COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) DISASTER RECOVERY PROGRAM

ENVIRONMENTAL REVIEW RECORD

JULY 2017

We Are Columbia

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U. S. Department of Housing and Urban Development

Columbia Field Office
Strom Thurmond Federal Building
1835 Assembly Street
Columbia, South Carolina 29201-2480
www.hud.gov

August 24, 2017

Ms. Teresa Wilson, City Manager
City of Columbia
1225 Lady Street, Suite 102
Columbia, South Carolina 29201

Dear Ms. Wilson:

SUBJECT: Removal of Environmental Grant Condition and Authority to Use Grant Funds

On August 8, 2017, our Office received your Request for Release of Funds (RROF) and Certification indicating the environmental review for the following project has been completed:

PROJECT: The project will use CDBG funding for The Columbia Homeowner Assistance, Small Rental Repair, Minor Repair, and Elevation Reimbursement Programs will provide CDBG Disaster Recovery grants to eligible property owners of single family (1-4 units) residences damaged by the October 2015 Flood to rehabilitate their homes.
PROJECT AMOUNT: $15,790,100
GRANT NUMBER: B16-MH-45-0001

In accordance with HUD regulations at 24 CFR Part 58, the RROF has been held for 15 days as required to allow the public to comment or object to the use of HUD funds in this project. No valid objections were received by HUD during this time frame. Based upon the review, this project is considered environmentally cleared and the grant condition requiring that this project be environmentally cleared before committing CDBG funds was removed on August 24, 2017. No further conditions are attached.

This letter and the enclosed Authority to Use Grant Funds (HUD-7015.16 form) should be placed in the Environmental Review Record (ERR) for each activity undertaken to show that the prescribed environmental review has been completed and the conditions satisfied. This clearance will remain in effect as long as the related environmental review is valid and the scope of the activities remains unchanged. If you have any questions or need additional information, please contact Steven Edwards at 803-765-5292.

Sincerely,

Bradley S. Evatt, Director
Community Planning and Development

Enclosure

Authority to Use Grant Funds

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

To: (name & address of Grant Recipient & name & title of Chief Executive Officer)	**Copy To:** (name & address of SubRecipient)
Ms. Teresa Wilson, City Manager City of Columbia 1225 Lady Street, Suite 102 Columbia, South Carolina 29201	

We received your Request for Release of Funds and Certification, form HUD-7015.15 on	08/08/17
Your Request was for HUD/State Identification Number	B16-MH-45-0001

All objections, if received, have been considered. And the minimum waiting period has transpired.
You are hereby authorized to use funds provided to you under the above HUD/State Identification Number.
File this form for proper record keeping, audit, and inspection purposes.

The environmental release date is August 24, 2017. The project will use CDBG DR funding in the amount of $15,790,100. The Columbia Homeowner Assistance, Small Rental Repair, Minor Repair, and Elevation Reimbursement Programs will provide CDBG Disaster Recovery grants to eligible property owners of single family (1-4 units) residences damaged by the October 2015 Flood to rehabilitate their homes.

Typed Name of Authorizing Officer	Signature of Authorizing Officer	Date (mm/dd/yyyy)
Bradley S. Evatt Title of Authorizing Officer Director, Community Planning and Development	X Bradley S. Evatt	08/24/2017

Previous editions are obsolete.

form **HUD-7015.16** (2/94)
ref. Handbook 6513.01

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

Environmental Review Record Summary Sheet

Project Number: B-16-MH-45-0001	HUD Program:	CDBG-DR	Program Year: 2017

Project Name: Columbia CDBG Disaster Recovery Program (Columbia Housing Assistance, Minor Repair, Small Rental Repair, and Elevation Reimbursement Programs)
Project Location: 1225 Lady Street, Columbia, SC 29201

Number of Dwelling Units Projected: 1500	Project site is in a location described as
	☒ Central city ☐ Suburban
☐ New Construction ☒ Rehabilitation	☐ Urban development ☐ Undeveloped area

Project Description (*Attach additional descriptive information, as appropriate to the project, including narrative, maps, photographs, site plans, budgets and other information.*)[1]: The City has designed four housing programs to assist primarily low-to-moderate (LMI) income households impacted by the October 2015 Flood in the rehabilitation, elevation, remediation, and repair of single family (1-4 units) residences; a separate statutory checklist (Categorical Exclusion Subject To 58.5) has been completed for these activities: major rehabilitation, minor rehabilitation, and elevation reimbursement activities. Detailed project descriptions and source documentation is attached.

The subject project has been reviewed pursuant to HUD regulations 24 CFR Part 58, "Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities," and the following determination with respect to the project is made:

- ❑ Exempt from NEPA review requirements per 24 CFR §58.34(a) (_____) (Compliance Checklist for §58.6 is attached.)

- ❑ Categorically Excluded NOT Subject to §58.5 authorities per 24 CFR §58.35(b) (_) (Compliance Checklist for §58.6 is attached.)

[1] Source documentation consists of verifiable source documents and/or relevant base data. Appropriate documentation must be provided for each authority and resource analyzed. Documents may be incorporated by reference into the ERR provided that each source document is identified and available for inspection by interested parties. Proprietary material and studies that are not otherwise generally available for public review shall be included in the ERR.

☒ Categorically Excluded SUBJECT to §58.5 authorities per 24 CFR §58.35(a) (___)

(Compliance Checklist for §58.6, and Statutory Worksheet and Checklist for the §58.5 authorities are attached.)

❑ An Environmental Assessment (EA) is required to be performed. (An Environmental Assessment Worksheet and Checklist performed in accordance with subpart E of 24 CFR Part 58, Compliance Checklist for §58.6, and Statutory Worksheet and Checklist for the §58.5 authorities are attached.)

❑ An Environmental Impact Statement (EIS) is required to be performed.

The ERR (see §58.38) must contain all of the environmental review worksheets, checklists, documents, public notices and written determinations or environmental findings required by Part 58 as evidence of the review, decision making and actions pertaining to a particular project. Include additional information such as, maps noting the project location in reference to an environmental impact source, studies, analyses and other documentation as appropriate.

Major Rehabilitation Activities

Categorical Exclusion Subject to §58.5 Determination for Activities Listed at 24 CFR §58.35(a)

Grant Recipient: City of Columbia Project Name: Columbia Homeowner Assistance and Small Rental Repair Programs

Project Description (Include all actions which are either geographically or functionally related): Clearance is requested for a tiered environmental review for the major rehabilitation, elevation, remediation, and repair of single family (1-4 units) residences damaged by the South Carolina Flood of 2015. The City of Columbia has developed a broad review based at the citywide geographic level and a site specific strategy for environmental clearance when individual addresses become known. CDBG Disaster Recovery Funding is $19,989,000 with an additional $1 million in CDBG Program Income funds for total program funding of $20,989,000. Of that amount $9,901,420 has been allocated to the housing activities covered by this review: Columbia Homeowner Assistance Program and the Small Rental Repair Program.

Location: City of Columbia city limits

Funding Source: CDBG HOME ESG HOPWA EDI Capital Fund Operating Subsidy Hope VI
Other: CDBG Disaster Recovery
Estimated Funding Amount: $9,901,420 Grant Number: B-16-MH-45-0001

I have reviewed and determined that the above mentioned project is a Categorically Excluded activity (subject to §58.5) per 24 CFR §58.35(a) as follows:

☐	58.35(a) (1). Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent (e.g., replacement of water or sewer lines, reconstruction of curbs and sidewalks, repaving of streets);
☐	58.35(a) (2). Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons;
	58.35(a) (3). Rehabilitation of buildings and improvements when the following conditions are met:
☒	58.35(a) (3) (i.)In the case of a building for residential use (with one to four units), the density is not increased beyond four units, the land use is not changed, and the footprint of the building is not increased in a floodplain or in a wetland;
☐	58.35(a) (3) (ii). In the case of multifamily residential buildings: (A) Unit density is not changed more than 20 percent; (B) The project does not involve changes in land use from residential to non-residential; and (C) The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.
☐	58.35(a) (3) (iii). In the case of non-residential structures, including commercial, industrial, and public buildings: (A) The facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent; **AND** (B) The activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another.
☐	58.35(a) (4) (i) An individual action on up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between; or

☐	58.35(a)((ii) An individual action on a project of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site. 58.35(a) (iii) Paragraphs (a) (4) (i) and (ii) of this section do not apply to rehabilitation of a building for residential use (with one to four units) (see paragraph (a) (3) (i) of this section).
☐	58.35(a) (5). Acquisition (including leasing) or disposition of, or equity loans on an existing structure, or acquisition (including leasing) of vacant land provided that the structure or land acquired, financed, or disposed of will be retained for the same use.
☐	58.35(a) (6). Combinations of the above activities.

The responsible entity must also complete and attach a **§58.5 Statutory Checklist and Worksheet and a §58.6 Compliance Checklist.** By signing below the Responsible Entity officially determines in writing that all activities covered by this determination are Categorically Excluded (subject to §58.5) and meets the conditions specified for such exclusion under section 24 CFR §58.35(a). This document must be maintained in the ERR.

AUTHORIZED RESPONSIBLE ENTITY OFFICIAL:

Teresa Wilson

Authorized Responsible Entity Signature

8/4/2017

Date

Teresa Wilson

Authorized Responsible Entity Name (printed)

City Manager, City of Columbia, SC

Title (printed)

Compliance Documentation Checklist
24 CFR 58.6

Grant Recipient: City of Columbia____ Project Name: Columbia CDBG Disaster Recovery Program_
Project Description (Include all actions which are either geographically or functionally related):
The City has designed two housing programs - Columbia Homeowners Assistance Program and the Small Rental Repair Program - to assist primarily low-to-moderate (LMI) income households severely impacted by the October 2015 Flood in major rehabilitation, elevation, remediation, and repair of single family (1-4 units) residences. (A detailed project description is attached.)_____

Level of Environmental Review Determination: Select One of the following:

☐(1) Exempt per 24 CFR 58.34, or
☐(2) Categorically Excluded not subject to statutes per §58.35(b), or
☒(3) Categorically Excluded subject to statutes per §58.35(a), or
☐(4) Environmental Assessment per §58.36, or
☐(5) EIS per 40 CFR 1500

STATUTES and REGULATIONS listed at 24 CFR 58.6

FLOOD DISASTER PROTECTION ACT

1. Does the project involve acquisition, construction or rehabilitation of structures located in a FEMA-identified Special Flood Hazard?

☐No; Cite Source Document: _____

☒Yes; Source Document: Any properties located in a Special Flood Hazard will require a site specific environmental review as described in the attached written strategy; an 8 Step Process has been completed for properties located in the floodplain._____

2. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☒Yes (Flood Insurance under the National Flood Insurance Program must be obtained and maintained for the economic life of the project, in the amount of the total project cost. A copy of the flood insurance policy declaration must be kept on file). **(Appendix I)**

☐No **(Federal assistance may not be used in the Special Flood Hazards Area)**.

COASTAL BARRIERS RESOURCES ACT

1. Is the project located in a coastal barrier resource area?

☒ No; Cite Source Documentation: The City of Columbia is not located within a coastal barrier resource area.__ (This element is completed).

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of existing property within a Civil Airport's Runway Clear Zone or a Military Installation's Clear Zone?

☒ No; Source Documentation: No property within the city limits is within 2500 feet of a Clear Zone or Runway Clear Zone _____
Project complies with 24 CFR 51.303(a)(3).

☐ Yes; **Disclosure statement must be provided** to buyer and a copy of the signed disclosure must be maintained in this Environmental Review Record **(Appendix II)**

Prepared by (name and title, please print): Gloria Saeed, Director, Community Development_____, _____

Signature: Gloria Saeed _____ Date: August 4/2017

COLUMBIA CDBG DISASTER RECOVERY PROGRAM
TIER 1 ENVIRONMENTAL REVIEW
FOR MAJOR REHABILITATION ACTIVITIES AT UNSPECIFIED SINGLE FAMILY HOUSING SITES

PROJECT DESCRIPTION

In October 2015, the City of Columbia, along with much of the State of South Carolina, experienced unprecedented rainfall and historic flooding with more than two feet of rainfall in less than 48 hours. As part of its Community Development Block Grant (CDBG) Disaster Recovery Program, HUD has allocated $19.989 million to the City of Columbia to address some of its critical unmet needs resulting from the 2015 Flood. The City added $1 million in CDBG Program Income funds to augment its disaster recovery budget. All programs will be administered by the City's Community Development Department.

Following a major disaster, households that qualify as low to moderate income (80% or less of Area Median Income) are likely to have more difficulty securing financing for necessary building repairs, finding suitable rental housing, or paying for remediation or relocation expenses. For that reason, the City of Columbia is directing almost 90%, or $17,790,100, of its total CDBG Disaster Recovery allocation to five (5) housing programs that will maximize benefits to the most vulnerable populations.

This environmental review record will be valid for five years, the maximum time allowed by HUD, and covers the following housing programs, aggregated functionally for major rehabilitation, elevation, and remediation, of single family (1-4 units) storm-damaged residences: Columbia Homeowner Assistance Program (CHAP) and the Small Rental Repair Program (SRRP). All program activities will occur within the incorporated Columbia city limits. Table 1 indicates the total funding among all CDBG Disaster Recovery activities. The City estimates program duration at six years. Table 2 indicates the project expenditures per year of all funding sources.

TABLE 1

ACTIVITY	CDBG DISASTER RECOVERY	CDBG PROGRAM INCOME	TOTAL DISASTER RECOVERY BUDGET
Housing major rehabilitation, repair, and elevation	$ 9,901,420		$ 9,901,420
Housing minor rehabilitation	$ 2, 398,680	$1,000,000	$ 3,398,680
Residential Acquisition and demolition (Buyout)	$2,000,000		$2,000,000
Elevation reimbursement	$ 3,490,000		$ 3, 490,000
Planning and administration	$1,998,900		$1,998,900
Economic development business loans	$200,000		$200,000
Total	**$19,989,000**	**$1,000,000**	**$20,989,000**

TABLE 2

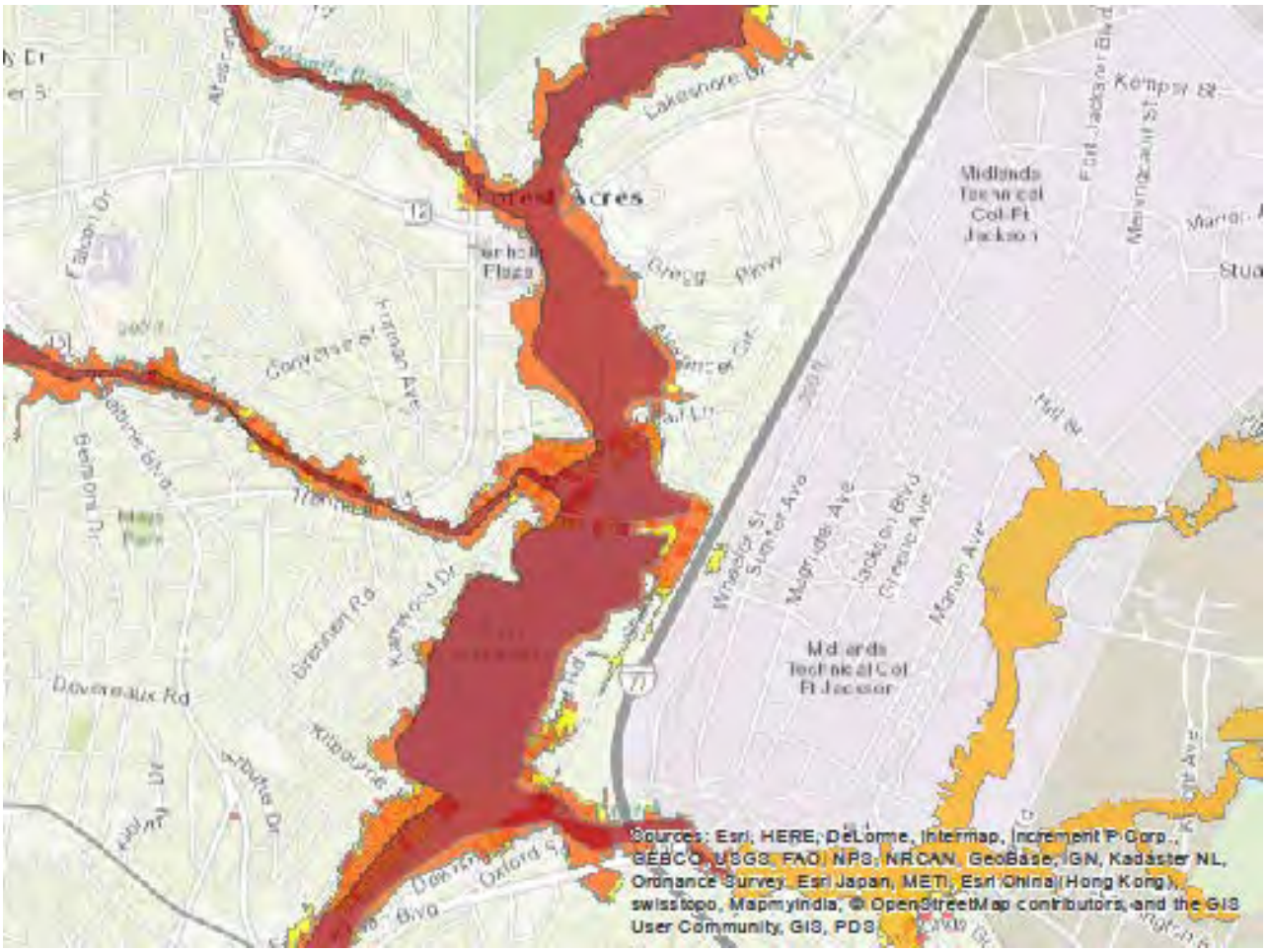
Funding Source	2017	2018	2019	2020	2021	2022	Total
CDBG DR	$8,753,880	$5,002,760	$3,928,910	$1,341,710	$537,760	$423,980	$19,989,000
CDBG PI		$1,000,000					$ 1,000,000
Total	$8,753,880	$6,002,760	$3,928,910	$1,341,710	$537,760	$423,980	$20,989,000

In Columbia, homes along and near the City's many creeks, lakes, and other waterways were inundated by floodwater causing almost complete destruction of some neighborhoods. Most of the major and severe damages to housing occurred along the banks of Lake Katherine, Central and Lower Gills Creek, Wildcat Creek, and Penn Branch areas of the city. All improvements, products, and fixtures will promote energy efficiency, water conservation, and green building practices to the extent applicable, including the following types of activities:

- Roof repair/replacement
- Flooring repair/replacement
- Electrical repair/replacement
- Window repair/replacement
- Electrical and plumbing fixtures
- Heating, Ventilation and Air Conditioning (HVAC) equipment
- Appliance replacement
- Lead-based paint, asbestos, and mold remediation
- Americans with Disabilities Act (ADA) accessibility
- Insulation and sheetrock repair/replacement
- Building foundation repair/replacement/elevation
- Repair/replacement unsafe water and sewer supplies
- Drainage improvements

TARGET AREAS FOR PROGRAM IMPLEMENTATION

The map below shows properties within the floodplain that sustained major and severe damage from the 2015 Flood (For a larger image, see Exhibit 2). Based on FEMA damage assessments, 259 properties within the Columbia city limits suffered major or severe damage, all households potentially eligible for CHAP and the Small Rental Repair Program. Of that number, 140 appear to lie within the floodplain. An 8 step decision process has been completed for all City properties in the floodplain with the determination that there are no alternatives that serve the same purpose for homes in the floodplain as all program activities will occur within the disturbed area of the previously developed parcel; a site specific Tier 2 review will ensure compliance with all program requirements when eligible properties have been identified.



LEGEND	
FEMA Flood Hazard Area	
AE Floodway	
AE Not Floodway	
A Flood Plain	
C Not Flood Plain	
FLOOD DAMAGED PROPERTIES	
Major	
Severe	

Flood hazard areas on Flood Insurance Rate Maps (FIRM) are identified as a Special Flood Hazard Area (SFHA). SFHA are defined as the area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year. The 1-percent annual chance flood is also referred to as the base flood or 100-year flood. SFHAs are labeled as Zone A, Zone AO, Zone AH, Zones A1-A30, Zone AE, Zone A99, Zone AR, Zone AR/AE, Zone AR/AO, Zone AR/A1-A30, Zone AR/A, Zone V, Zone VE, and Zones V1-V30. Moderate flood hazard areas, labeled Zone B or Zone X (shaded) are also shown on the FIRM, and are the areas between the limits of the base flood and the 0.2-percent-annual-chance (or 500-year) flood. The areas of minimal flood hazard, which are the areas outside the SFHA and higher than the elevation of the 0.2-percent-annual-chance flood, are labeled Zone C or Zone X (unshaded).

PROGRAM DETAILS

Columbia Homeowner Assistance Program (CHAP)
Eligible Activity: Rehabilitation - Housing
National Objective: Low- and Moderate-Income (LMI) Benefit
Budget Allocation: $3,336,150

The Columbia Homeowner Assistance Program (CHAP) will provide up to $150,000 to assist approximately 76 owner-occupied households with major or severe damages related to the October 2015 flood for properties with unmet needs exceeding $25,000. Funding for this program will be capped at $150,000 unless rehabilitation of the structure requires work to specifically address compliance with city building codes and floodplain ordinances such as elevation. All substantially damaged homes will be elevated a minimum of two feet above Base Flood Elevation (BFE). Consideration will also be given for costs related to environmental remediation and/or Green Building standards. Initial homeowner hazard insurance premiums, as well as flood insurance premiums, will be covered for one year.

Eligibility requirements for program participants are:

- Damaged residential dwelling must be located within Columbia city limits.
- Applicants must have owned and occupied the damaged property as their primary residence as of and prior to the date of the storm (October 2015).
- Applicants must have registered with FEMA and had their primary residence designated as having sustained *Major* or *Severe* damages.
- Residence must be a single-unit structure, duplex, townhome, or condominium.
- Application for and receipt of Increased Cost of Compliance (ICC) funding for elevation, if required.
- Sufficient gap financing, if required.

CDBG-DR funds will be provided in the form of a direct grant agreement between the city and the applicant and through a construction agreement between the applicant and the selected contractor. The grant agreement will include obligations to:

- Authorize payments directly to the contractor executing rehabilitation, elevation or repair work;
- Own and occupy the damaged dwelling as a primary residence for a period of one (1) year after the completion of repairs and issuance of a “Certificate of Occupancy”; and
- Maintain flood insurance in perpetuity. Execution of a program covenant memorializing the flood insurance requirement will be required.

Program duration is estimated as June 2017 – December 2020.

Columbia Small Rental Repair Program (SRRP)
Eligible Activity: Rehabilitation – Housing
National Objective: Low- and Moderate-Income (LMI) Housing
Budget Allocation: $6,565,270

The Small Rental Repair Program will assist property owners who agree to rent to LMI individuals and families at affordable rates in repairing approximately 193 storm damaged rental units outside of the floodplain. The program will also provide displaced rental households – including those not registered but who can provide evidence of storm damage - with affordable housing opportunities within the City of Columbia. Funding for this program will be capped at $150,000 per unit unless rehabilitation of the flood damaged structure requires additional work specifically to address compliance with city building codes and floodplain ordinances. Consideration will also be given for additional work related to environmental remediation and/or Green Building standards.

As a requirement for receiving CDBG-DR assistance, rental property owners must agree to make improved units available to existing or displaced LMI households before assisting other LMI rental households. Rental property owners must sign a grant agreement requiring that all rehabilitated units remain affordable for three (3) years. For the purpose of the SRRP, small rental properties are those with one to four rental units on one tax parcel. The rent for an affordable unit will be calculated based on the income level of the tenant and the size of the unit which should be between 50-80% of the local Fair Market Rate.

Eligibility requirements for participants in this program are:

- Rental property must be located within Columbia city limits.
- Applicants must have owned the damaged property as of and prior to the date of the storm (October 2015).
- Damaged rental structure should have no more than four units.
- Sufficient gap financing, if required.

Funds will be made available as a forgivable, deferred loan agreement between the City and the property owner and through a construction agreement between the applicant and the selected contractor. Assistance will be provided to property owners who agree to rent rehabilitated properties to those whose incomes are at or below 80% AMI, maintain affordable rent levels for three years, and maintain flood insurance in perpetuity, if applicable. Within 30 days of occupancy or re-occupancy of the rental property, the owner must provide the City with a copy of the executed lease as well as tenant income and demographic information. This information shall be provided annually to the city as property leases are renewed in order to monitor the program's affordability requirements.

Program duration is estimated as June 2017 – December 2022.

Determination of Level of Environmental Review

As the Responsible Entity, the City of Columbia has evaluated the scope of its housing rehabilitation programs, aggregated functionally, and determined three separate tiered environmental reviews – for major rehabilitation, minor rehabilitation, and elevation reimbursement - are appropriate as described in 24 CFR 58.15. The City has conducted a city-wide review of scattered sites until specific addresses for eligible applicants can be determined; an 8 Step Decision Process has been completed for the 140 major and severely damaged properties located in the floodplain. A *site specific* environmental review, which will be completed for each eligible property, will identify historic properties; whether homes are in a floodplain, floodway or wetland; the presence of asbestos, lead-based paint, or mold; any above ground hazardous materials; and any other factors not addressed in the Tier I review. These site specific environmental reviews will be completed for each property before project bidding or taking any choice limiting actions. A Site-Specific Strategy and Checklist for major rehabilitation activities are included with this review.

The City of Columbia has complied with the statutory laws and authorities cited in §58.5 (see the attached Statutory Checklist) and with the requirements of §58.6, completing the Compliance Checklist related to Flood Disaster Protection; restrictions for a project located in Coastal Barrier Resource Areas; and buyer notifications if a project is located in a Runway Clear Zone or Clear Zone.

Section 106 Historic Preservation Compliance Review

The City of Columbia has executed an Addendum to the Federal Emergency Management Agency (FEMA) Programmatic Agreement with South Carolina to expedite Section 106 reviews of historic properties that may be affected by one of the housing programs described above. Under the Unified Federal Review process each Responsible Entity must perform sufficient public outreach. A Public Notice concerning the proposed Addendum was published in *The State* on February 24, 2017 and letters were sent to the Richland County Conservation Commission, the Lexington County Historical Society, Historic Columbia, and the SC Department of Archives and History.

Ms. Julia Mates, Cultural Resources Coordinator and Architectural Historian at Tetra Tech, meets the Secretary of the Interior's Professional Qualification Standards to conduct Section 106 reviews and has been confirmed by HUD. The executed Addendum, a cover letter, and a copy of Ms. Mates' resume have been submitted to HUD and posted on the Section 106 Agreements section of the HUD Historic Preservation website.

As part of its broad programmatic review, the City has defined the Area of Potential Effects (APE) as any of the 15 historic preservation districts within the city limits. Individual sites cannot

be identified until applicant eligibility has been confirmed. Section 106 reviews will be completed for all dwelling units age 45 years or older.

STRATEGY TO ADDRESS SITE SPECIFIC COMPLIANCE FACTORS

As required by regulations defined at 24 CFR 58.15, the City of Columbia has developed the following site specific strategy for its tiered environmental review of major rehabilitation of residential structures 58.35(a)(3)(i). This strategy describes the steps the City will take to address the compliance factors that could not be addressed in the Tier I review. These compliance factors are included on the site specific checklist (attached). All documentation in the Tier II environmental review will be completed before funds are committed.

Historic Preservation:

The City of Columbia and State Historic Preservation Office (SHPO) have a Programmatic Agreement (PA) that expedites consultation **when rehabilitation activities conform to the original footprint and/or are performed in previously disturbed soils including:**

- ❑ In kind repair, replacement and reinforcement of footings, foundations, retaining walls, slopes and slope stabilization systems and installation of perimeter drainage.
- ❑ In kind repair of floors, walls, stairs, ceilings/trim or replacement of same if deteriorated beyond repair.
- ❑ Mold remediation when restricted to damaged areas
- ❑ Non-destructive or concealed testing for lead paint, asbestos or other hazardous materials or to assess hidden damages.
- ❑ In kind repair or replacement of utilities and mechanical, electrical and plumbing systems
- ❑ Elevation of HVAC and mechanical equipment if placed where it cannot be seen from the street.
- ❑ Installation or replacement of interior fire detection, suppression or security alarm systems
- ❑ In kind repair or replacement of damaged or severely deteriorated windows and frames, shutters, doors, door frames and hardware.
- ❑ In kind repainting of surfaces and repair of walls, porches, and foundations
- ❑ In kind repair, replacement or strengthening of roofing and damaged roof system components
- ❑ In kind repair and replacement of insulations systems.
- ❑ ADA compliance
- ❑ Elevation, and reconstruction of buildings less than 45 years old when activities conform to original footprint, are performed in previously disturbed soils and are not located within or adjacent to a historic district.

The Historic Preservation Officer will review all projects with activities included in the Second Tier 2 Allowances in the Programmatic Agreement (PA), as well as the standard Section 106

review of projects with activities that extend beyond the Programmatic Allowances. Upon determination by the Historic Preservation Officer that Section 106 applies to a given undertaking, the City will invite all potential consulting parties -- including federal, state and local agencies, interested parties, and the public – to address compliance factors on the Statutory Checklist and to participate in the project discussion. The City will share the project description, maps and program information with the following authorities when applicable:

- Advisory Council on Historic Preservation
- State Historic Preservation Officer
- Lexington County Historical Society
- Historic Columbia
- Richland County Conservation Commission

If an historic property owner applies and is eligible to participate in one of the City's housing programs, the Historic Preservation Officer will assess the effects of project activities. A determination of **no adverse effect** may be made when the Responsible Entity, SHPO, and other consulting parties agree to a set of conditions that will eliminate adverse effects, which may include, but are not limited to, the following:

- Physical destruction or damage to all or part of the property
- Removal of the property from its historic location
- Change of features within the property's setting
- Transfer, lease, or sale of property out of federal ownership
- Visual, atmospheric, or audible intrusions
- Foreseeable effects that may occur later in time or farther removed in distance
- Cumulative effects

If a determination is made that a project will have an **adverse effect** upon a historic property, the City of Columbia will notify the Advisory Council on Historic Preservation of its determination. The City will consult with SHPO/THPO and any interested stakeholders to identify the best way to avoid, minimize, or mitigate adverse effects. When a resolution among all parties has been agreed upon, it will be formalized in a Memorandum of Agreement (MOA). Failure to reach an agreement requires that the Advisory Council on Historic Preservation notify and advise the City concerning resolution.

Floodplain and Wetland Management:

Upon determination that a specific property is located within the floodplain or wetland, the City will consult with the following agencies to solicit comments concerning compliance with floodplain management and wetland protection regulations defined in Executive Order 11988, 24 CFR 55(b)(2), and Executive Order 11990:

- City of Columbia Floodplain Manager
- South Carolina Natural Resources Flood Mitigation Program
- FEMA Regional Environmental Office
- US Army Corps of Engineers, Columbia Regulatory Field Office

- US Fish and Wildlife Service
- South Carolina Emergency Management Division

National Flood Insurance Program (NFIP) insurance will be obtained for all property located within the 100 year floodplain (Special Flood Hazard Areas in Zones A, AE, AH, AO, AR, A99, V and VE). Flood insurance must be taken for the life of a loan or the useful life of an improvement funded by a grant, regardless of transfer of ownership. For grants, the amount of flood insurance coverage must equal the maximum limit of coverage available with respect to the type of building, or the project cost, whichever is less. *The project cost is the total cost for acquiring, constructing, repairing or improving the building.*

Any major rehabilitation activities on structures in the 100 year floodplain (Zone A) or involves a critical action within a 500 year floodplain (Zone B), must comply with local flood ordinances, be elevated a minimum of two feet above the BFE, retain the existing footprint and land use, and maintain flood insurance protection for the life of the property. The City has completed the 8 step process as part of this Tier 1 review to comply with 24 CFR Part 55, HUD's Floodplain Management and Wetland Protection regulations. The City of Columbia is located outside of the coastal hazard area. If the project involves major rehabilitation within a designated wetland, the City will comply with the decision-making process defined in 24 CFR 55.20 and apply for a Section 404 general permit. NFIP prohibits all activities other than a functional use in the floodway; federal financial assistance is not allowed.

8-Step Decision Making Process

Upon determination that a property eligible to participate in one of the City's housing rehabilitation programs is located within the floodplain, the City will publish a public notice and invite responsible agencies to participate in the environmental review process. Relying on input from public and agency comments, the City will identify and evaluate alternatives to locating the activity in a 100 year floodplain or wetland. Floodplain evaluations will focus on the impacts to lives and property and on water, agricultural, forestry and cultural resources. Wetland evaluations will consider factors relevant to the project's effect on the survival and quality of the wetland.

Where practicable, the City will modify the proposed action to minimize any adverse effects through the use of permeable surfaces, bioswales, stormwater capture and reuse, flood proofing, and elevating structures, among others. The modified activity and alternatives will be reevaluated and, if the reevaluation results in a determination of *No Practicable Alternative*, the City will publish a final notice describing the reasons the project must be located in the floodplain, a list of the alternatives considered, and any mitigation measures that will minimize adverse impacts and restore and preserve natural and beneficial functions and values. After the public comment period is complete, the approved project may be implemented.

Contamination and Toxic Substances

If any properties participating in the Columbia Homeowners Assistance or Small Rental Repair Programs contain asbestos materials, the City of Columbia will complete the site-specific Statutory Checklist to ensure compliance with EPA's Asbestos regulations found at 40 CFR Part 61 (NESHAP) and all state and local regulations. If the presence of mold is detected, all mold will be removed by a certified mold remediation firm with attention to:

- Safety - seal the work area using plastic sheeting so that mold spores do not disperse throughout the home. Workers and occupants should use a high quality, high filtration face mask and vinyl or neoprene gloves. A full protective suit is recommended when using harsh chemicals and for larger mold remediation projects.
- Assessments – assessments will be made before, during, and after remediation efforts
- Contamination control - prevent cross-contamination and the spread of mold from contaminated areas to areas absent of or with less contamination;
- Source removal - physically remove the mold at its source;
- Moisture removal - eliminate the moisture that caused the mold outbreak;
- Clean air - use ventilation or High Efficiency Particulate Air scrubbers to remove airborne mold spores; professionally clean air ducts.

All activities will be reviewed for compliance with the Toxic and Hazardous Chemical requirements. The City of Columbia will complete the Statutory Checklist to assess compliance with 24 CFR 58.5 (i)(2). A determination of the presence of toxic and hazardous chemicals will be made using EnviroMapper to determine if the property:

- Is listed on an EPA Superfund National Priorities or CERCLA or equivalent state list;
- Is located within 3000 feet of a toxic or solid waste landfill;
- Has an underground storage tank known or suspected to be contaminated by toxic chemicals or radioactive materials.

The City of Columbia will perform a government records search to determine whether there has been a release or threat of release to the subject property giving particular attention to any project site on or within one mile of an area that contains or may have contained hazardous waste such as dumps, landfills and industrial sites. The City will solicit information addressing the presence and possible effects of contamination or toxic substances from the following authorities, among others:

- South Carolina Department of Health and Environmental Control, Environmental Public Health Tracking Program
- EPA Region 4 Toxic Release Inventory and Superfund Database

Expected Mitigation Measures

- The City will implement Best Management Practices to identify and prevent storm water pollution and effectively handle storm water runoff from construction activities.
- Where practicable, the City will modify any proposed action to minimize adverse effects on wetlands through the use of permeable surfaces, bioswales, storm water capture and reuse, flood-proofing, and elevating structures above Base Flood Elevation (BFE), among others.
- All properties in the floodplain or floodway must obtain flood insurance, to be maintained in perpetuity.
- Flood-proofing adjustments and additions include:
  - Installing watertight shields for doors and windows.
  - Reinforcing walls to withstand floodwater pressures and impact forces generated by floating debris.
  - Using membranes and other sealants to reduce seepage of floodwater through walls.
  - Installing drainage collection systems and sump pumps to control interior water levels, collect seepage, and reduce hydrostatic pressure on the slab and walls.
  - Installing check valves to prevent the entrance of floodwater or sewage flows through utilities.
  - Anchoring the building to resist flotation, collapse, and lateral movement.
- Toxic substances will be removed, stabilized or encapsulated and a remediation plan developed.

