

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

**Project Information**

**Project Name:** Pocono-Family-YMCA

**HEROS Number:** 900000010443443

**Start Date:** 12/13/2024

**Responsible Entity (RE):** Borough Of Stroudsburg, 700 Sarah Street Stroudsburg PA,  
18360

**RE Preparer:** TBD

**State / Local Identifier:**

**Certifying Officer:** TBD

**Grant Recipient (if different than Responsible Entity):** Pocono Family YMCA

**Point of Contact:** Scott Peckins

**Consultant (if applicable):** Partner Engineering and Science, Inc.

**Point of Contact:** Allyson Shaw

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:** 805, 809, and 823 Main Street, Stroudsburg, PA 18360

**Additional Location Information:**

N/A

**Direct Comments to:** lkopp@stroudsburgboro.com  
700 Sarah Street  
Stroudsburg, PA 18360

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

The subject property is currently developed with the Young Men's Christian Association (YMCA) facility of Monroe County at a property that was originally developed residentially in 1914. Renovations to the structure were conducted between that time and first operated as a YMCA facility in 1916. The main portion of the building was constructed 1953. Current onsite operations consist of fitness classes, childcare, personal training, swimming, and other recreational/personal development activities. The proposed work would begin with the demolition of the current building on lot 1 (823 Main Street). Followed by a renovation of the existing building on lot 2 (809 Main Street). Ending with a combination of demolition, renovation, and a partial rebuild of the existing building on lot 3 (805 Main Street). The demolition will include the removal of the existing donut shop and expansion of the existing YMCA facility. A Phase I Environmental Site Assessment was completed for the subject property on July 30, 2024. This assessment has revealed no evidence of recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), or historical recognized environmental conditions (HRECs) in connection with the subject property. The proposed action is anticipated to receive financing with Community Project Funding Grant through HUD's Economic Development Initiative.

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

The subject property is seeking financing through HUD for the construction and redevelopment of an existing YMCA recreational facility. The total project area is 1.83 acres. Total land disturbance consists of 1.40 acres. The YMCA has developed a programming document with the help of Gro, that responds to the identified needs of the community to build an inclusive facility in Stroudsburg. The current site improvements do not properly accommodate the growing needs of the surrounding community due to the age, size, and lack of ADA-compliance of the building; life safety concerns are also present due to the lack of automatic fire suppression systems installed in the building; and the current pool leaks. This project is projected to meet the YMCA's need for a facility for not only maintaining its current programming but to also grow and be sustainable into the future. This project aligns with Community

Development Objectives outlined in the Monroe County Comprehensive Plan Update, 2030, dated December 2014.

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

Stroudsburg is located in the U.S. state of Pennsylvania. It is located in Monroe County and is within the Poconos region. The borough of Stroudsburg is located approximately 45 minutes from the metro area of Scranton. According to East Stroudsburg University economic reports, overall economic growth is rebounding, following the downturn of the 2020 and 2021 pandemic years. The proposed project will conform and support the existing conditions and trends in the region.

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

[Civil Plan Set.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:**

[Signed HUD FONSI PAGE.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
12345	Community Planning and Development (CPD)	Community Project Funding (CPF) Grants	\$1,000,000.00

**Estimated Total HUD Funded, Assisted or Insured Amount:** \$1,000,000.00

**This project anticipates the use of funds or assistance from another federal agency in addition to HUD in the form of:**

**Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** \$21,000,000.00

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

<b>Compliance Factors:</b> 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)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The closest active runway is the Blirstown Airport, located approximately 10.42-miles to the east of the subject property. The project is in compliance with Airport Hazards requirements.
<b>Coastal Barrier Resources Act</b> 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 located in a state that does not contain CBRS units. The closest coastal barrier is located approximately 80 miles to the southeast of the subject property. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
<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]	<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). According to Community Panel Number 42089C0427E, dated May 2, 2013, the subject property is not located within a Special Flood Hazard Area (SFHA). The subject property appears to be located in Unshaded Flood Zone X, defined as

		<p>"areas determined to be outside the 0.2% annual chance floodplain". Nonetheless, based on the review of the online NFIP information, the city is an active participant within the NFIP. The community identification number for the city is CID is 420694#. The project is in compliance with flood insurance requirements.</p>
<p><b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b></p>		
<p><b>Air Quality</b> Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project's county or air quality management district is in attainment status for all criteria pollutants. Review of the online EPA air quality information for Pennsylvania through the EPA State Implementation Plan (SIP) indicated the designated areas for SIP requirements does not include the subject property. As such, nonattainment pollutant areas are not considered a concern for the subject property. The project is in compliance with the Clean Air Act.</p>
<p><b>Coastal Zone Management Act</b> Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<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.</p>
<p><b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) &amp; 58.5(i)(2)]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Vapor Encroachment Screening. 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 exempt from radon consideration. A Phase I Environmental Site Assessment was completed for the subject property on July 30, 2024. This assessment revealed no evidence of recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), or historical recognized environmental conditions</p>

