

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

Project Information

Project Name: Trail-Replacement-and-Improvement-Project---E.-215-Street

HEROS Number: 900000010492147

Start Date: 08/21/2025

Responsible Entity (RE): EUCLID, 585 E 222nd St Euclid OH, 44123

RE Preparer: Edward Chenock, Jr.

State / Local Identifier: City of Euclid

Certifying Officer: Patrick Grogan-Myers

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.

Project Location: 585 E 222nd St, Euclid, OH 44123

Additional Location Information:

Euclid City Hall - Representative Address 585 E. 222 Street Euclid, OH 44123 The aforementioned pedestrian path is located at a small parcel that meanders Naumann Avenue, Arbor Avenue, Trebec Avenue, Carol Drive, and Milan Drive, then continues to just before Goller Avenue, and veers at a 90-degrees and continues to E. 216 Street and terminates at E. 218 Street immediately before Imani Way. The new path will be extended to provide expanded and improved access for pedestrians, and bicyclists, especially students enrolled at nearby schools.

Direct Comments to: City of Euclid Department of Planning and Development,
Division of Community Development (ATTN: Edward Chenock,
Jr.) - 585 E. 222 Street, Euclid, OH 44123

Email: echenock@cityofeuclid.com

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

The City of Euclid will remove an existing pedestrian path located between Naumann Avenue at E. 215 Street, that terminates at Milan Drive and E. 216 Street. It will be replaced with a wider multipurpose path for pedestrian and bicycling, with an extension to Goller Avenue, just south of Milan Drive. Ground disturbance will occur at this site due to the proposed construction of the new extension of the path, and the redesign of the path replacing the much narrower and existing path. Safety features, such as bollards will be installed to prevent unauthorized motor vehicles to use the path. The site is already owned by the City of Euclid, and the existing path is currently used by students who are enrolled at nearby Pinnacle Academy, Euclid Middle School, and Euclid High School (all on E. 222 Street), and Arbor Elementary School (on Arbor Avenue). This project seeks to improve the access to school with the widened path.

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

The purpose of the expanded and improved trail will be to allow for greater access for pedestrians, bicyclists, and school commuters traversing on foot or via bicycle to access three schools that are all within walking distance of the path. The extended trail connecting to Goller Avenue will extend access to residents living on Goller Avenue to provide a convenient entrance to the path.

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

The existing path is too narrow, and the asphalt and cement sections are spalled, cracked, and deteriorated. Tree roots have grown to create hazards not suitable for pedestrians and bicycles traversing the current path. Also, residents on Goller Avenue cannot sufficiently access the path, as they need to traverse up Carol or Milan Drive.

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

[CutSheet_E215StreetTrail_EuclidOH.pdf](#)

[E215_20250710_GPD_Prelim_Trail_Concept_Alt_NoPvtImpact.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:

[SignedEA_E215StreetTrail_EuclidOH.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
B-25-MC-390006	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$5,000.00

**Estimated Total HUD Funded, \$165,000.00
Assisted or Insured Amount:**

**Estimated Total Project Cost [24 CFR 58.2 (a) \$205,000.00
(5)]:**

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)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<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. The project location is not within 2,500 feet of the end of runways at Cleveland Hopkins International Airport, Burke Lakefront Airport, or the Cuyahoga County Airport (Clear Zone). There are no military airfields in Cuyahoga County or adjacent to Cuyahoga County (Accident Potential Zone). Military Airfield There are eight military airfields in the State of Ohio. The three military airfields nearest to Cuyahoga County are AAF Akron-Canton (North Canton, Ohio - about 45 miles), ARS Youngstown (Vienna, Ohio - about 60 miles), and ANGB Mansfield Lahm (Mansfield, Ohio - about 75 miles). Source: www.globemaster.de/index.html</p> <p>Civilian Airport There are three civilian airports in Cuyahoga County, Ohio: Burke Lakefront Airport, Cleveland Hopkins International Airport (both in neighboring Cleveland); and the Cuyahoga County Airport (in neighboring Richmond Heights). For the project location, the distance from the end of an airport runway to the nearest point at the project location is as follows: Burke Lakefront Airport - approximately 9.87 miles Cleveland Hopkins International Airport - approximately 22.11 miles Cuyahoga</p>