References

Historic Preservation

Nancy E. Boone, Federal Preservation Officer
HUD Office of Environment and Energy
451 7th Street, Room 7212
Washington, DC 20410
T: 202-402-5718

John D. Sylvest, State Historic Preservation Officer (SHPO)
South Carolina Department of Archives and History
8301 Parklane Road
Columbia, SC 29223
T: 803.896.6129

Eric M. Thurston
Historic Preservation Specialist
FEMA Region IV
Office: (770) 220-8817
Cell: (404) 536-4114
Eric.thurston@fema.dhs.gov

Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637
T: (202) 517-0200
E-mail: achp@achp.gov

Floodplain Management
Stephanie Everfield
FEMA Regional Environmental Office
Department of Homeland Security
3003 Chamblee Tucker Road
Atlanta, GA 30341-4112
Stephanie.everfield@dhs.gov

Ali Khan, Floodplain Manager
City of Columbia
1136 Washington Street
Columbia, SC 29201
T: 803-545-3400
lakhan@columbiasc.net

Wetlands Protection
Ezequiel Velez
EPA Region 4, Atlanta Federal Center
61 Forsyth Street, S. W.
Atlanta, GA 30303
Office: (404) 562-9191
Email: velez.ezequiel@epa.gov.

Tom McCoy, Field Supervisor
Charleston Ecological Services Field Office
US Fish and Wildlife Service
176 Croghan Spur Road, Suite 200
Charleston, SC 29407
thomas_mccoy@fws.gov

Jose Barrios**,** Southeast Regional Office
US Fish and Wildlife Service, National Wetlands Inventory
1875 Century Blvd., Suite 200
Atlanta, GA 30345
T: 404.679.7122 or
Ashley Monroe (Monroe.ashley@epa.gov) T: 404-562-9232

Farmland Protection
Ann English, State Conservationist
US Department of Agriculture
1835 Assembly Street, Room 950
Columbia, SC 29201
T: 803-253-3935
Ann.english@sc.usda.gov

Wild and Scenic Rivers
Jeff Duncan
Wild and Scenic Rivers, NPS
535 Chestnut St. Suite 207
Chattanooga, TN 37402
T: 423-987-6127
Jeff_duncan@nps.gov

Bill Marshall
Wild and Scenic Rivers, Endangered Species
SC Department of Natural Resources
PO Box 157, 1000 Assembly Street
Columbia, SC 29202
T: 803.734.9096
MarshallB@dnr.sc.gov

Air Quality
Rhonda Thompson, Chief, Bureau of Air Quality
South Carolina Health and Environmental Control
2600 Bull Street
Columbia, SC 29201
T: 803-898-4123
thompsrb@dhec.sc.gov;

Robert J. Brown, Director of Air Assessment, Innovations & Regulation
Bureau of Air Quality
2600 Bull Street
Columbia, SC 29201
T: 803-898-3432
brownjr@dhec.sc.gov

Air Quality State Implementation Plan
US EPA Region 4**,** Atlanta Federal Center
61 Forsyth Street SW
Atlanta, GA 30303-8960
T: 800-241-1754

Airport Hazards
Michael Gula, Director of Operations, Planning and Facilities
Columbia Metropolitan Airport
125A Summer Lake Drive
West Columbia, SC 29170
mgula@columbiaairport.com;

Toxic Chemicals and Hazardous Materials
South Carolina Health and Environmental Control
Hazardous Waste Compliance
2600 Bull Street
Columbia, SC 29201
T: 803-898-3432

US Army Corps of Engineers
South Atlantic Division
60 Forsyth Street, SW
Atlanta, GA 30303-8801
T: 404-562-5167

Charleston District Office
69 Haloed Avenue
Charleston, SC 29403
843-329-8123

Endangered Species
Melissa Bimbi, Biologist
US Fish and Wildlife Service
SC Ecological Services Field Office
176 Croghan Spur Road, Suite 200
Charleston, SC 29407
T: 843-727-4707
Melissa_bimbi@fws.gov

LIST OF PREPARERS AND SUMMARY OF QUALIFICATIONS:

Maya Gorman, CDBG Disaster Recovery Manager, City of Columbia

For ten years, Ms. Gorman served as the Lead Grant Manager for the Louisiana Office of Community Development Disaster Recovery Unit (OCD-DRU) Hurricane Katrina/Rita Orleans Parish CDBG Long Term Community Recovery (LTCR) Program; the Hurricane Gustav/Ike Parish-Implemented CDBG-DR Program; and the Hurricane Gustav/Ike Lafourche Parish CDBG Coastal Communities Fisheries Recovery Program. She is knowledgeable of the environmental review procedures required by 24 CFR Part 58 and has assisted several Responsible Entities in Louisiana in completing environmental review records at all levels of compliance, including Certifications of Exemption, Categorical Exclusion Not Subject to 58.5, Categorical Exclusion Subject to 58.5, and the Environmental Assessment.

Tetra Tech will be providing site specific reviews for the City of Columbia's residential rehabilitation activities. The firm has more than 10 years of experience working with HUD environmental review procedures. Tetra Tech has been providing Responsible Entities with HUD environmental review services for more than 10 years, including four years of disaster recovery program support. These Responsible Entities have included the Louisiana Office of Community Development Disaster Recovery Unit, New York Governor's Office of Storm Recovery and New York State Homes and Community Renewal, New Jersey Department of Environmental Protection, and San Francisco Mayor's Office of Housing and Community Development. These services have included preparation of 87 environmental assessments (EA), 33 Categorical Exclusions Subject to 58.36 (CEST), 27 statutory worksheets, over 15,000 Tier 2 CESTs, and historic reviews for about 8,900 properties, most of which were done for CDBG-DR projects. Tetra Tech's experience preparing HUD National Environmental Policy Act (NEPA) documentation and Environmental Review Records (ERR) demonstrates the firm's experience and working knowledge of NEPA regulations (under Code of Federal Regulations [CFR], Title 24, Part 58). Tetra Tech's HUD environmental review documents have addressed disaster recovery programs and similar projects, infrastructure, economic development, and housing programs for municipalities and other governmental entities.

LIST OF EXHIBITS

1. Programmatic Agreement FEMA, SCSHPO, SCEMD and TPHO and City of Columbia Addendum
2. Floodplain Map, FEMA FIRMs, Target Area Map and List of Flood Plain Properties
3. National Wetlands Inventory Map
4. Coastal Barrier Resources System Map
5. Sole Source Aquifers Region IV Map
6. Map of Critical Habitats and Resource List of Endangered Species; FWS Clearance to Proceed
7. National Wild and Scenic Rivers Map
8. SO2 Nonattainment Area Map
9. City of Columbia Zoning Maps
10. Columbia Metropolitan Airport Map
11. Low to Moderate Income Maps

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

Statutory Checklist for Compliance with 24 CFR §58.5 – NEPA Related Federal Laws and Authorities

(Must be completed for each individual addressed under overall project description)

Use this worksheet for projects that are Categorically Excluded Subject to 24 CFR §58.5 listed at 24 CFR §58.35(a) and for projects that require an Environmental Assessment.

Project Name: _Columbia Homeowners Assistance Program, Small Rental Repair Program

ERR FILE # _____

Definitions: **A:** The project is in compliance.
B: The project requires an additional compliance step or action.

Statute, Authority, Executive Order Cited at 24 CFR §58.5	A	B	COMPLIANCE FINDING	SOURCE DOCUMENTATION
1. 58.5(a) Historic Properties [36 CFR 800]		X	Consultation/review procedures required.	The City of Columbia has executed a Programmatic Agreement with FEMA, THPO, and the SC SHPO to expedite Section 106 reviews and compliance with 36 CFR 800 (Exhibit 1). See written strategy and site specific checklist.
2. 58.5(b)(1) Floodplain Management [24 CFR 55, Executive Order 11988]		X	Consultation/review procedures required	The City of Columbia followed HUD's 8-step decision process for property located in the floodplain as part of this Tier 1 review. All substantially damaged homes will be elevated at least two feet about BFE. A Floodplain Map, FEMA FIRMs, target area map and list of flood plain properties are attached (Exhibit 2). See written strategy and site specific checklist for Tier 2 review.
3. 58.5(b)(2) Wetland Protection [24 CFR 55, Executive Order 11990]		X	Consultation/review procedures required	The City of Columbia will perform a site specific assessment for each residence proposed for rehabilitation to determine the effect, if any, on wetlands. See written strategy. National Wetlands Inventory map is attached (Exhibit 3)
4. 58.5(c) Coastal Zone Management [Coastal Zone Management Act sections 307(c) & (d)]	X		The project is in compliance.	The City of Columbia is not within a Coastal Zone. See attached Coastal Barrier Resources System map (Exhibit 4).
5. 58.5(d) Sole Source Aquifers [40 CFR 149]	X		The project is in compliance.	The City of Columbia is not within a sole source aquifer watershed area. (Exhibit 5)

6. 58.5(e) Endangered Species [50 CFR 402]	X		The project is in compliance.	In a 5/8/17 phone call with Mark Caldwell of the FWS Charleston Field Office, it was determined that minor rehabilitation of existing residences on previously disturbed areas will have no effect on protected species in the City of Columbia. The USFWS website indicates there are no critical habitats within the city limits. A map of critical habitats, a list of at-risk species in Richland County, and the FWS Clearance to Proceed letter are attached (Exhibit 6).
7. 58.5(f) Wild and Scenic Rivers [36 CFR 297]	X		Project is in compliance.	In an email on 2/9/17 Bill Marshall, Rivers Coordinator, SC DNR, states that proposed activities will be restricted to existing structures on developed sites with no changes in land use and therefore will have little or no adverse effect on rivers. The City will apply Best Management Practices as described by SCDHEC to mitigate potential polluted runoff from work sites. See written strategy for site specific assessments. A NWSRS map is attached (Exhibit 7).
8. 58.5(g) Air Quality [40 CFR parts 6, 51,61, 93]	X		Project is in compliance.	In a letter dated 1/25/17, Rhonda Thompson, Chief, Bureau of Air Quality, DHEC, stated the project is consistent with the State Implementation Plan and no air quality permits are needed. A map of nonattainment areas does not include Columbia, SC (Exhibit 8). The City will perform site specific assessments on residences to determine the presence of asbestos or mold and remediate any effect. See written strategy.
9. 58.5(h) Farmland Protection [7 CFR 658]	X		Project is in compliance.	All activities will take place within the City limits, zoned for urban uses and will have no effect on farmland. Zoning maps and legends are attached (Exhibit 9).
10. 58.5(i)(1) Noise Control and Abatement [24 CFR 51B]	X		Project is in compliance.	A noise analysis is not required. **24 CFR 51.101(a)(3**) states that HUD's noise policy does not apply to any action under disaster assistance appropriations that are provided to restore facilities, such as residences, to the condition that existed prior to the disaster.
11. 58.5 (i) (1) Explosive and Flammable Operations [24 CFR 51C]	X		Project is in compliance.	ASD requirements do not apply for single family, rehabilitation because this project will not increase the number of people exposed to hazardous operations.
12. 58.5(i)(1) Airport Hazards (Runway Clear Zones and Clear Zones/Accident Potential Zones) [24 CFR 51D]	X		Project is in compliance.	These programs will not change the current use of the property, prolong the physical or economic life of the structures, or increase the unit density or number of people at the site. Michael Gula, Director of Operations, Columbia Metropolitan Airport, states no property within the city limits is within 2500 feet of Airport Clear Zones or Runway Clear Zones. A map indicating CAE is 5.85 miles outside of the city limits where all activities will take place is attached (Exhibit 10).
13. 58.5(i)(2)(i-iv) Contamination and Toxic Substances [24 CFR 58.5(i)(2)]		X	Consultation/review procedures required	The City of Columbia will assess individual residences to determine if the property is located within the minimum search distances

				of any type of environmental contamination. See written strategy.
14. 58.5(j) Environmental Justice [Executive Order 12898]		X	Consultation/review procedures required	These activities are designed to assist primarily low income and minority neighborhoods. No adverse environmental impact is anticipated during residential rehab of single family units, but a site specific review will be conducted under Tier 2 to ensure avoidance of adverse impacts. A map of Household Median Income by Block Group is attached (Exhibit 11).

DETERMINATION:

☐ **Box "A" has been checked for all authorities.** For Categorically Excluded actions pursuant to §58.35(a) [Does not apply to EA or EIS level of review which can never convert to Exempt], the project can convert to Exempt, per §58.34(a) (12), since the project does not require any compliance measures (e.g., consultation, mitigation, permit or approval) with respect to any law or authority cited at §58.5. The project is now made Exempt and **funds may be drawn down**; OR

☒ **Box "B" has been checked for one or more authority.** For Categorically Excluded actions pursuant to §58.35(a), the project cannot convert to Exempt since one or more authority requires compliance, including but not limited to consultation with or approval from an oversight agency, performance of a study or analysis, completion of remediation or mitigation measure, or obtaining of license or permit. **Complete pertinent compliance requirement(s), publish NOI/RROF, request release of funds (HUD-7105.15), and obtain HUD's Authority to Use Grant Funds (HUD-7015.16) per §58.70 and §58.71 before committing funds**; OR

☐ This project is not a Categorically Excluded action pursuant to §58.35(a), or may result in a significant environmental impact to the environment, and requires preparation of an Environmental Assessment (EA). Prepare the EA according to 24 CFR Part 58 Subpart E.

MITIGATION MEASURES AND CONDITIONS FOR PROJECT APPROVAL:

The City of Columbia is preparing this Tiered Environmental Review for its Disaster Recovery major rehabilitation housing activities. This Statutory Checklist supports a broad, programmatic review of an undefined number of scattered sites. Details regarding further consultations, mitigation measures, permit requirements, approvals and contract, grant, and loan conditions are included in the Environmental Review Record Project Description - Strategy to Address Site Specific Compliance Factors.

The City will comply with all state and federal asbestos regulations, seeking assistance from the DHEC in conducting asbestos inspections and materials testing, preparing demolition notifications, and obtaining asbestos permits, if necessary. If applicable, compliance with the National Emissions Standards for Asbestos regulations at 40 CFR Part 61 will be achieved and mold remediation will be completed.

The City has completed the 8 step decision-making process to comply with 24 CFR Part 55, HUD's Floodplain Management regulations, for properties located within a 100 year floodplain. All substantially damaged homes must be elevated at least two feet about the Base Flood Elevation. If the project involves major rehabilitation within a designated wetland, the City will comply with the decision-making process defined in 24 CFR 55.20 and apply for a Section 404 permit if necessary.

Where practicable, the City will modify any proposed action to minimize adverse effects on wetlands through the use of permeable surfaces, bioswales, storm water capture and reuse, and flood-proofing and elevating structures two feet above the Base Flood Elevation (BFE), among others. All properties in the floodplain or floodway must obtain flood insurance to be maintained in perpetuity.

Flood proofing adjustments and additions during residential rehabilitation include:

- Installation of watertight shields for doors and windows.
- Reinforcement of walls to withstand floodwater pressures and impact forces generated by floating debris.
- Use of membranes and other sealants to reduce seepage of floodwater through walls and wall penetrations.
- Installation of drainage collection systems and sump pumps to control interior water levels, collect seepage, and reduce hydrostatic pressures on the slab and walls.
- Installation of check valves to prevent the entrance of floodwater or sewage flows through utilities.
- Anchoring the building to resist flotation, collapse, and lateral movement.

Toxic substances will be removed, stabilized or encapsulated and a specific remediation plan developed when necessary.

PREPARER:

Gloria Saeed 8/4/17

Preparer's Signature Date

Gloria Saeed, Director, Community Development Department, City of Columbia

Preparer's Name and Title (printed)

COLUMBIA CDBG DISASTER RECOVERY PROGRAM
CDBG DISASTER RECOVERY ENVIRONMENTAL REVIEW
CATEGORICAL EXCLUSION SUBJECT TO §58.5
SITE SPECIFIC CHECKLIST – MAJOR REHABILITATION

§58.5(a) Historical Properties [36 CFR Part 800]

- ❑ Does the project include the type of activity that would have the potential to affect historic properties such as ground disturbance, new construction or rehabilitation?
  ☐ Yes ☐ No

- ❑ Is the project located within or directly adjacent to a historic district?
  ☐ Yes ☐ No

- ❑ Is the structure or surrounding structures listed on or eligible for listing on the National Register of Historic Places (e.g. greater than 45 years old)?
  ☐ Yes ☐ No

The City of Columbia and State Historic Preservation Office (SHPO) have a Programmatic Agreement (PA) that expedites consultation **when rehabilitation activities conform to the original footprint and/or are performed in previously disturbed soils including:**

- ❑ In kind repair, replacement and reinforcement of footings, foundations, retaining walls, slopes and slope stabilization systems and installation of perimeter drainage.
- ❑ In kind repair of floors, walls, stairs, ceilings/trim or replacement of same if deteriorated beyond repair.
- ❑ Mold remediation when restricted to damaged areas
- ❑ Non-destructive or concealed testing for lead paint, asbestos or other hazardous materials or to assess hidden damages.
- ❑ In kind repair or replacement of utilities and mechanical, electrical and plumbing systems
- ❑ Elevation of HVAC and mechanical equipment if placed where it cannot be seen from the street.
- ❑ Installation or replacement of interior fire detection, suppression or security alarm systems
- ❑ In kind repair or replacement of damaged or severely deteriorated windows and frames, shutters, doors, door frames and hardware.
- ❑ In kind repainting of surfaces and repair of walls, porches, and foundations
- ❑ In kind repair, replacement or strengthening of roofing and damaged roof system components
- ❑ In kind repair and replacement of insulations systems.
- ❑ ADA compliance
- ❑ Elevation, and reconstruction of buildings less than 45 years old when activities conform to original footprint, are performed in previously disturbed soils and are not located within or adjacent to a historic district.

- ❑ Were any properties of historical, architectural, religious or cultural significance identified in the project's Area of Potential Effect (APE)?

  ☐ Yes ☐ No

- ❑ Have you consulted with the SHPO to determine whether the project will have "No Adverse Effect on Historic Properties?"

  ☐ Yes ☐ No

- ❑ Does the SHPO concurrence letter received for this project require mitigation or have conditions?

  ☐ Yes ☐ No

- ❑ Have the SHPO and RE agreed on required mitigation or conditions? Describe mitigation measures.

  ☐ Yes ☐ No _____

Historic properties of religious and cultural significance to tribes and Native Hawaiian organizations

- ❑ Does the project include the types of activities such as those listed below that have the potential to affect historic properties of religious and cultural significance to tribes?
  - Ground disturbance (digging);
  - New construction in undeveloped natural areas;
  - Incongruent visual changes – impairment of the vista or viewshed from an observation point in the natural landscape;
  - Incongruent audible changes – increase in noise levels above an acceptable standard in areas known for their quiet, contemplative experience;
  - Incongruent atmospheric changes – introduction of lights that create skyglow in an area with a dark night sky;
  - Work on a building with significant tribal association;
  - Transfer, lease or sale of a historic property of religious and cultural significance.

  ☐ Yes ☐ No

  If Yes, continue. **If No**, tribal consultation is not required.

- ❑ Does HUD's Tribal Directory Assessment Tool indicate that tribes have an interest in the location where the project is sited? (http://egis.hud.gov/tdat/Tribal.aspx)

  ☐ Yes ☐ No

- ❑ Did the tribe(s) respond that they want to be a consulting party?

  ☐ Yes ☐ No

- ❑ After consulting with the tribe(s) and discussing the project, were any properties of religious or cultural significance to the tribe(s) identified in the project's APE?
  ☐ Yes ☐ No

- ❑ After consulting with the tribe(s), will the project have an adverse effect on properties of religious or cultural significance to the tribe(s)?
  ☐ Yes ☐ No

- ❑ Were any objections to a finding received from a consulting tribe?
  ☐ Yes ☐ No

§58.5(b) (1) Floodplain Management [24 CFR Part 55]

- ❑ Does the project involve repairs or improvements on one to four family properties that **do not** meet the threshold for "substantial improvement" of §55.2(b)(8), i.e., the cost does not equal or exceed 50% of the market value of the structure before improvement or repair started, before damage occurred.
  ☐ Yes ☐ No

- ❑ Is the project located within (or have an impact on) a 100 year floodplain (Zone A) or Coastal High Hazard (Zone V) identified by FEMA maps?
  ☐ Yes ☐ No

- ❑ Does the project involve a "critical action," per §55.2(b) (2) (i), located within a 500 year floodplain (Zone B) identified by FEMA maps?
  ☐ Yes ☐ No

All substantially rehabilitated or substantially improved structures must be elevated at least two feet above the Base Flood Elevation (BFE).

If the project is located within a 100 year floodplain or involves a critical action within a 500 year floodplain, the City of Columbia will follow HUD's Floodplain Management Regulations 8-Step decision-making process of §55.20 to comply with 24 CFR Part 55. We are currently completing the 8-Step decision-making process for all potential properties in the floodplain showing that there are no practicable alternatives to locating these rehabilitation projects in the floodplain, and defining measures to mitigate impacts to floodplains. The 8-step decision-making process will be included in the ERR and summarized in Part 55 and Part 58 public notices, as well as NOI/RROF and FONSI notices.

- ❑ Does the project involve a critical action in a coastal high hazard area or a floodway?
  ☐ Yes ☐ No

  If, **Yes,** HUD assistance may not be used for this project.

- ❑ Does the project involve a non-critical action that is not a functionally dependent use located in a floodway?

  ☐ Yes ☐ No If **Yes,** HUD assistance may not be used for this project

§58.5(b) (2) Wetlands Protection (E.O. 11990)

Does the project involve major rehabilitation or substantial improvements?

☐ ☐ Yes ☐ No

- ❑ Is the project within or adjacent to or will it affect wetlands, marshes, wet meadows, mud flats or natural ponds per field observation and National Wetlands Inventory (NWI) maps issued by the US Fish & Wildlife Service (USFWS) or, if not available, National Soil Surveys by National Resources Conservation Service (NRCS)?

  ☐ Yes ☐ No

- ❑ Are there drainage ways, streams, rivers, or coastlines on or near the site?

  ☐ Yes ☐ No

- ❑ Are there ponds, marshes, bogs, swamps or other wetlands on or near the site?

  ☐ Yes ☐ No

- ❑ Does the project involve new construction and/or filling located within a wetland designated on a USFWS National Wetlands Inventory map?

  ☐ Yes ☐ No

If **Yes** to any of the above, the City of Columbia will comply with wetlands decision-making process of 24 CFR §55.20.

- ❑ Will the project require a permit from the Corps under Section 404 of the Clean Water Act and/or will USFWS require wetland mitigation?

  ☐ Yes ☐ No

If Yes, ensure this will be noted in Part 55 and Part 58 public notices. Include all mitigation measures and permit requirements in the mitigation section of the Statutory Checklist.

§58.5(i) (2) Contamination and Toxic Substances

- ❑ Does the project involve demolition or renovation of buildings likely to contain asbestos containing materials?

  ☐ Yes ☐ No

  If Yes, the City of Columbia will ensure the project is in compliance with EPA's Asbestos regulations found at 40 CFR Part 61 (NESHAP) and all state and local regulations.

- ❑ Is the property damaged by mold?

  ☐ Yes ☐ No

- ❑ All mold will be removed by a certified mold remediation firm with attention to:
  - Safety - seal the work area using plastic sheeting so that mold spores do not disperse throughout the home. Workers and occupants should use a high quality, high filtration face mask and vinyl or neoprene gloves. A full protective suit is recommended when using harsh chemicals and for larger mold remediation projects.
  - Assessments – assessments will be made before, during, and after remediation efforts
  - Contamination control - prevent cross-contamination and the spread of mold from contaminated areas to areas absent of or with less contamination;
  - Source removal - physically remove the mold at its source;
  - Moisture removal - eliminate the moisture that caused the mold outbreak;
  - Clean air - use ventilation or High Efficiency Particulate Air scrubbers to remove airborne mold spores; professionally clean air ducts.

Sites known or suspected to be contaminated by toxic chemicals or radioactive materials include but are not limited to sites: (i) listed on an EPA Superfund National Priorities or CERCLA List, or equivalent State list; (ii) located within 3,000 feet of a toxic or solid waste landfill site; or (iii) with an underground storage tank. For any of these conditions, the grantee must provide an ASTM Phase I report.

- Review databases maintained by U.S. EPA and state, local, and tribal environmental quality departments or agencies to screen for potential *on-site* and *off-site* facilities that could pose health and safety problems and toxic clean-up sites that are presently under analysis or remediation.
- Investigate previous uses of the site. Site inspections and building and use permit records as well as Sanborn Co. maps show previous land uses which could have left toxic residues. Other methods of evaluation include performing a site walk, interviewing property owners or managers and local officials, and analyzing local land use records, permits, and violations.
- When site conditions indicate that the subject property is contaminated or likely contaminated by toxic substances, hazardous materials or petroleum products, one shall provide an ASTM certified Phase I ESA report, or other studies where applicable. Any hazards that are identified should be evaluated for the potential to affect the health and safety of the occupants and end-

users. Contact your local HUD field environmental officer for further technical assistance in this regard.

- ❑ Is the property located within the search distances of any of the types of environmental contamination sources?

Standard Environmental Record Sources	ASTM 1527-13 Recommended Minimum Search Distance (mi)	Yes	No
Federal Delisted NPL Site List	0.5	☐	☐
Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) List	0.5	☐	☐
Federal CERCLIS No Further Remedial Action Planned (NFRAP) Site List	0.5	☐	☐
Federal RCRA Non-CORRACTS Treatment, Storage and Disposal (TSD) Facilities List	0.5	☐	☐
State- and Tribal-Equivalent CERCLIS	0.5	☐	☐
State and Tribal Landfill and/or Solid Waste Disposal Site Lists	0.5	☐	☐
State and Tribal Leaking Storage Tank Lists	0.5	☐	☐
State and Tribal Voluntary Cleanup Sites	0.5	☐	☐
State and Trial Brownfield Sites	0.5	☐	☐
Federal National Priorities List (NPL)	1	☐	☐
Federal RCRA Correction Action (CORRACTS) Facilities List	1	☐	☐
State- and Tribal-Equivalent NPL	1	☐	☐
Federal Institutional Control/Engineering Control Registries	Property Only	☐	☐
State and Tribal Institutional Control/Engineering Control Registries	Property Only	☐	☐
Federal Emergency Response and Notification System (ERNS) List	Property Only	☐	☐
Federal RCRA Generators List	Property/Adjoining Properties	☐	☐
State and Tribal Registered Storage Tank Lists	Property/Adjoining Properties	☐	☐

If the project is located within any of the minimum search distances above, then the RE must further evaluate to determine if there has been a release or there is a threat of release to the subject property. Attach supporting documentation to the environmental review to support any conclusion that the site of concern is not a threat.

If a release or threat of release cannot be ruled out, then services of a qualified environmental professional is necessary to further evaluate potential for site contamination. Recommend an ASTM 1527-13 Phase I Environmental Site Assessment (Phase I).

Prior Uses of the Property

- ❑ Has the subject property, adjacent property, or adjoining property ever been used for any of the following types of uses?

	Yes	**No**		**Yes**	**No**
Gas Station	☐	☐	Vehicle Repair Shop	☐	☐
Car Dealership	☐	☐	Auto Garage	☐	☐
Depot	☐	☐	Commercial Printing Facility	☐	☐
Industrial or commercial warehouses	☐	☐	Dry Cleaners	☐	☐
Photo Developing Lab	☐	☐	Hospital	☐	☐
Junkyard or landfill	☐	☐	Agricultural/Farming Operations	☐	☐
Tannery	☐	☐	Livestock Operations	☐	☐

If the evaluation of previous uses results in a yes answer to any of the above, the services of a qualified environmental professional is necessary to rule out site contamination. An ASTM 1527-13 Phase I is recommended.

If the evaluation of previous uses does not identify previous uses of concern, attach supporting documentation for the conclusion to the environmental review.

Field Site Visit

- ❑ Did a visual inspection of the site show the following?

	Yes	No
Distressed vegetation	☐	☐
Vent or Fill Pipes	☐	☐
Storage Oil Tanks or Questionable Containers	☐	☐
Pits, Ponds or Lagoons	☐	☐
Stained Soil or Pavement (other than water stains)	☐	☐
Pungent, Foul or Noxious Odors	☐	☐
Dumped Material or Soil, Mounds of Dirt, Rubble, Fill, etc.	☐	☐

- ❑ Does the project have an underground storage tank other than a residential fuel tank, or known or suspected to be contaminated by toxic chemicals or radioactive materials?

  ☐ Yes ☐ No

- ❑ Is the project site near an industry or commercial facility disposing of chemicals or hazardous wastes?

  ☐ Yes ☐ No

- ❑ Could a nearby source of toxic, hazardous or radioactive substances affect the health and safety of project occupants or conflict with the intended use of the property?

  ☐ Yes or ☐ No

I**f the site visit identifies a "Yes" answer to any of the above,** a qualified environmental professional must undertake investigations necessary to ensure that the project is free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances such that there is no hazard which could affect the health and safety of occupants

Results of ASTM Site Contamination Reviews

- ❑ Was an ASTM Phase I Environmental Site Assessment (ESA) report completed for this project? (Strongly recommend a Phase I ESA for land acquisition, new construction, reconstruction or substantial rehabilitation).

  ☐ Yes ☐ No

- ❑ Did a Phase I, or equivalent evaluation, identify the potential for site contamination? [The RE must independently evaluate the Phase I and not rely entirely on the conclusions of whether or not there is a Recognized Environmental Condition (REC). Phase I's do not always appropriately identify RECs.]

  ☐ Yes ☐ No

- ❑ If there is the potential for site contamination, was an ASTM Phase II Environmental Site Assessment Completed that documented contamination?

  ☐ Yes or ☐ No

- ❑ Did results of the Phase I or Phase II identify the need to mitigate the environmental condition by removing, stabilizing or encapsulating the toxic substances in accordance with the requirements of the appropriate Federal, state or local oversight agency?

  ☐ Yes ☐ No

- ❑ If the project site requires remediation, does the RE have the following documentation?

	Yes	No
Remediation Plan	☐	☐
Regulatory Oversight Agency Approval of the Remediation Plan	☐	☐
Firm Cost Estimate to Implement the Remediation Plan	☐	☐
A Secured Source of Funding for Site Remediation	☐	☐
A project condition that the project construction or rehabilitation cannot proceed until the RE received a No Further Action (NFA) Required or Site Closure Letter from the Regulatory Oversight Agency	☐	☐
A project condition for Deed Restrictions related to any continuing obligations associated with the remediation plan or NFA or Site Closure Letters	☐	☐

- ❑ If the site requires remediation, and the property owner intends to complete the remediation prior to transferring the property to the HUD recipient, can the RE provide documentation of the following?

	Yes	No
Remediation Plan	☐	☐
Regulatory Oversight Agency Approval of the Remediation Plan	☐	☐
Purchase contract and closing document requirements for receipt of a No Further Action Required or Site Closure Letter from the Regulatory Oversight Agency prior to closing.	☐	☐
Deed restrictions for any continuing obligations associated with the remediation plan or NFA or Site Closure Letters	☐	☐

Minor Rehabilitation Activities

Categorical Exclusion Subject to §58.5 Determination for Activities Listed at 24 CFR §58.35(a)

Grant Recipient: City of Columbia Project Name: Minor Repair Program

Project Description (Include all actions which are either geographically or functionally related):
Clearance is requested for a tiered environmental review for the rehabilitation, remediation, and repair of single family (1-4 units) residences sustaining minor damage as a result of the South Carolina Flood of 2015. The City of Columbia has developed a broad review based at the citywide geographic level and a site specific strategy for environmental clearance when individual addresses for the Minor Repair Program become known. CDBG Disaster Recovery Funding is $19,989,000 with an additional $1 million in CDBG Program Income funds for total program funding of $20,989,000. Of that amount $3,398,680 has been allocated to the minor residential rehabilitation activity covered by this review ($2,398,680 in DR funds and $1 million in CDBG PI funds).

Location: City of Columbia

Funding Source: CDBG HOME ESG HOPWA EDI Capital Fund Operating Subsidy Hope VI
Other: CDBG Disaster Recovery
Estimated Funding Amount: $3,398,680 Grant Number: B-16-MH-45-0001

I have reviewed and determined that the above mentioned project is a Categorically Excluded activity (subject to §58.5) per 24 CFR §58.35(a) as follows:

☐	58.35(a) (1). Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent (e.g., replacement of water or sewer lines, reconstruction of curbs and sidewalks, repaving of streets);
☐	58.35(a) (2). Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons;
	58.35(a) (3). Rehabilitation of buildings and improvements when the following conditions are met:
☒	58.35(a) (3) (i.)In the case of a building for residential use (with one to four units), the density is not increased beyond four units, the land use is not changed, and the footprint of the building is not increased in a floodplain or in a wetland;
☐	58.35(a) (3) (ii). In the case of multifamily residential buildings: (A) Unit density is not changed more than 20 percent; (B) The project does not involve changes in land use from residential to non-residential; and (C) The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.
☐	58.35(a) (3) (iii). In the case of non-residential structures, including commercial, industrial, and public buildings: (A) The facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent; **AND** (B) The activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another.
☐	58.35(a) (4) (i) An individual action on up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between; or

☐	58.35(a)((ii) An individual action on a project of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site. 58.35(a) (iii) Paragraphs (a) (4) (i) and (ii) of this section do not apply to rehabilitation of a building for residential use (with one to four units) (see paragraph (a) (3) (i) of this section).
☐	58.35(a) (5). Acquisition (including leasing) or disposition of, or equity loans on an existing structure, or acquisition (including leasing) of vacant land provided that the structure or land acquired, financed, or disposed of will be retained for the same use.
☐	58.35(a) (6). Combinations of the above activities.

The responsible entity must also complete and attach a **§58.5 Statutory Checklist and Worksheet and a §58.6 Compliance Checklist**. By signing below the Responsible Entity officially determines in writing that all activities covered by this determination are Categorically Excluded (subject to §58.5) and meets the conditions specified for such exclusion under section 24 CFR §58.35(a). This document must be maintained in the ERR.

AUTHORIZED RESPONSIBLE ENTITY OFFICIAL:

Teresa Wilson

Authorized Responsible Entity Signature

8/4/2017

Date

Teresa Wilson

Authorized Responsible Entity Name (printed)

City Manager, City of Columbia, SC

Title (printed)

Compliance Documentation Checklist
24 CFR 58.6

Grant Recipient: City of Columbia____ Project Name: Columbia CDBG Disaster Recovery Program_
Project Description (Include all actions which are either geographically or functionally related):
The Minor Repair Program is designed to assist low-to-moderate (LMI) income households that sustained minor damage as a result of the October 2015 Flood in minor rehabilitation, remediation, and repair of single family (1-4 units) residences. (A detailed project description is attached.)_____

Level of Environmental Review Determination: Select One of the following:

☐(1) Exempt per 24 CFR 58.34, or
☐(2) Categorically Excluded not subject to statutes per §58.35(b), or
☒(3) Categorically Excluded subject to statutes per §58.35(a), or
☐(4) Environmental Assessment per §58.36, or
☐(5) EIS per 40 CFR 1500

STATUTES and REGULATIONS listed at 24 CFR 58.6

FLOOD DISASTER PROTECTION ACT

1. Does the project involve acquisition, construction or rehabilitation of structures located in a FEMA-identified Special Flood Hazard?

☒No; Cite Source Document: FEMA Flood Zone Maps and FIRM panels will be documented when site specific reviews are completed._____

☐Yes; Source Document: _____

2. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☒Yes (Flood Insurance under the National Flood Insurance Program must be obtained and maintained for the economic life of the project, in the amount of the total project cost. A copy of the flood insurance policy declaration must be kept on file). **(Appendix I)**

☐No **(Federal assistance may not be used in the Special Flood Hazards Area).**

COASTAL BARRIERS RESOURCES ACT

1. Is the project located in a coastal barrier resource area?

☒ No; Cite Source Documentation: The City of Columbia is not located within a coastal barrier resource area.__ (This element is completed).

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of existing property within a Civil Airport's Runway Clear Zone or a Military Installation's Clear Zone?

☒ No; Source Documentation: No property within the city limits is within 2500 feet of a Clear Zone or Runway Clear Zone _____
Project complies with 24 CFR 51.303(a)(3).

☐ Yes; **Disclosure statement must be provided** to buyer and a copy of the signed disclosure must be maintained in this Environmental Review Record **(Appendix II)**

Prepared by (name and title, please print): Gloria Saeed, Director, Community Development_____, _____

Signature: Gloria Saeed Date: 8/4/17

Columbia CDBG Disaster Recovery Program
Tier 1 Environmental Review Categorical Exclusion Subject To §58.5
for Minor Rehabilitation Activities at Unspecified Single Family Housing Sites
Project Description

In October 2015, the City of Columbia, along with much of the State of South Carolina, experienced unprecedented rainfall and historic flooding with more than two feet of rainfall in less than 48 hours. As part of its Community Development Block Grant (CDBG) Disaster Recovery Program, HUD has allocated $19.989 million to the City of Columbia to address some of its critical unmet needs resulting from the 2015 Flood. The City has added $1 million in CDBG Program Income funds to augment its disaster recovery program budget. All programs will be administered by the City's Community Development Department.

