



U.S. Department of Housing and Urban  
Development

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## **Environmental Review for Activity/Project that is Categorically Excluded Subject to Section 58.5**

**Pursuant to 24 CFR 58.35(a)**

### **Project Information**

**Project Name:** Cypress Street RCFE Project

**Responsible Entity:** City of Fort Bragg

**Grant Recipient** (if different than Responsible Entity):

**State/Local Identifier:** City of Fort Bragg

**Preparer:** Natalie McLaughlin

**Certifying Officer Name and Title:** Tabatha Miller, City Manager

**Grant Recipient** (if different than Responsible Entity):

**Consultant** (if applicable):

**Direct Comments to:** Natalie McLaughlin

**Project Location:** 350 East Cypress Street, Fort Bragg, California

**Description of the Proposed Project** [24 CFR 50.12 & 58.32; 40 CFR 1508.25]: The City of Fort Bragg will construct three urgently-needed Residential Care Facilities for the Elderly (RCFE). The project will be comprised of three, four-bedroom, three-bathroom residential units that are constructed to be fully accessible and equipped for aging and disabled clients. The facility's three residential buildings will each be licensed by the Community Care Licensing Division of the State Department of Social Services as a Service Level 4-I (highest staffing level to correspond to escalating severity of disability levels). The facility will be located on a 38,768 square foot (SF) (0.89 acre) parcel within city limits of Fort Bragg, California, on a parcel owned by Parents and Friends, Inc., a 501(c)3 organization. A full-service pharmacy leases the eastern side of the parcel (approximately 25% of the property) from PFI, and this facility will remain in place with a separate parking area. Each of the three homes will provide residential and care services to four extremely low-income, developmentally disabled adults who are age 59 and older and/or suffering from age-related dementia, Alzheimer's disease, or other age-related disabilities, providing services to a total of 12 individuals.

The project will include:

1. **Preconstruction.** Design, final plans and specifications, surveying and permits.

2. **Construction.** Site preparation, base compaction, foundation installation, construction and construction management. Project construction activities will consist of:
  - a. Demolition of two structures, including a dilapidated residence, second building, and three sheds;
  - b. Construction of three new residences of approximately 2,092 SF each;
  - c. Installation of fencing to enclose the project site with gated access to the RCFE;
  - d. Development of as many as 17 parking spaces;
  - e. Installation of pedestrian pathways from the street to each residence;
  - f. Construction of an approximately 64 SF sheltered entry/waiting area; and
  - g. Development of site improvements, including a lawn area, landscaped border, utility connections and enclosures for trash and propane.

**Level of Environmental Review Determination:**

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

This activity is determined to be categorically excluded according to 24 CFR 58.35(a)(4)(i), which states that “an individual action on up to four dwelling units where there is a maximum of four units on any one site” is categorically excluded under NEPA, but may be subject to review under authorities listed in 24 CFR 58.5. The activity consists of the development a Residential Care Facility comprised of three single-family residential units.

The following analysis reviews the activity’s compliance with the statutes and authorities listed in Section 58.5, and concludes that the activity as proposed is consistent with the statutes and authorities without further mitigation or compliance actions, and therefore converts to EXEMPT.

**Funding Information**

Grant Number	HUD Program	Funding Amount
#17-CDBG-12020		

**Estimated Total HUD Funded Amount:** \$3,038,896

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]:  
\$3,038,896

**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.

<p><b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
<p><b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.6</b></p>		
<p><b>Airport Hazards</b> 24 CFR Part 51 Subpart D</p>	<p>Yes    No <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>This project is not within an Airport Clear Zone or Accident Potential Zone.  Source document: <i>Mendocino County Airport Comprehensive Land Use Plan, Revised 1996.</i>  <b>No further mitigation or action is required.</b></p>
<p><b>Coastal Barrier Resources</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p>Yes    No <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>This project is located in California, which is not a state with Coastal Barrier Resources.  Source document: <i>16 USC 3501(a)(1)</i> which defines the locations of Coastal Barrier Resource Areas. The Pacific Coast is not included in that definition.  <b>No further mitigation or action is required.</b></p>
<p><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]</p>	<p>Yes    No <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>Section 102(a) of the Flood Disaster Protection Act of 1973 requires that most projects receiving federal assistance and located in an area identified by FEMA as being within a Special Flood Hazard Area (SFHA) be covered by flood insurance under the National Flood Insurance Program. The project involves the construction of structures.  The project is not located within a SFHA.  Source document: <i>FEMA Flood Insurance Rate Map 06045C-1016-G, Plate 1016 of 2100.</i>  <b>No further mitigation or action is required.</b></p>
<p><b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b></p>		
<p><b>Clean Air</b> Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes    No <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>The project would generate short-term emissions from construction activities such as site grading, asphalt paving, building construction, and architectural coatings (e.g., painting). Common construction emissions include fugitive dust from soil disturbance, fuel combustion from mobile heavy-duty diesel- and gasoline-powered</p>

