



**U.S. Department of Housing and Urban  
Development**  
451 Seventh Street, SW  
Washington, DC 20410  
[www.hud.gov/spanol.hud.gov](http://www.hud.gov/spanol.hud.gov)

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

## **Project Information**

**Project Name:** Grant Park Villas, LP

**Responsible Entity:** St. Clair County Commission

**Grant Recipient** (if different than Responsible Entity): St. Clair County Housing Authority

**State/Local Identifier:** MO197

**Preparer:** New Horizons, LLC

**Reviewer:** City of Raymore, Missouri

**Reviewer Name and Title:** David Gress, Director of Development Services

**Grant Recipient** (if different than Responsible Entity): St. Clair County Public Housing Authority, Grant Park Villas

**Consultants** (if applicable): New Horizons Enterprises, LLC

**Direct Comments to:** Chris Richardson-McQueen, Chief Housing Enrichment Officer – West Central Missouri Community Action Agency, 112 W. 4<sup>th</sup> St., Appleton City, MO 64724, 660-476-2185 ext. 1500, [crichardson@wcmcaa.org](mailto:crichardson@wcmcaa.org)

**Project Location:**

The subject property is depicted on the Raymore, Missouri, Quadrangle, U.S. Geological Survey (USGS), 7.5-minute topographic series (2017). The approximate latitude and longitude of the subject property are 38° 48' 19.17" North and 94° 27' 12.30" West, respectively. Based on the most recent topographic map reviewed, the subject property is approximately 1,062 feet above mean sea level. The subject property area has a general east-northeast topographic gradient.

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

Grant Park Villas will be located near the intersection of Adams Street and Grant Drive in the central quadrant of the City of Raymore. This location is approximately 0.75 miles from grocery shopping, a pharmacy, and several restaurants. Raymore, located within Cass County, is part of the Kansas City, Missouri/Kansas MSA. The proposed site has easy access to Belton, Missouri, and Interstate 49/ US Hwy 71, which allows a short 15-minute commute to South Kansas City, Missouri.

The proposed development will consist of three (3)-story buildings containing 48 living units. The buildings will have a mix of 2 bedroom/2 bath and 3 bedroom/2 bath apartments. Rents for the 2-bedroom units will range from \$450 - \$900 per month and rents for the 3-bedroom units will range from \$520 - \$950 per month. The proposed development will serve 30-80% of Average Monthly Income (AMI) individuals and families.

Grant Park Villas will also serve vulnerable populations or those who have a physical, mental, or emotional impairment, or those who have a developmental disability. West Central Missouri Community Action (West Central) is the Lead Referral Agency for Grant Park Villas. A total of 15% of the apartment units will be reserved for this population.

Grant Park Villas will be a Service-Enriched development. As such, Grant Park Villas has partnered with West Central to accept the challenge and responsibility to provide needed resident services. Their management team will assist in identifying services and in assisting residents seeking these services. West Central will hire, train, and supervise an on-site service coordinator for Grant Park Villas, LP. We should also note the premier location of the Cass County West Central office being directly across the street from Grant Park Villas. With the service provider as well as coordinator being so accessible, we feel this sets our partnership above.

All apartments will have the same amenities: living room, dining room/kitchen combination, kitchen exhaust fans, frost-free refrigerators with ice makers, garbage disposals, dishwashers, full size washers and dryers, utility closets, walk-in closets, ceiling fans, wall-to-wall carpet and vinyl floor coverings, and private patio or balcony.

The development will also include access to the community 'clubhouse', which will include a fitness center, service coordinator's office, community room with kitchenette, and a library/business center.

The National Association of Home Builders (NAHB) Green Building Guidelines will ensure that Grant Park Villas is energy efficient and environmentally sustainable. To accomplish this task, Zimmerman Properties Construction, LLC, Parker Associates Architects, and "e-consultants" have been contracted to assist in the design and construction of the development. Each of these professional entities brings experience and expertise in the design and construction of the "green" building and has many certified professionals on staff. A sustainability plan has been drafted and an energy audit has been completed. Also, ENERGY STAR® appliances, including dishwashers, refrigerators, and garbage disposals, will be installed in every unit.