Following a major disaster, households that qualify as low to moderate income (80% or less of Area Median Income) are likely to have more difficulty securing financing for necessary building repairs, finding suitable rental housing, or paying for remediation or relocation expenses. For that reason, the City of Columbia is directing almost 90%, or $17,790,100, of its CDBG Disaster Recovery allocation to five (5) housing programs that will maximize benefits to the most vulnerable populations.

This environmental review record will be valid for five years, the maximum time allowed by HUD, and covers the minor rehabilitation of single family (1-4 units) storm-damaged residences: Minor Repair Program. All program activities will occur within Columbia's city limits. Table 1 indicates the total funding among all CDBG Disaster Recovery activities. The City estimates program duration at six years. Table 2 indicates the project expenditures per year of all funding sources.

Table 1

Activity	CDBG Disaster Recovery	CDBG Program Income	Total Disaster Recovery Budget
Housing major rehabilitation, repair, and elevation	$ 9,901,420		$ 9,901,420
Housing minor rehabilitation	$ 2, 398,680	$1,000,000	$ 3,398,680
Residential Acquisition and demolition (Buyout)	$2,000,000		$2,000,000
Elevation reimbursement	$ 3,490,000		$ 3, 490,000
Planning and administration	$1,998,900		$1,998,900
Economic development business loans	$200,000		$200,000
Total	**$19,989,000**	**$1,000,000**	**$20,989,000**

TABLE 2

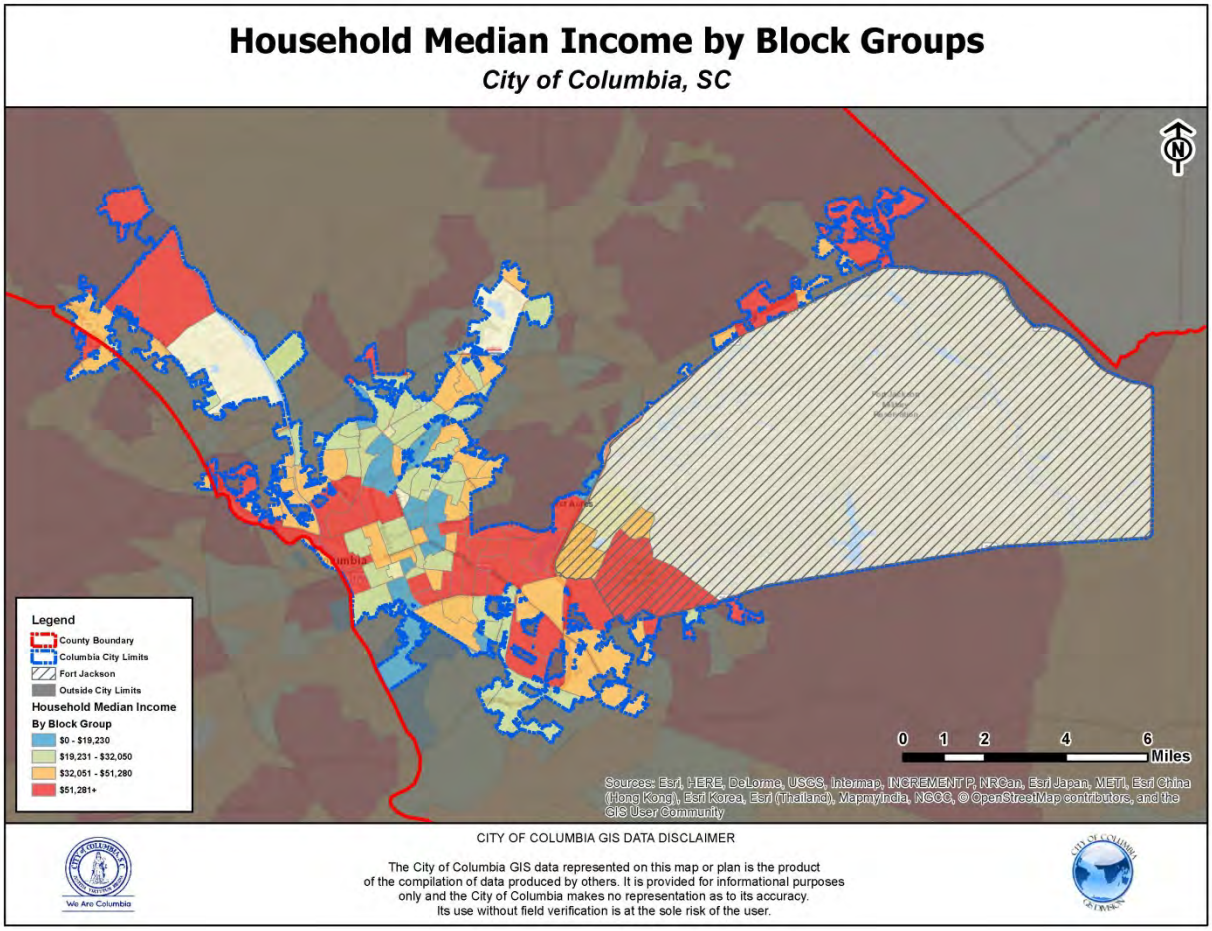
Funding Source	2017	2018	2019	2020	2021	2022	Total
CDBG DR	$8,753,880	$5,002,760	$3,928,910	$1,341,710	$537,760	$423,980	$19,989,000
CDBG PI		$1,000,000					$ 1,000,000
Total	$8,753,880	$6,002,760	$3,928,910	$1,341,710	$537,760	$423,980	$20,989,000

In Columbia, homes along and near the City's many creeks, lakes, and other waterways were inundated by floodwater causing almost complete destruction of some neighborhoods. Most of the major and severe damages to housing occurred along the banks of Lake Katherine, Central and Lower Gills Creek, Wildcat Creek, and Penn Branch areas of the city. All improvements, products, and fixtures will promote energy efficiency, water conservation, and green building practices to the extent applicable, including the following types of activities:

- Roof repair/replacement
- Flooring repair/replacement
- Electrical repair/replacement
- Window repair/replacement
- Electrical and plumbing fixtures
- Heating, Ventilation and Air Conditioning (HVAC) equipment
- Appliance replacement
- Lead-based paint, asbestos, and mold remediation
- Americans with Disabilities Act (ADA) accessibility
- Insulation and sheetrock repair/replacement
- Repair/replacement unsafe water and sewer supplies
- Drainage improvements

TARGET AREAS FOR PROGRAM IMPLEMENTATION

The map below shows properties that sustained minor damage from the 2015 Flood (For a larger image, see Exhibit 2). Based on FEMA damage assessments, 1198 properties within the Columbia city limits that sustained minor damage are considered low to moderate income households and are potentially eligible for the Minor Repair Program. Of that number, 15 appear to lie within the floodplain. An 8 step decision process has been completed for all City properties in the floodplain with the determination that there are no alternatives that serve the same purpose for homes in the floodplain as all program activities will occur within the disturbed area of the previously developed parcel. A site specific Tier 2 environmental review will identify those properties in the floodplain; however, 58.5 (b)(1) and 58.5 (b)(2) do not apply to projects for minor repairs or improvements to single family (1-4 units) residences.



Flood hazard areas on Flood Insurance Rate Maps (FIRM) are identified as a Special Flood Hazard Area (SFHA). SFHA are defined as the area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year. The 1-percent annual chance flood is also referred to as the base flood or 100-year flood. SFHAs are labeled as Zone A, Zone AO, Zone AH, Zones A1-A30, Zone AE, Zone A99, Zone AR, Zone AR/AE, Zone AR/AO, Zone AR/A1-A30, Zone AR/A, Zone V, Zone VE, and Zones V1-V30. Moderate flood hazard areas, labeled Zone B or Zone X (shaded) are also shown on the FIRM, and are the areas between the limits of the base flood and the 0.2-percent-annual-chance (or 500-year) flood. The areas of minimal flood hazard, which are the areas outside the SFHA and higher than the elevation of the 0.2-percent-annual-chance flood, are labeled Zone C or Zone X (unshaded).

PROGRAM DETAILS

City of Columbia Minor Repair Program (MRP)
Eligible Activity: Rehabilitation – Housing, 24 CFR 570.202, 24 CFR 507.201
National Objective: Low- and Moderate-Income Benefit
Budget Allocation: $2,398,680

Overview and Delivery

The proposed City of Columbia Minor Repair Program (MRP) will be administered by the city's Community Development Department. The program will make funding available to assist low-to-moderate income owner-occupied households that sustained Minor-Low and Minor-High damages who have remaining repair needs not covered by the FEMA IA Program and SBA. Funding up to $25,000 will address rain/flood damages as well as lead based paint, asbestos, and other repairs necessary to bring LMI dwellings up to the Columbia Property Maintenance Code and ensure that these housing units are more resilient to future natural hazards. Elderly and disabled applicants will be given priority for assistance.

Connection to Disaster and Unmet Needs

The provision of safe, disaster resistant housing for residents impacted by the October 2015 flood is critical to the City of Columbia's long-term recovery strategy. By addressing the most critical unmet housing needs and encouraging high-quality, disaster resistant construction, the city improves the long-term safety and stability of its community and minimizes the impact of future storms and floods. These home repairs also help stabilize damaged neighborhoods, retain consumers for local businesses, preserve the local tax base, and encourage new investment.

Based on damage assessments and remaining housing needs cited in this Action Plan, the city has determined that single family owner-occupied dwellings suffered the greatest damage from the 2015 Flood. Home repairs and improvements funded through this program will be designed to assist those low-income households not eligible for the City's Buyout and Homeowner Assistance Programs, which focus on homes with major to severe damages and to those inside the floodplain. Ninety four percent (94%) of low income owner occupied households, suffered minor to moderate damage and may not be eligible for those programs. As this group may be less likely to register with FEMA, the need is probably much greater than anticipated.

MRP was developed to provide an opportunity for limited home repairs for all 1,198 low to moderate income households residing in single family homes identified by FEMA as sustaining minor damages. Due to limited funding, elderly, disabled, and female headed households will be prioritized for participation in the program. This program will enable households with limited resources to receive assistance with completing their repairs.

Eligible Applicants

Eligibility requirements for participants in this program are as follows:

- Damaged residence must be located within Columbia City Limits.
- Applicants must have owned and occupied the damaged property as their primary residence as of and prior to the date of the storm event (October 2015).
- Applicants must have registered with FEMA and had their primary residence designated as having sustained Minor damages.
- Damaged residence must be a single-unit structure, duplex, townhome, or condominium with less than $25,000 in damages.
- Applicants must be at or below 80% AMI at application intake.

Ineligible Applicants

Ineligibility criteria for this program is as follows:

- Homes located outside of Columbia city limits.
- Secondary homes or rental properties.
- Residential structures with more than two units or rental properties.
- Non-LMI households.
- Applicants without flood insurance who have received prior federal assistance requiring the maintenance of flood insurance in perpetuity.
- Gap financing unavailable to complete rehabilitation, reconstruction, and/or elevation projects.
- Ineligible structure type.

Prioritization of Applicants

Elderly, disabled, and female headed households with children households will be given first priority for participation in MRP. Remaining applications for assistance by LMI households will be processed in the order that they are completed and determined to be eligible. The City expects to assist 1,198 households through this program.

Use of Funds

Delivery of funds will be provided in the form of a direct grant agreement between the city and the applicant and through a construction agreement between the applicant and the selected contractor. The grant agreement will include obligations to: 1) authorize payments directly to the contractor responsible for executing repair work orders; 2) ownership and occupancy of the home for not less than one (1) year after the completion of repairs and issuance of a *Certificate of Occupancy;* and, 3) maintenance of flood insurance in perpetuity on the damaged home, if required. Execution of a program covenant memorializing the flood insurance requirement will also be required for homes in located in designated flood plain areas.

Program duration is estimated as June 2017 – December 2020.

Determination of Level of Environmental Review

As the Responsible Entity, the City of Columbia has evaluated the scope of its housing rehabilitation and buyout programs, aggregated functionally, and determined four separate tiered environmental reviews – for major rehabilitation, minor rehabilitation, elevation reimbursement, and buyout - are appropriate as described in 24 CFR 58.15. Minor rehabilitation activities, the subject of this review, require a Categorical Exclusion Subject to 58.5. The City has conducted a city-wide review of scattered sites until eligible addresses for can be determined. A *site specific* environmental review for minor rehabilitation activities, which will be completed for each eligible property, will identify historic properties, the presence of asbestos or mold, any above ground hazardous materials, environmental justice and any other factors not addressed in the Tier I review. These site specific environmental reviews will be completed for each property before project bidding or taking any choice limiting actions. A Site-Specific Strategy is included with this review.

The City of Columbia has complied with the statutory laws and authorities cited in §58.5 (see the attached Statutory Checklist) and with the requirements of §58.6, completing the Compliance Checklist related to Flood Disaster Protection; restrictions for a project located in Coastal Barrier Resource Areas; and buyer notifications if a project is located in a Runway Clear Zone or Clear Zone.

Section 106 Historic Preservation Compliance Review

The City of Columbia has executed an Addendum to the Federal Emergency Management Agency (FEMA) Programmatic Agreement with South Carolina to expedite Section 106 reviews of historic properties that may be affected by one of the housing programs described above. Under the Unified Federal Review process each Responsible Entity must perform sufficient public outreach. A Public Notice concerning the proposed Addendum was published in *The State* on February 24, 2017 and letters were sent to the Richland County Conservation Commission, the Lexington County Historical Society, Historic Columbia, and the SC Department of Archives and History.

Ms. Julia Mates, a Cultural Resources Coordinator and Historian/Architectural Historian, meets the Secretary of the Interior's Professional Qualification Standards to conduct Section 106 reviews and has been confirmed by HUD. The executed Addendum, a cover letter, and a copy of Ms. Mates' resume have been submitted to HUD and will be posted on the Section 106 Agreements section of the HUD Historic Preservation website.

As part of its broad programmatic review, the City has defined the Area of Potential Effects (APE) as any of the 15 historic preservation districts within the city limits. Individual sites cannot be identified until applicant eligibility has been confirmed.

STRATEGY TO ADDRESS SITE SPECIFIC COMPLIANCE FACTORS

As required by regulations defined at 24 CFR 58.15, the City of Columbia has developed the following site specific strategy for its tiered environmental review of minor rehabilitation of residential structures 58.35(a)(3)(i). This strategy describes the steps the City will take to address the compliance factors that could not be addressed in the Tier I environmental review. These compliance factors are included on the site specific checklist (attached). All documentation in the Tier II environmental review will be completed before funds are committed.

Historic Preservation:

The City of Columbia and State Historic Preservation Office (SHPO) have a Programmatic Agreement (PA) that expedites consultation **when rehabilitation activities conform to the original footprint and/or are performed in previously disturbed soils.** The minor rehabilitation activities allowed under this program fall within the second Tier 2 Allowances in the Programmatic Agreement (PA) including:

- ❑ In kind repair, replacement and reinforcement of footings, foundations, retaining walls, slopes and slope stabilization systems and installation of perimeter drainage.
- ❑ In kind repair of floors, walls, stairs, ceilings/trim or replacement of same if deteriorated beyond repair.
- ❑ Mold remediation when restricted to damaged areas
- ❑ Non-destructive or concealed testing for lead paint, asbestos or other hazardous materials or to assess hidden damages.
- ❑ In kind repair or replacement of utilities and mechanical, electrical and plumbing systems
- ❑ Elevation of HVAC and mechanical equipment if placed where it cannot be seen from the street.
- ❑ Installation or replacement of interior fire detection, suppression or security alarm systems
- ❑ In kind repair or replacement of damaged or severely deteriorated windows and frames, shutters, doors, door frames and hardware.
- ❑ In kind repainting of surfaces and repair of walls, porches, and foundations
- ❑ In kind repair, replacement or strengthening of roofing and damaged roof system components
- ❑ In kind repair and replacement of insulations systems.
- ❑ ADA compliance

The Historic Preservation Officer will conduct the standard Section 106 review all projects with activities affecting buildings 45 years old or greater and those located within or adjacent to a historic district.

Upon determination by the Historic Preservation Officer that Section 106 applies to a given undertaking, the City of Columbia will invite all potential consulting parties -- including federal, state and local agencies, interested parties, and the public – to address compliance factors on the Statutory Checklist and to participate in the project discussion. The City will share the project description, maps and program information with the following authorities when applicable:

- Advisory Council on Historic Preservation
- State Historic Preservation Officer
- Lexington County Historical Society
- Historic Columbia
- Richland County Conservation Commission

If an historic property owner applies and is eligible to participate in one of the City's housing programs, the Historic Preservation Officer will assess the effects of project activities. A determination of **no adverse effect** may be made when the Responsible Entity, SHPO, and other consulting parties agree to a set of conditions that will eliminate adverse effects, which may include, but are not limited to, the following:

- Physical destruction or damage to all or part of the property
- Removal of the property from its historic location
- Change of features within the property's setting
- Transfer, lease, or sale of property out of federal ownership
- Visual, atmospheric, or audible intrusions
- Foreseeable effects that may occur later in time or farther removed in distance
- Cumulative effects

If a determination is made that a project will have an **adverse effect** upon a historic property, the City of Columbia will notify the Advisory Council on Historic Preservation of its determination. The City will consult with SHPO/THPO and any interested stakeholders to identify the best way to avoid, minimize, or mitigate adverse effects. When a resolution among all parties has been agreed upon, it will be formalized in a Memorandum of Agreement (MOA). Failure to reach an agreement requires that the Advisory Council on Historic Preservation notify and advise the City concerning resolution.

Floodplain and Wetland Management:

Upon determination that a specific property is located within the floodplain or wetland, the City will consult with the following agencies to solicit comments concerning compliance with floodplain management and wetland protection regulations defined in Executive Order 11988, 24 CFR 55(b)(2), and Executive Order 11990:

- City of Columbia Floodplain Manager
- South Carolina Natural Resources Flood Mitigation Program

- FEMA Regional Environmental Office
- US Army Corps of Engineers, Columbia Regulatory Field Office
- US Fish and Wildlife Service
- South Carolina Emergency Management Division

National Flood Insurance Program (NFIP) insurance will be obtained for all property located within the 100 year floodplain (Special Flood Hazard Areas in Zones A, AE, AH, AO, AR, A99, V and VE). Flood insurance must be taken for the life of a loan or the useful life of an improvement funded by a grant, regardless of transfer of ownership. For grants, the amount of flood insurance coverage must equal the maximum limit of coverage available with respect to the type of building, or the project cost, whichever is less. *The project cost is the total cost for acquiring, constructing, repairing or improving the building.*

Minor rehabilitation activities on structures in the 100 year floodplain (Zone A) or involves a critical action within a 500 year floodplain (Zone B), are not subject to local flood ordinances; however, flood insurance protection must be maintained for the life of the property.

8-Step Decision Making Process

The City has completed the 8 step process as part of this Tier 1 review to comply with 24 CFR Part 55, HUD's Floodplain Management and Wetland Protection regulations. The City of Columbia is located outside of the coastal hazard area. Structures or improvements located in the floodway are not eligible for CDBG Disaster Recovery funds.

Contamination and Toxic Substances

If any properties participating in the Minor Repair Program contain asbestos materials, the City of Columbia will complete the site-specific Statutory Checklist to ensure compliance with EPA's Asbestos regulations found at 40 CFR Part 61 (NESHAP) and all state and local regulations. If the presence of mold is detected, all mold will be removed by a certified mold remediation firm with attention to:

- Safety - seal the work area using plastic sheeting so that mold spores do not disperse throughout the home. Workers and occupants should use a high quality, high filtration face mask and vinyl or neoprene gloves. A full protective suit is recommended when using harsh chemicals and for larger mold remediation projects.
- Assessments – assessments will be made before, during, and after remediation efforts
- Contamination control - prevent cross-contamination and the spread of mold from contaminated areas to areas absent of or with less contamination;
- Source removal - physically remove the mold at its source;
- Moisture removal - eliminate the moisture that caused the mold outbreak;
- Clean air - use ventilation or High Efficiency Particulate Air scrubbers to remove airborne mold spores; professionally clean air ducts.

All activities will be reviewed for compliance with the Toxic and Hazardous Chemical requirements. The City of Columbia will complete the Statutory Checklist to assess compliance with 24 CFR 58.5 (i)(2). A determination of the presence of toxic and hazardous chemicals will be made using EnviroMapper to determine if the property:

- Is listed on an EPA Superfund National Priorities or CERCLA or equivalent state list;
- Is located within 3000 feet of a toxic or solid waste landfill;
- Has an underground storage tank known or suspected to be contaminated by toxic chemicals or radioactive materials.

The City of Columbia will perform a government records search to determine whether there has been a release or threat of release to the subject property giving particular attention to any project site on or within one mile of an area that contains or may have contained hazardous waste such as dumps, landfills and industrial sites. The City will solicit information addressing the presence and possible effects of contamination or toxic substances from the following authorities, among others:

- South Carolina Department of Health and Environmental Control, Environmental Public Health Tracking Program
- EPA Region 4 Toxic Release Inventory and Superfund Database

Environmental Justice

All eligible applicants for the Minor Repair Program will be low to moderate income households. If any adverse environmental impacts are caused by project activities, the City will perform an Environmental Justice (EJ) analysis using census, geographic and other data to determine if a low-income/minority population is disproportionately impacted. Mitigation or avoidance of adverse impacts will be considered to the extent practicable and affected populations will be involved in the public participation process.

Expected Mitigation Measures

- The City will implement Best Management Practices to identify and prevent storm water pollution and effectively handle storm water runoff from construction activities.
- Where practicable, the City will modify any proposed action to minimize adverse effects on wetlands through the use of permeable surfaces, bioswales, storm water capture and reuse, flood-proofing, and elevating structures above Base Flood Elevation (BFE), among others.
- All properties in the floodplain or floodway must obtain flood insurance, to be maintained in perpetuity.
- Flood-proofing adjustments and additions include:
  - Installing watertight shields for doors and windows.
  - Reinforcing walls to withstand floodwater pressures and impact forces generated by floating debris.

- Using membranes and other sealants to reduce seepage of floodwater through walls.
- Installing drainage collection systems and sump pumps to control interior water levels, collect seepage, and reduce hydrostatic pressure on the slab and walls.
- Installing check valves to prevent the entrance of floodwater or sewage flows through utilities.
- Anchoring the building to resist flotation, collapse, and lateral movement.

- Toxic substances will be removed, stabilized or encapsulated and a remediation plan developed.

REFERENCES

Historic Preservation

Nancy E. Boone, Federal Preservation Officer
HUD Office of Environment and Energy
451 7th Street, Room 7212
Washington, DC 20410
T: 202-402-5718

John D. Sylvest, State Historic Preservation Officer (SHPO)
South Carolina Department of Archives and History
8301 Parklane Road
Columbia, SC 29223
T: 803.896.6129

Eric M. Thurston
Historic Preservation Specialist
FEMA Region IV
Office: (770) 220-8817
Cell: (404) 536-4114
Eric.thurston@fema.dhs.gov

Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637
T: (202) 517-0200
E-mail: achp@achp.gov

Floodplain Management

Stephanie Everfield
FEMA Regional Environmental Office
Department of Homeland Security
3003 Chamblee Tucker Road
Atlanta, GA 30341-4112
Stephanie.everfield@dhs.gov

Ali Khan, Floodplain Manager
City of Columbia
1136 Washington Street
Columbia, SC 29201
T: 803-545-3400
lakhan@columbiasc.net

Wetlands Protection
Ezequiel Velez
EPA Region 4, Atlanta Federal Center
61 Forsyth Street, S. W.
Atlanta, GA 30303
Office: (404) 562-9191
Email: velez.ezequiel@epa.gov.

Tom McCoy, Field Supervisor
Charleston Ecological Services Field Office
US Fish and Wildlife Service
176 Croghan Spur Road, Suite 200
Charleston, SC 29407
thomas_mccoy@fws.gov

Jose Barrios**,** Southeast Regional Office
US Fish and Wildlife Service, National Wetlands Inventory
1875 Century Blvd., Suite 200
Atlanta, GA 30345
T: 404.679.7122 or
Ashley Monroe (Monroe.ashley@epa.gov) T: 404-562-9232

Farmland Protection
Ann English, State Conservationist
US Department of Agriculture
1835 Assembly Street, Room 950
Columbia, SC 29201
T: 803-253-3935 or Ann.english@sc.usda.gov

Wild and Scenic Rivers
Jeff Duncan
Wild and Scenic Rivers, NPS
535 Chestnut St. Suite 207
Chattanooga, TN 37402
T: 423-987-6127 or Jeff_duncan@nps.gov

Bill Marshall
Wild and Scenic Rivers, Endangered Species
SC Department of Natural Resources
PO Box 157, 1000 Assembly Street
Columbia, SC 29202
T: 803.734.9096 or MarshallB@dnr.sc.gov

Air Quality
Rhonda Thompson, Chief, Bureau of Air Quality
South Carolina Health and Environmental Control
2600 Bull Street
Columbia, SC 29201
T: 803-898-4123 or thompsrb@dhec.sc.gov;

Robert J. Brown, Director of Air Assessment, Innovations & Regulation
Bureau of Air Quality
2600 Bull Street
Columbia, SC 29201
T: 803-898-3432 or brownjr@dhec.sc.gov

Airport Hazards
Michael Gula, Director of Operations, Planning and Facilities
Columbia Metropolitan Airport
125A Summer Lake Drive
West Columbia, SC 29170
mgula@columbiaairport.com;

Toxic Chemicals and Hazardous Materials
South Carolina Health and Environmental Control, Hazardous Waste Compliance
2600 Bull Street
Columbia, SC 29201
T: 803-898-3432

US Army Corps of Engineers
South Atlantic Division
60 Forsyth Street, SW
Atlanta, GA 30303-8801
T: 404-562-5167

Charleston District Office
69 Haloed Avenue
Charleston, SC 29403
843-329-8123

Endangered Species
Melissa Bimbi, Biologist
US Fish and Wildlife Service
SC Ecological Services Field Office
176 Croghan Spur Road, Suite 200
Charleston, SC 29407
T: 843-727-4707 or Melissa_bimbi@fws.gov

LIST OF PREPARERS AND SUMMARY OF QUALIFICATIONS:

Maya Gorman, CDBG Disaster Recovery Manager, City of Columbia

For ten years, Ms. Gorman served as the Lead Grant Manager for the Louisiana Office of Community Development Disaster Recovery Unit (OCD-DRU) Hurricane Katrina/Rita Orleans Parish CDBG Long Term Community Recovery (LTCR) Program; the Hurricane Gustav/Ike Parish-Implemented CDBG-DR Program; and the Hurricane Gustav/Ike Lafourche Parish CDBG Coastal Communities Fisheries Recovery Program. She is knowledgeable of the environmental review procedures required by 24 CFR Part 58 and has assisted several Responsible Entities in Louisiana in completing environmental review records at all levels of compliance, including Certifications of Exemption, Categorical Exclusion Not Subject to 58.5, Categorical Exclusion Subject to 58.5, and the Environmental Assessment.

Tetra Tech will be providing site specific reviews for the City of Columbia's residential rehabilitation. The firm has more than 10 years of experience working with the U.S. Department of Housing and Urban Development (HUD) environmental review procedures. Tetra Tech has been providing Responsible Entities with HUD environmental review services for more than 10 years, including four years of disaster recovery program support. These Responsible Entities have included the Louisiana Office of Community Development Disaster Recovery Unit, New York Governor's Office of Storm Recovery and New York State Homes and Community Renewal, New Jersey Department of Environmental Protection, and San Francisco Mayor's Office of Housing and Community Development. These services have included preparation of 87 environmental assessments (EA), 33 Categorical Exclusions Subject to 58.36 (CEST), 27 statutory worksheets, over 15,000 Tier 2 CESTs, and historic reviews for about 8,900 properties, most of which were done for CDBG-DR projects. Tetra Tech's experience preparing HUD National Environmental Policy Act (NEPA) documents and Environmental Review Records (ERR) demonstrates our experience and working knowledge of the HUD NEPA regulations (under Code of Federal Regulations [CFR], Title 24, Part 58). Tetra Tech's HUD environmental review documents have addressed disaster recovery programs and similar projects, infrastructure, economic development, and housing programs for municipalities and other governmental entities.

LIST OF EXHIBITS

1. Programmatic Agreement FEMA, SCSHPO, SCEMD and TPHO and City of Columbia Addendum
2. Floodplain Map, FEMA FIRMs, Target Area Map and List of Flood Plain Properties
3. National Wetlands Inventory Map
4. Coastal Barrier Resources System Map
5. Sole Source Aquifers Region IV Map
6. Map of Critical Habitats and Resource List of Endangered Species; FWS Clearance to Proceed
7. National Wild and Scenic Rivers Map
8. SO2 Nonattainment Area Map
9. City of Columbia Zoning Maps
10. Columbia Metropolitan Airport Map
11. Low to Moderate Income Maps

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

Statutory Checklist for Compliance with 24 CFR §58.5 – NEPA Related Federal Laws and Authorities

(Must be completed for each individual addressed under overall project description)

Use this worksheet for projects that are Categorically Excluded Subject to 24 CFR §58.5 listed at 24 CFR §58.35(a) and for projects that require an Environmental Assessment.

Project Name: _Minor Repair Program

ERR FILE # _____

Definitions: **A:** The project is in compliance.
B: The project requires an additional compliance step or action.

Statute, Authority, Executive Order Cited at 24 CFR §58.5	A	B	COMPLIANCE FINDING	SOURCE DOCUMENTATION
1. 58.5(a) Historic Properties [36 CFR 800]		X	Consultation/review procedures required.	The City of Columbia has executed a Programmatic Agreement with FEMA, THPO, and the SC SHPO to expedite Section 106 reviews and compliance with 36 CFR 800 (Exhibit 1). See written strategy and site specific checklist.
2. 58.5(b)(1) Floodplain Management [24 CFR 55, Executive Order 11988]	X		The project is in compliance.	This project involves only minor repairs or improvements on one to four family properties that do not meet the threshold for "substantial improvement" of §55.2(b)(8).
3. 58.5(b)(2) Wetland Protection [24 CFR 55, Executive Order 11990]	X		The project is in compliance.	This project for minor repairs on one to four residential units does not involve new construction, land use conversion, major rehabilitation, or substantial improvements. National Wetlands Inventory map is attached (Exhibit 3)
4. 58.5(c) Coastal Zone Management [Coastal Zone Management Act sections 307(c) & (d)]	X		The project is in compliance.	The City of Columbia is not within a Coastal Zone. See attached Coastal Barrier Resources System map (Exhibit 4).
5. 58.5(d) Sole Source Aquifers [40 CFR 149]	X		The project is in compliance.	The City of Columbia is not within a sole source aquifer watershed area. (Exhibit 5)

6. 58.5(e) Endangered Species [50 CFR 402]	X		The project is in compliance.	In a phone call with Mark Caldwell of the FWS Charleston Field Office, it was determined that minor rehabilitation of existing residences on previously disturbed areas will have no effect on protected species in Columbia. The USFWS website indicates there are no critical habitats within the city limits. A map of critical habitats and FWS Clearance to Proceed letter are attached (Exhibit 6).
7. 58.5(f) Wild and Scenic Rivers [36 CFR 297]	X		The project is in compliance.	In an email on 2/9/17 Bill Marshall, Rivers Coordinator, SC DNR, states that proposed activities will be restricted to existing structures on developed sites with no changes in land use and therefore will have little or no adverse effect on rivers. The City will apply Best Management Practices as described by SCDHEC to mitigate potential polluted runoff from work sites. See written strategy for site specific assessments. A NWSRS map is attached (Exhibit 7).
8. 58.5(g) Air Quality [40 CFR parts 6, 51,61, 93]	X		Project is in compliance.	In a letter dated 1/25/17, Rhonda Thompson, Chief, Bureau of Air Quality, DHEC, stated the project is consistent with the State Implementation Plan and no air quality permits are needed. A map of nonattainment areas does not include Columbia, SC (Exhibit 8). The City will perform site specific assessments to determine the presence of asbestos or mold as part of its review of contamination and toxic substances (58.5i2) and remediate any effect in compliance with NESHAP and all state and local regulations.
9. 58.5(h) Farmland Protection [7 CFR 658]	X		Project is in compliance.	All activities will take place within the City limits, zoned for urban uses and will have no effect on farmland. Zoning maps and legends are attached (Exhibit 9).
10. 58.5(i)(1) Noise Control and Abatement [24 CFR 51B]	X		Project is in compliance.	A noise analysis is not required. 24 CFR 51.101(a)(3) states that HUD's noise policy does not apply to any action under disaster assistance appropriations that are provided to restore facilities, such as residences, to the condition that existed prior to the disaster.
11. 58.5 (i) (1) Explosive and Flammable Operations [24 CFR 51C]	X		Project is in compliance	ASD requirements do not apply for single family, minor rehab because this project will not increase the number of people exposed to hazardous operations.
12. 58.5(i)(1) Airport Hazards (Runway Clear Zones and Clear Zones/Accident Potential Zones) [24 CFR 51D]	X		Project is in compliance.	These programs will not change the current use of the property, prolong the physical or economic life of the structures, or increase the unit density or number of people at the site. Michael Gula, Director of Operations, Columbia Metropolitan Airport, states no property within the city limits is within 2500 feet of Airport Clear Zones or Runway Clear Zones. A map indicating CAE is 5.85 miles outside of the city limits where all activities will take place is attached (Exhibit 10).
13. 58.5(i)(2)(i-iv) Contamination and		X	Consultation/review	The City of Columbia will assess individual

Toxic Substances [24 CFR 58.5(i)(2)]			procedures required	residences to determine if the property is located within the minimum search distances of any type of environmental contamination. The City also will identify the presence of asbestos or mold and remediate any effect in compliance with NESHAP and all state and local regulations. See written strategy.
14. 58.5(j) Environmental Justice [Executive Order 12898]		X	Consultation/review procedures required	This project is designed to assist low income and minority households. No adverse environmental impact is anticipated during minor residential rehab, but a site specific review will be conducted. A map of Household Median Income by Block Group is attached (Exhibit 11).

DETERMINATION:

☐ **Box "A" has been checked for all authorities.** For Categorically Excluded actions pursuant to §58.35(a) [Does not apply to EA or EIS level of review which can never convert to Exempt], the project can convert to Exempt, per §58.34(a) (12), since the project does not require any compliance measures (e.g., consultation, mitigation, permit or approval) with respect to any law or authority cited at §58.5. The project is now made Exempt and **funds may be drawn down**; OR

☒ **Box "B" has been checked for one or more authority.** For Categorically Excluded actions pursuant to §58.35(a), the project cannot convert to Exempt since one or more authority requires compliance, including but not limited to consultation with or approval from an oversight agency, performance of a study or analysis, completion of remediation or mitigation measure, or obtaining of license or permit. **Complete pertinent compliance requirement(s), publish NOI/RROF, request release of funds (HUD-7105.15), and obtain HUD's Authority to Use Grant Funds (HUD-7015.16) per §58.70 and §58.71 before committing funds**; OR

☐ This project is not a Categorically Excluded action pursuant to §58.35(a), or may result in a significant environmental impact to the environment, and requires preparation of an Environmental Assessment (EA). Prepare the EA according to 24 CFR Part 58 Subpart E.

MITIGATION MEASURES AND CONDITIONS FOR PROJECT APPROVAL:

The City of Columbia is preparing this Tiered Environmental Review for its Disaster Recovery residential minor rehabilitation activities. This Statutory Checklist supports a broad, programmatic review of an unidentified number of scattered sites. Details regarding further consultations, mitigation measures, permit requirements, and contract and grant conditions, are included in the Environmental Review Record Project Description - Strategy to Address Site Specific Compliance Factors.

The City will comply with all state and federal asbestos regulations, seeking assistance from the DHEC in conducting asbestos inspections and materials testing, preparing demolition notifications, and obtaining asbestos permits, if necessary. If applicable, compliance with the National Emissions Standards for Asbestos regulations at 40 CFR Part 61 will be achieved and mold remediation will be completed.

To comply with 24 CFR Part 55, HUD's Floodplain Management and Wetland Protection regulations, the City has completed the 8 step decision-making process for all properties located within a 100 year floodplain. It has been determined that no significant impact will result from these projects, which

involve only minor repairs or improvements on one to four single family properties and do not meet the §55.2(b)(8) threshold for "substantial improvement."

Where practicable, the City will modify any proposed action to minimize adverse effects on wetlands through the use of permeable surfaces, bioswales, storm water capture and reuse, and flood-proofing and elevating structures above Base Flood Elevation (BFE), among others. All properties in the floodplain or floodway must obtain flood insurance to be maintained in perpetuity.

Flood proofing adjustments and additions during residential rehabilitation include:

- Installation of watertight shields for doors and windows.
- Reinforcement of walls to withstand floodwater pressures and impact forces generated by floating debris.
- Use of membranes and other sealants to reduce seepage of floodwater through walls and wall penetrations.
- Installation of drainage collection systems and sump pumps to control interior water levels, collect seepage, and reduce hydrostatic pressures on the slab and walls.
- Installation of check valves to prevent the entrance of floodwater or sewage flows through utilities.
- Anchoring the building to resist flotation, collapse, and lateral movement.