		<p>County Airport - approximately 2.84 miles Cuyahoga County Airport: This airport is utilized by private and charter aircraft for business and leisure flying. The small aircraft using this airport does not create a noise issue, even if it is less than five miles from the project location. Burke Lakefront Airport: This airport utilized by private and charter aircraft for business and leisure flying. The small aircraft using the airport does not create a noise issue. HUD considers noise to be an environmental issue at levels of 65 decibels or higher. The 65-decibel noise contour is wholly contained within airport property (Burke Lakefront Airport Environmental Assessment, Landrum & Brown, September, 2012, Exhibit 5-1 following page 5-16). Cleveland Hopkins International Airport: This airport is the primary commercial airport in the region. The airport has a pair of main runways oriented in a northeast-southwest direction, plus a shorter runway oriented in an east-west direction. HUD considers noise to be an environmental issue at levels of 65 decibels or higher. The 65-decibel noise contour is wholly contained within airport property, except for a small area to the southwest in an uninhabited river valley, and a small area to the northwest consisting of the airport rental car facility, industrial land, a park, and a low-rise public housing complex. These areas to the northeast of the airport that were subject to high noise levels have completed a federal process that resulted in the purchase and demolition of residential properties, the sound insulation of some properties, and new construction incorporating noise attenuation measures (Cleveland Hopkins International Airport, Noise</p>
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		Exposure Map, approved by FAA 2012, available in Noise Compatibility quarterly reports available on the airport website). Therefore, aircraft noise will not be an issue at the project location. Sources: www.faa.gov/airports/airport_safety/airportdata_5010/ ; http://www.clenoisestudy.com/maps-reports.html Attachment: Cuyahoga County Airport Runway Buffer Zone and City of Euclid, Ohio Location, Prepared 2014
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	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. There are no units of the Coastal Barrier Resources System in Cuyahoga County, where the City of Euclid is located. U.S. Fish & Wildlife Service, Coastal Barrier Resources Act. http://www.fws.gov/cbra/Maps/index.html Attached: CBRS Units, Lake Erie Shoreline, State of Ohio
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. Attached: Flood Insurance Rate Map, December 3, 2010; Community Panel 39035C0084E; Zone X. FEMA Flood Map Service Center, http://msc.fema.gov/portal
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in

		<p>compliance with the Clean Air Act. The U.S. Environmental Protection Agency (U.S. EPA) sets air pollution standards pursuant to the Clean Air Act, which are revised periodically. Metropolitan areas that fail to meet these standards may be designated as "nonattainment areas." When U.S. EPA revises its air pollution standards and designates a region as a nonattainment area, the state is required to submit a State Implementation Plan (SIP) with local input. SIPs outline control strategies to reduce air pollution in nonattainment areas. National Ambient Air Quality Standards (NAAQS) 8-hour Ozone Standard (0.08ppm) Ozone is a colorless gas formed by sunlight and the products of combustion, which causes lung irritation and can worsen existing respiratory conditions. The U.S. EPA designated Cuyahoga County and neighboring counties as a marginal nonattainment area for the 2015 8-hour ozone standard. In accordance with the Clean Air Act (42 USC Part D), the Ohio EPA, along with local input, has submitted a State Implementation Plan (SIP) to the U.S. EPA that outlines how the region will meet the standard. 24-hour Particulate Matter (PM2.5) PM2.5 refers to particulate matter of less than 25 micrometers in diameter. It is a component of sooty air pollution, caused by motor vehicles, fuel combustion, and coal-fired power plants. The federal Clean Air Act requires states to take steps to control fine particle pollution, which may include stricter controls on industrial facilities and transportation-related sources. On December 14, 2012, the U.S. EPA strengthened the 24-hour and annual NAAQS for fine particles (PM2.5). On December 18, 2014, the</p>
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		<p>U.S. EPA designated Cuyahoga and Lorain Counties as nonattainment areas for the 2012 fine particles standards. The Clean Air Act requires nonattainment areas to complete "New Source Review" requirements. This review is a federal/state permitting program for industrial facilities to ensure that new and modified sources of pollution do not impede progress toward cleaner air. These sources must obtain air pollution "offsets" before they can emit pollution in the nonattainment area. The proposed project will not result in the creation of a new or modified pollution emitting industrial facility. In addition, the proposed project will have a temporary impact on air quality, however the dust that is generated, such as through demolition, is not a significant part of the PM2.5 problem (the particles are generally larger than 25 micrometers). Air quality levels will return to normal after completion of the activity. In addition, diesel fuel powered construction equipment and vehicles will only be in use for a limited time during the project. Finally, there will be no significant increase in vehicular traffic generated by the proposed project, because the project will involve existing buildings, facilities, or improvements in an area that is already fully built-out. Source: https://www.noaca.org/home/showpublisheddocument/32802/638809302829730000</p>
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act. The City of Euclid is located along the Lake Erie</p>

