no evidence of recognized environmental conditions in connection with the property.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]

There are no project alternatives other than the No Action Alternative.

No Action Alternative [24 CFR 58.40(e)]

Area will continue to deteriorate and remain of no use to the surrounding community.

Summary of Findings and Conclusions:

The land on which the now closed prison property sits, represents an important community asset that should be used in a manner that adds value to economic recovery and diversification for residents in Big Pine Key and Monroe County. CFK's initial phase of this large-scale project focuses on defining the project's scope, initial site evaluation, and acute site improvement activities. Based upon completion of this environmental assessment, environmental review of the proposed project indicates there will be no significant changes to existing environmental conditions across the impact categories implemented by HUD in response to the National Environmental Policy Act of 1969. Based on completion of this environmental assessment, TBC

Mitigation Measures and Conditions [CFR 1505.2(c)]:

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Endangered Species Act	See Biological Assessment 2025-12-08	N/A	See Biological Assessment 2025-12-08	
Flood Insurance	For loans, loan insurance or guarantees, the amount of flood insurance coverage must at least equal the outstanding principal balance of the loan or the maximum limit of coverage made available under the National Flood Insurance Program, whichever is less. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must at least equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less.	N/A	Obtain necessary insurances	
Floodplain Management	1. Determine Floodplain/Wetland Presence: Identify if the project site is in a floodplain or wetland using maps (FHBM, FEMA, local data). DONE 2. Early Public Notice & Comment (Step 2): Publish an early notice (e.g., newspaper/bulletin board) in communities, inviting comments on the proposal, especially its floodplain/wetland impact, to gather input before major decisions, as shown in Georgia DCA. Will complete upon grant award	N/A		

	<p>3. Evaluate Alternatives: Analyze options, including a "No Action" alternative and alternatives that avoid floodplains/wetlands, to find the most responsible approach. Will complete upon grant award</p> <p>4. Final Public Notice & Comment (Step 4): Issue a final notice after evaluating alternatives, presenting the preferred option and mitigation measures, allowing for final public review and comment before the final decision. Will complete upon grant award</p> <p>5. Decision: The Responsible Entity makes the final decision, selecting the best alternative and mitigation plan.</p> <p>6. Implementation: Carry out the project according to the chosen plan, including approved mitigation measures. Will complete upon grant award</p> <p>7. Post-Construction: Monitor the project and mitigation measures to ensure they are effective. Will complete upon grant award</p> <p>8. Completion/Monitoring: Finalize the review, documenting compliance with all environmental conditions. Will complete upon grant award</p>			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	N/A	N/A		

Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	N/A	N/A		
Hazards and Nuisances including Site Safety and Site-Generated Noise	The College will follow Florida Building Code and State Requirements for Educational Facilities (SREF) guidelines. The Monroe County Code Sec. 17-128-9 define allowable hours of operation for construction and demolition as 8:00 a.m. to 7:00 p.m. daily. Customary sleeping hours are defined as commencing at 10:00 p.m. and ending at 8:00 a.m. the following morning, except that on Friday and Saturday nights, the period shall commence at 11:00 p.m. rather than 10:00 p.m. On the New Year's Eve holiday, the period shall not commence until 1:00 a.m. on January 1. The College will work in accordance with all County Code requirements applicable to the project.	N/A	CFK to follow FBC and SREF guidelines	
Employment and Income Patterns	N/A	N/A		
Demographic Character Changes / Displacement	N/A	N/A		
Environmental Justice EA Factor	N/A	N/A		
Educational and Cultural Facilities (Access and Capacity)	N/A	N/A		