Toxic substances will be removed, stabilized or encapsulated and a specific remediation plan developed when necessary.

PREPARER:

Gloria Saeed 8/4/17

Preparer's Signature Date

Gloria Saeed, Director, Community Development Department, City of Columbia

Preparer's Name and Title (printed)

COLUMBIA CDBG DISASTER RECOVERY PROGRAM
CDBG DISASTER RECOVERY ENVIRONMENTAL REVIEW
CATEGORICAL EXCLUSION SUBJECT TO §58.5
SITE SPECIFIC CHECKLIST – MINOR REPAIR

1. **§58.5(a) Historical Properties [36 CFR Part 800]**
   a. Does the project include the type of activity that would have the potential to affect historic properties such as acquisition, demolition, disposition, ground disturbance, new construction or rehabilitation?
   ☐ Yes ☐ No

   If Yes, continue. **If No**, the project is not the type of activity that has the potential to affect historic properties. Compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

   b. Do the RE and State Historic Preservation Office (SHPO) have a Programmatic Agreement (PA) that does not require consultation for this type of activity?
   ☐ Yes ☐ No

   If Yes, document compliance with the PA. Compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority. **If No**, continue.

   c. Is the project located within or directly adjacent to a historic district?
   ☐ Yes ☐ No

   d. Is the structure or surrounding structures listed on or eligible for listing on the National Register of Historic Places (e.g. greater than 45 years old)?
   ☐ Yes ☐ No

   e. Were any properties of historical, architectural, religious or cultural significance identified in the project's Area of Potential Effect (APE)?
   ☐ Yes ☐ No

   If Yes to any of the questions above, continue. **If No to all of the questions above**, the project will not affect historic properties. A concurrence from the SHPO that "no historic properties will be affected" is required. Compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

   f. Have you consulted with the SHPO to determine whether the project will have "No Adverse Effect on Historic Properties?"
   ☐ Yes ☐ No

   If Yes, continue. **If No**, consultation with the SHPO is required.

g. Does the SHPO concurrence letter received for this project require mitigation or have conditions?

☐ Yes ☐ No

If Yes, continue. **If No**, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

h. Have the SHPO and RE agreed on required mitigation or conditions?

☐ Yes ☐ No

If Yes, include mitigation requirements and/or conditions from the SHPO in the mitigation section of the Statutory Checklist. Mark box "B" on the Statutory Checklist for this authority. **If No,** continue with consultation until resolved.

Historic properties of religious and cultural significance to tribes and Native Hawaiian organizations

i. Does the project include the types of activities such as those listed below that have the potential to affect historic properties of religious and cultural significance to tribes?

- Ground disturbance (digging);
- New construction in undeveloped natural areas;
- Incongruent visual changes – impairment of the vista or viewshed from an observation point in the natural landscape;
- Incongruent audible changes – increase in noise levels above an acceptable standard in areas known for their quiet, contemplative experience;
- Incongruent atmospheric changes – introduction of lights that create skyglow in an area with a dark night sky;
- Work on a building with significant tribal association;
- Transfer, lease or sale of a historic property of religious and cultural significance.

☐ Yes ☐ No

If Yes, continue. **If No**, tribal consultation is not required.

j. Does HUD's Tribal Directory Assessment Tool indicate that tribes have an interest in the location where the project is sited? (http://egis.hud.gov/tdat/Tribal.aspx)

☐ Yes ☐ No

If Yes, contact federally recognized tribe(s) and invite consultation. Continue. **If No**, document the result in the ERR. Tribal consultation is not required.

k. Did the tribe(s) respond that they want to be a consulting party?

☐ Yes ☐ No

If Yes, continue. **If No,** (no response within 30 days or responded that they do not wish to consult), document response or lack of response in ERR. Further consultation is not required.

l. After consulting with the tribe(s) and discussing the project, were any properties of religious or cultural significance to the tribe(s) identified in the project's APE?

☐ Yes ☐ No

If **Yes,** continue. If **No**, notify tribe(s) and other consulting parties of your finding of "No Historic Properties Affected." Tribe(s) has 30 days to object to a finding.

m. After consulting with the tribe(s), will the project have an adverse effect on properties of religious or cultural significance to the tribe(s)?

☐ Yes ☐ No

If Yes, consult with tribe(s) and other consulting parties to resolve adverse effects, including considering alternatives and mitigation measures that would avoid or minimize adverse effects. **If No,** notify tribe(s) and other consulting parties of your finding of "No Adverse Effects." Tribe(s) has 30 days to object to a finding.

n. Were any objections to a finding received from a consulting tribe?

☐ Yes ☐ No

If Yes, continue with consultation until resolved. **If No,** consultation is complete.

Comments:

2. §58.5(g) Air Quality [40 CFR Parts 6, 51, 61 and 93]

a) Does the project involve demolition or renovation of buildings likely to contain asbestos containing materials?

☐ Yes ☐ No

If Yes, ensure the project is in compliance with EPA's Asbestos regulations found at 40 CFR Part 61 (NESHAP) and all State and local regulations. Continue below. **If No,** continue.

b) Does the project require and environmental assessment or environmental impact statement?

☐ Yes ☐ No

If **Yes,** continue. If **No**, compliance with CAA State Implementation Plan factor is complete. Mark Box A on the Statutory checklist.

c) Does the project involve five or more dwelling units, acquisition of undeveloped land, a change of land use, demolition, major rehabilitation, or new construction?

☐ Yes ☐ No

If **Yes**, continue. If **No,** compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

d) Is the project located in a Non-Attainment area?

☐ Yes ☐ No

If **Yes**, continue. If **No**, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

3. §58.5(i) (2) Contamination and Toxic Substances

- Is the property located within the search distances of any of the types of environmental contamination sources?

Standard Environmental Record Sources	ASTM 1527-13 Recommended Minimum Search Distance (mi)	Yes	No
Federal Delisted NPL Site List	0.5	☐	☐
Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) List	0.5	☐	☐
Federal CERCLIS No Further Remedial Action Planned (NFRAP) Site List	0.5	☐	☐
Federal RCRA Non-CORRACTS Treatment, Storage and Disposal (TSD) Facilities List	0.5	☐	☐
State- and Tribal-Equivalent CERCLIS	0.5	☐	☐
State and Tribal Landfill and/or Solid Waste Disposal Site Lists	0.5	☐	☐
State and Tribal Leaking Storage Tank Lists	0.5	☐	☐
State and Tribal Voluntary Cleanup Sites	0.5	☐	☐
State and Trial Brownfield Sites	0.5	☐	☐
Federal National Priorities List (NPL)	1	☐	☐
Federal RCRA Correction Action (CORRACTS) Facilities List	1	☐	☐
State- and Tribal-Equivalent NPL	1	☐	☐
Federal Institutional Control/Engineering Control Registries	Property Only	☐	☐
State and Tribal Institutional Control/Engineering Control Registries	Property Only	☐	☐
Federal Emergency Response and Notification System (ERNS) List	Property Only	☐	☐
Federal RCRA Generators List	Property/Adjoining Properties	☐	☐
State and Tribal Registered Storage Tank Lists	Property/Adjoining Properties	☐	☐

If the project is located within any of the minimum search distances above, then the RE must further evaluate to determine if there has been a release or there is a threat of release to the subject property. Attach supporting documentation to the environmental review to support any conclusion that the site of concern is not a threat.

If a release or threat of release cannot be ruled out, then services of a qualified environmental professional is necessary to further evaluate potential for site contamination. Recommend an ASTM 1527-13 Phase I Environmental Site Assessment (Phase I).

Prior Uses of the Property

- Has the subject property, adjacent property, or adjoining property ever been used for any of the following types of uses?

	Yes	**No**		**Yes**	**No**
Gas Station	☐	☐	Vehicle Repair Shop	☐	☐
Car Dealership	☐	☐	Auto Garage	☐	☐
Depot	☐	☐	Commercial Printing Facility	☐	☐
Industrial or commercial warehouses	☐	☐	Dry Cleaners	☐	☐
Photo Developing Lab	☐	☐	Hospital	☐	☐
Junkyard or landfill	☐	☐	Agricultural/Farming Operations	☐	☐
Tannery	☐	☐	Livestock Operations	☐	☐

If the evaluation of previous uses results in a yes answer to any of the above, the services of a qualified environmental professional is necessary to rule out site contamination. An ASTM 1527-13 Phase I is recommended.

If the evaluation of previous uses does not identify previous uses of concern, attach supporting documentation for the conclusion to the environmental review.

Field Site Visit

- Did a visual inspection of the site show the following?

	Yes	No
Distressed vegetation	☐	☐
Vent or Fill Pipes	☐	☐
Storage Oil Tanks or Questionable Containers	☐	☐
Pits, Ponds or Lagoons	☐	☐
Stained Soil or Pavement (other than water stains)	☐	☐
Pungent, Foul or Noxious Odors	☐	☐
Dumped Material or Soil, Mounds of Dirt, Rubble, Fill, etc.	☐	☐

- Does the project have an underground storage tank other than a residential fuel tank, or known or suspected to be contaminated by toxic chemicals or radioactive materials?

  ☐ Yes ☐ No

- Is the project site near an industry or commercial facility disposing of chemicals or hazardous wastes?

  ☐ Yes ☐ No

- Could a nearby source of toxic, hazardous or radioactive substances affect the health and safety of project occupants or conflict with the intended use of the property?

  ☐ Yes or ☐ No

I**f the site visit identifies a "Yes" answer to any of the above,** a qualified environmental professional must undertake investigations necessary to ensure that the project is free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances such that there is no hazard which could affect the health and safety of occupants or conflict with the intended utilization of the property. Continue.

Results of ASTM Site Contamination Reviews

- Was an ASTM Phase I Environmental Site Assessment (ESA) report completed for this project? (Strongly recommend an Phase I ESA for land acquisition, new construction, reconstruction or substantial rehabilitation).

  ☐ Yes ☐ No

- Did a Phase I, or equivalent evaluation, identify the potential for site contamination? [The RE must independently evaluate the Phase I and not rely entirely on the conclusions of whether or not there is a Recognized Environmental Condition (REC). Phase I's do not always appropriately identify RECs.]

  ☐ Yes ☐ No

- If there is the potential for site contamination, was an ASTM Phase II Environmental Site Assessment Completed that documented contamination?

  ☐ Yes or ☐ No

- Did results of the Phase I or Phase II identify the need to mitigate the environmental condition by removing, stabilizing or encapsulating the toxic substances in accordance with the requirements of the appropriate Federal, state or local oversight agency?

  ☐ Yes ☐ No

- If the project site requires remediation, does the RE have the following documentation?

	Yes	No
Remediation Plan	☐	☐
Regulatory Oversight Agency Approval of the Remediation Plan	☐	☐
Firm Cost Estimate to Implement the Remediation Plan	☐	☐
A Secured Source of Funding for Site Remediation	☐	☐
A project condition that the project construction or rehabilitation cannot proceed until the RE received a No Further Action (NFA) Required or Site Closure Letter from the Regulatory Oversight Agency	☐	☐
A project condition for Deed Restrictions related to any continuing obligations associated with the remediation plan or NFA or Site Closure Letters	☐	☐

If Yes, then, compliance is complete. Attach supporting documentation to the environmental review. Ensure that all mitigation measures are identified in the environmental review and that there is a mechanism for conveying requirements in agreements and awards. Mark Box B on the Statutory Checklist for this Authority. Attach all supporting documentation. **If No**, HUD cannot provide assistance for the project at this site.

- If the site requires remediation, and the property owner intends to complete the remediation prior to transferring the property to the HUD recipient, can the RE provide documentation of the following?

	Yes	No
Remediation Plan	☐	☐
Regulatory Oversight Agency Approval of the Remediation Plan	☐	☐
Purchase contract and closing document requirements for receipt of a No Further Action Required or Site Closure Letter from the Regulatory Oversight Agency prior to closing.	☐	☐
Deed restrictions for any continuing obligations associated with the remediation plan or NFA or Site Closure Letters	☐	☐

If Yes, then, compliance is complete. Attach supporting documentation to the environmental review. Ensure that all mitigation measures are identified in the environmental review and that there is a mechanism for conveying requirements in agreements and awards. Mark Box B on the Statutory Checklist for this Authority. Attach all supporting documentation.

If No, HUD cannot provide assistance for the project at this site.

Comments:

Pre-Award Reimbursement Activities

We Are Columbia

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

Categorical Exclusion Subject to §58.5 Determination for Activities Listed at 24 CFR §58.35(a)

Grant Recipient: City of Columbia Project Name: Elevation Reimbursement Program

Project Description (Include all actions which are either geographically or functionally related):
Clearance is requested for a tiered environmental review for the reimbursement of costs for elevation activities that have already occurred at single family (1-4 units) residences severely damaged by the South Carolina Flood of 2015. The city is providing limited elevation reimbursement to owner-occupied households who initiated their recovery prior to the one-year anniversary of the flood. This broad review is based at the citywide geographic level and a site specific strategy for environmental clearance when individual addresses become known for applicants to the Elevation Reimbursement Program.

Location: City of Columbia

Funding Source: CDBG HOME ESG HOPWA EDI Capital Fund Operating Subsidy Hope VI
Other: CDBG Disaster Recovery
Estimated Funding Amount: $3,490,000 Grant Number: B-16-MH-45-0001

I have reviewed and determined that the above mentioned project is a Categorically Excluded activity (subject to §58.5) per 24 CFR §58.35(a) as follows:

☐	58.35(a) (1). Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent (e.g., replacement of water or sewer lines, reconstruction of curbs and sidewalks, repaving of streets);
☐	58.35(a) (2). Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons;
	58.35(a) (3). Rehabilitation of buildings and improvements when the following conditions are met:
☒	58.35(a) (3) (i)In the case of a building for residential use (with one to four units), the density is not increased beyond four units, the land use is not changed, and the footprint of the building is not increased in a floodplain or in a wetland;
☐	58.35(a) (3) (ii). In the case of multifamily residential buildings: (A) Unit density is not changed more than 20 percent; (B) The project does not involve changes in land use from residential to non-residential; and (C) The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.

We Are Columbia

Community Development Department
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☐	58.35(a) (3) (iii). In the case of non-residential structures, including commercial, industrial, and public buildings: (A) The facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent; **AND** (B) The activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another.
☐	58.35(a) (4) (i) An individual action on up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between; or
☐	58.35(a)((ii) An individual action on a project of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site. 58.35(a) (iii) Paragraphs (a) (4) (i) and (ii) of this section do not apply to rehabilitation of a building for residential use (with one to four units) (see paragraph (a) (3) (i) of this section).
☐	58.35(a) (5). Acquisition (including leasing) or disposition of, or equity loans on an existing structure, or acquisition (including leasing) of vacant land provided that the structure or land acquired, financed, or disposed of will be retained for the same use.
☐	58.35(a) (6). Combinations of the above activities.

The responsible entity must also complete and attach a **§58.5 Statutory Checklist and Worksheet and a §58.6 Compliance Checklist**. By signing below the Responsible Entity officially determines in writing that all activities covered by this determination are Categorically Excluded (subject to §58.5) and meets the conditions specified for such exclusion under section 24 CFR §58.35(a). This document must be maintained in the ERR.

AUTHORIZED RESPONSIBLE ENTITY OFFICIAL:

Teresa Wilson
Authorized Responsible Entity Signature

8/4/2017
Date

Teresa Wilson
Authorized Responsible Entity Name (printed)

City Manager, City of Columbia, SC
Title (printed)

Compliance Documentation Checklist
24 CFR 58.6

Grant Recipient: City of Columbia____ Project Name: Columbia CDBG Disaster Recovery Program_
Project Description (Include all actions which are either geographically or functionally related):
The Elevation Reimbursement Program will provide limited assistance to owner occupied households that sustained severe damage as a result of the October 2015 Flood and who initiated reconstruction and elevation prior to the one year anniversary of the disaster. (A detailed project description is attached.)_____

Level of Environmental Review Determination: Select One of the following:

☐(1) Exempt per 24 CFR 58.34, or
☐(2) Categorically Excluded not subject to statutes per §58.35(b), or
☒(3) Categorically Excluded subject to statutes per §58.35(a), or
☐(4) Environmental Assessment per §58.36, or
☐(5) EIS per 40 CFR 1500

STATUTES and REGULATIONS listed at 24 CFR 58.6

FLOOD DISASTER PROTECTION ACT

1. Does the project involve acquisition, construction or rehabilitation of structures located in a FEMA-identified Special Flood Hazard?

☐No; Cite Source Document: _____

☒Yes; Source Document: FEMA Flood Zone Map and FIRM panels upon site specific reviews_____

2. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☒Yes (Flood Insurance under the National Flood Insurance Program must be obtained and maintained for the economic life of the project, in the amount of the total project cost. A copy of the flood insurance policy declaration must be kept on file). (**Appendix I**)

☐No (**Federal assistance may not be used in the Special Flood Hazards Area**).

COASTAL BARRIERS RESOURCES ACT

1. Is the project located in a coastal barrier resource area?

☒ No; Cite Source Documentation: The City of Columbia is not located within a coastal barrier resource area.__ (This element is completed).

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of existing property within a Civil Airport's Runway Clear Zone or a Military Installation's Clear Zone?

☒ No; Source Documentation: No property within the city limits is within 2500 feet of a Clear Zone or Runway Clear Zone _____
Project complies with 24 CFR 51.303(a)(3).

☐ Yes; **Disclosure statement must be provided** to buyer and a copy of the signed disclosure must be maintained in this Environmental Review Record (**Appendix II**)

Prepared by (name and title, please print): Gloria Saeed, Director, Community Development_____, _____

Signature: Gloria Saeed Date: 8/4/17

Columbia CDBG Disaster Recovery Program
Tier 1 Environmental Review Categorical Exclusion Subject To §58.5 for Pre-Award Reimbursement Activities at Unspecified Single Family Housing Sites
Project Description

In October 2015, the City of Columbia, along with much of the State of South Carolina, experienced unprecedented rainfall and historic flooding with more than two feet of rainfall in less than 48 hours. As part of its Community Development Block Grant (CDBG) Disaster Recovery Program, HUD has allocated $19.989 million to the City of Columbia to address some of its critical unmet needs resulting from the 2015 Flood. The City has added $1 million in CDBG Program Income funds to augment its disaster recovery program budget. All programs will be administered by the City's Community Development Department.

Following a major disaster, households that qualify as low to moderate income (80% or less of Area Median Income) are likely to have more difficulty securing financing for necessary building repairs, finding suitable rental housing, or paying for remediation or relocation expenses. For that reason, the City of Columbia is directing almost 90%, or $17,790,100, of its CDBG Disaster Recovery allocation to five (5) housing programs that will maximize benefits to the most vulnerable populations.

This environmental review record will be valid for five years, the maximum time allowed by HUD, and covers the reimbursement of elevation costs at single family (1-4 units) severely storm-damaged residences: Elevation Reimbursement Program. All program activities will occur within Columbia's city limits. Table 1 indicates the total funding among all CDBG Disaster Recovery activities. The City estimates program duration at six years. Table 2 indicates the project expenditures per year of all funding sources.

Table 1

Activity	CDBG Disaster Recovery	CDBG Program Income	Total Disaster Recovery Budget
Housing major rehabilitation, repair, and elevation	$ 9,901,420		$ 9,901,420
Housing minor rehabilitation	$ 2, 398,680	$1,000,000	$ 3,398,680
Residential acquisition and demolition (Buyout)	$2,000,000		$2,000,000
Elevation reimbursement	$ 3,490,000		$ 3, 490,000
Planning and administration	$1,998,900		$1,998,900
Economic development business loans	$200,000		$200,000
Total	**$19,989,000**	**$1,000,000**	**$20,989,000**

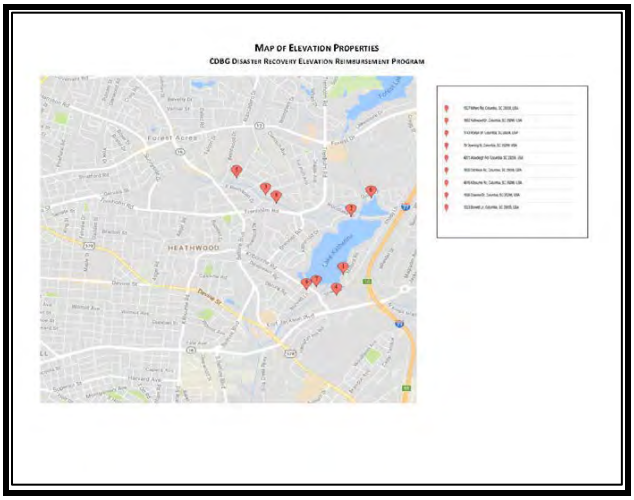
TABLE 2

Funding Source	2017	2018	2019	2020	2021	2022	Total
CDBG DR	$8,753,880	$5,002,760	$3,928,910	$1,341,710	$537,760	$423,980	$19,989,000
CDBG PI		$1,000,000					$ 1,000,000
Total	$8,753,880	$6,002,760	$3,928,910	$1,341,710	$537,760	$423,980	$20,989,000

In Columbia, homes along and near the City's many creeks, lakes, and other waterways were inundated by floodwater causing almost complete destruction of some neighborhoods. Most of the major and severe damages to housing occurred along the banks of Lake Katherine, Central and Lower Gills Creek, Wildcat Creek, and Penn Branch areas of the city.

TARGET AREAS FOR PROGRAM IMPLEMENTATION

The map below shows nine properties that sustained severe damages and were granted City of Columbia elevation permits before the one year anniversary of the October 2015 flood. Six property owners will be reimbursed $20,000 for necessary, reasonable elevation costs. All are located within the floodplain; three properties (1662 Kathwood Drive, 4915 Kilbourne Road, and 1626 Graeme Drive) are within a floodway, making them ineligible for federal funding. An 8 step process has been completed under this Tier 1 Review for substantially damaged structures in the floodplain. Site-specific reviews will ensure compliance with HUD program requirements.



PROGRAM DETAILS

City of Columbia Elevation Reimbursement Program (ERP)

Overview and Delivery

Given constrained recovery resources and identified housing needs, the city is providing limited elevation reimbursement to owner-occupied households who initiated their recovery prior to the one-year anniversary of the flood. The city recognizes that owners of "severely" damaged homes have incurred significant repair and reconstruction costs due to newly adopted elevation requirements and is committed to offsetting increased recovery costs for homeowners who were required to rebuild more resilient homes in order to prevent future losses. Regardless of income, eligible owner-occupants who have initiated elevation of their damaged structure in accordance with City of Columbia floodplain requirements will be provided up to $20,000 in reimbursement of CDBG-DR funding. It is envisioned that this funding coupled with $30,000 in ICC funding will relieve some of the recovery burdens for households in the most impacted areas of the city.

Connection to Disaster and Unmet Needs

The most severe damages from the October 2015 Flood occurred in Special Flood Hazard Areas that are required by Ordinance No. 2015-046 to meet minimum FEMA standards for floodplain management. By elevating structures above the Base Flood Elevation, the City seeks to protect human life and health while minimizing public expenditures for costly flood control projects, the need for rescue and relief efforts, prolonged business interruptions; and damage to public facilities and utilities located in floodplains.

As described in the Housing Damage Assessment of the Action Plan, the most severely damaged households are concentrated in Special Hazard Flood Areas along Columbia's waterways. By encouraging home elevation, the City is mitigating the impact of future disasters. The current allocation of almost $3.49 million for elevation reimbursement will enable approximately 175 households to offset elevation costs.

Eligible Applicants

Eligibility requirements for participants in this program are as follows:

- Damaged residence must be located within Columbia City Limits.
- Applicants must have owned and occupied the damaged property as their primary residence as of and prior to the date of the storm (October 5, 2015).
- Applicants must have registered with FEMA and had their primary residence designated as having sustained *Severe* damages.
- Damaged residence must be a single-unit structure.
- If applicable, applicants must have applied for FEMA Increased Cost of Compliance (ICC) funding for elevation of their damaged structure.

- Elevation projects started after the one year anniversary of the flood must receive Tier II environmental clearance prior to initiating elevation work.
- Elevation of the home is required by the city's floodplain ordinance and must be at least 50% complete prior to the issuance of reimbursement.

Ineligible Applicants

Ineligibility criteria for this program is as follows:

- Homes located outside of Columbia city limits.
- Secondary homes or rental properties.
- Residential structures with more than one unit or rental properties.
- Applicants without flood insurance who have received prior federal assistance requiring the maintenance of flood insurance in perpetuity.
- Gap financing unavailable to complete rehabilitation, reconstruction, and/or elevation projects.
- Applicants who are not classified by FEMA with "Severe" damages or required to elevate in accordance with the city's floodplain ordinance.
- Ineligible structure type.

Prioritization of Applicants

Applications for assistance from Low to Moderate Income (LMI), elderly, disabled, and female headed households with children will be prioritized for assistance. Originally, 22 households expressed interest in an elevation program; however many of those have sold their property to new owners in the interim to launching this program. Approximately, eight households originally permitted for elevation have retained ownership and residency.

Use of Funds

Delivery of funds will be provided in the form of a direct grant agreement between the city and the applicant. The grant agreement will include obligations for: 1) ownership and occupancy of the primary residence home for not less than one (1) year after reimbursement, and 2) maintenance of flood insurance in perpetuity on the damaged home as required. For movable housing units, the flood insurance must be maintained at any point that the unit is located in an area requiring flood insurance. Execution of a program covenant memorializing the flood insurance requirement will also be required for homes in located in designated flood plain areas.

Determination of Level of Environmental Review

As the Responsible Entity, the City of Columbia has evaluated the scope of its housing rehabilitation and buyout programs, aggregated functionally, and determined four separate tiered environmental reviews – for major rehabilitation, minor rehabilitation, pre-award (elevation) reimbursement, and buyout - are appropriate as described in 24 CFR 58.15. The reimbursement of elevation activities that have already occurred, the subject of this review, require a Categorical Exclusion Subject to 58.5. The City has conducted a city-wide review of scattered sites until eligible addresses for can be determined. A *site specific* environmental review for elevation reimbursement activities, which will be completed for each eligible property, will identify historic properties, any above ground hazardous materials, environmental justice and any other factors not addressed in the Tier I review. These site specific environmental reviews will be completed before taking any choice limiting actions. A Site-Specific Strategy is included with this review.

HUD's Community Planning and Development Notice 13-05, Guidance for Charging Pre-Award Costs of Homeowners, Businesses, and Other Qualifying Entities to CDBG Disaster Recovery Grants, allows limited reimbursement of eligible pre-award costs. The City is providing elevation reimbursement to owner-occupied households who initiated their recovery prior to the one-year anniversary of the flood, meet floodplain requirements that the lowest floor to be at least two feet above the Base Flood Elevation, and maintain flood insurance on the home in perpetuity regardless of ownership. Elevation Certificates will be required.

The City of Columbia has complied with the statutory laws and authorities cited in §58.5 (see the attached Statutory Checklist) and with the requirements of §58.6, completing the Compliance Checklist related to Flood Disaster Protection; restrictions for a project located in Coastal Barrier Resource Areas; and buyer notifications if a project is located in a Runway Clear Zone or Clear Zone.

Section 106 Historic Preservation Compliance Review

The City of Columbia has executed an Addendum to the Federal Emergency Management Agency (FEMA) Programmatic Agreement with South Carolina to expedite Section 106 reviews of historic properties that may be affected by one of the housing programs described above. Under the Unified Federal Review process each Responsible Entity must perform sufficient public outreach. A Public Notice concerning the proposed Addendum was published in *The State* on February 24, 2017 and letters were sent to the Richland County Conservation Commission, the Lexington County Historical Society, Historic Columbia, and the SC Department of Archives and History.

Ms. Julia Mates, Cultural Resources Coordinator, Tetra Tech, meets the Secretary of the Interior's Professional Qualification Standards to conduct Section 106 reviews and has been confirmed by HUD. The executed Addendum, a cover letter, and a copy of Ms. Mates' resume have been submitted to HUD and will be posted on the Section 106 Agreements section of the HUD Historic Preservation website.

As part of its broad programmatic review, the City has defined the Area of Potential Effects (APE) as any of the 15 historic preservation districts within the city limits. Individual sites cannot be identified until applicant eligibility has been confirmed.

Strategy to Address Site Specific Compliance Factors

As required by regulations defined at 24 CFR 58.15, the City of Columbia has developed the following site specific strategy for its tiered environmental review of pre-award costs for elevation of residential structures per local floodplain ordinances. This strategy describes the steps the City will take to address the compliance factors that could not be addressed in the Tier I environmental review. These compliance factors are included on the site specific checklist (attached). All documentation in the Tier II environmental review will be completed before funds are committed.

Historic Preservation:

The City of Columbia and State Historic Preservation Office (SHPO) have a Programmatic Agreement (PA) that expedites consultation **when rehabilitation activities conform to the original footprint and/or are performed in previously disturbed soils.** The minor rehabilitation activities allowed under this program fall within the second Tier 2 Allowances in the Programmatic Agreement (PA) including:

- ❑ In kind repair, replacement and reinforcement of footings, foundations, retaining walls, slopes and slope stabilization systems and installation of perimeter drainage.
- ❑ In kind repair of floors, walls, stairs, ceilings/trim or replacement of same if deteriorated beyond repair.
- ❑ Mold remediation when restricted to damaged areas
- ❑ Non-destructive or concealed testing for lead paint, asbestos or other hazardous materials or to assess hidden damages.
- ❑ In kind repair or replacement of utilities and mechanical, electrical and plumbing systems
- ❑ Elevation of HVAC and mechanical equipment if placed where it cannot be seen from the street.
- ❑ Installation or replacement of interior fire detection, suppression or security alarm systems
- ❑ In kind repair or replacement of damaged or severely deteriorated windows and frames, shutters, doors, door frames and hardware.

- ❑ In kind repainting of surfaces and repair of walls, porches, and foundations
- ❑ In kind repair, replacement or strengthening of roofing and damaged roof system components
- ❑ In kind repair and replacement of insulations systems.
- ❑ ADA compliance

The Historic Preservation Officer will conduct the standard Section 106 review all projects with activities affecting buildings 45 years old or greater and those located within or adjacent to a historic district.

Upon determination by the Historic Preservation Officer that Section 106 applies to a given undertaking, the City of Columbia will invite all potential consulting parties -- including federal, state and local agencies, interested parties, and the public – to address compliance factors on the Statutory Checklist and to participate in the project discussion. The City will share the project description, maps and program information with the following authorities when applicable:

- Advisory Council on Historic Preservation
- State Historic Preservation Officer
- Lexington County Historical Society
- Historic Columbia
- Richland County Conservation Commission

If an historic property owner applies and is eligible to participate in one of the City's housing programs, the Historic Preservation Officer will assess the effects of project activities. A determination of **no adverse effect** may be made when the Responsible Entity, SHPO, and other consulting parties agree to a set of conditions that will eliminate adverse effects, which may include, but are not limited to, the following:

- Physical destruction or damage to all or part of the property
- Removal of the property from its historic location
- Change of features within the property's setting
- Transfer, lease, or sale of property out of federal ownership
- Visual, atmospheric, or audible intrusions
- Foreseeable effects that may occur later in time or farther removed in distance
- Cumulative effects

If a determination is made that a project will have an **adverse effect** upon a historic property, the City of Columbia will notify the Advisory Council on Historic Preservation of its determination. The City will consult with SHPO/THPO and any interested stakeholders to identify the best way to avoid, minimize, or mitigate adverse effects. When a resolution among all parties has been agreed upon, it will be formalized in a Memorandum of Agreement (MOA).

Failure to reach an agreement requires that the Advisory Council on Historic Preservation notify and advise the City concerning resolution.

Floodplain and Wetland Management:

Upon determination that a specific property is located within the floodplain or wetland, the City will consult with the following agencies to solicit comments concerning compliance with floodplain management and wetland protection regulations defined in Executive Order 11988, 24 CFR 55(b)(2), and EO 11990:

- City of Columbia Floodplain Manager
- South Carolina Natural Resources Flood Mitigation Program
- FEMA Regional Environmental Office
- US Army Corps of Engineers, Columbia Regulatory Field Office
- US Fish and Wildlife Service
- South Carolina Emergency Management Division

National Flood Insurance Program (NFIP) insurance will be obtained for all property located within the 100 year floodplain (Special Flood Hazard Areas in Zones A, AE, AH, AO, AR, A99, V and VE). Flood insurance must be taken for the life of a loan or the useful life of an improvement funded by a grant, regardless of transfer of ownership. For grants, the amount of flood insurance coverage must equal the maximum limit of coverage available with respect to the type of building, or the project cost, whichever is less. *The project cost is the total cost for acquiring, constructing, repairing or improving the building.*

The National Flood Insurance Program (NFIP) prohibits federal financial assistance for use in a floodway except for functionally dependent uses such as a marina, port, bridge or dam. Any major rehabilitation activities on structures in the 100 year floodplain (Zone A) or involves a critical action within a 500 year floodplain (Zone B), must comply with local flood ordinances, be elevated a minimum of two feet above the BFE, retain the existing footprint and land use, and maintain flood insurance protection for the life of the property.

8-Step Decision Making Process

The City has completed the 8 step process as part of this Tier 1 review to comply with 24 CFR Part 55, HUD's Floodplain Management and Wetland Protection regulations. The City of Columbia is located outside of the coastal hazard area. Structures or improvements located in the floodway are not eligible for CDBG Disaster Recovery funds.

Contamination and Toxic Substances

If any properties participating in the Elevation Reimbursement Program contain asbestos materials, the City of Columbia will complete the site-specific Statutory Checklist to ensure compliance with EPA's Asbestos regulations found at 40 CFR Part 61 (NESHAP) and all state and local regulations. If the presence of mold is detected, all mold will be removed by a certified mold remediation firm with attention to:

- Safety - seal the work area using plastic sheeting so that mold spores do not disperse throughout the home. Workers and occupants should use a high quality, high filtration face mask and vinyl or neoprene gloves. A full protective suit is recommended when using harsh chemicals and for larger mold remediation projects.
- Assessments – assessments will be made before, during, and after remediation efforts
- Contamination control - prevent cross-contamination and the spread of mold from contaminated areas to areas absent of or with less contamination;
- Source removal - physically remove the mold at its source;
- Moisture removal - eliminate the moisture that caused the mold outbreak;
- Clean air - use ventilation or High Efficiency Particulate Air scrubbers to remove airborne mold spores; professionally clean air ducts.

All activities will be reviewed for compliance with the Toxic and Hazardous Chemical requirements. The City of Columbia will complete the Statutory Checklist to assess compliance with 24 CFR 58.5 (i)(2). A determination of the presence of toxic and hazardous chemicals will be made using EnviroMapper to determine if the property:

- Is listed on an EPA Superfund National Priorities or CERCLA or equivalent state list;
- Is located within 3000 feet of a toxic or solid waste landfill;
- Has an underground storage tank known or suspected to be contaminated by toxic chemicals or radioactive materials.

The City of Columbia will perform a government records search to determine whether there has been a release or threat of release to the subject property giving particular attention to any project site on or within one mile of an area that contains or may have contained hazardous waste such as dumps, landfills and industrial sites. The City will solicit information addressing the presence and possible effects of contamination or toxic substances from the following authorities, among others:

- South Carolina Department of Health and Environmental Control, Environmental Public Health Tracking Program
- EPA Region 4 Toxic Release Inventory and Superfund Database

Expected Mitigation Measures

- The City will implement Best Management Practices to identify and prevent storm water pollution and effectively handle storm water runoff from construction activities.
- Where practicable, the City will modify any proposed action to minimize adverse effects on wetlands through the use of permeable surfaces, bioswales, storm water capture and reuse, flood-proofing, and elevating structures above Base Flood Elevation (BFE), among others.
- All properties in the floodplain or floodway must obtain flood insurance, to be maintained in perpetuity.
- Flood-proofing adjustments and additions include:
  - Installing watertight shields for doors and windows.
  - Reinforcing walls to withstand floodwater pressures and impact forces generated by floating debris.
  - Using membranes and other sealants to reduce seepage of floodwater through walls.
  - Installing drainage collection systems and sump pumps to control interior water levels, collect seepage, and reduce hydrostatic pressure on the slab and walls.
  - Installing check valves to prevent the entrance of floodwater or sewage flows through utilities.
  - Anchoring the building to resist flotation, collapse, and lateral movement.
- Toxic substances will be removed, stabilized or encapsulated and a remediation plan developed.