		<p>Shoreline, but all properties between the Shoreline and Lake Shore Boulevard are within the Coastal Zone and are subject to the Coastal Management Plan. The project is not located in proximity to Lake Erie nor within the aforementioned Coastal Zone, nor the Cuyahoga River north of Harvard Avenue in Cleveland. ODNR/Coastal Management Program. http://coastal.ohiodnr.gov/ocmp Maps: https://gis.ohiodnr.gov/MapView/?config=interactiveatlas</p>
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>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. The project is in compliance with contamination and toxic substances requirements. Toxic Waste Landfills - Superfund Sites According to the U.S. EPA, there is only one Superfund site in Cleveland, which has been cleaned up (Chemical & Minerals Reclamation, Inc., 5418 Crescent Avenue, EPA ID: OHD980614549, clean up completed 1982). Therefore, Superfund sites are not an issue within Cuyahoga County. Source: https://www.epa.gov/superfund/search-superfund-sites-where-you-live Solid Waste Landfills There is one active solid waste landfill located in Cuyahoga County. It is a captive industrial landfill on the property of the Arcelor Mittal steel mill, and it is solely for the company's use. No active solid waste landfills are located within 3,000 feet of any site specific project location in Cuyahoga County. Note: The municipal landfill in the City of Brooklyn was closed by the end of 2015. Operations</p>

		<p>ceased in 2010. (http://www.cleveland.com/brooklyn/index.ssf/2014/01/brooklyn_landfill_to_permanent.html) Source: http://cuyahogarecycles.org/solid_waste_management_plan, Section III. Inventories. Large Quantity Hazardous Waste Generators Large quantity hazardous waste generators in the vicinity of the site specific project location can be identified through U.S. EPA Envirofacts. If a large quantity hazardous waste generator(s) is identified, the environmental review will need to list the generator(s) and state whether any impact is anticipated at the project location. There are no large quantity hazardous waste generators in the vicinity of the project location. The nearest large quantity hazardous waste generator, Eaton Corporation, is approximately 1.5 miles south of the project location. All waste generated on-site (50.9 tons in 2019), was shipped via approved hazardous waste handlers to approved hazardous waste facilities for processing. Source: https://www.epa.gov/enviro/topic-searches. Search Waste, BR Search. Solid Waste Disposal Solid waste created during project activities work will be recycled or disposed of in accordance with applicable regulations. Underground Storage Tanks Residential fuel storage tanks are typically small home heating oil tanks. They are often no longer in use because a heating system has been converted to another fuel source, such as natural gas. Tanks may be underground, in a crawl space, above ground outdoors, or in a basement. Home heating oil tanks are regulated by the office of the State Fire Marshall. At commercial buildings underground storage tanks had a</p>
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		<p>variety of uses, such as the storage of heating oil or gasoline for vehicles. A facility making vehicle repairs may have used an underground storage tank to store waste oil removed from vehicles. Occasionally, a tank may have been located above ground, either outdoors or inside a building. If an unused underground storage tank is identified on a property, the tank will be removed in accordance with applicable regulations prior to demolition or rehabilitation work at the property. Sources: Ohio Department of Commerce, Bureau of Underground Storage Tanks (BUSTR), at https://www.com.ohio.gov/fire/BUSTRRresources.aspx The proposed project is not anticipated to encounter underground storage tanks. Radon: The project is the replacement of an existing outdoor pedestrian and bicycle path. The project does not involve the construction or rehabilitation of an enclosed structure. Radon will not be an issue.</p>
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project will have 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. According to the U.S. Fish & Wildlife Service's /Environmental Conservation Online System, the Indiana Bat, Northern Long-eared Bat, Kirtland's Warbler, Piping Plover, and Red Knot may be present in Cuyahoga County. Source: http://ecos.fws.gov/ipac/ Indiana Bat (endangered) Habitat for the Indiana Bat includes hardwood forested areas, old fields, grasslands, and wetlands. During winter, the bats cluster together and hibernate in only a few caves in a multi-state area. During summer, the</p>