Commercial Facilities (Access and Proximity)	N/A	N/A		
Health Care / Social Services (Access and Capacity)	N/A	N/A		
Solid Waste Disposal and Recycling (Feasibility and Capacity)	N/A	N/A		
Waste Water and Sanitary Sewers (Feasibility and Capacity)	N/A	N/A		
Water Supply (Feasibility and Capacity)	N/A	N/A		
Public Safety - Police, Fire and Emergency Medical	N/A	N/A		
Parks, Open Space and Recreation (Access and Capacity)	N/A	N/A		
Transportation and Accessibility (Access and Capacity)	For any potential issue, the College would work with the County and local transit authority.	N/A	For any potential issue, the College would work with the County and local transit authority.	
Unique Natural Features /Water Resources	N/A	N/A		

Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	CFK contacted FWS.gov via the online project site (IPaC) and was assigned a main POC, Lisa Yarbrough, Fish and Wildlife Biologist on detail with NRCS as State Biologist Florida Ecological Services Field Office. The College was directed to have a consultant survey the land parcel for the host plant of the butterfly species. Survey completed and no crotons were found. See attached "Vegetation Survey February 2025"	N/A	Performed multiple wildlife assessments.	
Climate Change	The College will follow Florida Building Code and State Requirements for Educational Facilities (SREF) guidelines.	N/A	The College will follow Florida Building Code and State Requirements for Educational Facilities (SREF) guidelines.	
Energy Efficiency	N/A	N/A		

Project Mitigation Plan

Ms. Tamrah Hill is the Director Facilities for the College of the Florida Keys and current project manager. Mrs. Hill reports to Dr. Brittany Snyder the Executive VP and CFO. These persons would be responsible for implementing any required mitigation and monitoring implementation timeframe.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

✓ No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. A Google search indicated that the nearest civilian airport is Summerland Key Airport, 6.1 miles from the site. The nearest military airport is Naval Air Station Key West is 28.1 miles from the Big Pine Key site.

Supporting documentation

[1 Airport Supporting Docs.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

1. Is the project located in a CBRS Unit?

No

Document and upload map and documentation below.

Yes

Compliance Determination

This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act. 450 Key Deer Blvd. was reviewed on the FWS Coastal Barrier Resource System Mapper, <https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/>

Supporting documentation

[Coastal Barrier Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?

No. This project does not require flood insurance or is excepted from flood insurance.

✓ Yes

2. Upload a FEMA/FIRM map showing the site here:

[FEMA Flood.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

No

✓ Yes

3. Is the community participating in the National Flood Insurance Program or has less than one year passed since FEMA notification of Special Flood Hazards?

✓ Yes, the community is participating in the National Flood Insurance Program.

Based on the response, the review is in compliance with this section. Flood insurance under the National Flood Insurance Program must be

obtained and maintained for the economic life of the project, in the amount of the total project cost or the maximum coverage limit, whichever is less.

Document and upload a copy of the flood insurance policy declaration or a paid receipt for the current annual flood insurance premium and a copy of the application for flood insurance below.

Yes, less than one year has passed since FEMA notification of Special Flood Hazards.

No. The community is not participating, or its participation has been suspended.

Screen Summary

Compliance Determination

The structure or insurable property is located in a FEMA-designated Special Flood Hazard Area. The community is participating in the National Flood Insurance Program. For loans, loan insurance or guarantees, the amount of flood insurance coverage must at least equal the outstanding principal balance of the loan or the maximum limit of coverage made available under the National Flood Insurance Program, whichever is less. For grants and other non-loan forms of financial assistance, flood insurance coverage must be continued for the life of the building irrespective of the transfer of ownership. The amount of coverage must at least equal the total project cost or the maximum coverage limit of the National Flood Insurance Program, whichever is less. With flood insurance the project is in compliance with flood insurance requirements.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Yes

No

Air Quality Attainment Status of Project's County or Air Quality Management District

2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

No, project's county or air quality management district is in attainment status for all criteria pollutants.