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

Zimmerman Properties has personal experience with the need for the proposed site, as we developed and built Briar Creek Villas and Lakewood Terrace in Belton. Both properties are just 4 miles away from the future site of Grant Park Villas. Zimmerman Properties Construction also built Ridgeway Villas at the Legends in Kansas City, Kansas. Wilhoit Properties, Inc. has been managing all three developments since they opened. Briar Creek Villas has 79 people on the waiting list; Lakewood Terrace has 21 people on the waiting list; and Ridgeway Villas has 52 people on the waiting list. All three properties operate at over 98% occupancy. This level of occupancy and the lengthy waiting lists for Briar Creek Villas and Lakewood Terrace indicate a strong demand for quality affordable housing in the area.

West Central Missouri Community Action Agency (West Central) developed, owns, and manages Walnut Estates in Raymore and Greenleaf Estates in Belton. Both properties are less 5 miles from the future site of Grant Park Villas. Walnut Estates has 45 people on the waiting list and Greenleaf Estates has 28 people on the waiting list.

The St. Clair County PHA receives on average of 100 waiting list applications monthly where at least 70% of the applicants have a Cass County address. The waiting list is averaging 8 months to 1 year from date of application. There are currently 693 applicants with a Cass County on waiting list status of which 145 have more than one person in the household. The PHAs voucher portfolio is 1308 for a 9-county jurisdiction and Cass County accounts for 70% of the voucher holders. Eligible applicants are issued tenant-based voucher assistance for a period of 120 days and more than 62% of the applicants' issued vouchers are unable to find affordable housing options.

Due to the need for affordable housing and the need for rental assistance in the Cass County area the St. Clair County PHA will enter into an Agreement to Project Base 20 vouchers at Grant Park Villas, a new construction family development. Project basing will provide a more immediate option for families to receive rental assistance and assist with the PHAs voucher utilization rate.

Several retailers are located throughout the City of Raymore, primarily along Business 58/Foxwood Drive. Grant Park Villas will have easy access to Business 58/Foxwood Drive, as well as Interstate 49/US Hwy 71 being just +/- 2.5 miles away, making it easy for residents to get anywhere they need to in the city and beyond quickly. Located just one mile west of the proposed site on Business 58 is a grocery store, pharmacy, bank, fire station with ambulance service, and restaurants. Also, within 2.5 miles is major commercial area along Business 58 and Interstate 49/71.

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

The subject property includes one vacant lot, and is located in a primarily residential and commercial area of Raymore, Missouri. The subject property is bound by Grant Drive to the north with residential properties beyond, vacant land and residential properties to the east with Franklin Street and Elissa Drive beyond, churches and commercial properties to the south with West Walnut Street beyond, and Adams Street to the west with commercial properties beyond.

**Funding Information**

<b>Grant Number</b>	<b>HUD Program</b>	<b>Funding Amount</b>
MO197	Housing Choice Voucher	\$314,496 Annually