		<p>bats primarily roost in forested areas in trees with exfoliating bark or cavities. Sources: http://ecos.fws.gov/ecp0/profile/speciesProfile?sId=5949; http://en.wikipedia.org/wiki/Indiana_bat Northern Long-eared Bat (threatened) The primary summer habitat for the Northern Long-eared Bat is forest, because they typically roost in cavities or crevices of live or dead hardwood trees. During winter, the bats cluster together and hibernate in caves or mines. Sources: http://ecos.fws.gov/ecp0/profile/speciesProfile?sId=9045; https://en.wikipedia.org/wiki/Northern_long-eared_bat_(myotis) Kirtland's Warbler (endangered) Although previously a nesting species in Ohio, this bird is now only a migrant species. The nesting area is primarily the northern part of Michigan's Lower Peninsula, along with the Upper Peninsula, Wisconsin, and Canada. They nest only in young jack pine forests growing in a specific type of sandy soil. Sources: http://ecos.fws.gov/ecp0/profile/speciesProfile?sId=8078; https://en.wikipedia.org/wiki/Kirtland's_warbler Piping Plover (endangered) Although previously a nesting species in Ohio, this bird is now only a migrant species. Their preferred habitats are open sandy beaches or rocky shores, often in high, dry sections away from water. Sources: http://ecos.fws.gov/ecp0/profile/speciesProfile?sId=6039; https://en.wikipedia.org/wiki/Piping_plover Red Knot (threatened) The Red Knot is a shorebird that breeds in the far north of Canada, Europe, and Russia. It is a migrant species in Ohio. Sources: http://ecos.fws.gov/ecp0/profile/speciesProfile?sId=6039;</p>
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		<p>sProfile?slid=1864; https://en.wikipedia.org/wiki/Red_knot The project location will be in a fully developed residential area with nearby institutional uses. The project will be limited to the footprint of the existing parcel where the path is located. There are suitable habitats for these species near project location, such as the trees preferred by bats during the summer season. It is anticipated that the project will be completed during daylight hours when these species will not be disturbed. Endangered/ threatened species will not be an issue.</p>
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	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.
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 located in a fully developed residential neighborhood consisting of mostly single-family dwelling units and nearby institutional uses. None of the surrounding land uses is being used for largescale farming or agricultural purposes. A map detailing large-scale farmland and agricultural use within the State of Ohio is attached to this review. Therefore, 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 does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. Please see the Flood Insurance Section to view the appropriate FEMA FIRM Map that includes the location of the project site.

Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input type="checkbox"/> Yes <input type="checkbox"/> No	The project is currently being reviewed by the Ohio History Connection (Ohio State Historic Preservation Office). This Environmental Assessment will be updated once determinations are made by the consulting agency.
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, this project includes no activities that would require further evaluation under HUD's noise regulation. There may be temporary noise produced by heavy equipment necessary for the completion of the project, but it will only be temporary and during working daytime hours. The noise will cease at the end of the workdays, and when the project is complete. Therefore, 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	Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. A map detailing the location of Sole Source Aquifers within Region V of the United States Environmental Protection Agency is attached to this review. Per this map, the City of Euclid is not home to any Sole Source Aquifers. Therefore, 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 nearest NWSRS river is the Chagrin River and is located approximately five (5) miles to the east of the City of Euclid. A map detailing the location of the nearest NWSRS river is attached to this review. 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	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

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.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	This project is suitable due to existing land use zoning, as well as addresses the goals of the 2018 City Master Plan, and the 2023 Bike and Pedestrian Safety Action Plan.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	No impact anticipated in this area.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	3	No safety hazards, but nuisance is possible trespassing and loitering.	No Trespassing signage, and physical designs to prevent loitering will be included in the project.
SOCIOECONOMIC			
Employment and Income Patterns	1	Beneficial impact due to improved access to two nearby commercial corridors - E. 200 Street (0.5 miles to the west) and E. 222 Street (0.2 miles to the east).	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Demographic Character Changes / Displacement	2	No demographic changes or displacement will occur as part of this project.	
Environmental Justice EA Factor	1	Improved opportunities for commuting via walking or bicycling, providing commuters multimodal choices for commuting.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	1	Improved access to nearby Imani Church, Pinnacle Academy, Euclid High School, Euclid Public Library, Euclid City Hall, Memorial Park, and Arbor Elementary School.	
Commercial Facilities (Access and Proximity)	1	Improved access to two nearby commercial corridors - E. 200 Street (0.5 miles to the west) and E. 222 Street (0.2 miles to the east).	
Health Care / Social Services (Access and Capacity)	1	Improved access to social services offered at the nearby schools mentioned in Educational and Cultural Facilities.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	No impact on solid waste disposal and recycling as this is not the construction of a new roadway.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	No impact on existing sewer infrastructure.	
Water Supply (Feasibility and Capacity)	2	No impact on existing water supply.	
Public Safety - Police, Fire and Emergency Medical	1	Improved trail will allow for additional eyes on the neighborhood and access for police and fire to respond effectively from the new trail access at Goller Avenue.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Parks, Open Space and Recreation (Access and Capacity)	1	Improved recreational facility for pedestrians and bicyclists.	
Transportation and Accessibility (Access and Capacity)	1	Improved infrastructure for multimodal commuting choice.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	No impact on unique natural features.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	No impact on vegetation or wildlife.	
Other Factors 1			
Other Factors 2			
CLIMATE AND ENERGY			
Climate Change	2	No impact on climate change.	
Energy Efficiency	1	Impact on energy efficiency with multiple commuting choices.	