Yes, project's management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

Screen Summary

Compliance Determination

The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act. The county in which the acquisitions will occur is not located in a designated "Nonattainment" area according to the National Ambient Air Quality Standards. This information was determined by review of the NAAQS Table and review of prior Environmental Assessments performed by Monroe County.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

- Yes
 No

2. Does this project include new construction, conversion, major rehabilitation, or substantial improvement activities?

- Yes
 No

3. Has this project been determined to be consistent with the State Coastal Management Program?

- Yes, without mitigation

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Yes, with mitigation

No, project must be canceled.

Screen Summary**Compliance Determination**

This project is located in a Coastal Zone, but it has been determined to be consistent with the State Coastal Management Program. The State Clearinghouse was contacted. Their response is included. They did not select the project for review and provided clearance to proceed with the project.

Supporting documentation

[State Clearinghouse Coastal Mgmt approval.pdf](#)
[Species List Florida Ecological Services Field Office\(2\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

General Requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
Reference		
https://www.onecpd.info/environmental-review/site-contamination		

1. How was site contamination evaluated?* Select all that apply.

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

None of the above

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.

For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances* (excluding radon) found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

Provide a map or other documentation of absence or presence of contamination** and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.

✓ No

Explain:

No RECs were identified in Phase 1 ESA conducted by consultant with Property Consulting Group

Yes

* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.

** Utilize EPA's Enviromapper, NEPAssist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions* from having to consider radon in the contamination analysis listed in CPD Notice [CPD-23-103](#)?

Yes

Explain:

✓ No

* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

4. Is the proposed project new construction or substantial rehabilitation where testing will be conducted but cannot yet occur because building construction has not been completed?

Yes

Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be uploaded to the mitigation section within this screen.

No

5. Was radon testing or a scientific data review conducted that provided a radon concentration level in pCi/L?

Yes

No

If no testing was conducted and a review of science-based data offered a lack of science-based data for the project site, then document and upload the steps taken to look for documented test results and science-based data as well as the basis for the conclusion that testing would be infeasible or impracticable.

Explain:

File Upload:

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

Non-radon contamination was found in a previous question.

6. How was radon data collected?

All buildings involved were tested for radon

A review of science-based data was conducted

Enter the Radon concentration value, in pCi/L, derived from the review of science-based data:

Provide the documentation* used to derive this value:

File Upload:

[Radon check.jpg](#)

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

Radon concentration value is greater than or equal to 4.0 pCi/L and/or non-radon contamination was found in a previous question. Continue to Mitigation.

* For example, if you conducted radon testing then provide a testing report (such as an ANSI/AARST report or DIY test) if applicable (note: DIY tests are not eligible for use in multifamily buildings), or documentation of the test results. If you conducted a scientific data review, then describe and cite the maps and data used and include copies of all supporting documentation. Ensure that the best available data is utilized, if conducting a scientific data review.

7. Were the radon test results for any dwelling unit tested at or above 4.0 pCi/L?

Yes

Radon Mitigation is required for the question to proceed.

Enter the total number of dwelling units tested:

How many dwelling units tested at or above 4.0 pCi/L:

Enter the highest radon test result value:

Document the test results for all dwelling units tested with a copy of the test results for all dwelling units or testing report(s) covering all units:

File Upload:

✓ No

Provide a copy of the test results for all dwelling units tested or testing report(s) covering all units tested:

Attached the sample results for radon testing

File Upload:

[Radon check\(1\).jpg](#)

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen:

Non-radon contamination was found in a previous question.

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. Radon testing indicated radon levels below 4.0 pCi/L. The project is in compliance with contamination and toxic substances requirements.

Supporting documentation

[CFK Big Pine Key Report Condition Assesment Signed 12-12-2022.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402

1. Does the project involve any activities that have the potential to affect species or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

- ✓ Yes, the activities involved in the project have the potential to affect species and/or habitats.

2. Are federally listed species or designated critical habitats present in the action area?

No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

- ✓ Yes, there are federally listed species or designated critical habitats present in the action area.

3. What effects, if any, will your project have on federally listed species or designated critical habitat?

No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat. in the action area.