References

Historic Preservation

Nancy E. Boone, Federal Preservation Officer
HUD Office of Environment and Energy
451 7th Street, Room 7212
Washington, DC 20410
T: 202-402-5718

John D. Sylvest, State Historic Preservation Officer (SHPO)
South Carolina Department of Archives and History
8301 Parklane Road
Columbia, SC 29223
T: 803.896.6129

Eric M. Thurston
Historic Preservation Specialist
FEMA Region IV
Office: (770) 220-8817
Cell: (404) 536-4114
Eric.thurston@fema.dhs.gov

Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001-2637
T: (202) 517-0200
E-mail: achp@achp.gov

Floodplain Management
Stephanie Everfield
FEMA Regional Environmental Office
Department of Homeland Security
3003 Chamblee Tucker Road
Atlanta, GA 30341-4112
Stephanie.everfield@dhs.gov

Ali Khan, Floodplain Manager
City of Columbia
1136 Washington Street
Columbia, SC 29201
T: 803-545-3400
lakhan@columbiasc.net

Wetlands Protection
Ezequiel Velez
EPA Region 4, Atlanta Federal Center
61 Forsyth Street, S. W.
Atlanta, GA 30303
Office: (404) 562-9191
Email: velez.ezequiel@epa.gov.

Tom McCoy, Field Supervisor
Charleston Ecological Services Field Office
US Fish and Wildlife Service
176 Croghan Spur Road, Suite 200
Charleston, SC 29407
thomas_mccoy@fws.gov

Jose Barrios**,** Southeast Regional Office
US Fish and Wildlife Service, National Wetlands Inventory
1875 Century Blvd., Suite 200
Atlanta, GA 30345
T: 404.679.7122 or
Ashley Monroe (Monroe.ashley@epa.gov) T: 404-562-9232

Farmland Protection
Ann English, State Conservationist
US Department of Agriculture
1835 Assembly Street, Room 950
Columbia, SC 29201
T: 803-253-3935
Ann.english@sc.usda.gov

Wild and Scenic Rivers
Jeff Duncan
Wild and Scenic Rivers, NPS
535 Chestnut St. Suite 207
Chattanooga, TN 37402
T: 423-987-6127
Jeff_duncan@nps.gov

Bill Marshall
Wild and Scenic Rivers, Endangered Species
SC Department of Natural Resources
PO Box 157, 1000 Assembly Street
Columbia, SC 29202
T: 803.734.9096
MarshallB@dnr.sc.gov

Air Quality
Rhonda Thompson, Chief, Bureau of Air Quality
South Carolina Health and Environmental Control
2600 Bull Street
Columbia, SC 29201
T: 803-898-4123
thompsrb@dhec.sc.gov;

Robert J. Brown, Director of Air Assessment, Innovations & Regulation
Bureau of Air Quality
2600 Bull Street
Columbia, SC 29201
T: 803-898-3432
brownjr@dhec.sc.gov

Air Quality State Implementation Plan
US EPA Region 4**,** Atlanta Federal Center
61 Forsyth Street SW
Atlanta, GA 30303-8960
T: 800-241-1754

Airport Hazards
Michael Gula, Director of Operations, Planning and Facilities
Columbia Metropolitan Airport
125A Summer Lake Drive
West Columbia, SC 29170
mgula@columbiaairport.com;

Toxic Chemicals and Hazardous Materials
South Carolina Health and Environmental Control
Hazardous Waste Compliance
2600 Bull Street
Columbia, SC 29201
T: 803-898-3432

US Army Corps of Engineers
South Atlantic Division
60 Forsyth Street, SW
Atlanta, GA 30303-8801
T: 404-562-5167

Charleston District Office
69 Haloed Avenue
Charleston, SC 29403
843-329-8123

Endangered Species
Melissa Bimbi, Biologist
US Fish and Wildlife Service
SC Ecological Services Field Office
176 Croghan Spur Road, Suite 200
Charleston, SC 29407
T: 843-727-4707
Melissa_bimbi@fws.gov

LIST OF PREPARERS AND SUMMARY OF QUALIFICATIONS:

Maya Gorman, CDBG Disaster Recovery Manager, City of Columbia

For ten years, Ms. Gorman served as the Lead Grant Manager for the Louisiana Office of Community Development Disaster Recovery Unit (OCD-DRU) Hurricane Katrina/Rita Orleans Parish CDBG Long Term Community Recovery (LTCR) Program; the Hurricane Gustav/Ike Parish-Implemented CDBG-DR Program; and the Hurricane Gustav/Ike Lafourche Parish CDBG Coastal Communities Fisheries Recovery Program. She is knowledgeable of the environmental review procedures required by 24 CFR Part 58 and has assisted several Responsible Entities in Louisiana in completing environmental review records at all levels of compliance, including Certifications of Exemption, Categorical Exclusion Not Subject to 58.5, Categorical Exclusion Subject to 58.5, and the Environmental Assessment.

Tetra Tech will be providing site specific reviews for the City of Columbia's residential rehabilitation. The firm has more than 10 years of experience working with the U.S. Department of Housing and Urban Development (HUD) environmental review procedures. Tetra Tech has been providing Responsible Entities with HUD environmental review services for more than 10 years, including four years of disaster recovery program support. These Responsible Entities have included the Louisiana Office of Community Development Disaster Recovery Unit, New York Governor's Office of Storm Recovery and New York State Homes and Community Renewal, New Jersey Department of Environmental Protection, and San Francisco Mayor's Office of Housing and Community Development. These services have included preparation of 87 environmental assessments (EA), 33 Categorical Exclusions Subject to 58.36 (CEST), 27 statutory worksheets, over 15,000 Tier 2 CESTs, and historic reviews for about 8,900 properties, most of which were done for CDBG-DR projects. Tetra Tech's experience preparing HUD National Environmental Policy Act (NEPA) documents and Environmental Review Records (ERR) demonstrates the firm's experience and working knowledge of the HUD NEPA regulations (under Code of Federal Regulations [CFR], Title 24, Part 58). Tetra Tech's HUD environmental review documents have addressed disaster recovery programs and similar projects, infrastructure, economic development, and housing programs for municipalities and other governmental entities.

LIST OF EXHIBITS

1. Programmatic Agreement FEMA, SCSHPO, SCEMD and TPHO and City of Columbia Addendum
2. Early Floodplain Notice, Final Floodplain Notice, 8 Step Decision Making Process for Projects in the Floodplain
3. Floodplain Map, FEMA FIRMs, Target Area Map and List of Flood Plain Properties
4. National Wetlands Inventory Map
5. Coastal Barrier Resources System Map
6. Sole Source Aquifers Region IV Map
7. Map of Critical Habitats and Resource List of Endangered Species; FWS Clearance to Proceed
8. National Wild and Scenic Rivers Map
9. SO2 Nonattainment Area Map
10. City of Columbia Zoning Maps
11. Columbia Metropolitan Airport Map
12. Low to Moderate Income Maps

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

Statutory Checklist for Compliance with 24 CFR §58.5 – NEPA Related Federal Laws and Authorities

(Must be completed for each individual addressed under overall project description)

Use this worksheet for projects that are Categorically Excluded Subject to 24 CFR §58.5 listed at 24 CFR §58.35(a) and for projects that require an Environmental Assessment.

Project Name: _Elevation Reimbursement Program

ERR FILE # _____

Definitions: **A:** The project is in compliance.
B: The project requires an additional compliance step or action.

Statute, Authority, Executive Order Cited at 24 CFR §58.5	A	B	COMPLIANCE FINDING	SOURCE DOCUMENTATION
1. 58.5(a) Historic Properties [36 CFR 800]		X	Consultation/review procedures required.	The City of Columbia has executed a Programmatic Agreement with FEMA, THPO, and the SC SHPO to expedite Section 106 reviews. Elevation of buildings less than 45 years of age are exempt when the activity conforms to the original footprint, are performed in previously disturbed soils, and the building is not located within or adjacent to a National historic district. (Exhibit 1). See written strategy and site specific checklist.
2. 58.5(b)(1) Floodplain Management [24 CFR 55, Executive Order 11988]		X	The project is in compliance.	The 8-step decision process does not apply because this activity meets the exception for minor repairs or improvements on 1-4 unit single family properties. Participants in the floodplain must maintain Flood Insurance and provide certification that the structure meets minimum elevation standards. Floodplain Map and FEMA FIRM are attached. (Exhibit 2)
3. 58.5(b)(2) Wetland Protection [24 CFR 55, Executive Order 11990]	X		The project is in compliance.	This activity is limited to the pre-storm building footprint, not new construction, and will have minimal, if any, impact on wetlands. See written strategy. National Wetlands Inventory map is attached (Exhibit 3)
4. 58.5(c) Coastal Zone Management [Coastal Zone Management Act sections	X		The project is in compliance.	The City of Columbia is not within a Coastal Zone. See attached Coastal Barrier Resources

307(c) & (d)]				System map (Exhibit 4).
5. 58.5(d) Sole Source Aquifers [40 CFR 149]	X		The project is in compliance.	The City of Columbia is not within a sole source aquifer watershed area. (Exhibit 5)
6. 58.5(e) Endangered Species [50 CFR 402]	X		The project is in compliance.	Consultation is not required when assistance is provided for costs incurred and physical activities were undertaken before an environmental review is performed. A map of critical habitats and a Resource List of endangered species for Columbia are attached (Exhibit 6).
7. 58.5(f) Wild and Scenic Rivers [36 CFR 297]	X		Project is in compliance.	In an email on 2/9/17 Bill Marshall, Rivers Coordinator, SC DNR, states that proposed activities will be restricted to existing structures on developed sites with no changes in land use and therefore will have little or no adverse effect on rivers. A NWSRS map is attached (Exhibit 7).
8. 58.5(g) Air Quality [40 CFR parts 6, 51,61, 93]	X		Project is in compliance.	In a letter dated 1/25/17, Rhonda Thompson, Chief, Bureau of Air Quality, DHEC, stated the project is consistent with the State Implementation Plan and no air quality permits are needed. A map of nonattainment areas does not include Columbia, SC (Exhibit 8). This activity has already taken place within the pre-existing footprint and is in compliance with Clean Air Act requirements.
9. 58.5(h) Farmland Protection [7 CFR 658]	X		Project is in compliance.	All activities will take place within the City limits, zoned for urban uses and will have no effect on farmland. Zoning maps and legends are attached (Exhibit 9).
10. 58.5(i)(1) Noise Control and Abatement [24 CFR 51B]	X		Project is in compliance.	The noise policy at 24 CFR Part 51 B is not applicable to assistance that has the effect of restoring facilities within the pre-existing footprint.
11. 58.5 (i) (1) Explosive and Flammable Operations [24 CFR 51C]	X		Project is in compliance.	This activity has already taken place within the pre-existing footprint and does not increase the number of people exposed to hazardous operations.
12. 58.5(i)(1) Airport Hazards (Runway Clear Zones and Clear Zones/Accident Potential Zones) [24 CFR 51D]	X		Project is in compliance.	These programs will not change the current use of the property, prolong the physical or economic life of the structures, or increase the unit density or number of people at the site. Michael Gula, Director of Operations, Columbia Metropolitan Airport, states no property within the city limits is within 2500 feet of Airport Clear Zones or Runway Clear Zones. A map indicating CAE is 5.85 miles outside of the city limits where all activities will take place is attached (Exhibit 10).
13. 58.5(i)(2)(i-iv) Contamination and Toxic Substances [24 CFR 58.5(i)(2)]		X	Consultation/review procedures required	The City of Columbia will assess individual residences to determine if the property is located within the minimum search distances of any type of environmental contamination. See written strategy.
14. 58.5(j) Environmental Justice [Executive Order 12898]	X		The project is in compliance.	This activity will not raise environmental justice issues and has no potential for new or continued disproportionately high and adverse human health and environmental effects on minority or low income populations. A map of Household Median Income by Block Group is

				attached (Exhibit 11).

DETERMINATION:

☐ **Box "A" has been checked for <u>all</u> authorities.** For Categorically Excluded actions pursuant to §58.35(a) [Does not apply to EA or EIS level of review which can never convert to Exempt], the project can convert to Exempt, per §58.34(a) (12), since the project does not require any compliance measures (e.g., consultation, mitigation, permit or approval) with respect to any law or authority cited at §58.5. The project is now made Exempt and **funds may be drawn down**; OR

☒ **Box "B" has been checked for <u>one or more</u> authority.** For Categorically Excluded actions pursuant to §58.35(a), the project cannot convert to Exempt since one or more authority requires compliance, including but not limited to consultation with or approval from an oversight agency, performance of a study or analysis, completion of remediation or mitigation measure, or obtaining of license or permit. **Complete pertinent compliance requirement(s), publish NOI/RROF, request release of funds (HUD-7105.15), and obtain HUD's Authority to Use Grant Funds (HUD-7015.16) per §58.70 and §58.71 before committing funds**; OR

☐ This project is not a Categorically Excluded action pursuant to §58.35(a), or may result in a significant environmental impact to the environment, and requires preparation of an Environmental Assessment (EA). Prepare the EA according to 24 CFR Part 58 Subpart E.

MITIGATION MEASURES AND CONDITIONS FOR PROJECT APPROVAL:

The City of Columbia is preparing a Tiered Environmental Review for its Disaster Recovery housing elevation reimbursement activities. This Statutory Checklist supports a broad, programmatic review of unidentified scattered sites. Details regarding further consultations, mitigation measures, permit requirements, and contract and grant conditions are included in the Environmental Review Record Project Description - Strategy to Address Site Specific Compliance Factors.

All properties in the floodplain must maintain flood insurance in perpetuity and participants in the Elevation Reimbursement Program must provide certification that the structure meets minimum elevation standards of two feet above Base Flood Elevation (BFE).

Toxic substances will be removed, stabilized or encapsulated and a specific remediation plan developed when necessary.

PREPARER:

Gloria Saeed — 8/4/17

Preparer's Signature — Date

Gloria Saeed, Director, Community Development Department, City of Columbia

Preparer's Name and Title (printed)

COLUMBIA CDBG DISASTER RECOVERY PROGRAM
CDBG DISASTER RECOVERY ENVIRONMENTAL REVIEW
CATEGORICAL EXCLUSION SUBJECT TO §58.5
SITE SPECIFIC CHECKLIST – ELEVATION REIMBURSEMENT

§58.5(a) Historical Properties [36 CFR Part 800]

- ❑ Is the project located within or directly adjacent to a historic district?

  ☐ Yes ☐ No

- ❑ Is the structure or surrounding structures listed on or eligible for listing on the National Register of Historic Places (e.g. greater than 45 years old)?

  ☐ Yes ☐ No

The City of Columbia and State Historic Preservation Office (SHPO) have a Programmatic Agreement (PA) that expedites consultation **when rehabilitation activities conform to the original footprint and/or are performed in previously disturbed soils including:**

- In kind repair, replacement and reinforcement of footings, foundations, retaining walls, slopes and slope stabilization systems and installation of perimeter drainage.
- In kind repair of floors, walls, stairs, ceilings/trim or replacement of same if deteriorated beyond repair.
- Mold remediation when restricted to damaged areas
- Non-destructive or concealed testing for lead paint, asbestos or other hazardous materials or to assess hidden damages.
- In kind repair or replacement of utilities and mechanical, electrical and plumbing systems
- Elevation of HVAC and mechanical equipment if placed where it cannot be seen from the street.
- Installation or replacement of interior fire detection, suppression or security alarm systems
- In kind repair or replacement of damaged or severely deteriorated windows and frames, shutters, doors, door frames and hardware.
- In kind repainting of surfaces and repair of walls, porches, and foundations
- In kind repair, replacement or strengthening of roofing and damaged roof system components
- In kind repair and replacement of insulations systems.
- ADA compliance
- Elevation, and reconstruction of buildings less than 45 years old when activities conform to original footprint, are performed in previously disturbed soils and are not located within or adjacent to a historic district.

- ❑ Were any properties of historical, architectural, religious or cultural significance identified in the project's Area of Potential Effect (APE)?

  ☐ Yes ☐ No

- ❑ Have you consulted with the SHPO to determine whether the project will have "No Adverse Effect on Historic Properties?"

  ☐ Yes ☐ No

- ❑ Does the SHPO concurrence letter received for this project require mitigation or have conditions?

  ☐ Yes ☐ No

- ❑ Have the SHPO and RE agreed on required mitigation or conditions? Describe mitigation measures.

  ☐ Yes ☐ No _____

Historic properties of religious and cultural significance to tribes and Native Hawaiian organizations

- ❑ Does the project include the types of activities such as those listed below that have the potential to affect historic properties of religious and cultural significance to tribes?
  - Ground disturbance (digging);
  - New construction in undeveloped natural areas;
  - Incongruent visual changes – impairment of the vista or viewshed from an observation point in the natural landscape;
  - Incongruent audible changes – increase in noise levels above an acceptable standard in areas known for their quiet, contemplative experience;
  - Incongruent atmospheric changes – introduction of lights that create skyglow in an area with a dark night sky;
  - Work on a building with significant tribal association;
  - Transfer, lease or sale of a historic property of religious and cultural significance.

  If Yes, continue. **If No**, tribal consultation is not required.

- ❑ Does HUD's Tribal Directory Assessment Tool indicate that tribes have an interest in the location where the project is sited? (http://egis.hud.gov/tdat/Tribal.aspx)

  ☐ Yes ☐ No

- ❑ Did the tribe(s) respond that they want to be a consulting party?

  ☐ Yes ☐ No

- ❑ After consulting with the tribe(s) and discussing the project, were any properties of religious or cultural significance to the tribe(s) identified in the project's APE?

  ☐ Yes ☐ No

- ❑ After consulting with the tribe(s), will the project have an adverse effect on properties of religious or cultural significance to the tribe(s)?

- ❑ Were any objections to a finding received from a consulting tribe?

  ☐ Yes ☐ No

§58.5(i) (2) Contamination and Toxic Substances

- ❑ Does the project involve demolition or renovation of buildings likely to contain asbestos containing materials?

  ☐ Yes ☐ No

  If Yes, the City of Columbia will ensure the project is in compliance with EPA's Asbestos regulations found at 40 CFR Part 61 (NESHAP) and all state and local regulations.

- ❑ Is the property damaged by mold?

  ☐ Yes ☐ No

- ❑ All mold will be removed by a certified mold remediation firm with attention to:
  - Safety - seal the work area using plastic sheeting so that mold spores do not disperse throughout the home. Workers and occupants should use a high quality, high filtration face mask and vinyl or neoprene gloves. A full protective suit is recommended when using harsh chemicals and for larger mold remediation projects.
  - Assessments – assessments will be made before, during, and after remediation efforts
  - Contamination control - prevent cross-contamination and the spread of mold from contaminated areas to areas absent of or with less contamination;
  - Source removal - physically remove the mold at its source;
  - Moisture removal - eliminate the moisture that caused the mold outbreak;
  - Clean air - use ventilation or High Efficiency Particulate Air scrubbers to remove airborne mold spores; professionally clean air ducts.

Sites known or suspected to be contaminated by toxic chemicals or radioactive materials include but are not limited to sites: (i) listed on an EPA Superfund National Priorities or CERCLA List, or equivalent State list; (ii) located within 3,000 feet of a toxic or solid waste landfill site; or (iii) with an underground storage tank. For any of these conditions, the grantee must provide an ASTM Phase I report.

- Review databases maintained by U.S. EPA and state, local, and tribal environmental quality departments or agencies to screen for potential *on-site* and *off-site* facilities that could pose health and safety problems and toxic clean-up sites that are presently under analysis or remediation.
- Investigate previous uses of the site. Site inspections and building and use permit records as well as Sanborn Co. maps show previous land uses which could have left toxic residues. Other methods of evaluation include performing a site walk, interviewing property owners or managers and local officials, and analyzing local land use records, permits, and violations.

- When site conditions indicate that the subject property is contaminated or likely contaminated by toxic substances, hazardous materials or petroleum products, one shall provide an ASTM certified Phase I ESA report, or other studies where applicable. Any hazards that are identified should be evaluated for the potential to affect the health and safety of the occupants and end-users. Contact your local HUD field environmental officer for further technical assistance in this regard.

❑ Is the property located within the search distances of any of the types of environmental contamination sources?

Standard Environmental Record Sources	**ASTM 1527-13 Recommended Minimum Search Distance (mi)**	**Yes**	**No**
Federal Delisted NPL Site List	0.5	☐	☐
Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) List	0.5	☐	☐
Federal CERCLIS No Further Remedial Action Planned (NFRAP) Site List	0.5	☐	☐
Federal RCRA Non-CORRACTS Treatment, Storage and Disposal (TSD) Facilities List	0.5	☐	☐
State- and Tribal-Equivalent CERCLIS	0.5	☐	☐
State and Tribal Landfill and/or Solid Waste Disposal Site Lists	0.5	☐	☐
State and Tribal Leaking Storage Tank Lists	0.5	☐	☐
State and Tribal Voluntary Cleanup Sites	0.5	☐	☐
State and Trial Brownfield Sites	0.5	☐	☐
Federal National Priorities List (NPL)	1	☐	☐
Federal RCRA Correction Action (CORRACTS) Facilities List	1	☐	☐
State- and Tribal-Equivalent NPL	1	☐	☐
Federal Institutional Control/Engineering Control Registries	Property Only	☐	☐
State and Tribal Institutional Control/Engineering Control Registries	Property Only	☐	☐
Federal Emergency Response and Notification System (ERNS) List	Property Only	☐	☐
Federal RCRA Generators List	Property/Adjoining Properties	☐	☐
State and Tribal Registered Storage Tank Lists	Property/Adjoining Properties	☐	☐

If the project is located within any of the minimum search distances above, then the RE must further evaluate to determine if there has been a release or there is a threat of release to the subject property. Attach supporting documentation to the environmental review to support any conclusion that the site of concern is not a threat.

If a release or threat of release cannot be ruled out, then services of a qualified environmental professional is necessary to further evaluate potential for site contamination. Recommend an ASTM 1527-13 Phase I Environmental Site Assessment (Phase I).

Prior Uses of the Property

- ❑ Has the subject property, adjacent property, or adjoining property ever been used for any of the following types of uses?

	Yes	**No**		**Yes**	**No**
Gas Station	☐	☐	Vehicle Repair Shop	☐	☐
Car Dealership	☐	☐	Auto Garage	☐	☐
Depot	☐	☐	Commercial Printing Facility	☐	☐
Industrial or commercial warehouses	☐	☐	Dry Cleaners	☐	☐
Photo Developing Lab	☐	☐	Hospital	☐	☐
Junkyard or landfill	☐	☐	Agricultural/Farming Operations	☐	☐
Tannery	☐	☐	Livestock Operations	☐	☐

If the evaluation of previous uses results in a yes answer to any of the above, the services of a qualified environmental professional is necessary to rule out site contamination. An ASTM 1527-13 Phase I is recommended.

If the evaluation of previous uses does not identify previous uses of concern, attach supporting documentation for the conclusion to the environmental review.

Field Site Visit

- ❑ Did a visual inspection of the site show the following?

	Yes	No
Distressed vegetation	☐	☐
Vent or Fill Pipes	☐	☐
Storage Oil Tanks or Questionable Containers	☐	☐
Pits, Ponds or Lagoons	☐	☐
Stained Soil or Pavement (other than water stains)	☐	☐
Pungent, Foul or Noxious Odors	☐	☐
Dumped Material or Soil, Mounds of Dirt, Rubble, Fill, etc.	☐	☐

- ❑ Does the project have an underground storage tank other than a residential fuel tank, or known or suspected to be contaminated by toxic chemicals or radioactive materials?

  ☐ Yes ☐ No

- ❑ Is the project site near an industry or commercial facility disposing of chemicals or hazardous wastes?

  ☐ Yes ☐ No

- ❑ Could a nearby source of toxic, hazardous or radioactive substances affect the health and safety of project occupants or conflict with the intended use of the property?

  ☐ Yes or ☐ No

I**f the site visit identifies a "Yes" answer to any of the above,** a qualified environmental professional must undertake investigations necessary to ensure that the project is free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances such that there is no hazard which could affect the health and safety of occupants

Results of ASTM Site Contamination Reviews

- ❑ Was an ASTM Phase I Environmental Site Assessment (ESA) report completed for this project? (Strongly recommend an Phase I ESA for land acquisition, new construction, reconstruction or substantial rehabilitation).

  ☐ Yes ☐ No

- ❑ Did a Phase I, or equivalent evaluation, identify the potential for site contamination? [The RE must independently evaluate the Phase I and not rely entirely on the conclusions of whether or not there is a Recognized Environmental Condition (REC). Phase I's do not always appropriately identify RECs.]

  ☐ Yes ☐ No

- ❑ If there is the potential for site contamination, was an ASTM Phase II Environmental Site Assessment Completed that documented contamination?

  ☐ Yes or ☐ No

- ❑ Did results of the Phase I or Phase II identify the need to mitigate the environmental condition by removing, stabilizing or encapsulating the toxic substances in accordance with the requirements of the appropriate Federal, state or local oversight agency?

  ☐ Yes ☐ No

- ❑ If the project site requires remediation, does the RE have the following documentation?

	Yes	No
Remediation Plan	☐	☐
Regulatory Oversight Agency Approval of the Remediation Plan	☐	☐
Firm Cost Estimate to Implement the Remediation Plan	☐	☐
A Secured Source of Funding for Site Remediation	☐	☐
A project condition that the project construction or rehabilitation cannot proceed until the RE received a No Further Action (NFA) Required or Site Closure Letter from the Regulatory Oversight Agency	☐	☐
A project condition for Deed Restrictions related to any continuing obligations associated with the remediation plan or NFA or Site Closure Letters	☐	☐

- ❑ If the site requires remediation, and the property owner intends to complete the remediation prior to transferring the property to the HUD recipient, can the RE provide documentation of the following?

	Yes	No
Remediation Plan	☐	☐
Regulatory Oversight Agency Approval of the Remediation Plan	☐	☐
Purchase contract and closing document requirements for receipt of a No Further Action Required or Site Closure Letter from the Regulatory Oversight Agency prior to closing.	☐	☐
Deed restrictions for any continuing obligations associated with the remediation plan or NFA or Site Closure Letters	☐	☐

1. §58.5(j) Environmental Justice (E.O. 12898)

The City of Columbia will map low-income and minority populations in the vicinity of the project, perform an environmental justice analysis, solicit comments from affected population, and develop a mitigation plan to correct adverse conditions to the extent practical.

- ❑ Is the project located in or designed to serve a predominantly minority and low-income neighborhood?
  ☐ Yes ☐ No

- ❑ Would there be an adverse environmental impact caused by the proposed action, or would the proposed action be subject to an existing adverse environmental impact?
  ☐ Yes ☐ No

If Yes, mitigation or avoidance of adverse impacts must be considered to the extent practicable; and, public participation processes must involve the affected population(s) in the decision-making process.

- ❑ Has the mitigation plan been approved by the RE and the impacted community?
  ☐ Yes ☐ No

Request for Release of Funds

Request for Release of Funds and Certification

U.S. Department of Housing and Urban Development
Office of Community Planning and Development

OMB No. 2506-0087
(exp. 07/31/2017)

This form is to be used by Responsible Entities and Recipients (as defined in 24 CFR 58.2) when requesting the release of funds, and requesting the authority to use such funds, for HUD programs identified by statutes that provide for the assumption of the environmental review responsibility by units of general local government and States. Public reporting burden for this collection of information is estimated to average 36 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

Part 1. Program Description and Request for Release of Funds (to be completed by Responsible Entity)

1. Program Title(s)	2. HUD/State Identification Number	3. Recipient Identification Number (optional)
City of Columbia CDBG Disaster Recovery Program	B-16-MH-45-0001	

4. OMB Catalog Number(s)	5. Name and address of responsible entity
14.228	City of Columbia 1737 Main Street Columbia, SC 29217
6. For information about this request, contact (name & phone number)	
Gloria Saeed, 803-545-3766	

8. HUD or State Agency and office unit to receive request	7. Name and address of recipient (if different than responsible entity)
HUD Office of Community Planning and Development 1835 Assembly Street, 13th Floor Columbia, SC 29201	NA

The recipient(s) of assistance under the program(s) listed above requests the release of funds and removal of environmental grant conditions governing the use of the assistance for the following

9. Program Activity(ies)/Project Name(s)	10. Location (Street address, city, county, State)
Columbia CDBG Disaster Recovery Program (Columbia Homeowner Assistance Program, Small Rental Repair Program, Minor Repair Program, Elevation Reimbursement Program)	Columbia Community Development Department 1225 Lady Street, Suite 102 Columbia, SC 29201

11. Program Activity/Project Description

The Columbia Homeowner Assistance, Small Rental Repair, Minor Repair, and Elevation Reimbursement Programs will provide CDBG Disaster Recovery grants to eligible property owners of single family (1-4 units) residences damaged by the October 2015 Flood to rehabilitate their homes. The estimated project cost for these programs is $15,790,100; the City's total CDBG Disaster Recovery funding is $19,989,100.

Improvements will promote energy efficiency, water conservation, and green building practices in the repair or replacement of roofing; flooring; electrical, HVAC and plumbing systems; unsafe water and sewer supplies; insulation, sheetrock; foundations; as well as lead-based paint, asbestos and mold remediation; building elevation, drainage improvements, and Americans with Disabilities Act (ADA) accessibility. All program activities will be completed on existing residential structures within the Columbia city limits with no increase in density or change in land use. No adverse effects are anticipated on the natural environment or the related natural and beneficial functions and values of Columbia's approximately 8454 acres of floodplain.

The City has conducted a broad review of scattered sites within the city limits (Latitude: 34.009905, Longitude: 81.037131) addressing Coastal Zone Management, Sole Source Aquifers, Endangered Species, Wild and Scenic Rivers, Air Quality, Farmland Protection, Airport Hazards, Noise Control, and Explosive and Flammable Operations. Site-specific environmental reviews will be completed for those laws and authorities not addressed in the broad review for each eligible property when addresses become known. Of the 1489 potentially eligible properties, 197 are located in the floodplain, approximately 514.05 acres; of that number 59 appear to be low to moderate income (LMI) households. All applicants for the major and minor rehabilitation programs must meet LMI criteria; applicants for elevation reimbursement are not income qualified. Tier 2 site specific reviews will be completed for those laws and authorities not addressed in the Tier 1 broad review for each property under this program when addresses become known.

Part 2. Environmental Certification (to be completed by responsible entity)

With reference to the above Program Activity(ies)/Project(s), I, the undersigned officer of the responsible entity, certify that:

1. The responsible entity has fully carried out its responsibilities for environmental review, decision-making and action pertaining to the project(s) named above.
2. The responsible entity has assumed responsibility for and complied with and will continue to comply with, the National Environmental Policy Act of 1969, as amended, and the environmental procedures, permit requirements and statutory obligations of the laws cited in 24 CFR 58.5; and also agrees to comply with the authorities in 24 CFR 58.6 and applicable State and local laws.
3. The responsible entity has assumed responsibility for and complied with and will continue to comply with Section 106 of the National Historic Preservation Act, and its implementing regulations 36 CFR 800, including consultation with the State Historic Preservation Officer, Indian tribes and Native Hawaiian organizations, and the public.
4. After considering the type and degree of environmental effects identified by the environmental review completed for the proposed project described in Part 1 of this request, I have found that the proposal did ☐ did not ☑ require the preparation and dissemination of an environmental impact statement.
5. The responsible entity has disseminated and/or published in the manner prescribed by 24 CFR 58.43 and 58.55 a notice to the public in accordance with 24 CFR 58.70 and as evidenced by the attached copy (copies) or evidence of posting and mailing procedure.
6. The dates for all statutory and regulatory time periods for review, comment or other action are in compliance with procedures and requirements of 24 CFR Part 58.
7. In accordance with 24 CFR 58.71(b), the responsible entity will advise the recipient (if different from the responsible entity) of any special environmental conditions that must be adhered to in carrying out the project.

As the duly designated certifying official of the responsible entity, I also certify that:

8. I am authorized to and do consent to assume the status of Federal official under the National Environmental Policy Act of 1969 and each provision of law designated in the 24 CFR 58.5 list of NEPA-related authorities insofar as the provisions of these laws apply to the HUD responsibilities for environmental review, decision-making and action that have been assumed by the responsible entity.
9. I am authorized to and do accept, on behalf of the recipient personally, the jurisdiction of the Federal courts for the enforcement of all these responsibilities, in my capacity as certifying officer of the responsible entity.

Signature of Certifying Officer of the Responsible Entity	Title of Certifying Officer City Manager, City of Columbia, SC
X Teresa Wilson	Date signed 8/4/2017

Address of Certifying Officer

City Manager, City of Columbia, 1737 Main Street, Columbia, SC 29217

Part 3. To be completed when the Recipient is not the Responsible Entity

The recipient requests the release of funds for the programs and activities identified in Part 1 and agrees to abide by the special conditions, procedures and requirements of the environmental review and to advise the responsible entity of any proposed change in the scope of the project or any change in environmental conditions in accordance with 24 CFR 58.71(b).

Signature of Authorized Officer of the Recipient	Title of Authorized Officer
X	Date signed

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Finding of No Significant Impact
Notice of Intent to
Request Release of Funds

NOTICE OF FINDING OF NO SIGNFICANT IMPACT AND NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS

Date of Publication: July 18, 2017
City of Columbia
Community Development Department
1225 Lady Street, Suite 102
Columbia, SC 29201
803-545-4668

These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the City of Columbia, South Carolina.

REQUEST FOR RELEASE OF FUNDS

On or after August 3, 2017 the City of Columbia will submit a request to the HUD Office of Community Planning and Development for the release of CDBG Disaster Recovery funds under Title II Section 420 of the Consolidated Appropriations Act of 2016, as amended, to undertake the following project:

Tier 1 Broad Review Program Title: City of Columbia CDBG Disaster Recovery Program

Purpose: The Columbia CDBG Disaster Recovery program is in response to severe flooding and storm damage caused by the October 2015 Flood and addresses the City's unmet housing needs. The City will assist homeowners and rental property owners of single family (1-4 units) residences within the city limits who sustained damage as determined by the Federal Emergency Management Agency (FEMA) with housing rehabilitation, elevation or reconstruction through its Columbia Housing Assistance Program, Small Rental Repair Program, Elevation Reimbursement Program, and Minor Repair Program.

Location: The City has conducted a broad review of scattered sites within the city limits (Latitude: 34.009905, Longitude: 81.037131) addressing Coastal Zone Management, Sole Source Aquifers, Endangered Species, Wild and Scenic Rivers, Air Quality, Farmland Protection, Airport Hazards, Noise Control, and Explosive and Flammable Operations. Site-specific environmental reviews will be completed for those laws and authorities not addressed in the broad review for each eligible property when addresses become known. Of the 1489 potentially eligible properties, 197 are located in the floodplain, approximately 514.05 acres; of that number 59 appear to be low to moderate income (LMI) households. All applicants for the major and minor rehabilitation programs must meet LMI criteria; applicants for elevation reimbursement are not income qualified. Tier 2 site specific reviews will be completed for those laws and authorities not addressed in the Tier 1 broad review for each address under this program when addresses become known.

FINDING OF NO SIGNIFICANT IMPACT

The City of Columbia has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR) on file at City of Columbia, 1225 Lady Street, Suite 102, Columbia, SC 29201 and may be examined or copied weekdays 8:30A.M to 5 P.M.

PUBLIC COMMENTS

Any individual, group, or agency may submit written comments on the ERR to the City of Columbia. All comments received by August 3, 2017 will be considered by the City of Columbia prior to authorizing submission of a request for release of funds. Comments should specify which Notice they are addressing.

ENVIRONMENTAL CERTIFICATION

The City of Columbia certifies to HUD that Teresa Wilson in her capacity as City Manager consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the City of Columbia to use HUD program funds.

OBJECTIONS TO RELEASE OF FUNDS

HUD will accept objections to its release of fund and the City of Columbia's certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the City of Columbia; (b) the City of Columbia has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to the HUD Office of Community Planning and Development at 1835 Assembly Street, 13th Floor, Columbia, SC, 29201. Potential objectors should contact HUD to verify the actual last day of the objection period.

Teresa Wilson, City Manager, Columbia, SC

LEGAL ADVERTISEMENTS

NOTICE OF FINDING OF NO SIGNFICANT IMPACT AND NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS

Date of Publication: July 18, 2017
City of Columbia
Community Development Department
1225 Lady Street, Suite 102
Columbia, SC 29201
803-545-4688

These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the City of Columbia, South Carolina.

REQUEST FOR RELEASE OF FUNDS

On or after August 3, 2017 the City of Columbia will submit a request to the HUD Office of Community Planning and Development for the release of CDBG Disaster Recovery funds under Title II Section 420 of the Consolidated Appropriations Act of 2016, as amended, to undertake the following project:

Tier 1 Broad Review Program Title: City of Columbia CDBG Disaster Recovery Program

Purpose: The Columbia CDBG Disaster Recovery program is in response to severe flooding and storm damage caused by the October 2015 Flood and addresses the City's unmet housing needs. The City will assist homeowners and rental property owners of single family (1-4 units) residences within the city limits who sustained damage as determined by the Federal Emergency Management Agency (FEMA) with housing rehabilitation, elevation or reconstruction through its Columbia Homeowner Assistance Program, Small Rental Repair Program, Elevation Reimbursement Program, and Minor Repair Program.