Supporting documentation

Additional Studies Performed:

"Bike and Pedestrian Safety Action Plan," Cuyahoga County Planning Commission (2023) "City of Euclid 2018 Master Plan," City of Euclid (2018)

Field Inspection [Optional]: Date and completed by:

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

Cuyahoga Planning Commission; Residents residing on Naumann Avenue, Arbor Avenue, Trebec Avenue, Carol Drive, Milan Drive, Goller Avenue, Miller Avenue, and Imani Way; Pinnacle Academy; GPD Group Engineering; City of Euclid Service Department; City of Euclid Division of Community Development

List of Permits Obtained:

Public Outreach [24 CFR 58.43]:

Public Meeting - August 11, 2025, at site for neighborhood

[E215_20250811_Neighborhood_Mtg_Notes.docx](#)

Cumulative Impact Analysis [24 CFR 58.32]:

The new trail will provide expanded access to pedestrians and bicyclists of all ages accessing low-stress traffic areas, and will provide an enhanced safer route to the nearby schools. Currently, the existing path provides a safe route to the nearby schools, but the path is narrow and is no longer feasible. The expanded and enhanced path will make the commuting experience safer with expanded access of a nearby street just south of the existing path.

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

One of the alternatives was to leave the path intact and to resurface the existing path without changing its size.

No Action Alternative [24 CFR 58.40(e)]

If no action is taken to enhance this path, the existing path will continue to deteriorate. Existing hazards will become increasingly hazardous, which will endanger pedestrians, bicyclists, and students enrolled in the nearby schools who use this path.

Summary of Findings and Conclusions:

The project will be beneficial for pedestrians and bicyclists, and students enrolled at nearby schools, replacing the current and deteriorating path. The adverse impacts may include trespassing on abutting private property and loitering, and the City of Euclid intends to work with private property owners to post No Trespassing signage and to remove objects that may encourage loiterers and criminal activity.

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
Hazards and Nuisances including Site Safety and Site- Generated Noise	No Trespassing signage, and physical designs to prevent loitering will be included in the project.	N/A	No Trespassing signage and physical designs to prevent loitering and criminal activity to be included in the project. Also, safety features will be considered in the future at the project site.	

Project Mitigation Plan

No Trespassing signage and physical designs to prevent loitering and criminal activity to be included in the project. Also, safety features will be considered in the future at the project site.

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. The project location is not within 2,500 feet of the end of runways at Cleveland Hopkins International Airport, Burke Lakefront Airport, or the Cuyahoga County Airport (Clear Zone). There are no military airfields in Cuyahoga County or adjacent to Cuyahoga County (Accident Potential Zone). **Military Airfield** There are eight military airfields in the State of Ohio. The three military airfields nearest to Cuyahoga County are AAF Akron-Canton (North Canton, Ohio - about 45 miles), ARS Youngstown (Vienna, Ohio - about 60 miles), and ANGB Mansfield Lahm (Mansfield, Ohio - about 75 miles). Source: www.globemaster.de/index.html **Civilian Airport** There are three civilian airports in Cuyahoga County, Ohio: Burke Lakefront Airport, Cleveland Hopkins International Airport (both in neighboring Cleveland); and the Cuyahoga County Airport (in neighboring Richmond Heights). For the project location, the distance from the end of an airport runway to the nearest point at the project location is as follows: Burke Lakefront Airport - approximately 9.87 miles Cleveland Hopkins International Airport - approximately 22.11 miles Cuyahoga County Airport -

approximately 2.84 miles Cuyahoga County Airport: This airport is utilized by private and charter aircraft for business and leisure flying. The small aircraft using this airport does not create a noise issue, even if it is less than five miles from the project location. Burke Lakefront Airport: This airport utilized by private and charter aircraft for business and leisure flying. The small aircraft using the airport does not create a noise issue. HUD considers noise to be an environmental issue at levels of 65 decibels or higher. The 65-decibel noise contour is wholly contained within airport property (Burke Lakefront Airport Environmental Assessment, Landrum & Brown, September, 2012, Exhibit 5-1 following page 5-16). Cleveland Hopkins International Airport: This airport is the primary commercial airport in the region. The airport has a pair of main runways oriented in a northeast-southwest direction, plus a shorter runway oriented in an east-west direction. HUD considers noise to be an environmental issue at levels of 65 decibels or higher. The 65-decibel noise contour is wholly contained within airport property, except for a small area to the southwest in an uninhabited river valley, and a small area to the northwest consisting of the airport rental car facility, industrial land, a park, and a low-rise public housing complex. These areas to the northeast of the airport that were subject to high noise levels have completed a federal process that resulted in the purchase and demolition of residential properties, the sound insulation of some properties, and new construction incorporating noise attenuation measures (Cleveland Hopkins International Airport, Noise Exposure Map, approved by FAA 2012, available in Noise Compatibility quarterly reports available on the airport website). Therefore, aircraft noise will not be an issue at the project location. Sources: www.faa.gov/airports/airport_safety/airportdata_5010/; <http://www.clenoisestudy.com/maps-reports.html> Attachment: Cuyahoga County Airport Runway Buffer Zone and City of Euclid, Ohio Location, Prepared 2014

