



U.S. Department of Housing and Urban  
Development  
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Washington, DC 20410  
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## **Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58**

### **Project Information**

**Project Name:** Jamestown Housing Authority Electric/Heat Emergency Upgrade

**Responsible Entity:** Town of Jamestown

**Grant Recipient** (if different than Responsible Entity): Jamestown Housing Authority

**State/Local Identifier:** RI021

**Preparer:** Lisa Bryer, Town Planner

**Certifying Officer Name and Title:** Edward A. Mello, Town Administrator

**Grant Recipient** (if different than Responsible Entity): Jamestown Housing Authority

**Consultant** (if applicable): Roy Messier, Verdantas

**Direct Comments to:** Lisa Bryer, [lbryer@jamestownri.net](mailto:lbryer@jamestownri.net)

**Project Location: Jamestown Housing Authority, 45 Pemberton Avenue**

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

Jamestown Housing Authority (JHA) was awarded emergency funds to replace the existing oil-fired burner and federal pacific breakers with energy efficient mini-splits, solar assisted water heaters and updated electrical.

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

JHA is currently using the original oil-fired boiler to supply heat to all 35 units of public housing. The Housing Authority also has Federal Pacific breakers, which have been deemed faulty and are outdated.

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

JHA currently has sole source heat of the original boiler (1968) supplying heat and hot water to 35 units of senior/disabled public housing. HUD has mandated that the heating system be brought up to code to avoid relocation of the residents due to lack of insurance due to the outdated equipment on site.

**Funding Information**

Grant Number	HUD Program	Funding Amount
RI01E021501-22	CFP Emergency Grant	\$1,488,677.00

**Estimated Total HUD Funded Amount: \$1,488,677.00**

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$1,575,000**

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

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or	Compliance determinations
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	mitigation required?	
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b> 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
<b>Coastal Barrier Resources</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The site is greater than 200 ft from a water body according to RIDEM maps.
<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]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The site is outside Floodplain according to FEMA 44005C.
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b> Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
<b>Coastal Zone Management</b> Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
<b>Contamination and Toxic Substances</b> 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	There is suspected ACM insulation on the existing boiler. The insulation will be sampled/tested & if it comes back positive an Asbestos Abatement Plan will be prepared in accordance with RIDOH.
<b>Endangered Species</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
<b>Explosive and Flammable Hazards</b> 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	

<b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
<b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The site is outside Floodplain according to FEMA 44005C.
<b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	Property is located within the West Ferry Archaeological District where known native american burial site occur. The building exists today and no modifications to the structure are proposed. Site work related to electrical upgrades are proposed.
<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	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
<b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	Jamestown is designated as a sole source aquifer. This property is currently supplied by town public water.
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
<b>Wild and Scenic Rivers</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	This project will benefit the environmental justice of 35 residents by providing upgraded and safe heating and hot water and removing potentially hazardous equipment.

**Environmental Assessment Factors** [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and

described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

**Impact Codes:** Use an impact code from the following list 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
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The proposal is compatible with Jamestown’s Comprehensive Plan and Zoning Ordinance by upgrading affordable senior housing to code.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The proposal will not impact soil suitability/slope/erosion/drainage/stormwater runoff.
Hazards and Nuisances including Site Safety and Noise	1	The proposal will positively impact site safety and noise by the conversion from outdated oil heat equipment to energy efficient mini splits.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	2	The proposal will not impact employment and income patterns.
Demographic Character Changes, Displacement	2	The proposal will not impact demographic character changes, displacement if conducted. Displacement may occur if the project is not completed.
Environmental Justice	1	This project will provide energy efficient hot water, heat and air conditioning for 35 senior/disabled tenants.