**Estimated Total HUD Funded Amount: \$314,496**

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:**

\$11,451,140

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

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The nearest civilian airport is the Lee’s Summit Municipal Airport, which is approximately 11.0 miles northeast of the subject property. The nearest military airport is the Whiteman Air Force Base, which is located 48.0 miles to the east of the subject property. Included in Airport Hazard partner worksheet are maps depicting those distances between the airports and the subject property.
<b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	Subject property is located in Missouri, which is not one of the states required to complete Coastal Barrier Resource Act (CBRA) partner worksheet because of the lack of coastlines. Included in CBRA partner worksheet are a map depicting the distance between the nearest Coastal Barrier Resource System unit and the subject property.
<b>Flood Insurance</b>  Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) depicts the subject property as an “Area of Minimal Flood Hazard”. Included in the Flood Insurance partner worksheet is the FIRMette map.
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>  Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is planned for Raymore, Missouri, in Cass County. Cass County is in attainment status for all criteria pollutants. Included in the Clean Air partner worksheet is the Missouri Non-attainment/Maintenance status for each County (in Missouri) by year for all Criteria Pollutants. Cass County has never been in non-attainment and therefore is not listed.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>Coastal Zone Management</b>  Coastal Zone Management Act, sections 307(c) & (d)	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	Subject property is located in Missouri, which is not one of the states required to complete Coastal Zone Management Act (CZMA) partner worksheet because of the lack of coastlines. Included in CZMA partner worksheet are a map depicting the distance between the nearest Coastal Barrier Resource System unit and the subject property.
<b>Contamination and Toxic Substances</b>  24 CFR Part 50.3(i) & 58.5(i)(2)	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	A Phase I ESA was completed for the subject property on February 10, 2023, and updated on August 2, 2023. Both of the Phase I ESAs found no Recognized Environmental Conditions (RECs) in connection with the subject property. The Phase I ESAs were conducted by New Horizons Enterprises, LLC (New Horizons), in accordance with the Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM International (ASTM) Designation: E1527-21, Environmental Protection Agency (EPA) All Appropriate Inquiry (AAI) Regulation (Title 40 <i>Code of Federal Regulations</i> [40 CFR] Part 312), and the Missouri Housing Development Commission (MHDC) Guidelines for the subject property. Included in the Contamination and Toxic Substances partner worksheet is the Phase I ESA Update.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>Endangered Species</b>  Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>IPac returned a result of four federally listed endangered bat species – the Gray Bat, Indiana Bat, Northern Long-eared Bat, and the Tricolored Bat are potentially present in the action area of the proposed project. Also, one federally listed endangered insect species – the Monarch Butterfly is potentially present in the action area of the proposed project. No critical habitats were found within the proposed project area.</p> <p>A “No Effect” determination was concluded for the five listed species based on the proposed activities. This “No Effect” determination was based on the project being in an “already developed area” (an area that is already paved or supports structures and the only vegetation is limited to frequently mowed grass or conventional landscaping), and does not involve removing native vegetation. Included in the Endangered Species partner worksheet is a response from the Fish and Wildlife Service describing the endangered species potentially present on the proposed project site. Also included is the “No Effect” determination guidance worksheet.</p>
<b>Explosive and Flammable Hazards</b>  24 CFR Part 51 Subpart C	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The proposed project is the new construction of a multi-family residential building in Raymore, Missouri. An environmental database records search for the subject property has shown that there are no aboveground storage tanks within a 1-mile radius of the project site. Included in the Explosive and Flammable Hazard partner worksheet is the EDR Radius map for the subject property from the Phase I ESA Update.</p>

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>Farmlands Protection</b>  Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The subject property is located within the city limits of Raymore, Missouri. Based on aerial photographs from New Horizons Enterprises August 2, 2023, Phase I ESA Update, the subject property was converted from potential agricultural use to a cut and graded empty lot sometime between 1997 to 2006. Included in the Farmlands Protection partner worksheet are aerial photographs showing the change in land use over time.
<b>Floodplain Management</b>  Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) depicts the subject property as an “Area of Minimal Flood Hazard”. Included in the floodplain management partner worksheet is the FIRMette map
<b>Historic Preservation</b>  National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes    No <input checked="" type="checkbox"/> <input type="checkbox"/>	Only RE or HUD staff may initiate the Section 106 consultation process. Partner entities may gather information, including from SHPO records, identify and evaluate historic properties, and make initial assessments of effects of the project on properties listed in or eligible for the National Register of Historic Place. Partners should then provide the RE or HUD with all of their analysis and documentation so that they may initiate consultation. However, for MHDC projects, MHDC completes the consultation.
<b>Noise Abatement and Control</b>  Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	Based on noise assessment guidelines, noise exposure is calculated in the “Acceptable” range. Included in the Noise Abatement and Control partner worksheet are Day/Night Noise Level calculator and airport noise worksheets.
<b>Sole Source Aquifers</b>  Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	There are no sole source aquifers in the State of Missouri. Included in the Sole Source Aquifer partner worksheet is a map documenting the nearest sole source aquifer.



<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>Wetlands Protection</b>  Executive Order 11990, particularly sections 2 and 5	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	There are no mapped wetlands on the property. Included in the Wetlands Protection partner worksheet is a map showing U.S. Fish and Wildlife Service National Wetland Inventory in proximity to the project site.
<b>Wild and Scenic Rivers</b>  Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	Missouri has approximately 51,978 miles of river, of which 44.4 miles are designated as wild and scenic – less than 0.1% of the state’s river miles, all of which are located in the southern portion of the state. Included in the Wild and Scenic Rivers partner worksheet are maps regarding National Wild and Scenic Rivers program and listed river segments in Missouri.
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b>  Executive Order 12898	Yes    No <input type="checkbox"/> <input checked="" type="checkbox"/>	Based on the findings of the other 15 partner worksheets, there are no environmental impacts identified for the proposed project. But only the RE or HUD staff may initiate the Section 106 Historic Preservation consultation process. Local SPHOs should be contacted during the Section 106 process to verify formal compliance for Historic Preservation.