Supporting documentation

[Euclid_Airport_ClearZone.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. There are no units of the Coastal Barrier Resources System in Cuyahoga County, where the City of Euclid is located. U.S. Fish & Wildlife Service, Coastal Barrier Resources Act. <http://www.fws.gov/cbra/Maps/index.html> Attached: CBRS Units, Lake Erie Shoreline, State of Ohio

Supporting documentation

[Ohio - Coastal Barrier Resources System.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:

[39035C0084E12032010.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

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

Yes

4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?

Yes

✓ No

Screen Summary

Compliance Determination

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. Attached: Flood Insurance Rate Map, December 3, 2010; Community Panel 39035C0084E; Zone X. FEMA Flood Map Service Center, <http://msc.fema.gov/portal>

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):

☒ Carbon Monoxide

☐ Lead

☐ Nitrogen dioxide

- Sulfur dioxide
- ✓ Ozone
- ✓ Particulate Matter, <2.5 microns
- Particulate Matter, <10 microns

3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above

Carbon monoxide	9.00	ppm (parts per million)
Ozone	0.08	ppb (parts per million)
Particulate Matter, <2.5 microns	35.00	µg/m3 (micrograms per cubic meter of air)

Provide your source used to determine levels here:

<https://www.noaca.org/home/showpublisheddocument/32802/638809302829730000>

4. Determine the estimated emissions levels of your project. Will your project exceed any of the *de minimis* or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

- ✓ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

Enter the estimate emission levels:

Carbon monoxide	ppm (parts per million)
Ozone	ppb (parts per million)
Particulate Matter, <2.5 microns	µg/m3 (micrograms per cubic meter of air)

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

Yes, the project exceeds *de minimis* emissions levels or screening levels.

Screen Summary

Compliance Determination

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. The U.S. Environmental Protection Agency (U.S. EPA) sets air pollution standards pursuant to the Clean Air Act, which are revised periodically. Metropolitan areas that fail to meet these standards may be designated as "nonattainment areas." When U.S. EPA revises its air pollution standards and designates a region as a nonattainment area, the state is required to submit a State Implementation Plan (SIP) with local input. SIPs outline control strategies to reduce air pollution in nonattainment areas. National Ambient Air Quality Standards (NAAQS) 8-hour Ozone Standard (0.08ppm) Ozone is a colorless gas formed by sunlight and the products of combustion, which causes lung irritation and can worsen existing respiratory conditions. The U.S. EPA designated Cuyahoga County and neighboring counties as a marginal nonattainment area for the 2015 8-hour ozone standard. In accordance with the Clean Air Act (42 USC Part D), the Ohio EPA, along with local input, has submitted a State Implementation Plan (SIP) to the U.S. EPA that outlines how the region will meet the standard. 24-hour Particulate Matter (PM_{2.5}) PM_{2.5} refers to particulate matter of less than 25 micrometers in diameter. It is a component of sooty air pollution, caused by motor vehicles, fuel combustion, and coal-fired power plants. The federal Clean Air Act requires states to take steps to control fine particle pollution, which may include stricter controls on industrial facilities and transportation-related sources. On December 14, 2012, the U.S. EPA strengthened the 24-hour and annual NAAQS for fine particles (PM_{2.5}). On December 18, 2014, the U.S. EPA designated Cuyahoga and Lorain Counties as nonattainment areas for the 2012 fine particles standards. The Clean Air Act requires nonattainment areas to complete "New Source Review" requirements. This review is a federal/state permitting program for industrial facilities to ensure that new and modified sources of pollution do not impede progress toward cleaner air. These sources must obtain air pollution "offsets" before they can emit pollution in the nonattainment area. The proposed project will not result in the creation of a new or modified pollution emitting industrial facility. In addition, the proposed project will have a temporary impact on air quality, however the dust that is generated, such as through demolition, is not a significant part of the PM_{2.5} problem (the particles are generally larger than 25 micrometers). Air quality levels will return to normal after completion of the activity. In addition, diesel fuel powered construction equipment and vehicles will only be in use for a limited time during the project. Finally, there will be no significant increase in vehicular traffic generated by the proposed project, because the project will involve existing buildings, facilities, or improvements in an area that is already fully built-out. Source:

<https://www.noaca.org/home/showpublisheddocument/32802/638809302829730000>

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

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 is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act. The City of Euclid is located along the Lake Erie Shoreline, but all properties between the Shoreline and Lake Shore Boulevard are within the Coastal Zone and are subject to the Coastal Management Plan. The project is not located in proximity to Lake Erie nor within the aforementioned Coastal Zone, nor the Cuyahoga River north of Harvard Avenue in Cleveland. ODNR/Coastal Management Program.
<http://coastal.ohiodnr.gov/ocmp> Maps:
<https://gis.ohiodnr.gov/MapView/?config=interactiveatlas>

Supporting documentation

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:

The project is located in a fully developed area consisting of mostly single-family dwelling units and institutional uses. None of the surrounding land uses facilitate toxic, hazardous, or radioactive substances.

Yes

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

** Utilize EPA's Enviromapper, NEPAAssist, 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:

The project is the replacement of an existing outdoor pedestrian and bicycle path. The project does not involve the construction or rehabilitation of an enclosed structure. Radon will not be an issue.

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.

Screen Summary

Compliance Determination

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. The project is in compliance with contamination and toxic substances requirements. Toxic Waste Landfills - Superfund Sites According to the U.S. EPA, there is only one Superfund site in Cleveland, which has been cleaned up (Chemical & Minerals Reclamation, Inc., 5418 Crescent Avenue, EPA ID: OHD980614549, clean up completed 1982). Therefore, Superfund sites are not an issue within Cuyahoga County. Source: <https://www.epa.gov/superfund/search-superfund-sites-where-you-live> Solid Waste Landfills There is one active solid waste landfill located in Cuyahoga County. It is a captive industrial landfill on the property of the Arcelor Mittal steel mill, and it is solely for the company's use. No active solid waste landfills are located within 3,000 feet of any site specific project location in Cuyahoga County. Note: The municipal landfill in the City of Brooklyn was closed by the end of 2015. Operations ceased in 2010.

(http://www.cleveland.com/brooklyn/index.ssf/2014/01/brooklyn_landfill_to_perma_nent.html) Source: http://cuyahogarecycles.org/solid_waste_management_plan, Section III. Inventories. Large Quantity Hazardous Waste Generators Large quantity hazardous waste generators in the vicinity of the site specific project location can be identified through U.S. EPA Envirofacts. If a large quantity hazardous waste generator(s) is identified, the environmental review will need to list the generator(s) and state whether any impact is anticipated at the project location. There are no large quantity hazardous waste generators in the vicinity of the project location. The nearest large quantity hazardous waste generator, Eaton Corporation, is approximately 1.5 miles south of the project location. All waste generated on-site (50.9 tons in 2019), was shipped via approved hazardous waste handlers to approved hazardous waste facilities for processing. Source:

<https://www.epa.gov/enviro/topic-searches>. Search Waste, BR Search. Solid Waste Disposal Solid waste created during project activities work will be recycled or disposed of in accordance with applicable regulations. Underground Storage Tanks Residential fuel storage tanks are typically small home heating oil tanks. They are often no longer in use because a heating system has been converted to another fuel

source, such as natural gas. Tanks may be underground, in a crawl space, above ground outdoors, or in a basement. Home heating oil tanks are regulated by the office of the State Fire Marshall. At commercial buildings underground storage tanks had a variety of uses, such as the storage of heating oil or gasoline for vehicles. A facility making vehicle repairs may have used an underground storage tank to store waste oil removed from vehicles. Occasionally, a tank may have been located above ground, either outdoors or inside a building. If an unused underground storage tank is identified on a property, the tank will be removed in accordance with applicable regulations prior to demolition or rehabilitation work at the property. Sources: Ohio Department of Commerce, Bureau of Underground Storage Tanks (BUSTR), at <https://www.com.ohio.gov/fire/BUSTRResources.aspx> The proposed project is not anticipated to encounter underground storage tanks. Radon: The project is the replacement of an existing outdoor pedestrian and bicycle path. The project does not involve the construction or rehabilitation of an enclosed structure. Radon will not be an issue.

Supporting documentation

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

Explain your determination:

The project will occur during daytime hours, when most endangered species are in hibernation. Also, even though the site is a wooded area, it's not densely wooded enough to disturb hibernating endangered species.