May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

- ✓ Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

5. Formal consultation is required

Section 7 of ESA (16 USC 1536) mandates consultation to resolve potential impacts to federally listed endangered and threatened species and critical habitats. If a HUD assisted project may affect any endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

Document and upload the following below:

- (1) A biological assessment, evaluation, or equivalent document
- (2) Biological opinion(s) issued by FWS and/or NMFS
- (3) Any other documentation of formal consultation

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen.

- ✓ Mitigation as follows will be implemented:

See Biological Assessment 2025-12-08

No mitigation is necessary.

Screen Summary

Compliance Determination

This project was found Likely to Adversely Affect listed species, and formal consultation was conducted. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act.

Supporting documentation

[Biological Assessment 2025-12-08.pdf](#)

[Vegetation survey February 2025\(1\).pdf](#)

[Species List_ Florida Ecological Services Field Office \(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

Yes

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

Based on the response, the review is in compliance with this section.

Yes

Screen Summary

Compliance Determination

Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

Farmlands Protection

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

Yes

No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

There is no prime farmland, unique farmland, or farmland of statewide concern identified in the project area.

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary

Compliance Determination

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

1. Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD's floodplain management regulations in Part 55?

Yes

(a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b).

(b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19.

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:

(1) The property is cleared of all existing buildings and walled structures; and

(2) The property is cleared of related improvements except those which:

(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);

(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and

(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

(d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance,

or other HUD assistance.

(e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions.

(f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland.

(g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if: (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and (2) the proposed project will not result in any new construction in or modifications of a wetland .

(h) Issuance or use of Housing Vouchers, or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies).

(i) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

Describe:

No

2. Does the project include a Critical Action? Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants.

Yes

Describe:

No

3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information¹ to determine flood elevation. Include documentation and an explanation of why this is the best available information² for the site. Note that newly constructed and substantially improved³ structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

CISA for non-critical actions. If using a local tool, data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

- ✓ 0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or — if available — a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

¹ Sources which merit investigation include the files and studies of other federal agencies, such as the U. S. Army Corps of Engineers, the Tennessee Valley Authority, the Soil Conservation Service and the U. S. Geological Survey. These agencies have prepared flood hazard studies for several thousand localities and, through their technical assistance programs, hydrologic studies, soil surveys, and other investigations have collected or developed other floodplain information for numerous sites and areas. States and communities are also sources of information on past flood 'experiences within their boundaries and are particularly knowledgeable about areas subject to high-risk flood hazards such as alluvial fans, high velocity flows, mudflows and mudslides, ice jams, subsidence and liquefaction.

² If you are using best available information, select the FVA option below and provide supporting documentation in the screen summary. Contact your [local environmental officer](#) with additional compliance questions.

³ Substantial improvement means any repair or improvement of a structure which costs at least 50 percent of the market value of the structure before repair or improvement or results in an increase of more than 20 percent of the number of dwelling units. The full definition can be found at [24 CFR 55.2\(b\)\(12\)](#).

5. Does your project occur in the FFRMS floodplain?

Yes

No

6. Is your project located in any of the floodplain categories below?

Select all that apply:

Floodway.

Do the floodway exemptions at 55.8 or 55.21 apply?

Yes

No

Coastal High Hazard Area (V Zone) or Limit of Moderate Wave Action (LiMWA).

Yes

No

None of the above.

7. Does the 8-Step Process apply? Select one of the following options:

8-Step Process is inapplicable per 55.13.