Location: The City has conducted a broad review of scattered sites within the city limits (Latitude: 34.000905, Longitude: 81.037131) addressing Coastal Zone Management, Sole Source Aquifers, Endangered Species, Wild and Scenic Rivers, Air Quality, Farmland Protection, Airport Hazards, Noise Control, and Explosive and Flammable Operations. Site-specific environmental reviews will be completed for those laws and authorities not addressed in the broad review for each eligible property when addresses become known. Of the 1469 potentially eligible properties, 197 are located in the floodplain, approximately 514.05 acres; of that number 69 appear to be low to moderate income (LMI) households. All applicants for the major and minor rehabilitation programs must meet LMI criteria; applicants for elevation reimbursement are not income qualified. Tier 2 site specific reviews will be completed for those laws and authorities not addressed in the Tier 1 broad review for each address under this program when addresses become known.

Program Description: The Columbia Homeowner Assistance, Small Rental Repair, Elevation Reimbursement, and Minor Repair Programs will provide CDBG Disaster Recovery grants to eligible property owners of single family (1-4 units) residences damaged by the October 2015 Flood to rehabilitate their homes. Improvements will promote energy efficiency, water conservation, and green building practices in the repair or replacement of roofing; flooring; electrical, HVAC and plumbing systems; unsafe water and sewer supplies; insulation, sheetrock; foundations; as well as lead-based paint, asbestos and mold remediation; building elevation, drainage improvements, and Americans with Disabilities Act (ADA) accessibility. All program activities will be completed on existing residential structures within the Columbia city limits with no increase in density or change in land use. No adverse effects are anticipated on the natural environment or the related natural and beneficial functions and values of Columbia's approximately 8454 acres of floodplain.

Tier 2 Site Specific Review:
The site specific reviews will cover the following laws and authorities not addressed in the Tier 1 broad review: 24 CFR 58.5(a) Historic Properties 58.5(b)(1) Floodplain Management; 58.5(b)(2) Wetland Protection; 58.5(i)(2)(i-iv) Contamination and Toxic Substances; and 58.5(j) Environmental Justice.

Mitigation Measures/Conditions/Permits (if any):
Any rehabilitation activities on structures in the floodplain will have minimal environmental impact because all structures must comply with local flood ordinances, be elevated a minimum of two feet above the BFE, retain the existing footprint and land use, and maintain flood insurance protection for the life of the property.
The City will implement Best Management Practices to identify and prevent storm water pollution and effectively handle storm water runoff from construction activities. Where practicable, the City will modify any proposed action to minimize adverse effects on wetlands. Toxic substances will be removed, stabilized or encapsulated and a remediation plan developed. Required permits will be obtained before work begins. Rehabilitation will include the following flood-proofing adjustments:
•All improvements shall be anchored to prevent flotation, collapse or lateral movement; constructed with materials and utility equipment resistant to flood damage; and constructed by methods that minimize flood damage.
•Electrical, plumbing, and HVAC equipment shall be designed and/or located to prevent water from entering or accumulating within the components during flooding.
•New and replacement water supply and sanitary sewage systems shall be designed to minimize or eliminate infiltration of floodwaters into the systems or discharges from the systems into floodwaters.
•On-site waste disposal systems shall be located and constructed to avoid impairment to them or contamination from them during flooding.

Estimated Project Cost: $15,790,100 **HUD Funding:** $15,790,100

FINDING OF NO SIGNIFICANT IMPACT

The City of Columbia has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR) on file at City of Columbia, 1225 Lady Street, Suite 102, Columbia, SC 29201 and may be examined or copied weekdays 8:30A.M to 5 P.M.

PUBLIC COMMENTS

Any individual, group, or agency may submit written comments on the ERR to the City of Columbia. All comments received by August 3, 2017 will be considered by the City of Columbia prior to authorizing submission of a request for release of funds. Comments should specify which Notice they are addressing.

ENVIRONMENTAL CERTIFICATION

The City of Columbia certifies to HUD that Teresa Wilson in her capacity as City Manager consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the City of Columbia to use HUD program funds.

OBJECTIONS TO RELEASE OF FUNDS

HUD will accept objections to its release of fund and the City of Columbia's certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the City of Columbia; (b) the City of Columbia has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to the HUD Office of Community Planning and Development at 1835 Assembly Street, 13th Floor, Columbia, SC, 29201. Potential objectors should contact HUD to verify the actual last day of the objection period.

Teresa Wilson, City Manager, Columbia, SC
3180574

Floodplain Notices
Categorical Exclusion Subject to 58.5

EARLY NOTICE AND PUBLIC REVIEW
OF A PROPOSED ACTIVITY IN A 100-YEAR/500-YEAR FLOODPLAIN

To: All interested Agencies, Groups and Individuals

This is to give notice that the City of Columbia, located in Richland and Lexington Counties, South Carolina, has determined that the following proposed action under the CDBG Disaster Recovery Program and B-16-MH-45-0001 is located in the 100-year/500-year floodplain, and the City will be identifying and evaluating practicable alternatives to locating the action in the floodplain and the potential impacts on the floodplain from the proposed action, as required by Executive Order 11988, in accordance with HUD regulations at 24 CFR 55.20 Subpart C, Procedures for Making Determinations on Floodplain Management and Protection of Wetlands.

The Columbia Homeowner Assistance, Small Rental Repair, Elevation Reimbursement, and Minor Repair Programs will provide $15,790,100 in CDBG Disaster Recovery grants to eligible property owners of single family (1-4 units) residences damaged by the October 2015 Flood for the rehabilitation, elevation, remediation, and repair of their homes. Improvements will promote energy efficiency, water conservation, and green building practices in the repair or replacement of roofing; flooring; electrical, HVAC and plumbing systems; unsafe water and sewer supplies; lead-based paint, asbestos and mold remediation; insulation, sheetrock; foundations; as well as building elevation, drainage improvements and ADA accessibility. All program activities will be completed on existing residential structures within the incorporated Columbia city limits with no increase in density or change in land use. No adverse effects are anticipated on the natural environment or the related natural and beneficial functions and values of Columbia's approximately 8453.84 acres of floodplain.

According to the latest Flood Insurance Rate Maps (FIRM), 141 properties located within Floodplain Zones A, AE, and X along the banks of Lake Katherine, Central and Lower Gills Creek, Wildcat Creek, and Penn Branch sustained major or severe damages; another 56 properties in the floodplain sustained minor damage; 197 total flood damaged parcels equal 514.05 acres. (See FIRM Panels 45079C0091, C0092, C0242, C0263, C0264, C0376 and C0377.) Special Flood Hazard Areas (SFHA) are locations that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year, referred to as the base flood or 100-year flood. SFHAs are labeled as Zone A and Zone AE. Moderate flood hazard areas, labeled Zone X, are the areas between the limits of the base flood and the 0.2-percent-annual-chance or 500-year flood.

There are three primary purposes for this notice. First, people who may be affected by activities in floodplains and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Commenters are encouraged to offer alternative sites outside of the floodplain, alternative methods to serve the same project purpose, and methods to minimize and mitigate impacts. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about floodplains can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in floodplains, it must inform those who may be put at greater or continued risk.

Written comments must be received by the City of Columbia at the following address on or before June 22, 2017: City of Columbia, 1225 Lady Street, Suite 102, Columbia, SC 29201; 803-545-4668 Attention: Gloria Saeed, Director of Community Development. A full description of the project may also be reviewed from 8:30 am to 5 pm at the address above and at http//dr.columbia.gov. Comments may also be submitted via email to magorman@columbiasc.net.

Date: June 5, 2017

EARLY NOTICE AND PUBLIC REVIEW
OF A PROPOSED ACTIVITY IN A 100-YEAR/500-YEAR FLOODPLAIN

To: All interested Agencies, Groups and Individuals

This is to give notice that the City of Columbia, located in Richland and Lexington Counties, South Carolina, has determined that the following proposed action under the CDBG Disaster Recovery Program and B-16-MH-45-0001 is located in the 100-year/500-year floodplain, and the City will be identifying and evaluating practicable alternatives to locating the action in the floodplain and the potential impacts on the floodplain from the proposed action, as required by Executive Order 11988, in accordance with HUD regulations at 24 CFR 55.20 Subpart C, Procedures for Making Determinations on Floodplain Management and Protection of Wetlands.

The Columbia Homeowner Assistance, Small Rental Repair, Elevation Reimbursement, and Minor Repair Programs will provide $15,790,100 in CDBG Disaster Recovery grants to eligible property owners of single family (1-4 units) residences damaged by the October 2015 Flood for the rehabilitation, elevation, remediation, and repair of their homes. Improvements will promote energy efficiency, water conservation, and green building practices in the repair or replacement of roofing; flooring; electrical, HVAC and plumbing systems; unsafe water and sewer supplies; lead-based paint, asbestos and mold remediation; insulation, sheetrock; foundations; as well as building elevation, drainage improvements and ADA accessibility. All program activities will be completed on existing residential structures within the incorporated Columbia city limits with no increase in density or change in land use. No adverse effects are anticipated on the natural environment or the related natural and beneficial functions and values of Columbia's approximately 8453.84 acres of floodplain.

According to the latest Flood Insurance Rate Maps (FIRM), 141 properties located within Floodplain Zones A, AE, and X along the banks of Lake Katherine, Central and Lower Gills Creek, Wildcat Creek, and Penn Branch sustained major or severe damages; another 56 properties in the floodplain sustained minor damage; 197 total flood damaged parcels equal 514.05 acres. (See FIRM Panels 45079C0091, C0092, C0242, C0263, C0264, C0376 and C0377.) Special Flood Hazard Areas (SFHA) are locations that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year, referred to as the base flood or 100-year flood. SFHAs are labeled as Zone A and Zone AE. Moderate flood hazard areas, labeled Zone X, are the areas between the limits of the base flood and the 0.2-percent-annual-chance or 500-year flood.

There are three primary purposes for this notice. First, people who may be affected by activities in floodplains and those who have an interest in the protection of the natural environment should be given an opportunity to express their concerns and provide information about these areas. Commenters are encouraged to offer alternative sites outside of the floodplain, alternative methods to serve the same project purpose, and methods to minimize and mitigate impacts. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about floodplains can facilitate and enhance Federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the Federal government determines it will participate in actions taking place in floodplains, it must inform those who may be put at greater or continued risk.

Written comments must be received by the City of Columbia at the following address on or before June 22, 2017: City of Columbia, 1225 Lady Street, Suite 102, Columbia, SC 29201; 803-545-4668 Attention: Gloria Saeed, Director of Community Development. A full description of the project may also be reviewed from 8:30 am to 5 pm at the address above and at http//dr.columbia.gov. Comments may also be submitted via email to magorman@columbiasc.net.

Date: June 5, 2017
3109167

City of Columbia CDBG Disaster Recovery Program
8-Step Decision Making Process for Projects in the Floodplain

E.O. 11988 as provided by 24 CFR §55.20
Project No. B-16-MH-45-0001

Step 1: ***Determine whether the action is located in a 100-year floodplain (or a 500-year floodplain for critical actions).***

The Columbia CDBG Disaster Recovery program is in response to severe flooding and storm damage caused by the October 2015 Flood and addresses the City's unmet housing needs. The program will provide funding for homeowners within the city limits whose primary residence sustained damage as determined by the Federal Emergency Management Agency (FEMA). All program activities will occur within the disturbed area of the previously developed parcel.

The Columbia Homeowner Assistance, Small Rental Repair, Elevation Reimbursement, and Minor Repair Programs will provide CDBG Disaster Recovery grants to eligible property owners of single family (1-4 units) residences damaged by the October 2015 Flood to rehabilitate, elevate, remediate, and repair their homes. Improvements will promote energy efficiency, water conservation, and green building practices in the repair or replacement of roofing; flooring; electrical, HVAC and plumbing systems; unsafe water and sewer supplies; insulation, sheetrock; foundations; as well as lead-based paint, asbestos and mold remediation; building elevation, drainage improvements, and ADA accessibility. No adverse effects are anticipated on the natural environment or the related natural and beneficial functions and values of Columbia's approximately 8454 acres of floodplain.

At this time, the exact locations of properties eligible for Columbia's CDBG Disaster Recovery housing programs have not been identified. The City is targeting the most heavily damaged areas with concentrations of low and moderate income households (80% or less than AMI) to prioritize housing rehabilitation assistance for those with greatest need. Of the 1489 potentially eligible applicants for Columbia's Homeowner Assistance (76), Small Rental Repair (193), Elevation Reimbursements (22), and Minor Repair (1198) Programs, 197 are located in the floodplain; of that number 59 are considered low to moderate income households.

Columbia requires that all property owners whose homes are determined to be *substantially damaged* by a Municipal Floodplain Administrator must rebuild so that the first floor is at least two feet above the FEMA Base Flood Elevation (BFE). A structure is considered substantially damaged if the cost of restoration equals or exceeds 50% of the pre-flood market value of the structure.

Step 2: ***Notify the public for early review of the proposal and involve the affected and interested public in the decision making process.***

A public notice describing the project was published in *The State* newspaper on June 5, 2017 and sent to interested federal, state, and local agencies. A list of specific agencies and individuals and a copy of the published notification is kept in the project's environmental review record and attached to this document. A copy was also posted on the City of Columbia website. The required

15 calendar days were allowed for public comment. As required by regulation, the notice also included the name, proposed location and description of the activity, total number of floodplain acres involved, and the responsible entity contact for information, as well as the City of Columbia CDBG Disaster Recovery website address and the location and hours of the office where a full description of the proposed action can be viewed.

No comments from the public were received before the stated deadline of June 22, 2017.

The City of Columbia Flood Plain Manager and city engineers were contacted concerning mitigation requirements of the National Flood Insurance Program (NFIP) as well as local ordinances that must be implemented as part of NFIP.

Step 3: ***Identify and evaluate practicable alternatives.***

The overall site selection criteria for Columbia's CDBG Disaster Recovery Programs are:

- Site must be within the incorporated Columbia city limits;
- Applicant must have registered with FEMA for the October 2015 flood;
- Damage must be directly related to the October 2015 flood;
- Property must be a single family residence of one to four units;
- Property must have been owner occupied and the primary residence at the time of the 2015 flood (except for rental property owners); and
- Properties in the floodplain or floodway must maintain flood insurance in perpetuity and elevate a minimum of two feet above BFE.

Columbia considered the following alternative actions believed to satisfy these requirements:

- ***Locate the Project Within the Floodplain***

  In October 2015, the City of Columbia experienced unprecedented, historic rainfall and flooding exceeding a once in a thousand-year flood event with more than two feet of rain in less than 48 hours. Following a major disaster, households who qualify as either low or moderate income are likely to have increased difficulty securing financing for necessary repairs, replacing damaged personal property, finding suitable rental housing, or paying for temporary housing or relocation expenses. For that reason, the City of Columbia has targeted the most heavily damaged areas with concentrations of low and moderate income (LMI) households (80% or less than AMI) to prioritize housing rehabilitation assistance for those with greatest need. Of the 1489 potentially eligible applicants for Columbia's Homeowner Assistance (76), Small Rental Repair (193), Elevation Reimbursements (22), and Minor Repair (1198) Programs, 197 are located in the floodplain; of that number 59 appear to be low to moderate income (LMI) households. All applicants for the major and minor rehabilitation programs must meet LMI criteria; applicants for elevation reimbursement (22) are not income qualified.

  Columbia requires that all property owners whose homes are determined to be *substantially damaged* by a Municipal Floodplain Administrator must rebuild so that the first floor is at least two feet above the FEMA Base Flood Elevation (BFE). A structure is considered substantially

damaged if the cost of restoration equals or exceeds 50% of the pre-flood market value of the structure.

All program activities – major rehabilitation, minor rehabilitation, and reimbursement of a portion of costs to elevate mandated by local floodplain ordinances - will occur on existing structures within the disturbed area of the previously developed parcel with no change in density or land use. No adverse effects are anticipated on the natural environment or the related natural and beneficial functions and values of Columbia's floodplain.

- ***Locate the Project Outside of the Floodplain***
  This alternative was considered and rejected as all housing rehabilitation activities will be performed on existing residential structures, 59 of which are within the floodplain. Denying assistance to the 59 properties in the floodplain would be detrimental to those homeowners with the greatest need leaving them susceptible to future floods.

  The reimbursement of a portion of the pre-award elevation cost of complying with local and NFIP floodplain ordinances, which mandates elevating new construction and substantial rehabilitation to two feet above BFE, is only applicable to properties located inside the floodplain.

- ***No Action or Alternative Actions that Serve the Same Purpose***
  The provision of safe, disaster resistant housing for residents impacted by the October 2015 flood is critical to the City of Columbia's long-term recovery strategy. By choosing to bypass those properties within the floodplain, and not offering rehabilitation assistance or reimbursement of mandated floodplain compliance measures for storm damaged housing, the City ignores the long-term safety and stability of the community and increases the potential impact of future storms and floods. There are no alternatives for homes within the floodplain that serve the same purpose.

Step 4: *Identify Potential Direct and Indirect Impacts of Associated with Floodplain Development.*

Any major rehabilitation activities on structures in the floodplain will have minimal environmental impact because all structures must comply with local flood ordinances, be elevated a minimum of two feet above the BFE, retain the existing footprint and land use, and maintain flood insurance protection for the life of the property. Structures or improvements located in the floodway will be subject to National Flood Insurance Program (NFIP) Floodplain Management requirements (44 CFR 60.3), which will be determined on a site-specific basis. Hydrologists and engineers will be consulted and technical analyses will identify physical measures affecting the hydrologic or hydraulic characteristics of a flooding source that may result in modifications of an existing floodway. Requests for Conditional Letters of Map Revisions (CLMAR) will be made if necessary, and documentation obtained for a no-rise certification, if applicable.

Minor rehabilitation activities on single family (one to four units) residences will occur on existing structures within the disturbed area of the previously developed parcel and will have no direct or indirect impact on floodplain development.

The Fish and Wildlife Service South Carolina Ecological Services Field Office has determined that the rehabilitation or reconstruction of family housing on previously developed land will have no effect on any federally listed species protected under Section 7 of the Endangered Species Act.

Step 5: ***Where practicable, design or modify the proposed action to minimize the potential adverse impacts to lives, property, and natural values within the floodplain and to restore, and preserve the values of the floodplain.***

The City of Columbia has adopted construction methods emphasizing high quality, durability, energy efficiency, and sustainability and continues to address hazard risks from possible sea level rise, high winds, storm surge, and flooding. All substantially rehabilitated or reconstructed buildings must meet all city building codes, standards and ordinances. Potential adverse impacts to lives, property and natural values will be minimized by requiring that any rebuilding be constructed according to the best available science with respect to base flood elevations and flood resistant mitigation measures.

Columbia participates in the National Flood Insurance Program (NFIP) and is monitored by the South Carolina Department of Natural Resources (SCDNR) for compliance with FEMA regulations. On June 16, 2015, to maintain compliance with FEMA regulations, the Columbia City Council passed an updated floodplain ordinance requiring citizens who experienced significant storm damages to build new structures or significantly improve existing structures with the bottom of the lowest finished floor at least 2 feet above the Base Flood Elevation (BFE). No basements are permitted in these areas.

The following provisions, among others, are required by the City of Columbia for new construction and substantial improvements in all special flood hazard areas (SFHA):

- New construction and substantial improvements shall be anchored to prevent flotation, collapse or lateral movement; shall be constructed with materials and utility equipment resistant to flood damage; and shall be constructed by methods and practices that minimize flood damage.
- Electrical, heating, ventilation, plumbing, air conditioning equipment and other service facilities shall be designed and/or located to prevent water from entering or accumulating within the components during flooding.
- New and replacement water supply and sanitary sewage systems shall be designed to minimize or eliminate infiltration of floodwaters into the systems or discharges from the systems into floodwaters.
- On-site waste disposal systems shall be located and constructed to avoid impairment to them or contamination from them during flooding.
- Floodways located in SHFA are extremely hazardous due to floodwater velocity, which carries dangerous debris and can cause erosion. Encroachments are prohibited including fill, new

construction, substantial improvements, and other development unless a professional engineer certifies that encroachment will not result in increased flood levels during the base flood discharge. Requests for Conditional Letters of Map Revisions (CLMAR) will be made if necessary.

These comprehensive building standards incorporate flood mitigation measures and promote long-term community resiliency that will preserve the lives of residents, support community revitalization, and protect the environment. To minimize damage from future hazards, Columbia is also implementing Green Building standards. Where practicable and on a site-specific basis, the City will modify proposed actions to minimize any adverse effects on water resources through the use of permeable surfaces, bioswales, storm water capture and reuse, flood proofing, and elevating structures, among others. Impacts to the floodplain will also be limited due to construction occurring within the previously developed site.

Swales will be introduced using native vegetation to address drainage impacts The U.S. Fish and Wildlife Service (FWS) has determined that the rehabilitation or reconstruction of family housing on previously developed land will have no effect on any federally listed species protected under Section 7 of the Endangered Species Act.

Step 6: *Reevaluate the Alternatives.*

Locating the major rehabilitation, minor rehabilitation, and reimbursement of elevation cost activities within the floodplain is the only viable option for the rehabilitation of existing structures on previously developed sites. A small number of homeowners are interested in selling rather than repairing their property in the floodplain; these will be addressed separately under an Environmental Assessment for a buyout activity. The no action alternative is also impracticable because it will not satisfy the need to provide assistance to families that suffered the greatest damage from the October 2015 storm.

Step 7: *Determination of No Practicable Alternative*

There are no alternatives to locating the activity in a 100 year floodplain as all program activities will occur within the disturbed area of the previously developed parcel. Residential rehabilitation, elevation, reconstruction or repair activities will be completed on existing residential structures with no increase in density or change in land use. No adverse effects are anticipated on the natural environment or the related natural and beneficial functions and values of Columbia's floodplain.

A final floodplain notice was published on June 30, 2017 and posted consistent with the prior notice. The notice explains the reasons why the modified project must be located in the floodplain, offers a list of alternatives considered at Steps 3 and 6, and describes all mitigation measures at Step 5 taken to minimize adverse impacts and preserve natural and beneficial floodplain values. The notice is attached to this document. No concerns were expressed by the public concerning this notice.

Step 8: *Implement the Proposed Action*

The city will assure that this plan, as modified and described above, is executed and the necessary language will be included in all agreements with participating parties. The city will also take an active

role in monitoring the construction process to ensure no unnecessary impacts occur nor unnecessary risks are taken. The flood insurance requirement for the life of the property will be monitored by the City of Columbia by listing the municipality as an interested party on the 2nd mortgagee/other box of the flood insurance application and by placing a covenant on the property that lasts for the useful life of the structure.

Floodplain Management

Stephanie Everfield
FEMA Regional Environmental Office
Department of Homeland Security
3003 Chamblee Tucker Road
Atlanta, GA 30341-4112
770-220-5200
Stephanie.everfield@dhs.gov

Ali Khan, Floodplain Manager
City of Columbia
1136 Washington Street
Columbia, SC 29201
T: 803-545-3400
lakhan@columbiasc.net

Lisa Jones
South Carolina Dept. Natural Resources
Division of Land Resources & Conservation Districts
2221 Devine Street, Suite 222
Columbia, SC 29205
803-734-9120
jones@dnr.state.sc.us

FINAL NOTICE AND PUBLIC EXPLANATION OF A PROPOSED ACTIVITY IN A 100-YEAR/500-YEAR FLOODPLAIN

To: All interested Agencies, Groups and Individuals

This is to give notice that the City of Columbia has conducted an evaluation as required by Executive Order 11988 in accordance with HUD regulations at 24 CFR 55.20 Subpart C Procedures for Making Determinations on Floodplain Management and Wetlands Protection. The activity is funded under the CDBG Disaster Recovery Program grant B-16-MH-45-0001. The proposed projects are located at unidentified scattered sites in the incorporated city limits of Columbia, located in Richland and Lexington Counties, South Carolina.

The Columbia Homeowner Assistance, Small Rental Repair, Elevation Reimbursement, and Minor Repair Programs will provide financial assistance to eligible property owners of single family (1-4 units) residences damaged by the October 2015 Flood to rehabilitate, elevate, remediate, and repair their homes. All program activities will be completed on existing residential structures within the city limits with no increase in density or change in land use. No adverse effects are anticipated on the natural environment or the related natural and beneficial functions and values of Columbia's approximately 8454 acres of floodplain.

At this time, the exact locations of properties eligible for Columbia's CDBG Disaster Recovery housing programs have not been identified. The City is targeting the most heavily damaged areas with concentrations of low and moderate income households (80% or less than AMI) to prioritize housing rehabilitation assistance for those with the greatest need. Of the 1489 potentially eligible applicants for the Homeowner Assistance (76), Small Rental Repair (193), Elevation Reimbursement (22), and Minor Repair (1198) Programs, 197 are located in the floodplain; of that number 59 appear to be low to moderate income (LMI) households. All applicants for the major and minor rehabilitation programs must meet LMI criteria; applicants for elevation reimbursement are not income qualified.

The City of Columbia has considered the following alternatives and mitigation measures to be taken to minimize adverse impacts and to restore and preserve natural and beneficial values:

Locating the major rehabilitation, minor rehabilitation, and reimbursement of elevation cost activities within the floodplain is the only viable option for the rehabilitation of existing structures on previously developed sites. The no action alternative is also impracticable because it denies assistance to families that suffered the greatest damage from the October 2015 storm, ignores the long-term safety and stability of the community, and increases the potential impact of future storms and floods. There are no alternatives for homes within the floodplain that serve the same purpose.

Any major rehabilitation activities on structures in the floodplain will have minimal environmental impact because all structures must comply with local flood ordinances, be elevated a minimum of two feet above the BFE, retain the existing footprint and land use, and maintain flood insurance protection for the life of the property. All improvements located in the floodway will be subject to National Flood Insurance Program (NFIP) Floodplain Management requirements (44 CFR 60.3), which will be determined on a site-specific basis. Hydrologists and engineers will be consulted and technical analyses will identify physical measures affecting the hydrologic or hydraulic characteristics of a flooding source that may result in modifications of an existing floodway. Requests for Conditional Letters of Map Revisions (CLMAR) will be made if necessary, and documentation obtained for a no-rise certification, if applicable.

Minor rehabilitation activities on single family residences will occur on existing structures within the disturbed area of the previously developed parcel and will have no direct or indirect impact on floodplain development. No adverse effects are anticipated on the natural environment or the related natural and beneficial functions and values of Columbia's floodplain.

Columbia has adopted comprehensive building standards incorporating flood mitigation measures that promote long-term community resiliency, preserve the lives of residents, and protect the environment. Potential adverse impacts to lives, property and natural values will be minimized by requiring the following provisions for new construction and substantial improvements in all special flood hazard areas (SFHA):

- All improvements shall be anchored to prevent flotation, collapse or lateral movement; constructed with materials and utility equipment resistant to flood damage; and constructed by methods that minimize flood damage.
- Electrical, plumbing, and HVAC equipment shall be designed and/or located to prevent water from entering or accumulating within the components during flooding.
- New and replacement water supply and sanitary sewage systems shall be designed to minimize or eliminate infiltration of floodwaters into the systems or discharges from the systems into floodwaters.
- On-site waste disposal systems shall be located and constructed to avoid impairment to them or contamination from them during flooding.
- Encroachments are prohibited in floodways located in SHFA unless a professional engineer certifies that encroachment will not result in increased flood levels during the base flood discharge.

Where practicable and on a site-specific basis, the City will modify proposed actions to minimize any adverse effects on water resources through the use of permeable surfaces, bioswales, stormwater capture and reuse, flood proofing, and elevating structures, among others. Impacts to the floodplain will also be limited due to construction occurring within the previously developed site.

The City of Columbia has reevaluated the alternatives to building in the floodplain and has determined that it has no practicable alternative. Environmental files that document compliance with steps 3 through 6 of Executive Order 11988, are available for public inspection, review and copying upon request at the times and location delineated in the last paragraph of this notice for receipt of comments.

There are three primary purposes for this notice. First, people who may be affected by activities in floodplains and those who have an interest in protecting the natural environment should be given an opportunity to express their concerns and provide information about these areas. Second, an adequate public notice program can be an important public educational tool. The dissemination of information and request for public comment about floodplains can facilitate and enhance federal efforts to reduce the risks and impacts associated with the occupancy and modification of these special areas. Third, as a matter of fairness, when the federal government determines it will participate in actions taking place in floodplains, it must inform those who may be put at greater or continued risk.

Written comments must be received by the City of Columbia at the following address on or before July 10, 2017: City of Columbia, 1225 Lady Street, Suite 102, Columbia, SC 29201; 803-545-4688 Attention: Gloria Saeed, Director of Community Development. A full description of the project may also be reviewed from 8:30-5 pm at the address above and at **http//dr.columbia.gov.** Comments may also be submitted via email to **magorman@columbiasc.net.**

Date: June 30, 2017

FINAL NOTICE AND PUBLIC EXPLANATION

OF A PROPOSED ACTIVITY IN A 100-YEAR/500-YEAR FLOODPLAIN

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At this time, the exact locations of properties eligible for Columbia's CDBG Disaster Recovery housing programs have not been identified. The City is targeting the most heavily damaged areas with concentrations of low and moderate income households (80% or less than AMI) to prioritize housing rehabilitation assistance for those with the greatest need. Of the 1460 potentially eligible applicants for the Homeowner Assistance (76), Small Rental Repair (198), Elevation Reimbursement (32), and Minor Repair (1198) Programs, 197 are located in the floodplain, of that number 59 appear to be low to moderate income (LMI) households. All applicants for the major and minor rehabilitation programs must meet LMI criteria; applicants for elevation reimbursement are not income qualified.

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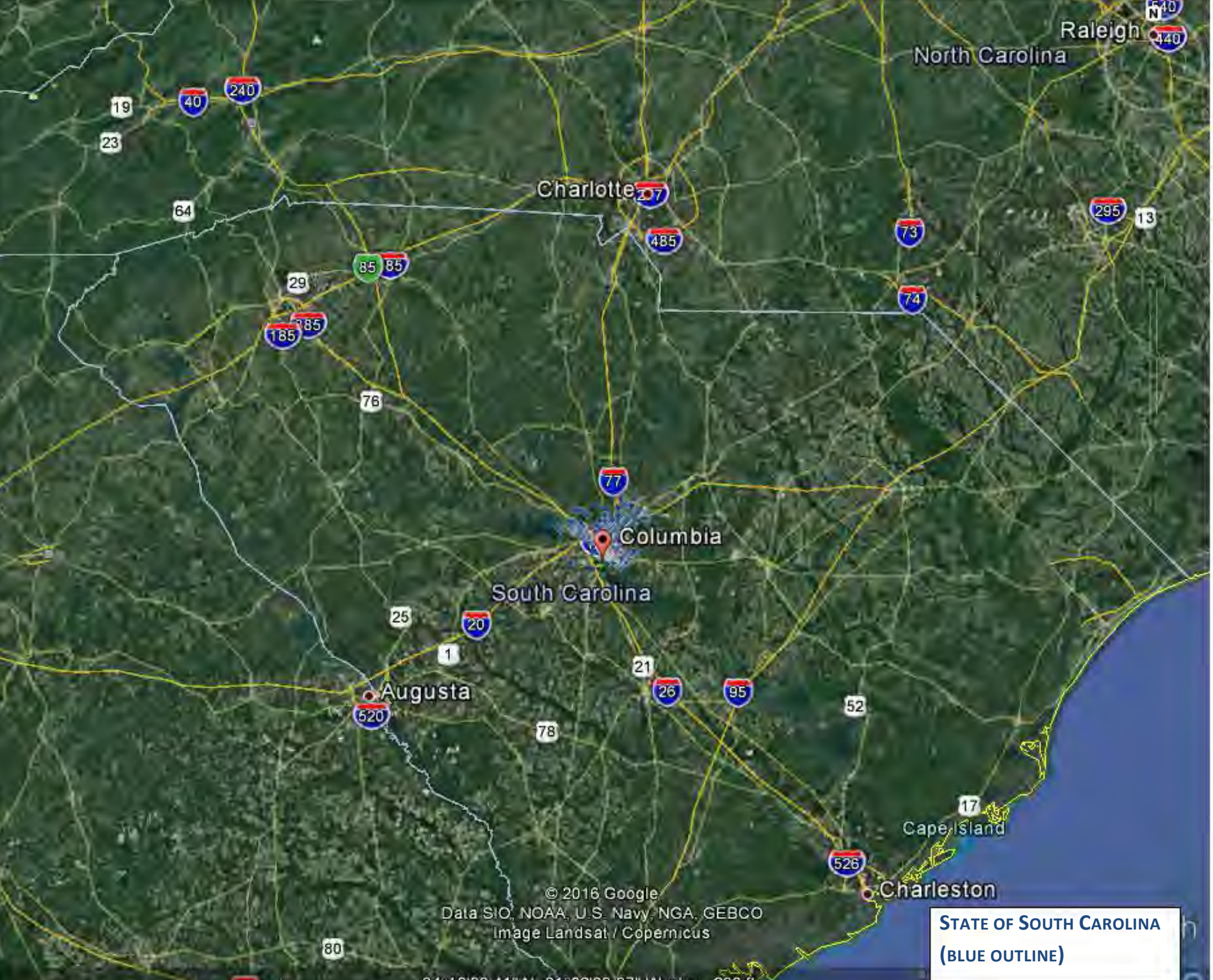
Date: June 30, 2017
3153607

Maps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Columbia
South Carolina
Augusta
Cape Island
Charleston
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Data SIO, NOAA, U.S. Navy, NGA, GEBCO
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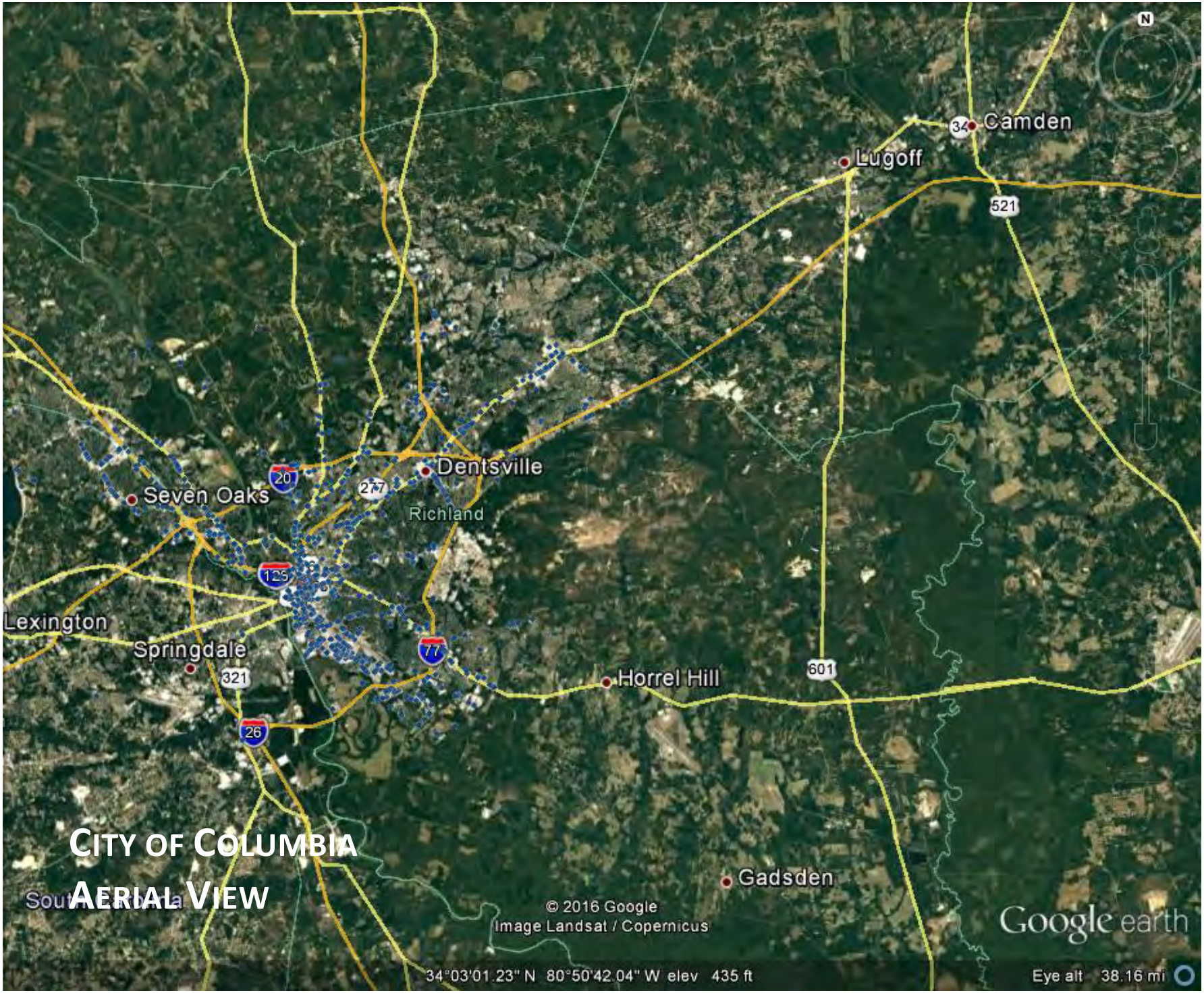
STATE OF SOUTH CAROLINA
(BLUE OUTLINE)