equipment, portable auxiliary equipment, and worker commute trips. During construction, fugitive dust, the dominant source of PM<sub>10</sub> and PM<sub>2.5</sub> emissions, is generated when wheels or blades disturb surface materials. Uncontrolled dust from construction can become a nuisance and potential health hazard to those living and working nearby. Off-road construction equipment is often diesel-powered and can be a substantial source of NO<sub>x</sub> emissions, in addition to PM<sub>10</sub> and PM<sub>2.5</sub> emissions. Worker commute trips and architectural coatings are dominant sources of ROG emissions.

Mendocino County is non-attainment for the State PM-10 standard (particulate matter less than 10 microns in size). The primary manmade sources of PM-10 pollution in the area are wood combustion (woodstoves, fireplaces, and outdoor burning), fugitive dust, automobile traffic, and industry. The MCAQMD maintains full-time monitoring equipment in the City of Fort Bragg. Development within Mendocino County must comply with all applicable provisions of the Particulate Matter Attainment Plan adopted by the Mendocino County Air Quality Management District on March 15, 2005.

Temporary construction impacts/effects are subject to Air Quality Management District Regulation 1, Rule 430, requiring dust control during construction activities. Section 18.30.080(D) of the Coastal Land Use and Development Code (CLUDC) outlines municipal standards for dust management and prevention, which ensure compliance with applicable air quality standards. The proposed project would be consistent with these requirements.

Since the proposed project must comply with the existing standards for air quality contained in the CLUDC and the MCAQMD Particulate Matter Containment Plan, the project would not conflict with, nor would it obstruct the implementation of any air quality plan, nor would it violate any air quality standard. Additionally, the project would not contribute substantially to an existing or projected air quality violation. Finally, the project would not result in a cumulatively considerable net increase of PM-10 pollution (the only criteria pollutant for which the region is

		<p>in non-attainment), provided the standards of the CLUDC and the MCAQMD Particulate Matter Containment Plan are met or exceeded.</p> <p>Source documents: <i>MCAQMD of the California North Coast Air Basin, Particulate Matter Attainment Plan, 2005</i> and <i>Bay Area Air Quality Management District Regulation 1, Rule 430</i></p> <p><b>No further mitigation or action is required.</b></p>
<p><b>Coastal Zone Management</b> Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p>Yes    No  <input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>Section 307 of the CZMA requires Federal actions having reasonably foreseeable effects to uses or resources of State coastal zones to be consistent with the enforceable policies of a State's Federally-approved CMP.</p> <p>The CZMA sets out four categories of Federal actions subject to CZMA review:</p> <ul style="list-style-type: none"> <li>• Activities conducted by or on behalf of Federal agencies (also referred to as "Federal agency activities;")</li> <li>• Activities authorized by Federal licenses or permits;</li> <li>• Outer Continental Shelf plans; and</li> <li>• Federal assistance to state and local governments.</li> </ul> <p>For this project, the City of Fort Bragg is seeking CDBG grants; therefore, this activity falls under the fourth category of Federal actions subject to CZMA review. It is the responsibility of the state or local applicant to show compliance with the CZMA, and federal funds may not be released to the applicant until CZMA compliance is satisfied.</p> <p>CZMA compliance is required for all Federal assistance to state and local applicant activities that are listed by the State in their CMP for CZMA review. If the assistance activity is not listed by the State in the CMP, no further action is required. The Office for Coastal Management (OCM) provides lists identifying the federal financial assistance activities subject to federal consistency review for each state.</p> <p>For the State of California, OCM provides a document from the California Coastal</p>