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Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>COMMUNITY FACILITIES AND SERVICES</b>		
Educational and Cultural Facilities	1	This project will provide energy efficient heat, air conditioning and solar assisted hot water for a community room used by 47 residents. The JHA property is located within the West Ferry Archaeological District. The JHA will enter into a contract with the Narragansett Tribe to ensure cultural resources are not impacted in the necessary electrical improvements.
Commercial Facilities	2	The proposal will not impact commercial facilities.
Health Care and Social Services	1	The proposal will benefit health care and social services to the residents of the Jamestown Housing Authority.
Solid Waste Disposal / Recycling	2	The proposal will not impact Solid Waste Disposal / Recycling.
Waste Water / Sanitary Sewers	2	The proposal will not impact Wastewater / Sanitary Sewers.
Water Supply	2	The proposal will not impact water supply.
Public Safety - Police, Fire and Emergency Medical	2	The proposal will not impact public safety.
Parks, Open Space and Recreation	2	The proposal will not impact Parks, Open Space and Recreation.
Transportation and Accessibility	2	The proposal will not impact transportation and accessibility.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	2	The proposal will not impact Unique Natural Features, Water Resources.

Vegetation, Wildlife	2	The proposal will not impact vegetation, wildlife.
Other Factors	2	

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>CLIMATE AND ENERGY</b>		
Climate Change Impacts	1	This project will allow the HA to stop using oil fuel to run the heat/hot water for 35 units.
Energy Efficiency	1	This project will provide energy efficient heat and air conditioning and solar-assisted hot water for 35 residents.

**Additional Studies Performed:**

**Field Inspection** (Date and completed by):

An engineering study was performed by consultant Verdantas which led to a design of the proposed electrical upgrades necessary.

RISE Engineering performed a study to determine the most efficient heat and hot water system to install.

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

HUD: Martha Curren  
 RIHPHC: Elizabeth Totten, Charlotte Taylor  
 Narragansett Indian Tribe Historical Preservation Office: John Brown, Cora Pierce  
 Rise Engineering: Jake Littman  
 Verdantas: Roy Messier  
 Superior Electric: Andre Soares  
 RI Energy:  
 Office of Energy Resources: Anika Kreckel  
 HAI Insurance Group: Nick Mayo  
 US Senator Reed

**List of Permits Obtained:**

Jamestown Building Permit

**Public Outreach** [24 CFR 50.23 & 58.43]:

Consistent outreach with residents of JHA to inform them of the work necessary and schedule.

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

The JHA has grouped together a team of consultants, led by Verdantas to evaluate the project and develop the most effective alternative to replacing the outdated boiler providing hot water and heat to the JHA residents.

The JHA project work is a *geographic aggregation* project since all the work to be completed occurs within the same site. As such, we are submitting a single environmental review.

JHA has considered all reasonable alternative courses of action, will schedule the activities to resolve conflicts and mitigate the individual, combined and cumulative effects of the project. The proposed project mitigates negative impacts to the residents by allowing them to continue to live in their units during the work. If this work does not occur, there is a risk of having to relocate all 35 residents.

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

This work has to be completed and is mandated by HUD.

**No Action Alternative [24 CFR 58.40(e)]:**

The no action alternative is to not do the work, in which case, the JHA will not be able to run the JHA housing as intended.

**Summary of Findings and Conclusions:**

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

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
HUD	JHA, with the proposed work plan will mitigate the relocation of 35 residents. The work is necessary to bring the facility into compliance with building code and safety of residents.
Narragansett Indian Tribe Historic Preservation Office (NITHPO)	An agreement will be entered into with NITHPO in order to ensure that no native american burials are disturbed by this project.

RI Historic Preservation and Heritage Commission (RIHPHC)	RIHPHC will ensure that all state and federal laws related to Section 106 comply and issue an approval.
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**Determination:**

**Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]  
It is the intent of this project to not result in any significant impact on the quality of the human environment.

**Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]

Preparer Signature: Lisa W. Bryer *Lisa W. Bryer* Date: August 21, 2024

Name/Title/Organization: Town of Jamestown, RI

Certifying Officer Signature: *E. Mello* Date: 8/21/24

Name/Title: Edward A. Mello, Town Administrator

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).