City of Columbia Aerial View

City Limits
Columbia, SC

CITY OF COLUMBIA
GIS DATA DISCLAIMER

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City Limits
County Boundary
Fort Jackson

0 1 2 4 Miles

This map was prepared by:

GIS@ColumbiaSC.net
City of Columbia - GIS Division
2015

Document Name: CityLimits_24x36
Document Path: W:\GIS\GIS_Admin\Templates\Website Maps\CityLimits_24x36.mxd

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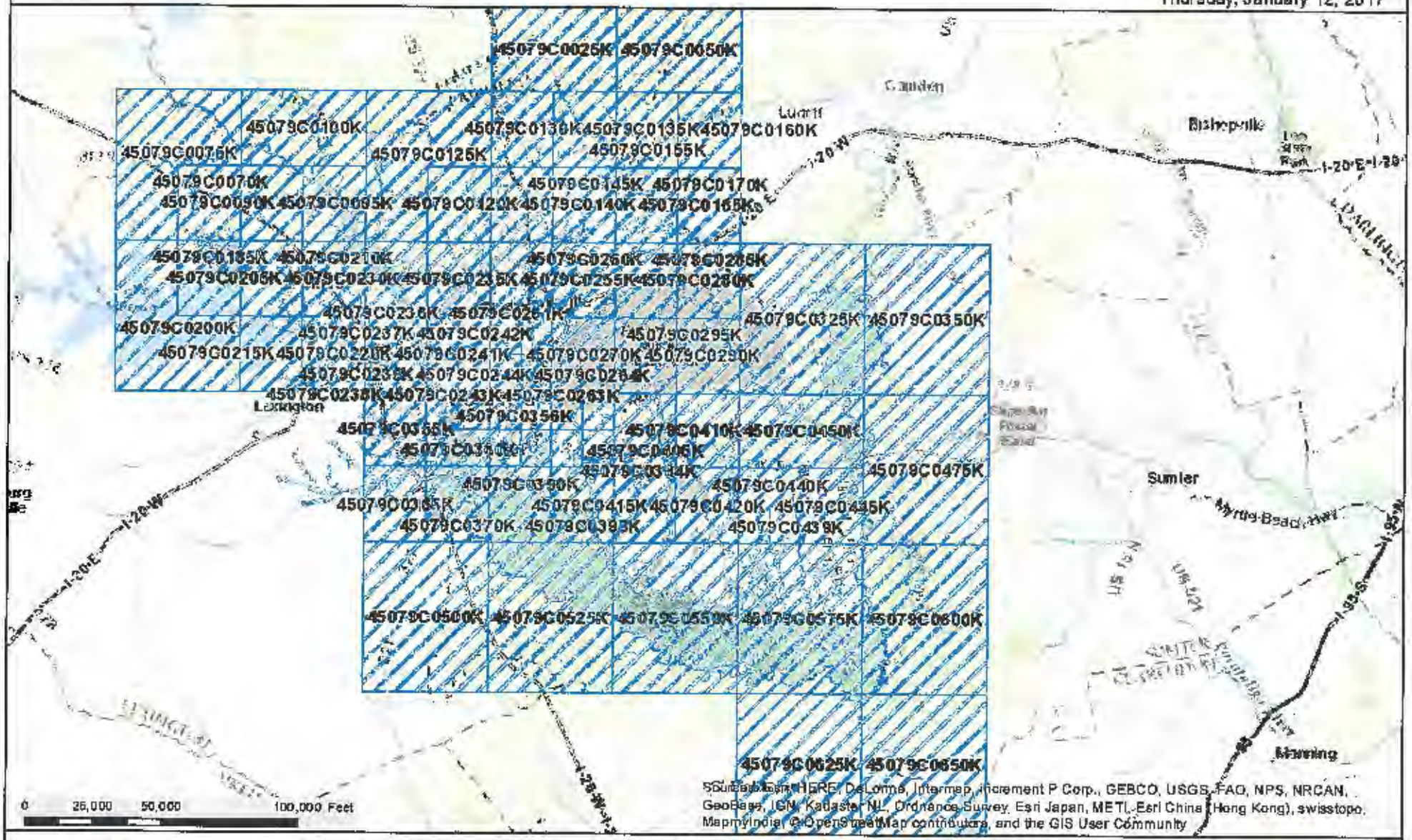
City of Columbia

FEMA FIRM

Thursday, January 12, 2017



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City of Columbia

Floodplain

Thursday, January 12, 2017

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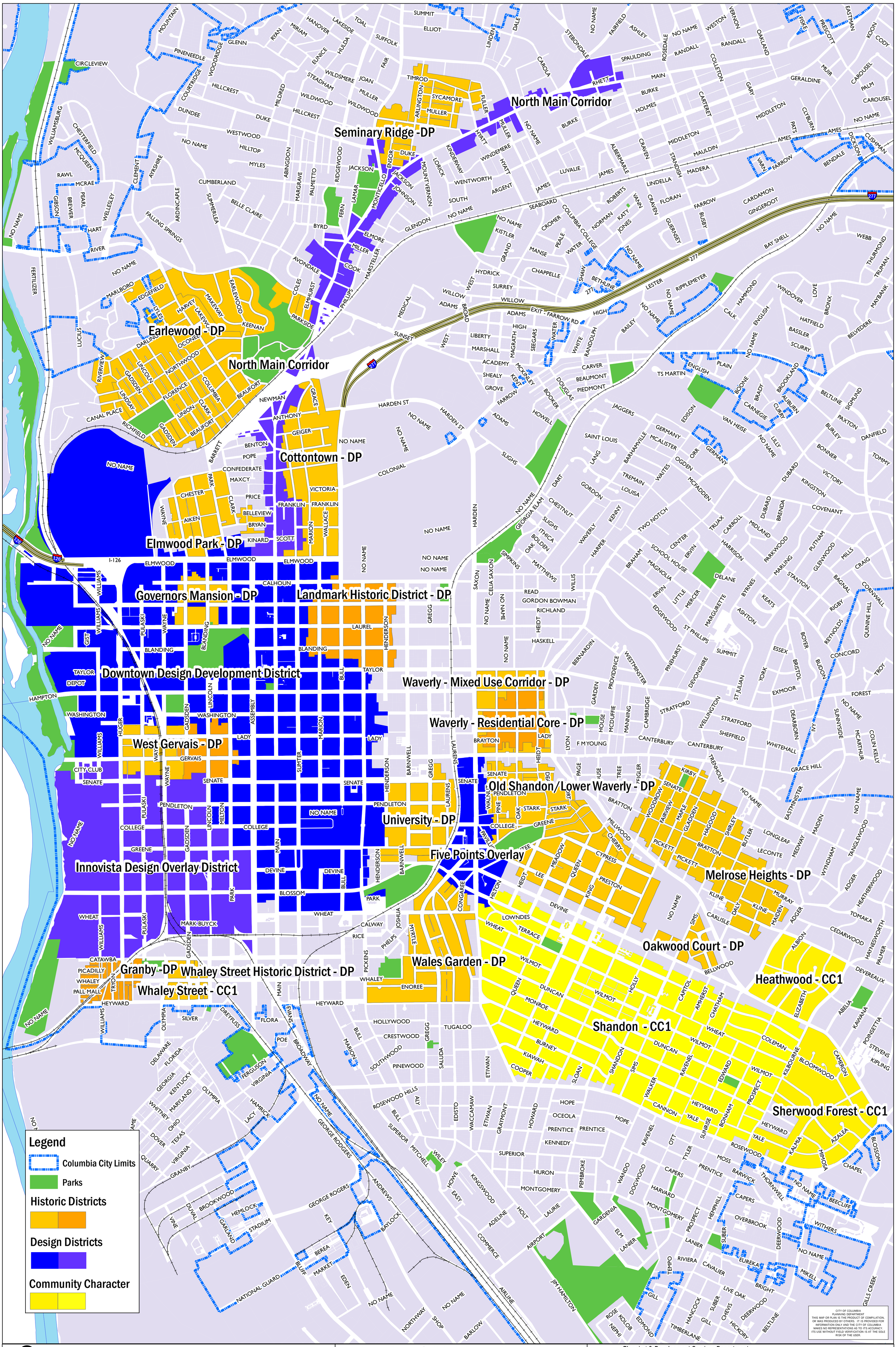

Urban Design & Historic Preservation Districts

City of Columbia, SC

Planning & Development Services Department
December 19, 2013
Prepared by: S. Zigmund

Exhibits

LIST OF EXHIBITS

1. Programmatic Agreement FEMA, SCSHPO, SCEMD and TPHO and City of Columbia Addendum
2. Floodplain Map and FEMA FIRM
3. National Wetlands Inventory Map
4. Coastal Barrier Resources System Map
5. Sole Source Aquifers Region IV Map
6. Map of Critical Habitats and Resource List of Endangered Species; Memorandum to File Concerning Endangered Species
7. National Wild and Scenic Rivers Map
8. SO2 Nonattainment Area Map
9. City of Columbia Zoning Maps
10. Columbia Metropolitan Airport Map
11. Low to Moderate Income Maps

FEMA Programmatic Agreement

With South Carolina SHPO, EMD and TPHO

From:	Boone, Nancy E
To:	Thurston, Eric; Sylvest, John; eryan@emd.sc.gov; Wilson, Teresa B; Gorman, Maya
Cc:	Bechtold, Ashley; Madson, Stephanie; Fosmire, Eric; "John.Ketchum@dhs.gov"; Frye, Sandra L; Smith, Lenwood E; Eric Oosahwee-voss; wenonahh@ccppcrafts.com; Pallo, Larissa; McNamara, Lauren B
Subject:	City of Columbia signs HUD Addendum for CDBG-DR projects
Date:	Friday, March 10, 2017 12:46:54 PM
Attachments:	Columbia Addendum - executed.PDF

Greetings.
The City of Columbia has signed the HUD Addendum to the FEMA PA and may now use the procedures in the FEMA PA to review their CDBG-DR projects.
Attached is a copy of the Addendum signature page and a cover memo describing the activities the city plans to undertake in their CDBG-DR program. Also attached is the resume of the qualified professional who will conduct Tier II reviews under the PA.
The Addendum documents for the City of Columbia, as well as the previously executed documents for the South Carolina Disaster Recovery Office, Lexington County, and Richland County, will be posted in HUD's online Section 106 Disaster Recovery Database in the near future.
If you have any questions, please feel free to contact me.
Thank you.
Best regards,
Nancy

Nancy E. Boone
Federal Preservation Officer
US Department of Housing and Urban Development
Office of Environment and Energy
451 7th Street SW, Room 7212
Washington, DC 20410
Voice: 202.402.5718

From: Boone, Nancy E
Sent: Friday, November 18, 2016 4:22 PM
To: 'Thurston, Eric' <Eric.Thurston@fema.dhs.gov>; Sylvest, John <JSylvest@scdah.sc.gov>; 'eryan@emd.sc.gov' <eryan@emd.sc.gov>
Cc: Bechtold, Ashley <ashley.bechtold@fema.dhs.gov>; Madson, Stephanie <Stephanie.Madson@fema.dhs.gov>; Fosmire, Eric <Eric.Fosmire@scdr.sc.gov>; 'John.Ketchum@dhs.gov' <John.Ketchum@dhs.gov>; Frye, Sandra L <sandra.l.frye@hud.gov>; Smith, Lenwood E <Lenwood.E.Smith@hud.gov>; 'Eric Oosahwee-voss' <eoosahwee-voss@ukb-nsn.gov>; 'wenonahh@ccppcrafts.com' <wenonahh@ccppcrafts.com>; 'Pallo, Larissa' <larissa.pallo@fema.dhs.gov>; 'VALERIA JACKSON' <JACKSONV@rcgov.us>; 'Jimmy Ardis' <jimmy.ardis@gmail.com>; 'Bristow, Dollie' <ddbristow@columbiasc.net>
Subject: RE: SC HP PA Addendum FEMA Signature Page

Greetings.

Following our recent request for signatures on the HUD Addendum to the FEMA Programmatic Agreement, the three Signatories -FEMA, SHPO, and SC Emergency Management – have executed the Addendum and it is in effect. Thank you very much for your work to facilitate the Addendum.

The South Carolina Disaster Recovery Office (SCDRO) has also signed the Addendum and may now use the procedures in the FEMA PA to review their CDBG-DR projects. SCDRO submitted the resume (attached) of their qualified historic preservation professional, Derek Galose, who will review Tier 2 Programmatic Allowances under the procedure in the FEMA PA, as well as conduct Section 106 review of projects that do not fall under the Allowances. Also attached is a memo from SCDRO that describes the types of disaster recovery activities that the state expects to support with CDBG-DR funds. SCDRO plans to assist 1500 homeowners, and the expedited procedures in the PA will streamline the review of many projects that do not have the potential to adversely affect historic buildings or archeological resources.

The United Keetoowah Band of Cherokee Indians and the Catawba Indian Nation have been invited to sign the Addendum as Invited Signatories and are welcome to sign at any time.

Also, it is expected that Lexington County, Richland County, and the City of Columbia will sign the Addendum in the near future. We will notify you when those entities have executed the Addendum.

Please feel free to contact me if you have any questions. Thank you.

Best regards,
Nancy

Nancy E. Boone
Federal Preservation Officer
US Department of Housing and Urban Development
Office of Environment and Energy
451 7th Street SW, Room 7212
Washington, DC 20410
Voice: 202.402.5718

We Are Columbia

March 3, 2017

Nancy E. Boone, Federal Preservation Officer
US Department of Housing and Urban Development
Office of Environment and Energy
451 7th Street SW, Room 7212
Washington, DC 20410

RE: HUD Addendum to the FEMA Programmatic Agreement

Ms. Boone:

The City of Columbia, under the administration of the Community Development Department, will be using CDBG Disaster Recovery funds to assist homeowners and small rental property owners of one to four (1-4) units in the following types of activities:

Rehabilitation, Repair, Remediation,
Elevation, and Acquisition/Buyout of Single Family Homes

As the Responsible Entity, the City of Columbia determined a tiered environmental review, as described in 24 CFR 58.15, is appropriate for its five (5) Disaster Recovery housing programs. The City is conducting a city-wide review of scattered sites until specific addresses can be determined for eligible applicants. A *site specific* environmental review, which will be completed for each eligible property, will identify flood plains, historic properties, noise issues, the presence of asbestos, and any above ground hazards, if applicable.

Rehabilitation activities will assist flood-damaged households in the most heavily impacted areas of Columbia along the banks of Lake Katherine, Central and Lower Gills Creek, Wildcat Creek, and Penn Branch. All improvements, products, and fixtures will promote energy efficiency, water conservation, and green building practices to the extent applicable, including:

- Roof repair/replacement
- Flooring repair/replacement
- Electrical repair/replacement
- Window repair/replacement
- Electrical and plumbing fixtures

Teresa Wilson • City Manager
1737 Main Street • P.O. Box 147 • Columbia, South Carolina 29217
Office: 803.545.3026 • Fax: 803.545.3051 • Email: tbwilson@columbiasc.net

- Heating, Ventilation and Air Conditioning (HVAC) equipment
- Appliance replacement
- Lead-based paint, asbestos, and mold remediation
- Americans with Disabilities Act (ADA) accessibility
- Insulation and sheetrock repair/replacement
- Building foundation repair/replacement/elevation
- Repair/replacement unsafe water and sewer supplies
- Drainage improvements

A public notice of the City's intention to adopt the FEMA Programmatic Agreement by Addendum was published in *The State* on Friday, February 24, 2017. Similar notices were sent via email to potentially interested parties: the Lexington County Historical Society, Historic Columbia, the Richland County Conservation Commission, and the State Historic Preservation Officer, South Carolina Department of Archives and History.

On behalf of the City of Columbia, Ms. Staci Richie, a qualified historic preservation professional, will conduct Section 106 reviews of projects with activities included in the Tier 2 program allowances (exemptions) in the Programmatic Agreement (PA), as well as the standard Section 106 review of projects with activities that extend beyond the exemptions in the PA. Ms. Richie's resume is attached.

Please do not hesitate to contact me should you require additional information during your review.

Regards,

Teresa Wilson

Teresa Wilson
City Manager

Teresa Wilson • City Manager
1737 Main Street • P.O. Box 147 • Columbia, South Carolina 29217
Office: 803.545.3026 • Fax: 803.545.3051 • Email: tbwilson@columbiasc.net

ADDENDUM
to
PROGRAMMATIC AGREEMENT AMONG
THE FEDERAL EMERGENCY MANAGEMENT AGENCY,
THE SOUTH CAROLINA STATE HISTORIC PRESERVATION OFFICER,
THE SOUTH CAROLINA EMERGENCY MANAGEMENT DIVISION, AND
TRIBES PARTICIPATING AS INVITED SIGNATORIES
to include
THE SOUTH CAROLINA DISASTER RECOVERY OFFICE and
PARTICIPATING SOUTH CAROLINA UNITS OF GENERAL LOCAL GOVERNMENT

PARTICIPATING UNITS OF GENERAL LOCAL GOVERNMENT

CITY OF COLUMBIA

Teresa Wilson

Teresa Wilson
City Manager

3/2/2017

Date

TETRA TECH

Julia Mates

Cultural Resources Coordinator
Historian/Architectural Historian

EXPERIENCE SUMMARY

Ms. Mates has practiced the fields of history/architectural history and cultural resource management since 1999. She has served as a consulting historian on historical research investigations for federal, state and local governments. Her experience includes the inventory, recordation, and evaluation of historic resources using National Register of Historic Places and California Register of Historic Resources guidelines. Her environmental planning experience includes preparing reports for and making recommendations to federal, state, municipal and private entities regarding Section 106 review and compliance, including consultation with various State Historic Preservation Officers. She has experience with Section 106 of the National Historic Preservation Act, National Environmental Policy Act (NEPA), and the California Environmental Quality Act (CEQA).

As a cultural resources project manager at Tetra Tech, she has served as a consulting historian, principal investigator, and resource author. Ms. Mates has contributed to planning and cultural resources management projects in California, Oklahoma, Hawaii, Alaska, Nevada, Massachusetts, North Carolina, New Jersey, New York, Washington, Florida, Colorado, North Dakota, Michigan, West Virginia, North Dakota, South Dakota, Minnesota, and Utah. She has evaluated various types of historical resources for eligibility for National and State Registers, including those for dams, pipelines, culverts, bridges, roads, military structures, water conveyance systems, navigational aids, residences, and commercial and industrial buildings. Ms. Mates has written numerous technical reports and compliance documents, such as historic survey reports, findings of effect, determinations of eligibility and Historic American Buildings Survey / Historic Architectural and Engineering Record documentation. In addition to research, writing, and architectural recordation, Ms. Mates also has experience in conducting oral histories. Based on her level of education and experience, Ms. Mates qualifies as a historian/architectural historian under the United States Secretary of the Interior's Professional Qualification Standards (as defined in 36 CFR, Part 61).

EDUCATION

BA, History, University of California, Los Angeles, 1993

MA, Public History, California State University, Sacramento, 2001

AREAS OF EXPERTISE

Section 106 of National Historic Preservation Act

California Environmental Quality Act (CEQA)

National Environmental Policy Act (NEPA)

United States Secretary of the Interior's Guidelines for Historic Preservation

Recreation, Land Use, and Aesthetics Author for CEQA/NEPA

YEARS OF EXPERIENCE

16

RELEVANT EXPERIENCE

Section 106 Consultation and Historical Evaluation Regarding the U.S. Environmental Protection Agency Special Appropriation Act Projects Grant Funding of the City of El Monte's Garvey Avenue Underpass Drainage Improvement Project. Lead Historian. Ms. Mates prepared the Section 106 consultation materials and conducted research to determine if any historic properties were located within the APE for this project, the replacement of stormwater pipes. Ms. Mates also evaluated a historic-age pump house to determine if it would be adversely effected by the project.

Section 106 Consultation Regarding the U.S. Environmental Protection Agency Special Appropriation Act Projects Grant Funding of the Vallejo Sanitation and Flood Control District's Mare Island Force Main Replacement Project, Vallejo, Solano County, California. Lead Historian/Architectural Historian. Ms. Mates prepared the Section 106 consultation materials and conducted research to determine if any historic properties were located within the APE for this project that involved drilling a bore for installation of utilities beneath Mare Island Strait and in River Park and vacant City-owned property on Mare Island. As part of the project, Ms. Mates

evaluated historic-age tracks associated with the Navy's activities on Mare Island to determine if they would be adversely effected by the project.

United States Postal Service, Determinations of Eligibility, Various Locations. Lead Historian/Architectural Historian. Ms. Mates has evaluated post office buildings for listing in the appropriate National Parks Service documentation forms for submission to the Keeper. Ms. Mates has also re-evaluated historic post office buildings already listed in the NRHP and prepared addendums that detail exterior and interior historic character defining features when existing documentation does not include this detail. Ms. Mates has prepared determinations of eligibility or addendums to the NRHP nominations for the following post offices:

- Morgan North Post Office, New York
- Morgan Annex, New York
- Red Bluff Main Post Office, California
- Santa Barbara Main Post Office, California
- Lihue Main Post Office, Hawaii
- Napa Franklin Station, California
- Broadway-Manchester Post Office, California
- Burbank-Glen Oaks Post Office, California
- College Station, New York
- Provo Main Post Office, Utah

Architectural History Effects Investigation for 912 Baltimore Avenue, Kansas City, Jackson County, MO. Lead Architectural Historian. Verizon proposed to replace two antennas on an existing telecommunications two antenna arrays on the south side of the rooftop of the Carbide and Carbon Building. The project required a license from the Federal Communications Commission (FCC) and compliance with the National Historic Preservation Act (NHPA) of 1966. Ms. Mates conducted an investigation to assess the presence of NRHP eligible or listed APE for direct visual effects using the Nationwide Programmatic Agreement for Colocation of Wireless Antennas, effective March 2001 and the Nationwide Programmatic Agreement for Review of Effects on Historic Properties for Certain Undertakings Approved by the Federal Communications Commission, effective March 2005. (2016)

Historic Preservation Reviews for Hurricane Sandy Relief, Tier 2, ProSource and New York State Homes and Community Renewal, NY. Ms. Mates served as an architectural historian for the Tier 2 reviews of the rehabilitation of historic-age properties to meet requirements under Section 106 of the National Historic Preservation Act. Ms. Mates evaluated the project activities to determine if they met the allowances under the Programmatic Agreement of 2013 and evaluated properties for their eligibility for listing in the NRHP. Her team evaluated over 3,500 properties. The properties were located in several New York counties, including Nassau County, Bronx County, Queens County, Broome County, and Schoharie County. 2013-2014

Historic Preservation Reviews for New Jersey's CDBG-DR Grant Program, New Jersey. Ms. Mates serves as an architectural historian for historic preservation and Section 106 reviews being prepared in support of disaster recovery programs in New Jersey funded by CDBG-DR grants awarded under the Disaster Relief Appropriations Act, 2013 (Pub. L. 113-2, enacted January 29, 2013) for Hurricane Sandy, Hurricane Irene, and Tropical Storm Lee. These reviews are being conducted for New Jersey Department of Environmental Protection in accordance with the HUD NEPA Regulations (24 CFR Parts 50 and 58). 2014-2015

Cultural Resources Services, Fort Hunter Liggett, Jolon, California. Lead Historian. Ms. Mates conducted a Historic Buildings and Structures inventory and evaluation of 20 buildings and structures on base that were constructed between 1922 and 1970 for eligibility for inclusion in the National Register of Historic Places. Ms. Mates and her team conducted archival research to prepare historic context under which to evaluate the buildings and structures and documented and evaluated the buildings on California State eligibility forms (DPR 523) and prepared a report detailing the analysis and findings.

Maintenance Dredging of Honolulu Harbor Environmental Assessment. Lead Historian. The U.S. Army Corps of Engineers, Honolulu District (POH) is proposing to conduct maintenance dredging and subsequent offshore disposal of the dredged materials within federally-managed areas of five commercial harbors in the state of Hawaii. The five harbors include Honolulu and Kalaeloa/Barber's Point Harbors, Island of O'ahu, Nawiliwili Harbor, Island of Kaua'i, Kahului Harbor, Island of Maui, and Hilo Harbor, Island of Hawai'i where the federally managed areas are the entrance channels and turning basins. Ms. Mates was the lead historian and prepared the Section 106 consultation between the USACE and The State of Hawaii Historic Preservation Division, which included identifying cultural resources studies and surveys within and adjacent to the five harbors, as well as determining the level of impacts to historic buildings, structures, and known archaeological sites within the project area. 2015

Historic Resource Survey Report of NASA Goldstone Deep Space Communications Complex, Fort Irwin, CA. Lead Historian/Architectural Historian. The Historic Resource Survey was conducted for the National Aeronautics and Space Administration (NASA) Jet Propulsion Laboratory's Goldstone Deep Space Communications Complex (GDSCC or "Goldstone") at Fort Irwin in Southern California. The study's purpose was twofold: 1) to inventory and assesses whether any of the buildings and structures that have turned historic-age (using a 45 year cut-off date of 1970) are eligible individually for listing in the National Register of Historic Places (NRHP) and 2) to assesses the previously individually evaluated historic-age buildings and structures at the facility in surveys conducted in 2009 to determine if a historic district or districts are present at the Goldstone facility. Ms. Mates was the lead Historian/Architectural Historian for the project, conducted background research, recorded the buildings and structures at Goldstone, and evaluated them for eligibility for listing in the NRHP. The report was prepared for the Environmental Affairs Program Office of NASA/JPL. 2015

Historic Resources Survey, NASA/Jet Propulsion Laboratory, Pasadena, California. Lead Historian/Architectural Historian. The historic resource survey was conducted for the National Aeronautics and Space Administration's (NASA's) Jet Propulsion Laboratory (JPL) Pasadena facility Ms. Mates conducted the survey on behalf of NASA's JPL in order to determine if the buildings and structures that are historic-age (using a 45 year cut-off date), and not previously inventoried and evaluated, are eligible individually for listing in the National Register of Historic Places (NRHP). In addition, Ms. Mates analyzed whether the seven previously determined eligible buildings and structures at the JPL facility (and the 20 buildings and structures that are the subject of this survey) possess a linkage historically or aesthetically and retain their historic significance and integrity to merit listing in the NRHP as a historic district. 2015

1033 Polk Street Historic Resources Evaluation. Lead Historian/Architectural Historian. This project is to demolish the existing historic building (eligible for listing in the CRHR) and construct a new mixed-use residential building with ground-floor retail space with frontages along Polk and Cedar Streets. Ms. Mates worked with the City and County of San Francisco Planning Department and the project applicant in preparing the required documents for demolition of a historic property under CEQA. Ms. Mates prepared a Historic Resource Evaluation, which included conducting an inventory and historic district evaluation of the areas surrounding 1033 Polk Street. Ms. Mates also determined whether there are any cohesive or significant patterns in the neighborhood and provided an evaluation of whether a historic district is present. 2013-2015

Historic Resources Survey for (Intensive) Cultural Resource Investigations, Mountain Valley Pipeline Project, EQT Midstream Partners, LP. West Virginia. Architectural Historian. The project was an architectural and historical resources survey for the Mountain Valley Pipeline. Approximately 195 miles of the 294.1 - mile pipeline will be constructed in West Virginia. The cultural surveys were designed to identify resources within the direct and indirect APE that are potentially eligible for listing in the NRHP. Ms. Mates conducted fieldwork, surveyed, recorded and evaluated over 250 architectural resources within the APE, including farmsteads, bridges, railroad segments, and cemeteries for eligibility for listing in the NRHP. Prepared state forms for West Virginia SHPO. 2014-2016

Preparation of Historic Properties Inventory, Portions of the Richmond Field Station, UC Berkeley, Richmond, California, Principal Historian. Ms. Mates served as the Principal Historian for this project which entailed the inventory, recordation, and evaluation of 25 buildings on the Richmond Field Station to determine eligibility of the buildings for listing in the CRHR and the NRHP. Many of the buildings date to the early twentieth century when the area was the California Cap Company. Ms. Mates served as the Project Manager, author, and evaluator of the report. 2013-2015

Principal Architectural Historian, Gray's Reef Light Station, Emmett County, Michigan 2010. Gray's Reef Light Station is located in Lake Michigan, owned by the US Coast Guard, and listed on the National Register of Historic Places. The US Coast Guard wished to remove the radio beacon tower, located on the cupola of the light station. This Undertaking was considered an adverse effect on the historic property. Ms. Mates served as the architectural historian, overseeing the removal of the radio beacon tower and advising the removal contractors in order to ensure preservation of the structure. After successful completion of the removal, Ms. Mates authored a report detailing the removal and the Section 106 process and submitted it to the US Coast Guard and Michigan State Historic Preservation Office.

Lost Isle Cultural Resources Research Investigation, Acker Island, Stockton, California, 2010. Serving as research investigator for background historical land use of the project area, Ms. Mates conducted records searches and interpreted historic maps to determine the potential for the presence of cultural resources within a one-mile radius of the Lost Isle construction project on Acker Island. Ms. Mates' research investigation memorandum was delivered to the Army Corps of Engineers, Sacramento District.

Resource Author, Supplemental Environmental Assessment for Construction of Combat Alert Cell at Hickam Air Force Base, US Air Force/HQ AFCEE, Oahu, Hawaii, 2010. Ms. Mates assisted with the impacts analysis of architectural resources to prepare a Supplemental Environmental Assessment for the United State Air Force and Headquarters Air Force Center for Engineering and the Environment. The Environmental Assessment will evaluate the environmental impacts of the proposed demolition of the existing Homeland Defense Fighter Alert Facility and construction of a New Homeland Defense Fighter Alert Facility at Hickam Air Force Base. Ms. Mates also authored the consultation communication from the base to the Hawaii State Historic Preservation Office (SHPO).

Cultural Resources Author, Booker T. Washington Recreational Center, San Francisco Mayor's Office of Housing, San Francisco, California, 2010. Ms. Mates serves as the author for the cultural resources section of this Environmental Assessment for this project which involves demolition of the current building and construction of a new recreational center in its place. The building is eligible for the California Register of Historical Resources and the National Register of Historic Places under Criteria 2 and B, respectively. Ms. Mates analyzed the project activities on this historic resource, developed mitigation measures, conducted State Historic Preservation Office consultation as well as Native American and tribal consultation. The project is in compliance with the NEPA regulation and the Department of Housing and Urban Development.

Cultural Resources Author, Phelan Loop, Environmental Assessment, San Francisco Mayor's Office of Housing, San Francisco, California, 2010. Ms. Mates was the author for the cultural resources section of this Environmental Assessment for this project which entailed construction of a housing development at Phelan Loop. The project was in compliance with the NEPA regulation and the Department of Housing and Urban Development. Ms. Mates also conducted consultations with the State Historic Preservation Officer in compliance with Section 106 of the National Historic Preservation Act.

Cultural Resources Author, San Francisco Mayor's Office of Housing, Hunters View Redevelopment Project Environmental Assessment, San Francisco, California, 2009 - 2010. Ms. Mates analyzed the impacts on cultural resources on the proposed project—the demolition and construction of a multi- building affordable housing development in Hunters Point in San Francisco—under NEPA guidelines. The EA was also written to address requirements of the California Environmental Quality Act. Ms. Mates wrote the Cultural Resources section of the document and assisted with tribal consultations.

ADDENDUM
to
PROGRAMMATIC AGREEMENT AMONG
THE FEDERAL EMERGENCY MANAGEMENT AGENCY,
THE SOUTH CAROLINA STATE HISTORIC PRESERVATION OFFICER,
THE SOUTH CAROLINA EMERGENCY MANAGEMENT DIVISION, AND
TRIBES PARTICIPATING AS INVITED SIGNATORIES
to include
PARTICIPATING SOUTH CAROLINA UNITS OF GENERAL LOCAL GOVERNMENT

WHEREAS, FEMA makes assistance available to States, Commonwealths, commumt1es, Federally recognized Indian Tribes (Tribes) and other eligible entities through programs (Programs) set forth in Appendix A, pursuant to the Homeland Security Act of 2002, Pub. L. No. 107-296 (2002) (codified as amended at 6 U.S.C. § 101 *et seq.);* Robert T. Stafford Disaster Relief and Emergency Assistance Act, Pub. L. No. 93-288 (1974) (codified as amended at 42 U.S.C. § 5121 *et seq.*, (Stafford Act); the National Flood Insurance Act of 1968, Pub. L. No. 90-448 (1968) (as amended); the National Flood Insurance Reform Act of 1994, Pub. L. No. 103-325 (1994) (as amended); the Post-Katrina Emergency Management Reform Act of 2006, Pub. L. No. 109-295 (2006) (as amended); implementing regulations contained in Title 44 of the Code of Federal Regulations (CFR), Executive Order 13407 (2006), and such other acts, executive orders, implementing regulations, or Congressionally authorized programs as are enacted from time to time; and

WHEREAS, FEMA has developed a Prototype Programmatic Agreement (FEMA Prototype ·-· :A:greernent)pursuant to ·36CFR §800;t4(b)(4) in consultatiorrwith the-ACHP and NCSHPOto serve as a basis for negotiation of a State/Tribal specific Programmatic Agreement with the SHPO, State/Tribal Emergency Management Agency, and/or participating Tribe(s); and

WHEREAS, FEMA consulted with the South Carolina State Historic Preservation Officer (SHPO), the South Carolina Emergency Management Division (SCEM) the Catawba Indian Nation, and the United Keetoowah Band of Cherokee Indians to adopt and execute the FEMA Prototype Agreement for its Programs in South Carolina, and the South Carolina State specific Agreement (Agreement) was executed on October 16, 2014; and

WHEREAS, under the Disaster Relief Appropriations Act of 2013 (Public Law 113-2, January 29, 2013), and other Congressionally authorized programs as are enacted from time to time, the U.S. Department of Housing and Urban Development (HUD) allocates Community Development Block Grant- Disaster Recovery (CDBG-DR) funds for disaster recovery activities similar to the activities covered by the Agreement; and

WHEREAS, the South Carolina Disaster Recovery Office (SCDRO) and participating units of general local government have assumed HUD's environmental review responsibilities as Responsible Entities and are responsible for environmental review, decision-making and action, pursuant to Section I04(g) of the Housing and Community Development Act of 1974 and 24

CFR Part 58, and propose to administer Community Development Block Grant- Disaster Recovery (CDBG-DR) funds pursuant to the Transportation, Housing and Urban Development, and Related Agencies Appropriations Act, 2016 and other Congressionally authorized programs as are enacted from time to time;

WHEREAS, Stipulation I.A.6. of the Agreement allows other Federal agencies, including state and local governments acting as Responsible Entities for CDBG-DR funds, to fulfill their Section 106 responsibilities for those types of activities covered under the terms of the Agreement by accepting and complying with the terms of the Agreement and executing this Addendum; and

WHEREAS, SCDRO and participating units of general local government will ensure that staff who meet the Secretary's Professional Qualification Standards will review Second Tier projects in accordance with Appendix B of the Agreement and will provide resumes of such staff to the signatories to this Addendum; and

NOW, THEREFORE, SCDRO and participating units of general local government agree to assume the federal agency role and accept the terms and conditions of the Agreement and subsequent amendments, as appropriate under HUD's authorizing legislation and regulations, and thereby take into account the effect of its undertakings and satisfy its Section 106 responsibilities for the CDBG-DR program for activities in their jurisdictions in South Carolina.

DURATION AND EXTENSION, This Addendum to the Agreement will remain in effect for currently open disast r de larations and subsequent disast r declarations in the stc1Je *9[* South Carolina; however, the Addendum will not exceed the expiration date of the Agreement. Signatories may collectively agree to extend this Addendum to cover additional calendar years provided that the Agreement is also extended.

EXECUTION AND IMPLEMENTATION, of this Addendum to the Agreement evidences that SCDRO and participating units of general local government have taken into account the effects of their undertakings on historic properties, and that through the execution of this Addendum and implementation of the Agreement, SCDRO and participating units of general local government will satisfy their responsibilities under Section 106 of the National Historic Preservation Act and its implementing regulations for the referenced CDBG-DR program for activities in their jurisdictions in South Carolina. This Addendum may be executed in counterparts, with separate signature pages. Units of general local government may decide to participate and execute the Addendum at any time during the term of the Addendum.