		<p>(HRECs) in connection with the subject property. According to online information, there are no natural gas or petroleum wells located on or adjacent to the subject property. The subject property is not located within the fall distance of a high voltage power transmission tower, or other tower. Natural hazards include faults/fractures, cliffs, bluffs, crevices, slope failure from rains, unprotected water bodies, fire hazard materials, wind/sandstorm concerns, poisonous plants/insects/animals, or hazardous terrain features. No natural or built hazards were identified during the field reconnaissance. The project is in compliance with contamination and toxic substances requirements. The project is in compliance with contamination and toxic substances requirements.</p>
<p><b>Endangered Species Act</b> 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 because there are no listed species or designated critical habitats in the action area. A summary of the IPaC database indicates three endangered, one proposed threatened, one candidate species; and no critical habitats are within the project area. A review of the database and species habitat information indicates no suitable habitat is present for the subject property at this time. The subject property is currently developed with an existing property for commercial use. As such, there is no potential for disturbance or effect to the listed species. The subject property consists of existing commercial buildings and a parking lot with limited landscaping with plans for redevelopment. The current vegetation of the subject property consists of manicured lawns, hedges, and some trees. A detailed writeup of species</p>

		<p>habitats and potential to occur on the subject property is attached. Based on the review of USFWS Official Species List of threatened and endangered species, it is Partner's opinion that a No Effect Determination is applicable for the subject property and no additional action is warranted at this time. This project is in compliance with the Endangered Species Act.</p>
<p><b>Explosive and Flammable Hazards</b> Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the project description the project includes no activities that would require further evaluation under this section. There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. Based on the site reconnaissance, no existing industrial facilities handling explosive or fire-prone materials such as liquid propane, gasoline, diesel fuel of 100-gallons or larger are adjacent to and/or visible from the subject property, including from online satellite imagery (when available). The project is in compliance with explosive and flammable hazard requirements.</p>
<p><b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The subject property consists of existing commercial buildings with plans for new constructing and improving the existing YMCA buildings; and because the project does not convert agricultural land to non-agricultural land, the Federal Farmland Protection Policy Act (FPPA) is not triggered. Additionally, according to the USDA mapped soil information, the onsite soils are rated as "All areas are prime farmland". However, according to the Geography Division, U.S. Census Bureau map, the subject property is located within an urban area. As such, no additional action regarding FPPA is warranted at</p>

		<p>this time. The project is in compliance with the Farmland Protection Policy Act.</p>
<p><b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not occur in the FFRMS floodplain. This project does not occur in the FFRMS floodplain. According to Community Panel Number 42089C0427E, dated May 2, 2013, the subject property is not located within a Special Flood Hazard Area (SFHA). The subject property appears to be located in Flood Zone X (unshaded), defined as "areas determined to be outside the 0.2% annual chance floodplain". No preliminary and/or pending FEMA FIRM is available for the subject property. Per Executive Order (EO) 11988, no additional action is warranted as the subject property is considered to be a non-critical action site. However, HUD adopted FEMA's Federal Flood Risk Management Standard (FFRMS), which became effective May 23, 2024, with a compliance date of June 24, 2024. (Of note, for FHA and MAP-guide compliant programs / projects, HUD has extended the compliance deadline to Jan. 1, 2025). Per EO 13690 for FFRMS, the following methods were assessed: Climate Informed Science Approach (CISA) - The Federal Flood Standard Support Tool (FFSST) was utilized to determine the CISA flood information and elevation(s). The FFSST is currently in BETA form and has not been officially adopted by HUD. The tool is utilized for information purposes only as of the issuance of this report. Nonetheless, the subject property was not depicted in the FFSST floodplain. In addition, the subject property was not depicted within a flood area on the Pennsylvania Flood Risk Mapper website. No other readily available local floodplain maps were reviewed. 0.2 Percent Annual Chance of Flooding (PFA) (0.2 PFA) - Based on the FEMA FIRM, the subject</p>



		<p>property area is not located within the Flood Zone X (shaded), outside the 500-year floodplain/0.2 annual chance flood. Because the subject property is not located within Flood Zone X (shaded) and outside the 500-year floodplain/0.2 annual chance flood, PFA is not an applicable FFRMS method. Freeboard Value Approach (FVA) - Based on the FEMA FIRM, the subject property is situated approximately 160-feet east of the nearest SFHA, which is listed as a Flood Zone AE. The base flood elevation (BFE) of the SFHA associated with Pocono Creek is listed at an elevation of 424.61-feet. Per FFRMS, 2-feet of freeboard is added vertically and horizontally to the BFE. As such, the FFRMS floodplain elevation is 426.61-feet. The difference in elevation beginning from the FFRMS floodplain to the subject property rises approximately seven feet. Based on the FVA, the subject property is not located within the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.</p>
<p><b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The proposed project involves a 1.83-acre existing site. Ground disturbance will include 1.40 acres of this site. The proposed project was submitted to SHPO, May 10, 2023, to determine if historic or archaeological resources would be affected if the proposal was implemented. The PA SHPO responded on July 3, 2023 (ER Project # 2023PR02153) indicating that there are no above ground concerns and no archaeological concerns. In addition, the USDA initiated consultation with THPO agencies that may have a potential interest with the proposed</p>

