



U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

**Tiered Environment Review
for Activity/Project that is
Categorically Excluded Subject to Section 58.5
Pursuant to 24 CFR 58.35(a)**

Project Information

Project Name: City-of-Allentown-Healthy-Home-Production-Program

HEROS Number: 900000010355741

Responsible Entity (RE): ALLENTOWN, 435 Hamilton St Allentown PA, 18101

State / Local Identifier:

RE Preparer: Tanya Allison

Certifying Officer: Matt Tuerk

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: Allentown, PA 18101

Additional Location Information:

N/A

Direct Comments to: City of Allentown, 435 Hamilton Street, Allentown, PA (8am to 4:30pm weekdays)
or by email to Tanya.Allison@AllentownPA.gov

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

The City of Allentown's Healthy Home Production Program will provide grants to single and multi-family residential housing units within the geographic boundaries of the city, to address healthy home hazards. All properties will have income qualified occupants, at or below 80% of the Area Median Income. Preference will be given to households wherein reside families with

children, older adults (62+ years), and/or persons with disabilities. During the course of the program up to 137 units will be provided visual lead and healthy homes inspections. Of those enrolled units, up to 135 units will have healthy homes hazards addressed. This work will consist of, but not limited to, paint stabilization, plumbing repairs, electrical repairs, HVAC repairs, roof repairs, smoke and carbon monoxide installation, pest control, mold remediation, asbestos remediation, and radon remediation. The cost for Healthy Homes Production is up to \$10,000 per unit. This Tier I Review will remain in effect for 5 years and a separate Tier II ERR will be completed for every property after a scope of work has been completed. All properties determined to be within a flood zone will require the property to be covered by flood insurance and projected work must be minimal and determined to have no adverse impact. All proposed work on properties within designated historic districts or determined eligible for historical significance will be required to meet the Secretary for Interior Standards for Rehabilitation guidelines and meet the approval of the City of Allentown Historical Architectural Review Board (HARB) and/or PA SHPO.

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

[EconDev20201120_HUDMap.pdf](#)

Approximate size of the project area: more than 1 square mile

Length of time covered by this review: 5 Years

Maximum number of dwelling units or lots addressed by this tiered review:

140

Level of Environmental Review Determination:

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5: 58.35(a)(3)

Determination:

	Extraordinary circumstances exist and this project may result in significant environmental impact. This project requires preparation of an Environmental Assessment (EA); OR
✓	There are no extraordinary circumstances which would require completion of an EA, and this project may remain CEST.

Approval Documents:

[ER Tier 1 Packet Signiture Page.pdf](#)

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

Grant Number	HUD Program	Program Name
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PAHHP0110-23	Healthy Homes and Lead Hazard Control	
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Estimated Total HUD Funded Amount: \$2,000,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$2,220,000.00

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	Was compliance achieved at the broad level of review?	Describe here compliance determinations made at the broad level and source documentation.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	As determined by 24CFR Part 51 Subpart D. This project scope is for minor remediation projects and does not include new construction or reconstruction, not the sale or purchase of property. There are no military airports in the City of Allentown or civilian airports within 2500 feet of homes within the projected program area.
Coastal Barrier Resources Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	This project is located in Pennsylvania which does not have any Coastal Barrier Resources. Therefore, this project is in compliance with the Coastal Barrier Resources Act of 1982.
Flood Insurance	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Healthy Homes Production work does not include new construction or conversion of land using facilitating the development of public, commercial or industrial facilities of five or more dwelling units. All projects will be in existing occupied residence and there will be no increase exposure to air quality. Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The

		project is in compliance with the Clean Air Act.
Coastal Zone Management Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The Healthy Homes Production Program is located in Lehigh County, PA. The counties in PA that have Coastal Zone Management Areas are Erie, Philadelphia, Delaware, and Bucks Counties. This project is not located in Coastal Zone Management Area. Therefore, this project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Endangered Species Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	This project area does not interfere or take place in any critical habitat locations. The scope of work is to complete Healthy Home Hazard reduction work to existing occupied residential units. There will be No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act.
Explosive and Flammable Hazards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The proposed work does not include development, construction, rehabilitation that will increase residential densities, or conversion. The project is in compliance with explosive and flammable hazard requirements.
Farmlands Protection	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The City of Allentown is located in an urbanized area. There will be no impact to farmland or significant agricultural soils. 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Historic Preservation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Noise Abatement and Control	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The Healthy Homes Production Program will not result in any new construction, conversion, major rehabilitation or acquisition of undeveloped land. It is therefore in compliance with Noise Abatement and Control without site-specific noise analysis. In addition the project remediation may result in noise