(a) HUD's mortgage insurance actions and other financial assistance for the purchasing, mortgaging, or refinancing of existing one- to four-family properties in communities that are in the Regular Program of the NFIP and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24), where the action is not a critical action and the property is not located in a floodway, coastal high hazard area, or LiMWA;

(b) Financial assistance for minor repairs or improvements on one- to four-family properties that do not meet the thresholds for "substantial improvement" under § 55.2(b)(12);

(c) HUD or a recipient's actions involving the disposition of individual HUD or recipient held, one- to four-family properties;

(d) HUD guarantees under the Loan Guarantee Recovery Fund Program (24 CFR part 573), where any new construction or rehabilitation financed by the existing loan or mortgage has been completed prior to the filing of an application under the program, and the refinancing will not allow further construction or rehabilitation, nor result in any physical impacts or changes except for routine maintenance;

(e) The approval of financial assistance to lease units within an existing structure located within the floodplain, but only if;

(1) The structure is located outside the floodway or coastal high hazard area, and is in a community that is in the Regular Program of the NFIP and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24); and

(2) The project is not a critical action; and

(3) The entire structure is or will be fully insured or insured to the maximum extent available under the NFIP for at least the term of the lease.

(f) Special projects for the purpose of improving efficiency of utilities or installing renewable energy that involve the repair, rehabilitation, modernization, weatherization, or improvement of existing structures or infrastructure, do not meet the thresholds for "substantial improvement" under § 55.2(b)(12), and do not include the installation of equipment below the FFRMS floodplain elevation;

5-Step Process is applicable per 55.14.

(a) HUD actions involving the disposition of HUD-acquired multifamily housing projects or "bulk sales" of HUD-acquired one- to four-family properties in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and in good standing (i.e., not suspended from program eligibility or placed on probation under 44 CFR 59.24).

(b) HUD's actions under the National Housing Act (12 U.S.C. 1701) for the purchase or refinancing of existing multifamily housing projects, hospitals, nursing homes, assisted living facilities, board and care facilities, and intermediate care facilities, in communities that are in good standing under the NFIP.

(c) HUD's or the recipient's actions under any HUD program involving the repair, rehabilitation, modernization, weatherization, or improvement of existing multifamily housing projects, hospitals, nursing homes, assisted living facilities, board and care facilities, intermediate care facilities, and one- to four-family properties, in communities that are in the Regular Program of the National Flood Insurance Program (NFIP) and are in good standing, provided that the number of units is not increased more than 20 percent, the action does not involve a conversion from nonresidential to residential land use, the action does not meet the thresholds for "substantial improvement" under § 55.2(b)(10), and the footprint of the structure and paved areas is not increased by more than 20 percent.

(d) HUD's (or the recipient's) actions under any HUD program involving the repair, rehabilitation, modernization, weatherization, or improvement of existing nonresidential buildings and structures, in communities that are in the Regular Program of the NFIP and are in good standing, provided that the action does not meet the thresholds for "substantial improvement" under § 55.2(b)(10) and that the footprint of the structure and paved areas is not increased by more than 20 percent.

(e) HUD's or the recipient's actions under any HUD program involving the repair, rehabilitation, or replacement of existing nonstructural improvements including streets, curbs and gutters, where any increase of the total impervious surface area of the facility is de minimis. This provision does not include critical actions, levee systems, chemical storage facilities (including any tanks), wastewater facilities, or sewer lagoons.

✓ 8-Step Process applies.

8. Mitigation

For the project to comply with this section, all adverse impacts must be mitigated. Explain in detail the measures that must be implemented to mitigate the impact or effect, including the timeline for implementation. Note: newly constructed and substantially improved structures within the FFRMS floodplain must be elevated to the FFRMS floodplain elevation or floodproofed, if applicable.