		<p>project including the Delaware Nation of Oklahoma, the Delaware Tribe of Indians, the Seneca-Cayugao Nation, and the Stockbridge Munsee Tribe. Consultation with these tribes occurred in October 2023. No responses were reportedly received in the mandatory 30-day response time. The project is in compliance with Section 106.</p>
<p><b>Noise Abatement and Control</b> Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The proposed project includes new construction of an expansion to an existing community center facility. Based on a review, it appears that there may be a potential new playground area (noise sensitive use - outdoor gathering area) per the attached civil plan set (page 139 - attached in the Project Summary of this HEROS report). If this playground is expected to be exterior, and not limited to the confines of a building, then a Noise Assessment will be warranted. Partner completed a preliminary noise assessment for the subject property and identified the following major roadways within 1,000 feet of the subject property: Main Street along the Northern property boundary; zero railroads within a 3,000-ft radius; and four municipal airports were identified within a 15-mile radius boundary. The municipal airports identified are as follows: Stroudsburg-Pocono Airport (permanently closed; 4.0-miles from subject property), Blairstown Airport (10.42-miles), Rocky Hill Airport (12.03-miles), and Pocono Mountains Municipal Airport (14.24-miles).</p>
<p><b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. Based on a review of the Designated Sole Source Aquifers National Map, published by the USEPA, the subject property is not located in a sole source aquifer recharge</p>

		<p>area. The water supply for the subject property is tied into the public utilities; therefore, it does not impact existing groundwater conditions. The project is in compliance with Sole Source Aquifer requirements.</p>
<p><b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project will not impact on- or off-site wetlands. According to the U.S. Fish &amp; Wildlife Service National Wetlands Inventory website, there are no federally regulated wetlands located on the subject or adjoining property. The project is in compliance with Executive Order 11990.</p>
<p><b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is not within proximity of a NWSRS river. The subject property is not located within a one-mile radius of a designated Wild and Scenic River. Therefore, consultation review by the National Park Service is not required. The Wild and Scenic Rivers Act protects selected rivers in a free-flowing condition and prohibits federal support for activities that would harm a designated river's free-flowing condition, water quality or outstanding resource values. The project is in compliance with the Wild and Scenic Rivers Act.</p>
<p><b>HUD HOUSING ENVIRONMENTAL STANDARDS</b></p>		
<p><b>ENVIRONMENTAL JUSTICE</b></p>		
<p><b>Environmental Justice</b> Executive Order 12898</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>No adverse environmental impacts were identified in the project's total environmental review. The immediate surrounding properties include retail properties (a bank, storefront dry cleaner, church, and offices) to the north; offices, a social club, residential and typical downtown retail/restaurant businesses to the east; an automotive repair shop and residential properties to the south; and restaurant and a salon business to the west. These land uses are not expected to have a detrimental environmental impact to the subject</p>