**Environmental Assessment Factors** [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

**Impact Codes:** Use an impact code from the following list 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

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	<p>Conformance with Plans – The project should increase affordable housing in the area. A total of 30-80% of the units for the property will be for Area Median Income (AMI) individuals and families, as well as 15% of the units will be used for disabled or vulnerable populations.</p> <p>Compatible Land Use and Zoning – The proposed property is on the edge of a commercial corridor along 58 Highway and a residential area to the north/east.</p> <p>Scale and Urban Design – This proposed property would be the only apartment complex in the local vicinity. Moreover, there are no large buildings in that local vicinity, therefore this complex would house only 3-story buildings in the area.</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	3	<p>Soil Suitability – Subject property soil should appropriately support the proposed land use.</p> <p>Slope – Very minimal slope on the proposed property.</p> <p>Erosion – During the construction process, the disturbance of vegetation will increase erosion on the proposed property. A stormwater pollution prevention plan (SWPPP) should be put in place for the construction process.</p> <p>Drainage/Stormwater Runoff – Stormwater drainage systems will be built into the complex. A SWPPP should be put in place for the construction process to prevent erosion.</p>
Hazards and Nuisances including Site Safety and Noise	2	<p>Hazards and Nuisances – No natural hazards are associated with the proposed subject property. No air pollution generators in the local vicinity. The proposed residential property would be a noise sensitive area. No nuisances are expected to be associated with the proposed subject property.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	1	<p>The proposed project will employ an array of contractors for the construction process as well as include a few employed positions to manage the facility once the construction is complete.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
Demographic Character Changes, Displacement	2	Demographic Character Changes – The proposed project is anticipated to have little to no impact on the physical, social, and psychological makeup of the local community. Displacement – The proposed project is not anticipated to impact direct and indirect displacement of people, businesses and institutions in the local vicinity.
Environmental Justice	1	The proposed project is anticipated to have a minor positive impact on the community's environmental justice. The proposed project plans 30-80% of the units for the property for Area Median Income (AMI) individuals and families, as well as 15% of the units will be used for disabled or vulnerable populations.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	2	The local elementary school (Raymore Elementary) was last reported at a 12:1 student to teacher ratio. The Raymore-Peculiar High School was last reported at a 15:1, these schools would be able to accommodate the additional students from the proposed property.
Commercial Facilities	2	The proposed project should have no impact on surrounding commercial establishments.
Health Care and Social Services	2	Health Care – The proposed project is located 3.5 miles from the Belton Regional Medical Center which has the capacity to accommodate the additional Raymore residents. Social Services – The proposed project is anticipated to have little to no impact on the availability of social services in the community.
Solid Waste Disposal / Recycling	2	The nearest solid waste landfill is the Johnson County Landfill located 22.5 miles northwest of the proposed site. The proposed project is not anticipated to negatively impact solid waste disposal and recycling in the community.
Waste Water / Sanitary Sewers	2	The nearest waste water treatment plant is the Belton Waste Water Treatment Facility located 5.7 miles southwest of the proposed site. The proposed project is anticipated to have little to no impact on the community's waste water treatment.
Water Supply	2	The nearest water supply is the Cass County Water Supply District #3 located 2.9 miles east-northeast of the proposed site. The