Explain:

1. Determine Floodplain/Wetland Presence: Identify if the project site is in a floodplain

or wetland using maps (FHBM, FEMA, local data). DONE

2. Early Public Notice & Comment (Step 2): Publish an early notice (e.g., newspaper/bulletin board) in communities, inviting comments on the proposal, especially its floodplain/wetland impact, to gather input before major decisions, as shown in Georgia DCA. Will complete upon grant award
3. Evaluate Alternatives: Analyze options, including a "No Action" alternative and alternatives that avoid floodplains/wetlands, to find the most responsible approach. Will complete upon grant award
4. Final Public Notice & Comment (Step 4): Issue a final notice after evaluating alternatives, presenting the preferred option and mitigation measures, allowing for final public review and comment before the final decision. Will complete upon grant award
5. Decision: The Responsible Entity makes the final decision, selecting the best alternative and mitigation plan.
6. Implementation: Carry out the project according to the chosen plan, including approved mitigation measures. Will complete upon grant award
7. Post-Construction: Monitor the project and mitigation measures to ensure they are effective. Will complete upon grant award
8. Completion/Monitoring: Finalize the review, documenting compliance with all environmental conditions. Will complete upon grant award

Which of the following if any mitigation/minimization measures have been identified for this project in the 8-Step or 5-Step Process?

Buyout and demolition or other supported clearance of floodplain structures.

Insurance purchased in excess of statutory requirement th eunder the Flood Disaster Protection Act of 1973.

Permeable surfaces.

Natural landscape enhancements that maintain or restore natural hydrology.

Planting or restoring native plant species.

Bioswales.

Stormwater capture and reuse.

Green or vegetative roofs with drainage provisions.

Natural Resources Conservation Service conservation easements or similar easements.

Floodproofing of structures as allowable (e.g. non-residential floors) .

Elevating structures (including freeboard above the required base flood elevations) .

Levee or structural protection from flooding.

Channelizing or redefining the floodway or floodplain through a Letter of Map Revision (LOMR).

Screen Summary

Compliance Determination

This project is located in the FFRMS floodplain. The 8-Step or 5-Step Process is required. With the 8-Step or 5-Step Process the project will be in compliance with Executive Orders 11988 and 13690.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

Threshold

Is Section 106 review required for your project?

- No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)
- ✓ No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].
- Yes, because the project includes activities with potential to cause effects (direct or indirect).

Threshold (b). Document and upload the memo or explanation/justification of the other determination below:

Based on the response, the review is in compliance with this section.

Screen Summary

Compliance Determination

Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106.

Supporting documentation

[Historic Places map.pdf](#)

[National Register of Historic Places Correspondence.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B

1. What activities does your project involve? Check all that apply:

New construction for residential use

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

None of the above

Screen Summary

Compliance Determination

Based on the project description, and consultation of the Section 106 Agreement Database and Disaster Recovery Programmatic Agreements Database, it has been determined that this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

General requirements	Legislation	Regulation
The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

✓ No

2. Is the project located on a sole source aquifer (SSA)?

A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

✓ No

Based on the response, the review is in compliance with this section. Document and upload documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area, below.

Yes

Screen Summary

Compliance Determination

The project is not located on a sole source aquifer area. The address was crosschecked with EPA website <https://www.epa.gov/dwssa/map-sole-source-aquifer-locations>. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[Sole Sorce Aqua.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order

No

Yes

2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.

"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."

No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.

Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination

Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

Screen Summary

Compliance Determination

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.

Supporting documentation

[Wetlands Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

1. Is your project within proximity of a NWSRS river?

No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

Screen Summary

Compliance Determination

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[National Wild and Scenic River System.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project's total environmental review?

Yes

No

2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?

Yes

No

Explain:

The proposed project is in compliance with Executive Order 12898. Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, Section 1-101, in order for environmental justice to be a concern, the proposed project would have a "disproportionately high and adverse" effect on a minority or low-income population. As shown by the other sections of this environmental assessment, the proposed project would not have a significant adverse impact on any of the residents of Monroe County.

Based on the response, the review is in compliance with this section. Document and upload any supporting documentation below.

Screen Summary**Compliance Determination**

The project as proposed May Affect, but is not likely to Adversely Affect (MANLAA) endangered species. This determination does not impact low income or minority communities. Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. The project is in compliance with Executive Order 12898.

Supporting documentation**Are formal compliance steps or mitigation required?**

Yes

 No