		<p>property. The proposed activities have no potential to create discrimination or isolation of minority or low-income individuals based on the location of the subject property. Additionally, this project does not create an adverse health or environmental effect that disproportionately impacts minorities of low-income populations. The subject property is located within an Opportunity Zone (Census Tract 3008). The project is in compliance with Executive Order 12898.</p>
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**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
<b>LAND DEVELOPMENT</b>			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The subject property is zoned C-2 (Central Business Commercial) by the Borough of Stroudsburg. The subject property is currently a developed YMCA facility on 1.83-acres of land. The subject property is planned for the redevelopment of an existing YMCA recreational facility with demolition and new construction elements involved. The proposed project will be in conformance to locally-adopted design guidelines.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Based on information obtained from the United States Department of Agriculture (USDA) Natural Resources Conservation Service Web Soil Survey online database, the subject property is mapped as primarily as Pope silt loam soils, which are generally moderately well and well drained soils with	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>moderately coarse textures. Based on information accessed via the USGS website, the majority of the subject property is underlain by the Paleozoic-era Devonian bedrock, which is made up of alternating layers of shale, siltstone, and limestone. Construction of the Proposed Project would involve grading and earth moving activities, as well as construction of project components. Construction would result in the temporary disturbance of soil and would expose disturbed areas to potential storm events. This exposure could generate accelerated runoff, localized erosion, and sedimentation. Construction activities could exacerbate soil erosion and result in the loss of topsoil. Therefore, the applicant of the Proposed Project obtained coverage under the National Pollutant Discharge Elimination System Construction with a permit that is appended herein.</p>	
<p>Hazards and Nuisances including Site Safety and Site-Generated Noise</p>	<p>2</p>	<p>The subject property is not expected to be a noise generator given that the proposed use is identical to the current property use. According to online information, there are no oil or gas wells located on or adjoining the subject property, and no fracking activities are conducted on or adjacent to the subject property at this time. According to the online information and site reconnaissance, there are no hazardous pipelines near the subject property. The subject property is not located within the fall distance of a high voltage power transmission tower, or other tower. No additional built hazards were identified during the field reconnaissance. Other built hazards include: water towers, metal electrical towers, hazardous streets, dangerous intersections, inadequate street lighting, children play areas located next to a busy street, railroad crossings, hazardous or chemical storage, or industrial operations. No additional known natural hazards will</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		likely affect the subject property. Natural hazards include: faults/fractures, cliffs, bluffs, crevices, slope failure from rains, unprotected water bodies, fire hazard materials, wind/sand storm concerns, poisonous plants/insects/animals, or hazardous terrain features.	
<b>SOCIOECONOMIC</b>			
Employment and Income Patterns	1	Stroudsburg is located in the U.S. state of Pennsylvania. It is located in Monroe County, and is part of the East Stroudsburg, PA Metropolitan Statistical Area, which in turn is part of the New York combined statistical area. As of the 2023 census, the population was estimated to be 5,832. This property will have no adverse impact on employment and income patterns in the area. The median household income was \$58,412 and the median family income was \$63,967. The per capita income for the borough was \$36,498. About 12.3% of the population were below the poverty line. Please note that above information should be verified with a Market Study, which was not provided for Partner's review. The development will be utilizing an existing urban property and will not displace any existing person(s). The proposed development will provide employment and recreation opportunities for the community and will have an overall beneficial impact to those who reside in the community.	
Demographic Character Changes / Displacement	2	According to the US Census Bureau, the racial makeup of the town was 67% White, 11.8% African American, 0% Native American, 3.3% Asian, and 11% from two or more races. Hispanic or Latino of any race were 19.4% of the population. Of the 5,832 people in the population, 4.9% were under 5 years old, 14.7% were under the age of 18, and 31.7% were 65 years and over. 52.4% of the population were female. Based on the existing use of the property for a YMCA facility, no indirect or direct	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		displacement is anticipated to occur. No indirect or long-term impacts to demographic character or displacement are anticipated with the proposed project.	
Environmental Justice EA Factor	2	The proposed development is not anticipated to negatively impact minority or low-income communities and is considered to have a beneficial impact to low-income communities given that the subject property is proposed for the improvement of an existing YMCA facility, of which is an organization that's mission is to promote healthy lifestyles for its communities. No evidence of historical environmental injustices or disproportionate impacts burdening low-income and/or minority persons/communities were identified during the assessment activities.	
<b>COMMUNITY FACILITIES AND SERVICES</b>			
Educational and Cultural Facilities (Access and Capacity)	1	Stroudsburg Area School District services the area with eight schools and a combined 5,200 students. The planned use of the subject property would not increase student density, or effect school bus routes. The proposed project will be an improved resource for the community for education resources and community space. This will be an improved benefit for the community. No additional or alternative facilities will be needed to ensure safety and suitable access to/from educational or cultural facilities	
Commercial Facilities (Access and Proximity)	2	Multiple commercial facilities such as restaurants, retail businesses, and gas stations are located within a short distance. The subject property is not displacing any retail or medical services to the community. The use of the subject property would provide a service for the community in the form of recreational facilities and educational spaces. No commercial facilities will be displaced with the proposed project. The development of this project is not considered a concern and will not require additional commercial facilities.	

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
Health Care / Social Services (Access and Capacity)	2	The Bartonsville Healthcare center is located 1.2-miles to the east of the subject property. Social services including mental health counselling, family support and respite services, employment services, and other disability services are offered at nearby facilities. Given that the subject property is not proposed for residential development, and no new residential units are proposed, the proposed project will not impact existing health care or social service facilities.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The project will involve demolition waste and construction waste. The finished project will output household type waste. Solid waste disposal and recycling services are provided by an adequate and acceptable municipal system. The Borough of Stroudsburg contracts with GFL Environmental to provide waste and recycling services to the community.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The subject property is currently an existing YMCA facilities. Wastewater and sanitary sewers are provided by an adequate and acceptable municipal system provided by the Borough of Stroudsburg. Onsite stormwater will drain to the municipal storm sewer system.	
Water Supply (Feasibility and Capacity)	2	Water service is provided by an adequate and acceptable municipal system provided by the Brodhead Creek Regional Authority (BCRA). The sources of municipal water are from surface water from the Brodhead Creek and two groundwater wells (well #1 and well #2). A third groundwater well is located along McMichael Creek. The subject property does not sit on a sole source aquifer. According to the BCRA 2023 Annual Water Quality Report, water supplied to the subject property is in compliance with all State and Federal regulations pertaining to drinking water standards, including lead and copper.	



Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Public Safety - Police, Fire and Emergency Medical	2	Police, fire, and emergency services are all located within a 15-minute response time. The closest fire station is located 0.2-miles to the north, the closest police station is located 0.2-miles to the north, and the closest hospital and emergency room is located 1.2-miles to the east of the subject property. The development of this site will have minimal impact on the city and/or county Police, Fire and Emergency Medical Services. The proposed development will not increase demand on police and fire services. Access routes for accessibility for emergency vehicles and compliance with local regulations will be addressed by the civil design team, per city/county building compliance. The project meets the site access requirements for emergency vehicles, including fire truck and ambulance at both sites.	
Parks, Open Space and Recreation (Access and Capacity)	1	The subject property is currently an existing YMCA facility. The proposed project will contribute to improved recreation opportunities in the area, having an overall positive impact on the community. The proposed project will not have an adverse effect on passive and active recreational activities to include parks, recreational areas and open spaces within the vicinity of the subject property.	
Transportation and Accessibility (Access and Capacity)	2	The subject property is located on Main Street, of which is along two Pocono Pony metro transit routes. The subject property will be easily accessible by vehicle. Construction plans were available; and consideration should be made to make sure the subject property is designed with adequate parking and pedestrian walkways onsite, including ADA parking spaces and accessible routes to the subject property buildings. The area is serviced by the Monroe County Transit Authority (MCTA), commonly referred to as "the Pocono Pony",	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		a public agency which services the Monroe County area.	
<b>NATURAL FEATURES</b>			
Unique Natural Features /Water Resources	2	No geological features that include rare or special social/cultural, economic, education, aesthetic or scientific value were identified on or abutting the subject property. As such, no adverse impact to unique natural features is considered applicable for the proposed development. Building setbacks are in place for the proposed development. The proposed project is not subject to rapid water withdrawal problems that change the depth or character of the water table or aquifer. No septic systems are proposed for the proposed project. No visual or other indications of water quality problems on or near the site were identified. The proposed project will include a stormwater runoff control/design. The proposed project will not involve the discharge of non-sewage pollutants into surface water bodies. Lastly, the proposed project will not limit the access to or quality of water for downstream communities.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The property is located within the Borough of Stroudsburg among other commercial and residentially developed areas. The subject property is planned to continue its use as a YMCA facility for recreational and educational uses following development. Construction plans were provided that include manicured landscaping including grassy lawns, trees, shrubs, and low-lying vegetation. No noxious weeds or invasive vegetative species will be included as part of the proposed action.	
Other Factors 1	2	No other known environmental factors are affected by the proposed development.	
Other Factors 2	2	No other known environmental factors are affected by the proposed development.	
<b>CLIMATE AND ENERGY</b>			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Climate Change	2	According to FEMA's National Risk Index (NRI) online tool, the subject property census tract has an overall Relatively Low" Risk Index. Further analysis is discussed within supporting documentation. The subject property should comply with all local building codes.	
Energy Efficiency	2	The subject property will be developed to meet a nationally recognized green building standard. Energy efficient mechanical systems and light fixtures will be used at the site to minimize utility consumption.	

**Supporting documentation**[NPDES Permit.pdf](#)[EA Factors Combined.pdf](#)**Additional Studies Performed:****Field Inspection [Optional]:** Date and completed

by:

Mike Baltrusaitis

7/18/2024 12:00:00 AM

[Civil Plan Set.pdf](#)**List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:**

Coastal Barrier Resource Map, U.S Fish & Wildlife Service (FWS), FEMA - Flood Zone Map USEPA, State Planning Electronic Collaboration System (SPeCS) for SIPs, Pennsylvania Office of Coastal Zone Management (CZM), U.S. Fish and Wildlife Service (FWS) Endangered Species, U.S. Dept. of Agriculture (USDA), Natural Resources Conservation Service (NRCS), Farmland Classification Map, USDA Soil Survey ISGS, ArcGIS USA Urban Areas, EPA Sole Source Aquifer Map, U.S. FWS, National Wetlands Inventory (NWI) map, National Wild and Scenic Rivers System, Environmental Protection Agency (EPA) "EJ Screen" Tool, EPA Cleanups in My Community Map, FracTracker Alliance Pennsylvania Map, National Pipeline Mapping System (NPMS), Homeland Infrastructure Foundation Level Database Transmission Lines, Map of radon Zones, Pipeline Association for Public Awareness, FEMA National Risk Index Map, United States Geological Survey (USGS) Topographic Maps, Borough of Stroudsburg, Monroe County

**List of Permits Obtained:**

The project applicant has received a National Pollution Discharge Elimination System Permit (NPDES) for the proposed project. Additional permits, reviews and approvals required for construction activities will be issued by local, city/county and state regulatory agencies with implementation by project contractor and oversight by engineer/architect.

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

In the course of conducting this environmental compliance review, any public outreach will be documented in the appropriate review section and uploaded hereto. Upon acceptance by the HUD Certifying Official, the FONSI will be posted on a publicly available website for one year at:

<https://www.hudexchange.info/programs/environmental?review/environmental?review-records>

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

Phase I Environmental Site Assessment prepared by Pennoni Associates Inc., July 2024.

**Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]****No Action Alternative [24 CFR 58.40(e)]**

The "no action" alternative was considered; however, no action would not meet the demand for the unique features of the proposed development. No other recreation facilities were identified in the vicinity of the proposed project.

**Summary of Findings and Conclusions:**

The proposed project includes the demolition of an existing donut shop for expansion of a regional YMCA facility. The project will have an overall net benefit to the community at large with additional recreation and community involvement activities that cater to those of all ages. If the proposed project is found to have a new outdoor gathering area after discussions with the project applicant, then a Noise Assessment shall be completed.

**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.

<b>Law, Authority, or Factor</b>	<b>Mitigation Measure or Condition</b>	<b>Comments on Completed Measures</b>	<b>Mitigation Plan</b>	<b>Complete</b>
Noise Abatement and Control	The proposed project includes new construction of an expansion to an existing community center facility. Based on a review, it appears that there may be a potential new playground area (noise sensitive use - outdoor gathering area) per the attached civil plan set (page 139 - attached in the Project Summary of this HEROS report). If this playground is expected to be exterior, and not limited to the confines of a building, then a Noise Assessment will be warranted.	N/A	See mitigation plan herein.	

**Project Mitigation Plan**

See mitigation plan above.

**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 closest active runway is the Blairstown Airport, located approximately 10.42-miles to the east of the subject property. The project is in compliance with Airport Hazards requirements.

**Supporting documentation**

[Airport Hazards 15000 Feet.pdf](#)

[Airport Hazards 2500 Feet.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)	

**This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.**

### Compliance Determination

This project is located in a state that does not contain CBRS units. The closest coastal barrier is located approximately 80 miles to the southeast of the subject property. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

### Supporting documentation

[CBRS Map.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:**

[FIRMETTE.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). According to Community Panel Number 42089C0427E, dated May 2, 2013, the subject property is not located within a Special Flood Hazard Area (SFHA). The subject property appears to be located in Unshaded Flood Zone X, defined as "areas determined to be outside the 0.2% annual chance floodplain". Nonetheless, based on the review of the online NFIP information, the city is an active participant within the NFIP. The community identification number for the city is CID is 420694#. The project is in compliance with flood insurance requirements.

#### **Supporting documentation**

[Community status book report for state PA.pdf](#)

#### **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):

**Screen Summary**

**Compliance Determination**

The project's county or air quality management district is in attainment status for all criteria pollutants. Review of the online EPA air quality information for Pennsylvania through the EPA State Implementation Plan (SIP) indicated the designated areas for SIP requirements does not include the subject property. As such, nonattainment pollutant areas are not considered a concern for the subject property. The project is in compliance with the Clean Air Act.

**Supporting documentation**

[SIP info state of PA.pdf](#)

**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.

#### **Supporting documentation**

[CZM Map.pdf](#)

#### **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)
<b>Reference</b>		
<a href="https://www.onecpd.info/environmental-review/site-contamination">https://www.onecpd.info/environmental-review/site-contamination</a>		

**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:

According to a Phase I Environmental Site Assessment, prepared by Pennoni on July 30, 2024, no RECs were identified with the subject property.

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 building and proposed building expansion is not residential or proposed for residential occupancy. The existing facility and proposed expansion is a transient fitness center and community center.

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**

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Vapor Encroachment Screening. 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 exempt from radon consideration. A Phase I Environmental Site Assessment was completed for the subject property on July 30, 2024. This assessment revealed no evidence of recognized environmental conditions (RECs), controlled recognized environmental conditions (CRECs), or historical recognized environmental conditions (HRECs) in connection with the subject property. According to online information, there are no natural gas or petroleum wells located on or adjacent to the subject property. The subject property is not located within the fall distance of a high voltage power transmission tower, or other tower. Natural hazards include faults/fractures, cliffs, bluffs, crevices, slope failure from rains, unprotected water bodies, fire hazard materials, wind/sandstorm concerns, poisonous plants/insects/animals, or hazardous terrain features. No natural or built hazards were identified during the field reconnaissance. The project is in compliance with contamination and toxic substances requirements. The project is in compliance with contamination and toxic substances requirements.

#### **Supporting documentation**

[Penonni Enviro Report YMCAX24001 Final Report.pdf](#)  
[NPMS pipeline map.pdf](#)  
[Gas and Oil well map.pdf](#)

#### **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

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

**2. Are federally listed species or designated critical habitats present in the action area?**

- ✓ No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below. Documentation may include letters from the Services, species lists from the Services’ websites, surveys or other documents and analysis showing that there are no species in the action area.

Yes, there are federally listed species or designated critical habitats present in the action area.