		<p>Commission listing the activities subject to the certification process for consistency with the management program, under Section 307(c)(3) of the CZMA. This list does not include activities, licenses, permits or federal assistance programs initiated by CDBG and/or HUD. Since this assistance activity is not listed, no further action is required for CZMA review.</p> <p>Source document: <i>California Coastal Management Program – List of Federal Licenses and Permits Subject to Certification for Consistency</i></p> <p><b>No further mitigation or action is required.</b></p>
<p><b>Contamination and Toxic Substances</b> 24 CFR Part 50.3(i) &amp; 58.5(i)(2)</p>	<p>Yes    No  <input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>All property proposed for use in HUD programs must be free of hazardous materials, contamination, toxic chemicals and gases and radioactive substances, where a hazard could affect the health and safety of occupants or conflict with the intended utilization of the property. Multi-family projects of greater than five dwelling units must also include a review of previous uses of the site or other evidence of contamination on or near the site to assure the proposed occupants are not impacted by any of these hazards. This project is a Residential Care Facility of three dwelling units; therefore, a review of previous uses on the site is not required.</p> <p>A review of Environmental Protection Agency <i>Envirofacts</i> mapping shows two data points within 1,000 feet of the project site—one at Mendocino Coast European (an auto repair shop) approximately 100 feet from the project, and one at Mendocino Coast District Hospital approximately 250 feet from the project site. The compliance status for each is “no violation identified.”</p> <p>The data points and compliance reports are included with this report.</p> <p>In addition to the lack of nearby contamination and/or toxic substances, the proposed project would not result in the use or release of any toxic, hazardous or radioactive materials, contamination, chemicals or gases.</p>

		Source document: <i>Environmental Protection Agency Envirofacts</i>
<b>Endangered Species</b>  Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p><b>No further mitigation or action is required.</b></p> <p>The project activity involves a previously developed urban property and would have no effect on any natural habitats or federally protected species. The project site is developed with a single-family residence, associated accessory buildings and a retail pharmacy, and therefore does not support these species' habitat requirements.</p> <p>An Environmentally Sensitive Habitat Area Scoping Survey determined that no special status plants, plant communities, wildlife or wildlife habitat is present on the parcel. Several stands of trees are dominated by non-native tree species.</p> <p>The project site does not provide habitat for any endangered species, per the biological assessment survey and therefore the project is not subject to Section 7 consultation under the Endangered Species' Act of 1973.</p> <p>Source document: <i>Environmental Sensitive Habitat Area Scoping Survey</i> prepared by North Coast Resource Management biologist Estelle Clifton</p> <p><b>No further mitigation or action is required.</b></p>
<b>Explosive and Flammable Hazards</b> 24 CFR Part 51 Subpart C	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p>The project would not result in an increased number of people being exposed to hazardous operations by increasing residential densities, converting the type of use of a building to habitation, or making a vacant building habitable. The project does not involve explosive or flammable materials or operations.</p> <p>Source documents: <i>United States Department of Housing and Urban Development. Environmental Criteria and Standards. 24 CFR Part 51.</i></p> <p><b>No further mitigation or action is required.</b></p>
<b>Farmlands Protection</b>  Farmland Protection Policy Act of 1981, particularly sections	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<p>The project site consists of urban land; therefore, the project would not affect farmlands. There are no protected farmlands in the City of Fort Bragg.</p>

<p>1504(b) and 1541; 7 CFR Part 658</p>		<p>Source document: <i>United States Department of Agriculture, Natural Resources Conservation Services. Web Soil Survey and California Department of Conservation, California Important Farmland Finder</i></p> <p><b>No further mitigation or action is required.</b></p>
<p><b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes    No <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>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. FEMA FIRM map 06045C-1016-G, Panel 1016 of 2100 shows the project site is not within a Coastal High Hazard Area, 100-Year Floodplain or Floodway.</p> <p>Source document: FEMA <i>Flood Insurance Rate Map 06045C-1016-G, Plate 1016 of 2100.</i></p> <p><b>No further mitigation or action is required.</b></p>
<p><b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes    No <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>On February 6, 2012, Alex DeGeorgey of North Coast Resource Management conducted a records search at the California Historical Resources Information System’s Northwest Information Center (File Number 11-0836). The search area included a one-half mile radius around the project area. Sources consulted include the archaeological site and survey base maps, survey reports, site records, historic General Land Office maps, the National Register of Historical Resources and the California Points of Historical Interest. In addition, Mr. DeGeorgey reviewed ethnographic literature germane to the area for information regarding prehistoric and ethnographic use of the area.</p> <p>No record of archaeological cultural, or historic sites appeared in the archival research within the project area. Seven prehistoric archaeological sites and one historic site are recorded within on half-mile of the project area.</p> <p>The City requested a record search from the California Historical Resources Information System’s Northwest Information Center (NWIC File No. 18-1237 correspondence dated January 7, 2019). The Northwest Information Center response indicates the following:</p>