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

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

Screen Summary

Compliance Determination

This project will have 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. According to the U.S. Fish & Wildlife Service's /Environmental Conservation Online System, the Indiana Bat, Northern Long-eared Bat, Kirtland's Warbler, Piping Plover, and Red Knot may be present in Cuyahoga County. Source: <http://ecos.fws.gov/ipac/> Indiana Bat (endangered) Habitat for the Indiana Bat includes hardwood forested areas, old fields, grasslands, and wetlands. During winter, the bats cluster together and hibernate in only a few caves in a multi-state area. During summer, the bats primarily roost in forested areas in trees with exfoliating bark or cavities. Sources: <http://ecos.fws.gov/ecp0/profile/speciesProfile?sId=5949>; http://en.wikipedia.org/wiki/Indiana_bat Northern Long-eared Bat (threatened) The primary summer habitat for the Northern Long-eared Bat is forest, because they typically roost in cavities or crevices of live or dead hardwood trees. During winter, the bats cluster together and hibernate in caves or mines. Sources: <http://ecos.fws.gov/ecp0/profile/speciesProfile?sId=9045>; [https://en.wikipedia.org/wiki/Northern_long-eared_bat_\(myotis\)](https://en.wikipedia.org/wiki/Northern_long-eared_bat_(myotis)) Kirtland's Warbler (endangered) Although previously a nesting species in Ohio, this bird is now only a migrant species. The nesting area is primarily the northern part of Michigan's Lower Peninsula, along with the Upper Peninsula, Wisconsin, and Canada. They nest only in young jack pine forests growing in a specific type of sandy soil. Sources: <http://ecos.fws.gov/ecp0/profile/speciesProfile?sId=8078>; https://en.wikipedia.org/wiki/Kirtland's_warbler Piping Plover (endangered) Although previously a nesting species in Ohio, this bird is now only a migrant species. Their preferred habitats are open sandy beaches or rocky shores, often in high, dry sections away from water. Sources: <http://ecos.fws.gov/ecp0/profile/speciesProfile?sId=6039>; https://en.wikipedia.org/wiki/Piping_plover Red Knot (threatened) The Red Knot is a shorebird that breeds in the far north of Canada, Europe, and Russia. It is a migrant species in Ohio. Sources: <http://ecos.fws.gov/ecp0/profile/speciesProfile?sId=1864>; https://en.wikipedia.org/wiki/Red_knot The project location will be in a fully developed residential area with nearby institutional uses. The project will be limited to the footprint of the existing parcel where the path is located. There are suitable habitats for these species near project location, such as the trees preferred by bats during the summer season. It is anticipated that the project will be completed during daylight hours when these species will not be disturbed. Endangered/ threatened species will not be an issue.

Supporting documentation

Are formal compliance steps or mitigation required?

Trail-Replacement-and-
Improvement-Project---E.-
215-Street

Euclid, OH

900000010492147

- 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:

Not applicable to this project.

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 located in a fully developed residential neighborhood consisting of mostly single-family dwelling units and nearby institutional uses. None of the surrounding land uses is being used for largescale farming or agricultural purposes. A map detailing large-scale farmland and agricultural use within the State of Ohio is attached to this review. Therefore, the project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[Ohio_Farmland_Map.pdf](#)

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

Screen Summary

Compliance Determination

This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. Please see the Flood Insurance Section to view the appropriate FEMA FIRM Map that includes the location of the project site.

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 (a). Either upload the PA below or provide a link to it here:

Upload exemption(s) below or copy and paste all applicable text here:

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

Screen Summary

Compliance Determination

The project is currently being reviewed by the Ohio History Connection (Ohio State Historic Preservation Office). This Environmental Assessment will be updated once determinations are made by the consulting agency.

Trail-Replacement-and-
Improvement-Project---E.-
215-Street

Euclid, OH

900000010492147

Supporting documentation

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, this project includes no activities that would require further evaluation under HUD's noise regulation. There may be temporary noise produced by heavy equipment necessary for the completion of the project, but it will only be temporary and during working daytime hours. The noise will cease at the end of the workdays, and when the project is complete. Therefore, the project is in compliance with HUD's Noise regulation.

Supporting documentation

Trail-Replacement-and-
Improvement-Project---E.-
215-Street

Euclid, OH

900000010492147

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

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

No

Screen Summary

Compliance Determination

Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. A map detailing the location of Sole Source Aquifers within Region V of the United States Environmental Protection Agency is attached to this review. Per this map, the City of Euclid is not home to any Sole Source Aquifers. Therefore, the project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[USEPA_RegionV_Aquifers.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

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 nearest NWSRS river is the Chagrin River and is located approximately five (5) miles to the east of the City of Euclid. A map detailing the location of the nearest NWSRS river is attached to this review. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Euclid NRI Map.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

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

Screen Summary

Compliance Determination

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No