		attenuation due to replacement of doors and windows.
Sole Source Aquifers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The Healthy Homes Production Program will consist of minor interior and exterior remediation and will result in no new construction or conversion activities. Additionally, no sole source aquifers exist in or near the City of Allentown.
Wetlands Protection	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The City of Allentown is an urbanized area and is not located in or near wetlands and is therefore in compliance with Executive Order 11990, particularly sections 2 & 5.
Wild and Scenic Rivers Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The City of Allentown is not located near a Wild and scenic River nor near a river on the National Rivers Inventory and is therefore in compliance with the Wild and Scenic Rivers Act of 1968, particularly section 7(b) & (c)]
ENVIRONMENTAL JUSTICE		
Environmental Justice	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The Healthy Homes Production Program is provided to low-moderate income families. The projects sites and surrounding neighborhoods will not suffer from adverse environmental conditions and will not create an adverse and disproportionate environmental impact or aggravate an existing impact. It will not have a disproportionate adverse impact on minority or low-income populations. The project is not in an environmental justice community of concern.

Supporting documentation

- [Air Quality Lehigh County 8-Hr 2023.pdf](#)
- [Coastal Barriers 2023.pdf](#)
- [Regional Map and Pennsylvania Coastal Zones 2023.pdf](#)
- [Map Critical Habitat NMFS 2023.pdf](#)
- [Minority Population EJMAP 2023.pdf](#)
- [Farmland USGS 2023.pdf](#)
- [Flood map census tracts HUD tracts.jpg](#)
- [Floodplain Hazard Map NEPAAssist 2023.pdf](#)
- [bhpguidancepreservationplanning.pdf](#)
- [Sole Source Aquifers ArcGIS 2023.pdf](#)

- [Wetlands_USGS_2023.pdf](#)
- [Wild Scenic Rivers 2023.pdf](#)
- [Airport_NEPAAssist_2023.pdf](#)
- [Airport Noise 2023.pdf](#)

Written Strategies

The following strategies provide the policy, standard, or process to be followed in the site-specific review for each law, authority, and factor that will require completion of a site-specific review.

1	<p>Flood Insurance</p> <p>Flood zones will be addressed at the project level. Using FEMA.gov, we will review each project to determine if the unit is located in a Special Flood Hazard Area and a FIRMette will be created. Project located within a determined flood hazard zone will be approved with the condition that the owner has obtained and agrees to maintain flood insurance under the National Flood Insurance Program. A copy of the flood insurance policy declaration will be kept on file in the Community Housing office and uploaded into HEROS.</p>
2	<p>Contamination and Toxic Substances</p> <p>All projects will be reviewed for contamination and toxic substances during the Tier II site-specific review. A site visit will be conducted to determine if there are any visible signs of contamination or toxic substances on or near the project site. Area will be documented with photos. EPA NEPAAssist and GIS databases will be accessed for all records within a one-mile radius of the project location for regulatory non-compliant status. A review will be conducted of the nature of all facilities deemed non-compliant and its potential for contamination of the project site. If pathways of contamination exist from the non-compliant facility, the project will be denied grant funds. The site-specific review will be approved with identified Healthy Homes Hazards such as Lead, Asbestos, and Radon on site. These hazards will be identified and reported by an Inspection/risk assessment completed for each property. Hazards will be mitigated and retested for clearance at project completion.</p>
3	<p>Floodplain Management</p> <p>The City of Allentown expects to pay approximately \$10,000 per unit for Healthy Homes Remediation. This level of funding will not constitute a substantial rehabilitation, defined as cost exceeding 50% of the value of the property. In addition, the city participates in the National Flood Insurance Program. Therefore, Steps 1, 4, 5, and 6 of the 8 Step Decision Making Process need to be completed. In the event that a project on a residence in a flood plain during Tier II is determined to be a substantial rehabilitation, the 8-step decision making process will be followed for that project.</p>
4	<p>Historic Preservation</p>

	<p>Historic Preservation compliance will be achieved at the project level. All proposed actions and rehabilitations as part of this project will comply with Section 106 of the National Historic Preservation Act and other federal historic preservation regulations. This includes buildings that are listed or eligible for listing on the National Register, either individually, or as part of a National Register listed or eligible district. The proposed actions to historic buildings will comply with the Secretary of the Interior Standards for Rehabilitation of Historic Buildings. In addition, all actions to remediate lead paint hazards in historic buildings will comply with the National Park Service Preservation Brief 37: Appropriate Methods of Reducing Lead Paint Hazards in Historic Housing. This site-specific review will be completed by the City of Allentown's Historic Officer once a programmatic agreement has been established with PA SHPO. All projects that cannot be resolved at the staff level will be forwarded to PA SHPO for review.</p>
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Supporting documentation

[Tier 2 Template HHP BLANK.pdf](#)

[IIII-Floodplain management and protection.pdf](#)

APPENDIX A: Site Specific Reviews