- There have been no cultural resources studies of the project area.
- The project area contains no recorded archaeological resources.
- The State Office of Historic Preservation Historic Property Directory (OHP HPD) list no recorded buildings or structures within or adjacent to the project area.
- The NWIC base maps show no recorded building or structures within the project area.
- There is one Native American resources in or adjacent to the project area.
- There is moderate to high potential for unrecorded Native American resources within the project area.
- There is moderate potential that unrecorded historic-period archaeological resources are within the project area.
- Per review of the Fort Bragg (1943) USGS 15-minute topographic quadrangle map, there is one building or structure 45 years or older within the project area.

The NWIC study recommends further archival and field study by a qualified archaeologist to identify cultural resources, and consultation with SHPO regarding potential impacts to historic properties. These further studies were completed and discussed in greater detail below. The NWIC study also recommends Native American consultation, which is also described below.

**Native American Consultation.** Assembly Bill 52, which went into effect in July 2015, is an amendment to CEQA Section 5097.94 of the Public Resources Code. AB52 established a consultation process with all California Native American tribes identified by the Native American Heritage Commission (NAHC) with cultural ties to an area and created a new class of resources under CEQA known as Tribal Cultural Resource. The City of Fort Bragg, as the Lead Agency under CEQA, is responsible for complying with the requirements of CEQA Section 5097.94 of the Public Resources Code.

On February 12, 2019, City of Fort Bragg staff emailed the Tribal Historic Preservation Officer of the Sherwood Valley Band of Pomo to inform the tribe about the proposed undertaking and to

solicit input from the tribe. Included with the email were the project site plan map, record search results letter from the California Historic Resources Information System and a survey report prepared for the parcel in 2012 (DeGeorgey 2012).

The Native American Heritage Commission (NAHC) was contacted on February 27, 2019 to review the Sacred Lands Files for any resources present within the project area and to request the contact information for the Native American groups in the area. Attachment B of the enclosed archaeological survey provides the evidence of Native American consultation conducted as part of the investigation.

**Archaeological Survey.** The surveys, included as Attachment 6, were conducted by Alex DeGeorgey of North Coast Resource Management. Mr. DeGeorgey conducted a complete intensive inventory within the entire subject parcel, which entailed systematic pedestrian examination of the ground surface and transects spaced no more than 10 meters apart. No archaeological resources were discovered within the area. Additionally, a cultural resources inventory was conducted to address the responsibilities of Section 106 of the National Historic Preservation Act 36 CFR 800. No cultural resources were identified within the project area as a result of the records search, literature review, or Native American consultation.

During the archaeological field survey, a historic-era residence was identified. The built environment was evaluated by architectural historian Dr. Diana Painter, who summarized her findings in a Historic Resource Evaluation and Section 106 Review, included as Attachment 8. The report sought to identify any historic resources, defined as resources eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR) that may be present on the property and that may be affected by the current undertaking. The report also sought to identify any historic resources that may be present in the immediate vicinity of the proposed project and that may be indirectly affected by the construction of the project. The buildings reviewed are defined

		<p>as being in the horizontal APE, and include a pharmacy and eight additional buildings. The report concluded that no historic resources, defined as a resource eligible for listing in the NRHP or CRHR were identified as part of the Historic Resources Evaluation.</p> <p>A standard requirement to address the potential for discoveries of buried and concealed archaeological resources during project construction will be incorporated into construction procurement documents.</p> <p><b>Other consultations.</b> City staff reviewed the City's Historic Buildings Inventory to identify historic properties in the APE. The City's Historic buildings Inventory is limited to the western half of the City and does not include any buildings in or around the project area. The City sent the State Historic Preservation Office (SHPO) a consultation letter that includes the cultural resource and archaeological analysis of the site by the qualified archaeologist, Northwest Information Center and City research. SHPO failed to respond within 30 days as found at 36 CFR 800.3(c) (4) the City can proceed with the findings that the project would not affect sensitive archaeological or cultural resources.</p> <p><b>No further mitigation or action is required.</b></p>
<p><b>Noise Abatement and Control</b></p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The project would develop three residential units as new noise sources. These residences would have no noise impacts under HUD guidelines. The project is not near an airport.</p> <p>Source document: <i>United States Department of Housing and Urban Development Environmental Criteria and Standards, 24 CFR Part 51</i></p> <p><b>No further mitigation or action is required.</b></p>
<p><b>Sole Source Aquifers</b></p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes    No</p> <p><input type="checkbox"/>    <input checked="" type="checkbox"/></p>	<p>The project is not served by a US EPA designated sole-source aquifer, is not located within a sole source aquifer watershed, and would not affect a sole-source aquifer subject to the HUD EPA MOU.</p> <p>Source document: <i>United states Environmental Protection Agency, Sole</i></p>

