



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: MALCB0015-24-Lead-Hazard-Reduction-Capacity-Building

**HEROS
Number:** 900000010468954

Start Date: 05/06/2025

**Responsible Entity
(RE):** HAVERHILL, CITY HALL HAVERHILL MA, 01830

**State / Local
Identifier:**

RE Preparer: Yosita Thanjai

**Certifying
Officer:** Andrew K. Herlihy

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

Point of Contact:

**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.

Additional Location Information:

Citywide

Direct Comments to: City Hall
Community Development Department
4 Summer St, Room 309, Haverhill MA 01830

Email: ythanjai@haverhillma.gov

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

The Haverhill Lead Hazard Reduction Capacity Building Program (LHRCBP) is committed to the abatement of eligible low to moderate income housing units located in inner-city census tracts that are largely comprised of the highest concentration of 100 year-old+ single family and multi-family dwellings in the City. The Mount Washington and Acre neighborhoods best meet this criteria and shall be a point of emphasis for the Program. The Program will focus on addressing lead hazards in all types of housing units citywide including owner-occupied, rental, single family, and multi-family residences (2-4 units). The budgeted cost per project is \$19,000. The Program plans to complete 18 units during Year 3 of the grant.

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

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:
20

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:

<input type="checkbox"/>	Extraordinary circumstances exist and this project may result in significant environmental impact. This project requires preparation of an Environmental Assessment (EA); OR
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✓	There are no extraordinary circumstances which would require completion of an EA, and this project may remain CEST.
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Approval Documents:

[Signature Page - Environmental Review Record SIGNED 5202025.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
MALCB0015-24	Healthy Homes and Lead Hazard Control		\$2,434,342.00

Estimated Total HUD Funded Amount: \$2,434,342.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$2,696,995.03

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	Compliance is met at a broad level because the program is limited to maintenance and minor rehabilitation without increase in size or density of a structure, new construction, or change in land use from industrial or

		commercial to residential. Further, activities listed in the project description will not significantly prolong the physical or economic life of existing single-family residences. The program complies with this environmental review factor and no further analysis is required.
Coastal Barrier Resources Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance is met at the broad level because Haverhill is not located in proximity to a Coastal Barrier Resources System Unit. No further analysis is required.
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	Compliance is met at a broad level because the program does not include new construction or conversion of land use facilitating the development of public, commercial or industrial facilities. No further analysis is required.
Coastal Zone Management Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance is met at the broad level because Haverhill is not located in a defined coastal zone in the state Coastal Management Plan and therefore does not trigger analysis of this environmental review factor. No further analysis is required.
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	Compliance is met at the broad level because the program is limited to maintenance and minor rehabilitation of existing single-family homes which will have no effect on endangered species or habitat. The program is in compliance with this environmental review factor and no further analysis is required.
Explosive and Flammable Hazards	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance is met at a broad level because program activities will not include development, construction, or rehabilitation that will increase residential densities, or conversion. The program is in compliance with this

		environmental review factor and no further analysis is required.
Farmlands Protection	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance is met at the broad level because the program consists of completing maintenance and minor rehabilitation to existing single family residences and would not include any activities such as new construction, acquisition of undeveloped land, or conversion of land use. No further analysis is required.
Floodplain Management	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance is met at a broad level because exceptions at 24 CFR 55.12b2, 55.12c1, and 55.12c10 apply to this grant proposal. Exceptions at 55.12b2 include financial assistance for minor repairs or improvements on one- to four-family properties that do not meet the thresholds for substantial improvement. Exceptions at 55.12c1 include reference to 58.34a5 inspections and testing and 58.34a10 control or arrest imminent threats to public safety including those resulting from physical deterioration. The exception at 55.12c10 includes removal of material and architectural barriers. No further analysis is required.
Historic Preservation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Noise Abatement and Control	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance is achieved at a broad level because the program consists solely of maintenance and minor rehabilitation. HUD Noise regulation applies to modernization grants, major or substantial rehabilitation. See 24 CFR 51.101a5. No further analysis is required.
Sole Source Aquifers	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance is met at the broad level because the attached US EPA map shows that there are no sole source aquifers in Haverhill. The project complies with the Safe Drinking Water Act. No further analysis is required.
Wetlands Protection	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Wild and Scenic Rivers Act	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Compliance with this factor is met at a broad level given that a review of the

		National Wild and Scenic Rivers website shows the City of Haverhill is not in proximity to any NWSRS river as defined. No further analysis is required.
ENVIRONMENTAL JUSTICE		
Environmental Justice	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	This program does not create adverse environmental or human health impacts. The project itself is targeted at low income and underserved communities. Compliance is met at a broad level and no further analysis is required. The Lead Hazard Reduction Capacity Building Program shall serve the same target area as the Haverhill CBDG Program.

Supporting documentation

[Air Quality Maps.pdf](#)
[Coastal Barriers Maps and Attachments.pdf](#)
[Coastal-Zone-Management-Map.pdf](#)
[Species by County Report.pdf](#)
[Critical Habitat for threatened and endangered species map.pdf](#)
[Environmental-Justice-Worksheet.docx](#)
[Farmlands Map.pdf](#)
[Haverhill - Sole Source Aquifers Map.pdf](#)
[Wild Scenic Rivers Worksheet and Attachments.pdf](#)
[MA Airport Listing.pdf](#)
[Explosive-and-Flammable-Facilities-Worksheet.docx](#)
[Noise Worksheet and Attachments.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	Flood Insurance
	Each project site will be identified on a Federal Emergency Management Agency Flood Insurance Rate Map and proof of flood Insurance will be provided if a project over 10,000 dollars lies within a Special Flood Hazard Area. The flood map will be attached to each Tier 2 environmental review. When required, proof of insurance will also be attached to the Tier 2 environmental review.
2	Contamination and Toxic Substances

	<p>The federal NEPAssist database will be utilized to screen each project for potential risk of exposure to Uncontained Contaminants, Toxics, and other Hazardous Substances that could impact the health and safety of residents. Project site locations found to have such risk will be further evaluated to determine an appropriate course of action. Any home constructed before 1978 where painted surfaces will be disturbed will be tested, treated, and cleared of LEAD BASED PAINT hazards, according to the grant Notice of Funding Opportunity or the Lead Safe Housing Rule, whichever is more stringent. In some cases, projects may be rejected, depending on the nature and degree of contamination and relative risk. The concentration of RADON GAS in buildings must be considered per HUD policy effective April 11, 2024. Mitigation will be required if radon concentration is 4 picocuries per liter or greater. We will follow HUD policy when choosing a method to consider radon gas concentration in project homes. Results of the consideration will be included in each Tier 2 environmental review.</p>
3	<p>Historic Preservation</p> <p>All homes built more than 50 years ago will be reviewed by the Massachusetts Historic Commission to establish whether the home is historic or a contributing element to a historic district. All homes identified as historic, in accordance with Section 106 of the National Historic Preservation Act, must achieve a No Adverse Effect or 'No Historic Properties Affected' determination from the State Historic Preservation Officer which may require necessary changes to a scope of work. Projects that cannot achieve a No Adverse Effect or 'No Historic Properties Affected' determination will be rejected from the list of prospective project sites.</p>
4	<p>Wetlands Protection</p> <p>Each site will be evaluated against local wetlands maps and zones in order to protect critical wetlands in the community.</p>

Supporting documentation

[Tier II Part 50-58 Tier 2 with Instructions_March 2024.docx](#)

APPENDIX A: Site Specific Reviews