**Screen Summary****Compliance Determination**

This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area. A summary of the IPaC database indicates three endangered, one proposed threatened, one candidate species; and no critical habitats are within the project area. A review of the database and species habitat information indicates no suitable habitat is present for the subject property at this time. The subject property is currently developed with an existing property for commercial use. As such, there is no potential for disturbance or effect to the listed species. The subject property consists of existing commercial buildings and a parking lot with limited landscaping with plans for redevelopment. The current vegetation of the subject property consists of manicured lawns, hedges, and some trees. A detailed writeup of species habitats and potential to occur on the subject property is attached. Based on the review of USFWS Official Species List of threatened and endangered species, it is Partner's opinion that a No Effect Determination is applicable for the subject property and no additional action is warranted at this time. This project is in compliance with the Endangered Species Act.

**Supporting documentation**

[Endangered species analysis.pdf](#)

[0 Species Table v1.pdf](#)

**Are formal compliance steps or mitigation required?**

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. There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. Based on the site reconnaissance, no existing industrial facilities handling explosive or fire-prone materials such as liquid propane, gasoline, diesel fuel of 100-gallons or larger are adjacent to and/or visible from the subject property, including from online satellite imagery (when available). The project is in compliance with explosive and flammable hazard requirements.

#### **Supporting documentation**

[Explosive Hazards Map.pdf](#)

**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.)	<a href="#">7 CFR Part 658</a>

**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:

The proposed project includes renovation and expansion of an existing building into an existing commercial lot within an urban area.

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 subject property consists of existing commercial buildings with plans for new constructing and improving the existing YMCA buildings; and because the project does not convert agricultural land to non-agricultural land, the Federal Farmland Protection Policy Act (FPPA) is not triggered. Additionally, according to the USDA mapped soil information, the onsite soils are rated as "All areas are prime farmland". However, according to the Geography Division, U.S. Census Bureau map, the subject property is located within an urban area. As such, no additional action regarding FPPA is warranted at this time. The project is in compliance with the Farmland Protection Policy Act.

**Supporting documentation**

[Urban areas map.pdf](#)

[Farmland Classification.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 information<sup>1</sup> to determine flood elevation. Include documentation and an explanation of why this is the best available information<sup>2</sup> for the site. Note that newly constructed and substantially improved<sup>3</sup> 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.

<sup>1</sup> 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.

<sup>2</sup> 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.

<sup>3</sup> 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. This project does not occur in the FFRMS floodplain. According to Community Panel Number 42089C0427E, dated May 2, 2013, the subject property is not located within a Special Flood Hazard Area (SFHA). The subject property appears to be located in Flood Zone X (unshaded), defined as "areas determined to be outside the 0.2% annual chance floodplain". No preliminary and/or pending FEMA FIRM is available for the subject property. Per Executive Order (EO) 11988, no additional action is warranted as the subject property is considered to be a non-critical action site. However, HUD adopted FEMA's Federal Flood Risk Management Standard (FFRMS), which became effective May 23, 2024, with a compliance date of June 24, 2024. (Of note, for FHA and MAP-guide compliant programs / projects, HUD has extended the compliance deadline to Jan. 1, 2025). Per EO 13690 for FFRMS, the following methods were assessed: Climate Informed Science Approach (CISA) - The Federal Flood Standard Support Tool (FFSST) was utilized to determine the CISA flood information and elevation(s). The FFSST is currently in BETA form and has not been officially adopted by HUD. The tool is utilized for information purposes only as of the issuance of this report. Nonetheless, the subject property was not depicted in the FFSST floodplain. In addition, the subject property was not depicted within a flood area on the Pennsylvania Flood Risk Mapper website. No other readily available local floodplain maps were reviewed. 0.2 Percent Annual Chance of Flooding (PFA) (0.2 PFA) - Based on the FEMA FIRM, the subject property area is not located within the Flood Zone X (shaded), outside the 500-year floodplain/0.2 annual chance flood. Because the subject property is not located within Flood Zone X (shaded) and outside the 500-year floodplain/0.2 annual chance flood, PFA is not an applicable FFRMS method. Freeboard Value Approach (FVA) - Based on the FEMA FIRM, the subject property is situated approximately 160-feet east of the nearest SFHA, which is listed as a Flood Zone AE. The base flood elevation (BFE) of the SFHA associated with Pocono Creek is listed at an elevation of 424.61-feet. Per FFRMS, 2-feet of freeboard is added vertically and horizontally to the BFE. As such, the FFRMS floodplain elevation is 426.61-feet. The difference in elevation beginning from the FFRMS floodplain to the subject property rises approximately seven feet. Based on the FVA, the subject property is not located within the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.

**Supporting documentation**

[PAFloodRiskSummary.pdf](#)

[No pfirm snip it.pdf](#)

[FVA elevations.pdf](#)

[FIRMETTE\(1\).pdf](#)

[FFRMS CISA Tool.pdf](#)

[1 FFRMS Flow Chart.pdf](#)

**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” <a href="https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf">https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf</a>

**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).

**Step 1 – Initiate Consultation**

Select all consulting parties below (check all that apply):

✓ State Historic Preservation Offer (SHPO) Completed

Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

Other Consulting Parties

**Describe the process of selecting consulting parties and initiating consultation here:**

As part of prior NEPA evaluations for the proposed project for the USDA RD financing, THPO and the SHPO were consulted.