Environmental Assessment Factor	Impact Code	Impact Evaluation
		proposed project is anticipated to have little to no impact on the community's water supply.
Public Safety - Police, Fire and Emergency Medical	2	The nearest current fire hydrant is located on the southeast corner of Adams Street and Grant Drive, which is on the proposed subject property. Buildings/complexes with a fire flow of less than 2,500 gallons per minute may be permitted to have hydrants on one side of the building only. Therefore, one fire hydrant may provide sufficient fire flow. The local fire department is the South Metropolitan Fire Protection District Station 1 which is located 3,100 feet northwest of the proposed property. The local police department is the Raymore City Police Department which is located 3,300 feet northwest of the proposed property.
Parks, Open Space and Recreation	2	Though the proposed property would displace a greenspace that is currently located on the proposed lot, the extent that this small field was used for recreation is very minimal, and possibly non-existent. The T.B. Hanna Station Park is within walking distance and is located less than 1,000 feet south of the proposed site. The proposed project is anticipated to have little to no impact on the community's park and recreation access.
Transportation and Accessibility	3	The proposed project is located on Adams Street which is just off of Walnut Street/Highway-58. Walnut Street/Highway-58 is a 35 MPH road without any stop signs or traffic lights within 3,000 of the intersection of Adams Street and Walnut Street. Also, Walnut Street to the west of the above-mentioned intersection bends north and obstructs the view of oncoming traffic. A traffic study may be required to ensure the increased traffic flow from the proposed project does not have an adverse impact on traffic safety.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	3	<p>Unique Natural Features - There are no unique natural features located on the proposed project site, therefore the project is not expected to have a negative impact on any unique natural features.</p> <p>Water Resources – There is a small pond on the property adjoining to the east of the proposed project. A Stormwater Pollution Prevention Plan (SWPPP) should be enacted during the construction process to ensure runoff control.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
Vegetation, Wildlife	2	<p>Vegetation - Current vegetation is grass that is routinely mowed; therefore, native vegetation will not be adversely impacted.</p> <p>Wildlife - The project will not damage or destroy rare, threatened, or endangered species or their habitats. In this manner, it also will have no effect on state or federal threatened species, endangered species, or species of concern. While the project will only be three stories in height, the project will utilize bird-friendly designs for its windows. It will consider best management practices to avoid potential collisions.</p>
Other Factors	2	There are no other factors to consider for this project.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>CLIMATE AND ENERGY</b>		
Climate Change Impacts	3	<p>A large construction project will naturally have a negative impact on climate change unless mitigation steps are taken. The usage of large quantities of raw building materials, which include, but are not limited to concrete, wood, metal, water, and drywall. The fabrication and processing of these materials requires energy and therefore are Greenhouse Gas producing.</p> <p>Although the proposed project will have a minor impact on climate change, the proposed project site is not located in an area likely to be impacted by natural hazards that may be affected by climate change (floods, wildfires, drought, etc.).</p>
Energy Efficiency	3	<p>The proposed project is located proximate to transportation, retail, and community services. The parcel has residential developments to the north and east and has commercial properties to the south and west.</p> <p>The proposed project will convert the parcel from vacant lot into multifamily affordable residential housing; this will lead to increased energy consumption at the project location as compared to existing use. To the extent possible, the design of the building will incorporate energy conserving measures such as strategic window placement, insulation, and outdoor landscaping to assist with exposure to the sun and to reduce overall energy consumption.</p>

**Additional Studies Performed:**  
Phase I Environmental Site Assessment  
Phase I Environmental Site Assessment Update

**Field Inspection** (Date and completed by):

January 20, 2023, New Horizons' Environmental Scientist, Jonah Spake;

July 26, 2023, New Horizons' Environmental Scientist, Alvin Stokes

**List of Sources, Agencies and Persons Consulted** [40 CFR 1508.9(b)]:

- US Department of Housing and Urban Development (HUD)
- HUD Exchange
- Day/Night Noise Level Calculator
- Airport Noise Worksheet
- Google Maps
- US Fish and Wildlife Service – Coastal Barrier Resources System
- US Fish and Wildlife Service – National Wetlands Inventory
- Environmental Protection Agency (EPA)
- EPA Greenbook maps
- EPA ArcGIS
- US Department of the Interior
- Environmental Data Resources, Inc. (EDR)
- Federal Emergency Management Agency (FEMA)
- FEMA Flood Insurance Rate Maps
- National Wild and Scenic River System
- Missouri Department of Natural Resources
- US Nuclear Regulatory Commission
- US Geological Survey

**List of Permits Obtained:**

**Public Outreach** [24 CFR 50.23 & 58.43]:

**Cumulative Impact Analysis** [24 CFR 58.32]:

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

**No Action Alternative** [24 CFR 58.40(e)]:

**Summary of Findings and Conclusions:**

**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below all mitigation measures adopted by the Responsible Entity (RE) 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

**Determination:**

- Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]  
The project will not result in a significant impact on the quality of the human environment.
- Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]  
The project may significantly affect the quality of the human environment.

Reviewer Signature:  Date: 10/7/23

Name/Title/Organization: David Gress, Development Services Director - City of Raymore, MO

Certifying Officer Signature:  Date: 10-11-2023

Name/Title: Robert Salmon, St. Clair County Presiding Commissioner

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).