		<p><i>Source Aquifers subject to HUD-EPA Memorandum of Understanding, dated September 30, 1990 and United States Environmental Protection Agency, Sole Source Aquifers in Region 9</i></p> <p><b>No further mitigation or action is required.</b></p>
<p><b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes    No <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>The project site contains no wetlands, per the Environmentally Sensitive Habitat Area survey; therefore, the project would have no effect or impact on wetlands pursuant to Executive Order 11990.</p> <p>Source document: <i>Environmental Sensitive Habitat Area Scoping Survey</i> prepared by North Coast Resource Management biologist Estelle Clifton</p> <p><b>No further mitigation or action is required.</b></p>
<p><b>Wild and Scenic Rivers</b>  Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes    No <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>No Wild or Scenic Rivers are located within the project area. The nearest Wild and Scenic River is the Eel River, greater than 20 miles from the project site.</p> <p>Source document: <i>National Wild and Scenic Rivers System in the U.S.</i> online map</p> <p><b>No further mitigation or action is required.</b></p>
<p><b>ENVIRONMENTAL JUSTICE</b></p>		
<p><b>Environmental Justice</b> Executive Order 12898</p>	<p>Yes    No <input type="checkbox"/>   <input checked="" type="checkbox"/></p>	<p>Executive Order 12898 requires federal agencies to consider how federally assisted projects may have disproportionately high and adverse human health or environmental effects on minority and low-income populations. The City of Fort Bragg is designated "place" classified as a Severely Disadvantaged Community, meaning the average household income is less than 60% the statewide average household income. The site and surrounding neighborhood will not suffer from adverse environmental conditions as a result of this project. As this</p>

	<p>Environmental Review illustrates, any adverse environmental impact can be mitigated so that it does not create an adverse or disproportionate environmental impact or aggravate an existing impact on a minority or low-income population.</p> <p>The project is meant to serve developmentally disabled adults, and would therefore enhance and contribute to the quality of live for low income citizens.</p> <p>Furthermore, the project will be required to obtain a Coastal Development Permit at a Public Hearing before the City of Fort Bragg Planning Commission. Planning Commission Public Hearings are publicly noticed in the local newspaper of record, on the property site visible from the right-of-way, on community message boards and on the City's website. This hearing will provide additional opportunity for low-income or minority populations to be meaningfully informed and involved in a participatory planning process to address any potential adverse effects from the project and the resulting changes.</p> <p>Source document: <i>HUD Guidance and Technical Advice, Environmental Justice</i></p> <p><b>No further mitigation or action is required.</b></p>
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**Field Inspection** (Date and completed by): **Completed by Scott Perkins, 3/6/19**

**Summary of Findings and Conclusions:** Based on the environmental analysis above, no environmental conditions were identified that require mitigation or further action to achieve compliance. As a result, the categorically excluded activity converts to EXEMPT per Section 58.34(a)(12) because it does not require any mitigation for compliance with any listed statues or authorities.

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

Summarize below 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
N/A	N/A

**Determination:**

- This categorically excluded activity/project converts to Exempt, per 58.34(a)(12) because there are no circumstances which require compliance with any of the federal laws and authorities cited at §58.5. **Funds may be committed and drawn down after certification of this part** for this (now) EXEMPT project; OR
- This categorically excluded activity/project cannot convert to Exempt because there are circumstances which require compliance with one or more federal laws and authorities cited at §58.5. Complete consultation/mitigation protocol requirements, **publish NOI/RROF and obtain “Authority to Use Grant Funds”** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR
- This project is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).

Preparer Signature: Natalie McLaughlin Date: 5-15-19

Name/Title/Organization: Natalie McLaughlin, Special Projects Assistant, City of Fort Bragg

Responsible Entity Agency Official Signature:

Tabatha Miller Date: 5-15-19

Name/Title: City Manager, Tabatha Miller

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).