Document and upload all correspondence, notices and notes (including comments and objections received below).

**Was the Section 106 Lender Delegation Memo used for Section 106 consultation?**

Yes

No

**Step 2 – Identify and Evaluate Historic Properties**

- 1. Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:**  
805, 809, and 823 Main Street, Stroudsburg, PA 18360. See attached consultation letters.

**In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.**

Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
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**Additional Notes:**

- 2. Was a survey of historic buildings and/or archeological sites done as part of the project?**

Yes

✓ No

**Step 3 –Assess Effects of the Project on Historic Properties**

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5)] Consider direct and indirect effects as applicable as per guidance on direct and indirect effects.

**Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.**

- ✓ No Historic Properties Affected

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

**Document reason for finding:**

- ✓ No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Adverse Effect

**Screen Summary****Compliance Determination**

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The proposed project involves a 1.83-acre existing site. Ground disturbance will include 1.40 acres of this site. The proposed project was submitted to SHPO, May 10, 2023, to determine if historic or archaeological resources would be affected if the proposal was implemented. The PA SHPO responded on July 3, 2023 (ER Project # 2023PR02153) indicating that there are no above ground concerns and no archaeological concerns. In addition, the USDA initiated consultation with THPO agencies that may have a potential interest with the proposed project including the Delaware Nation of Oklahoma, the Delaware Tribe of Indians, the Seneca-Cayugao Nation, and the Stockbridge Munsee Tribe. Consultation with these tribes occurred in October 2023. No responses were reportedly received in the mandatory 30-day response time. The project is in compliance with Section 106.

**Supporting documentation**

- [Tab E - THPO Stockbridge Munsee Tribe - final.pdf](#)
- [Tab E - THPO Seneca-Cayuga Nation - final.pdf](#)
- [Tab E - THPO Delaware Tribe of Indians - final.pdf](#)
- [Tab E - THPO Delaware Nation Oklahoma - final.pdf](#)
- [SHPO snip it from USDA report.pdf](#)
- [NRHP map.pdf](#)

**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**

The proposed project includes new construction of an an expansion to an existing community center facility. Based on a review, it appears that there may be a potential new playground area (noise sensitive use - outdoor gathering area) per the attached civil plan set (page 139 - attached in the Project Summary of this HEROS report). If this playground is expected to be exterior, and not limited to the confines of a building, then a Noise Assessment will be warranted. Partner completed a preliminary noise assessment for the subject property and identified the following major roadways within 1,000 feet of the subject property: Main Street along the Northern property boundary; zero railroads within a 3,000-ft radius; and four municipal airports were identified within a 15-mile radius boundary. The municipal airports identified are as



follows: Stroudsburg-Pocono Airport (permanently closed; 4.0-miles from subject property), Blirstown Airport (10.42-miles), Rocky Hill Airport (12.03-miles), and Pocono Mountains Municipal Airport (14.24-miles).

**Supporting documentation**

[Roadways within 1000 FT.pdf](#)

[Railroads 3000 ft Radius Map.pdf](#)

[Airports Distance Map within 15 Miles.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Sole Source Aquifers

General requirements	Legislation	Regulation
<b>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.</b>	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. Based on a review of the Designated Sole Source Aquifers National Map, published by the USEPA, the subject property is not located in a sole source aquifer recharge area. The water supply for the subject property is tied into the public utilities; therefore, it does not impact existing groundwater conditions. The project is in compliance with Sole Source Aquifer requirements.

#### Supporting documentation

[Sole Source Aquifer Map.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. According to the U.S. Fish & Wildlife Service National Wetlands Inventory website, there are no federally regulated wetlands located on the subject or adjoining property. The project is in compliance with Executive Order 11990.

**Supporting documentation**

[Wetlands Map.pdf](#)

**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 subject property is not located within a one-mile radius of a designated Wild and Scenic River. Therefore, consultation review by the National Park Service is not required. The Wild and Scenic Rivers Act protects selected rivers in a free-flowing condition and prohibits federal support for activities that would harm a designated river's free-flowing condition, water quality or outstanding resource values. The project is in compliance with the Wild and Scenic Rivers Act.

#### **Supporting documentation**

[Wild Scenic River map.pdf](#)

[Study River List 2022.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 immediate surrounding properties include retail properties (a bank, storefront dry cleaner, church, and offices) to the north; offices, a social club, residential and typical downtown retail/restaurant businesses to the east; an automotive repair shop and residential properties to the south; and restaurant and a salon business to the west. These land uses are not expected to have a detrimental environmental impact to the subject property. The proposed activities have no potential to create discrimination or isolation of minority or low-income individuals based on the location of the subject property. Additionally, this project does not create an adverse health or environmental effect that disproportionately impacts minorities of low-income populations. The subject property is located within an Opportunity Zone (Census Tract 3008). The project is in compliance with Executive Order 12898.

**Supporting documentation**

[Opportunity zones map.pdf](#)

[EJScreen Community Report.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No