ADDENDUM
to
PROGRAMMATIC AGREEMENT AMONG
THE FEDERAL EMERGENCY MANAGEMENT AGENCY,
THE SOUTH CAROLINA STATE HISTORIC PRESERVATION OFFICER,
THE SOUTH CAROLINA EMERGENCY MANAGEMENT DIVISION, AND
TRIBES PARTICIPATING AS INVITED SIGNATORIES
to include
THE SOUTH CAROLINA DISASTER RECOVERY OFFICE and
PARTICIPATING SOUTH CAROLINA UNITS OF GENERAL LOCAL GOVERNMENT

SIGNATORY PARTIES:

FEDERAL EMERGENCY MANAGEMENT AGENCY

Gracia B. Szczech Date: 11/16/16

Gracia B. Szczech

Regional Administrator
Region IV

ADDENDUM
to
PROGRAMMATIC AGREEMENT AMONG
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PARTICIPATING SOUTH CAROLINA UNITS OF GENERAL LOCAL
GOVERNMENT

SIGNATORY PARTIES:

SOUTH CAROLINA EMERGENCY MANAGEMENT DIVISION

_____ Date: 4 Nov 16
Kim Stenson

Director

ADDENDUM
to
PROGRAMMATIC AGREEMENT AMONG
THE FEDERAL EMERGENCY MANAGEMENT AGENCY,
THE SOUTH CAROLINA STATE HISTORIC PRESERVATION OFFICER,
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THE SOUTH CAROLINA DISASTER RECOVERY OFFICE and
PARTICIPATING SOUTH CAROLINA UNITS OF GENERAL LOCAL GOVERNMENT

INVITED SIGNATORIES:

UNITED KEETOOWAH BAND OF CHEROKEE INDIANS

_ _ _ _ _ _ _ _ _ _ _ _ _ _ _ Date: __ __ __ __ __ __ __ __

George Wickliffe

Chief

ADDENDUM
to
PROGRAMMATIC AGREEMENT AMONG
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PARTICIPATING SOUTH CAROLINA UNITS OF GENERAL LOCAL GOVERNMENT

INVITED SIGNATORIES:

CATAWBA INDIAN NATION

_ _ _ _ _ _ _ _ _ _ _ _ _ _ _ Date: _ _ _ _ _ _ _ _ _
William Harris

Chief

_ _ _ _ _ _ _ _ _ _ _ _ _ _ _ Date: _ _ _ _ _ _ _ _ _
Wenonah Haire

Tribal Historic Preservation Officer

ADDENDUM
to
PROGRAMMATIC AGREEMENT AMONG
THE FEDERAL EMERGENCY MANAGEMENT AGENCY,
THE SOUTH CAROLINA STATE HISTORIC PRESERVATION OFFICER,
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THE SOUTH CAROLINA DISASTER RECOVERY OFFICE and
PARTICIPATING SOUTH CAROLINA UNITS OF GENERAL LOCAL GOVERNMENT

SIGNATORY PARTIES:

SOUTH CAROLINA STATE HISTORIC PRESERVATION OFFICER

_____ Date: 11-4-16
W. Eric Emerson, Ph.D.

State Historic Preservation Officer

ADDENDUM
to
PROGRAMMATIC AGREEMENT AMONG
THE FEDERAL EMERGENCY MANAGEMENT AGENCY,
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SOUTH CAROLINA DISASTER RECOVERY OFFICE

Alan D. Young **Date:** 11-16-16
Alan D. Young

Director of Grants and Incentives
South Carolina Department of Commerce

ADDENDUM
to
PROGRAMMATIC AGREEMENT AMONG
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PARTICIPATING UNITS OF GENERAL LOCAL GOVERNMENT

CITY OF COLUMBIA

Teresa Wilson

Teresa Wilson
City Manager

3/2/2017

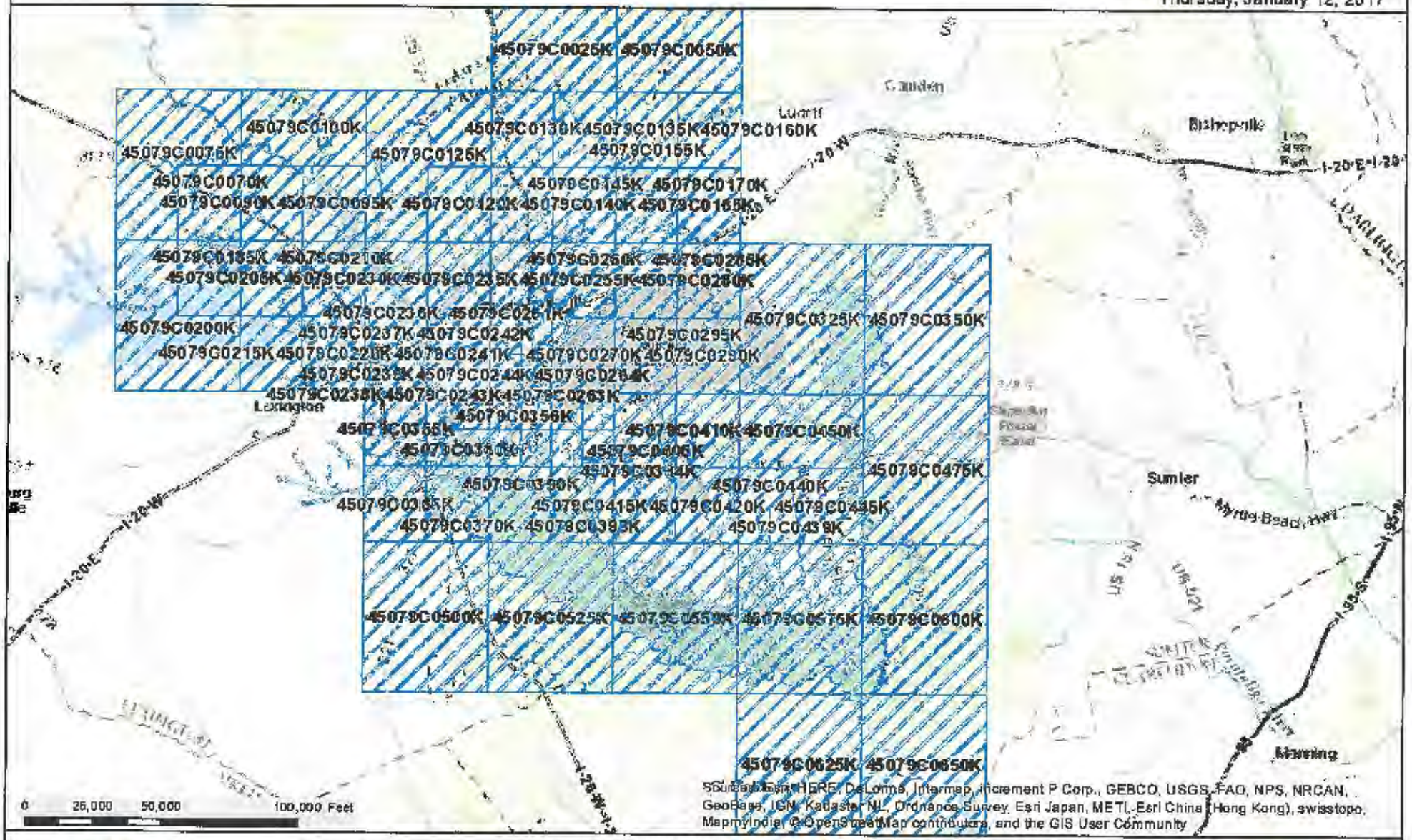
Date

FLOODPLAIN MAP AND FEMA FIRM

City of Columbia

FEMA FIRM

Thursday, January 12, 2017



CITY OF COLUMBIA GIS DATA DISCLAIMER

The City of Columbia GIS data represented on this map or plan is the product of compilation, as produced by others. It is provided for informational purposes only and the City of Columbia makes no representation as to its accuracy. Its use without field verification is at the sole risk of the user.

City of Columbia

Floodplain

Thursday, January 12, 2017

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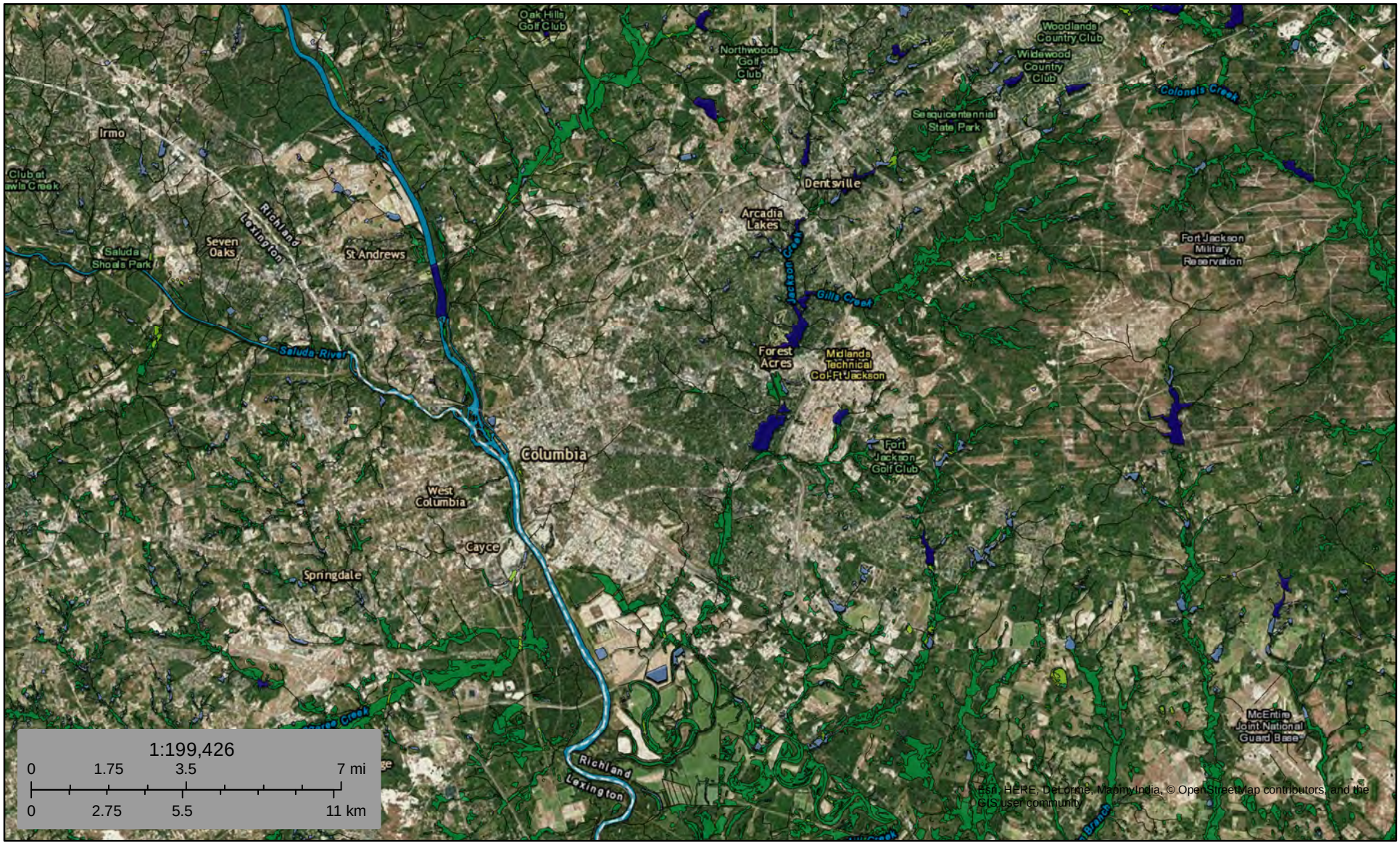
National Wetlands Inventory Map

U.S. Fish and Wildlife Service

National Wetlands Inventory

Wetlands



December 29, 2016

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Lake
- Other
- Riverine

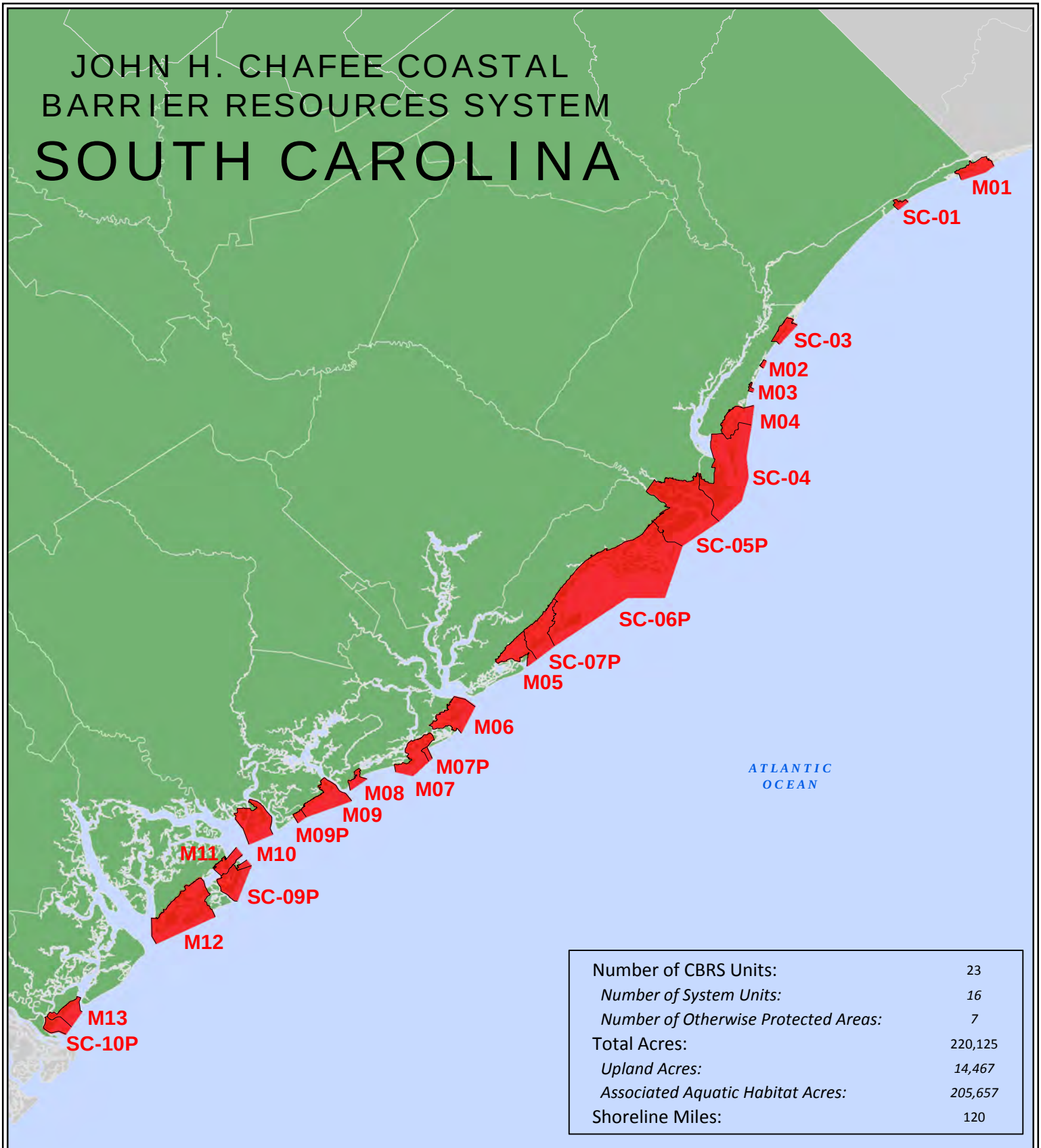
This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

Coastal Barrier Resources System Map

JOHN H. CHAFEE COASTAL BARRIER RESOURCES SYSTEM

SOUTH CAROLINA



Number of CBRS Units:	23
Number of System Units:	*16*
Number of Otherwise Protected Areas:	*7*
Total Acres:	220,125
Upland Acres:	*14,467*
Associated Aquatic Habitat Acres:	*205,657*
Shoreline Miles:	120

N

Map Date: December 18, 2014

Boundaries of the John H. Chafee Coastal Barrier Resources System (CBRS) shown on this map were transferred from the official CBRS maps for this area and are depicted on this map (in red) for informational purposes only. The official CBRS maps are enacted by Congress via the Coastal Barrier Resources Act, as amended, and are maintained by the U.S. Fish and Wildlife Service. The official CBRS maps are available for download at http://www.fws.gov/CBRA/index.html.

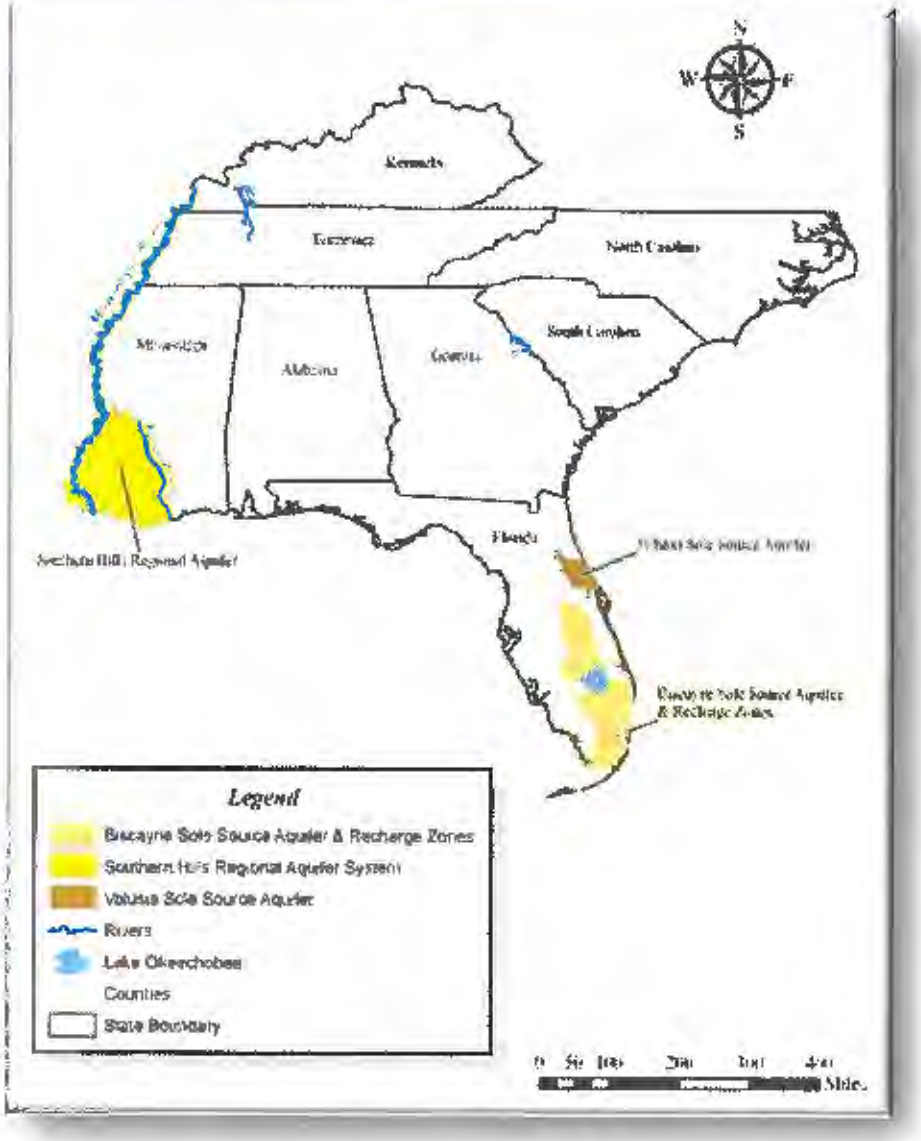
Sole Source Aquifers Region IV

SOLE SOURCE AQUIFERS

40 CFR 149

REGIONAL CONTACT

EPA Region IV Sole Source Coordinator:
Larry Cole
U.S. Environmental Protection Agency
Water Protection Division
Ground Water & UIC Enforcement Section
Sam Nunn Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960
Tel: [illegible]
Email: [illegible] larry@epa.gov
Website: archive.epa.gov/pesticides/region4/water/groundwater/web/html/r4ssa.html



Critical Habitats and Endangered Species

United States Department of the Interior

FISH AND WILDLIFE SERVICE
176 Croghan Spur Road, Suite 200
Charleston, South Carolina 29407

U.S. Fish and Wildlife Service Clearance to Proceed with Department of Housing and Urban Development Projects and US Department of Agriculture Rural Development Projects

The U.S. Fish and Wildlife Service (Service) is one of two lead Federal Agencies responsible for the protection and conservation of Federal Trust Resources, including threatened or endangered species listed under the Endangered Species Act of 1973 (16 U.S.C. 1531 *et seq.*) (ESA). Included in this mandate is the review of projects involving Federal agencies. The U.S. Department of Housing and Urban Development (HUD), as well as the U. S. Department of Agriculture (USDA) typically allocates grant funds for rural development projects. Obligations under the ESA, as well as the National Environmental Policy Act (NEPA), require HUD and USDA to perform an environmental impact review prior to the project's authorization. Primarily, these projects involve repair or reconstruction of existing facilities associated with developed land.

In order to expedite the consultation process, the South Carolina Ecological Services Field Office will no longer respond to concurrence requests for *no effect* determinations. Many of the projects supported by the HUD Community Development Block Grant and the USDA Rural Development Program typically result in no adverse impacts to fish and wildlife resources. A Federal agency should not contact the Service if the action agency determines an action will have no effect upon listed species or critical habitat. To aid your agency in determining if your project will have no effect on the resources under the jurisdiction of the Service, we compiled a list of activities that typically result in no adverse impacts to the natural environment.

To fulfill Section 7 and NEPA environmental impact review requirements, we provide the following guidance and clearance relative to the criteria stated below for HUD and USDA project requests in all cities and unincorporated areas throughout South Carolina.

If your project description falls in one of the categories below and there is no impact to Federal Trust Resource, this letter will provide a blanket concurrence for such projects conducted in South Carolina. Therefore, applicants should not contact the Service, because no further action is required under Section 7(a)(2) of the ESA. The following categories of projects have been evaluated in accordance with the Fish and Wildlife Coordination Act (16 U.S.C 661 *et seq.*), and the ESA.

Description of HUD and USDA Projects Covered

1. Purchase machinery, equipment, and supplies for use in existing structures and buildings.
2. Finance or refinancing existing dwellings.
3. Restore or rehab existing structures and expansion of structures associated with developed land. Developed lands are paved, filled, graveled, or routinely mowed

vegetated grasses. Undeveloped lands or areas are those sites where natural vegetation dominates. Examples include renovation of substandard single or multiple family residences, conversion of a school building to a community center and renovation or expansion of an existing factory building.

4. Demolish and rebuild family housing and other urban buildings with new structures and associated developments (e.g., parking lots) that do not expand into previously undeveloped areas. One example is the construction of new housing without expansion beyond limits of existing developed lot.
5. Implement streetscape beautification projects within city limits. Examples of these projects include the removal and replacement of existing sidewalks, curbing or gutters; demolishing and disposing of existing curbing; installing handicap sidewalk ramps or irrigation systems for plants; installing or replacing streetlights, benches or trashcans; and installing new sidewalks within city limits in right of ways with no impacts to wetlands or waters of the United States.
6. Repair, replace, or renovate existing water treatment plant (potable water supply) facilities without expansion of the existing boundary.
7. Install new pipelines by using trenchless technology (directional drilling) techniques to upgrade existing pipelines. Trenchless technology eliminates the need to disturb the environment caused by excavating and backfilling trenches. Trenchless technology methods used for upgrading pipelines include cured-in-place pipe (CIPP); slip-lining (SL); close-fit pipe (CFP); and thermoformed pipe (ThP). The choice of the method utilized depends on the physical conditions of the pipeline, but all of the methods involve work in the pipeline *without surface or subsurface excavations.*
8. Transfer all HUD loans where the original lending or mortgage institutions for existing projects are no longer holding the loans and the properties transfer via HUD back loans.

We believe that these activities will have "no effect" any federally listed species protected under Section 7 of the ESA, based on the criteria referenced provided.

Clearance to Proceed

For *all* projects that meet the criteria described above, *no* further coordination with the Service is necessary.

If you need further assistance, please contact my staff or me at (843)727-4707.

Sincerely,

Jay B. Herrington
Field Supervisor

Critical Habitat for Threatened & Endangered Species [USFWS]

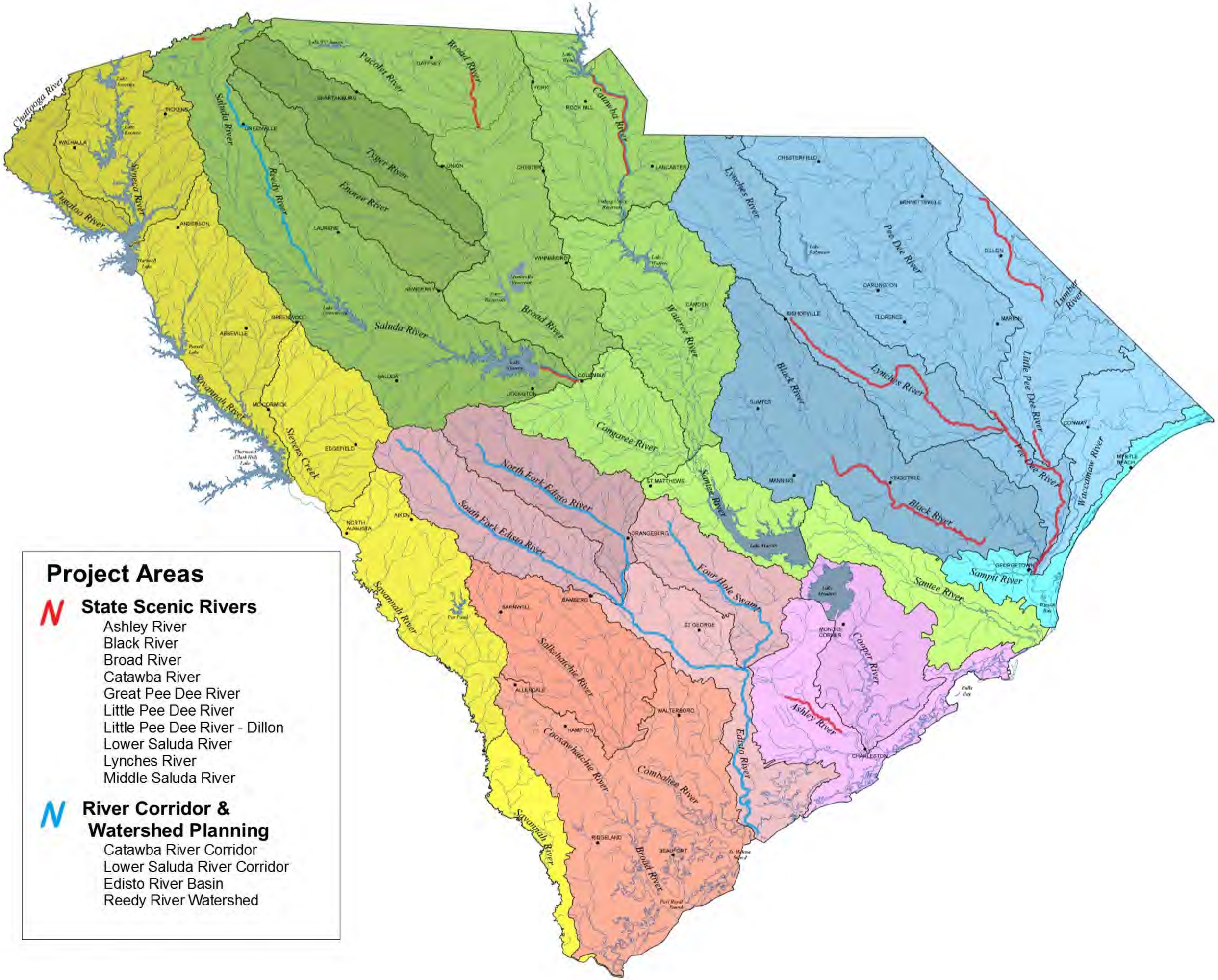
A specific geographic area(s) that contains features essential for the conservation of a threatened or endangered species and that may require special management and protection.

Esri, HERE, DeLorme, FAO, NOAA, USGS, EPA, NPS | U.S. Fish and Wildlife Service

National Wild and Scenic Rivers

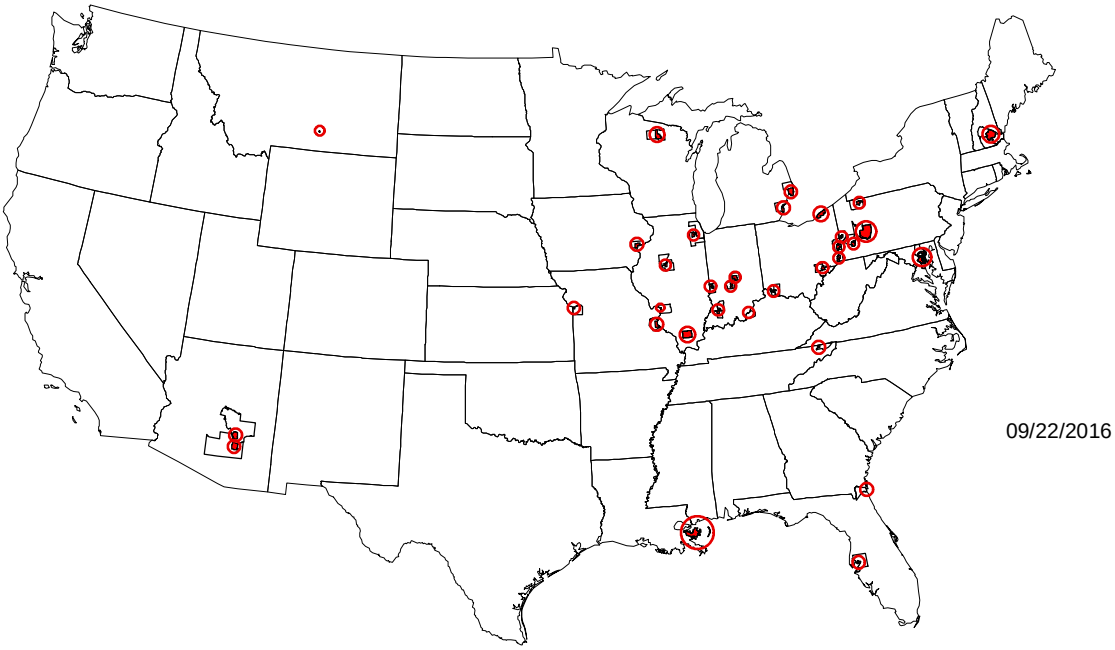
NATIONAL WILD AND SCENIC RIVERS SYSTEM

Designations as of June 2015


Project Areas
State Scenic Rivers
Ashley River
Black River
Broad River
Catawba River
Great Pee Dee River
Little Pee Dee River
Little Pee Dee River - Dillon
Lower Saluda River
Lynches River
Middle Saluda River
River Corridor & Watershed Planning
Catawba River Corridor
Lower Saluda River Corridor
Edisto River Basin
Reedy River Watershed
Chattooga River
Tugaloo River
Seneca River
Saluda River
Reedy River
Tyger River
Enoree River
Pacolet River
Broad River
Catawba River
Lynches River
Pee Dee River
Lumber River
Little Pee Dee River
Black River
Wateree River
Congaree River
Sumter River
Santee River
Sampit River
Waccamaw River
Savannah River
Stevens Creek
North Fork Edisto River
South Fork Edisto River
Four Hole Swamp
Salkehatchie River
Coosawhatchie River
Combahee River
Edisto River
Cooper River
Ashley River
Broad River
GREENVILLE
SPARTANBURG
GAFFNEY
YORK
ROCK HILL
CHESTER
UNION
LAURENS
LANCASTER
CHESTERFIELD
BENNETTSVILLE
DILLON
DARLINGTON
FLORENCE
MARION
BISHOPVILLE
WINNSBORO
NEWBERRY
CAMDEN
GREENWOOD
ABBEVILLE
SALUDA
COLUMBIA
LEXINGTON
SUMTER
MANNING
KINGSTREE
CONWAY
MYRTLE BEACH
GEORGETOWN
MCCORMICK
EDGEFIELD
ST MATTHEWS
ORANGEBURG
AIKEN
NORTH AUGUSTA
BAMBERG
SARNWELL
ST GEORGE
MONCKS CORNER
ALLENDALE
WALTERBORO
HAMPTON
CHARLESTON
RIDGELAND
BEAUFORT

SO2 Nonattainment Area Map

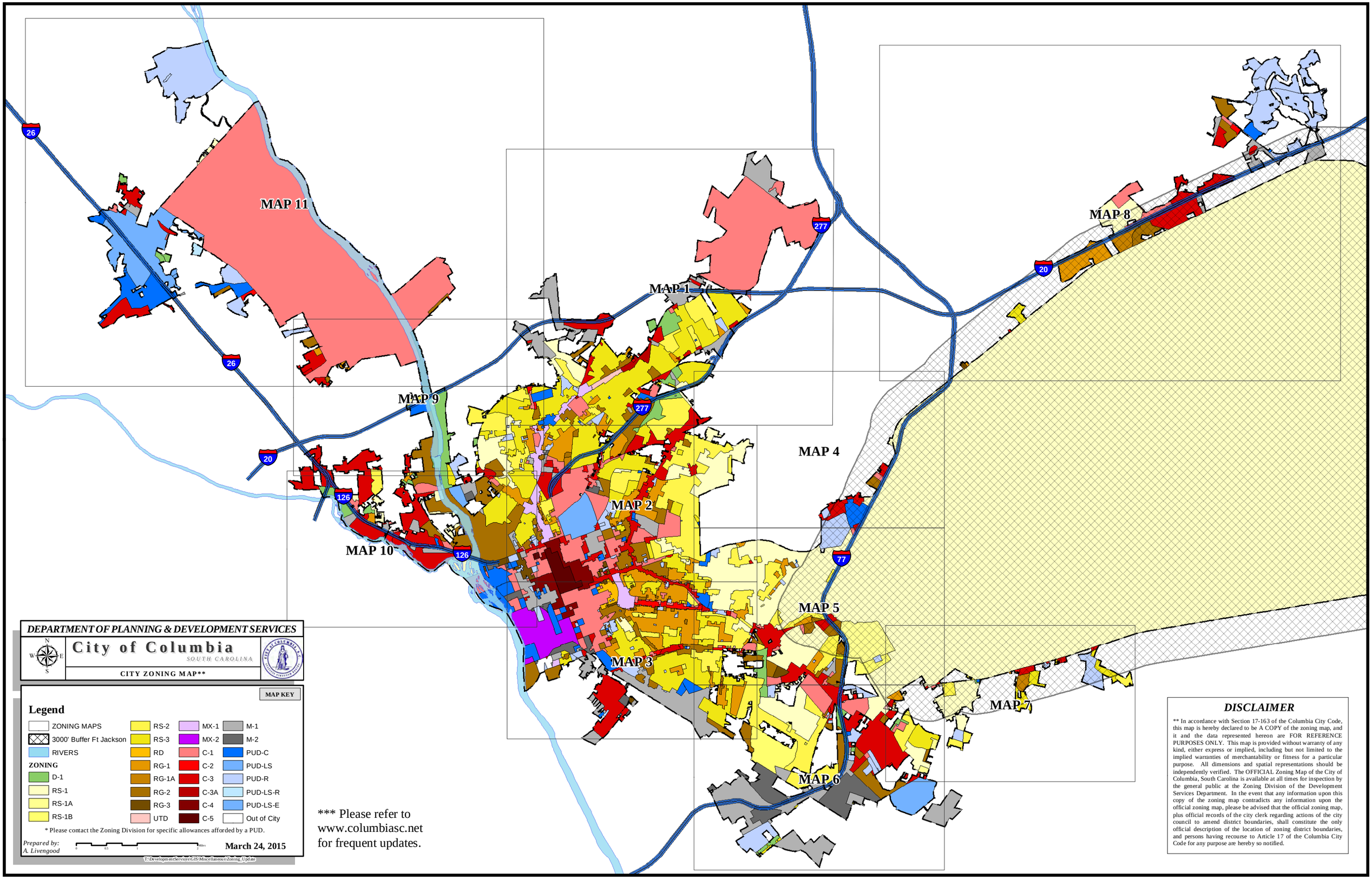
SO2 Nonattainment Areas (2010 Standard)



Nonattainment areas are indicated by color.
When only a portion of a county is shown in color,
it indicates that only that part of the county is within
a nonattainment area boundary.

SO2 Nonattainment Areas

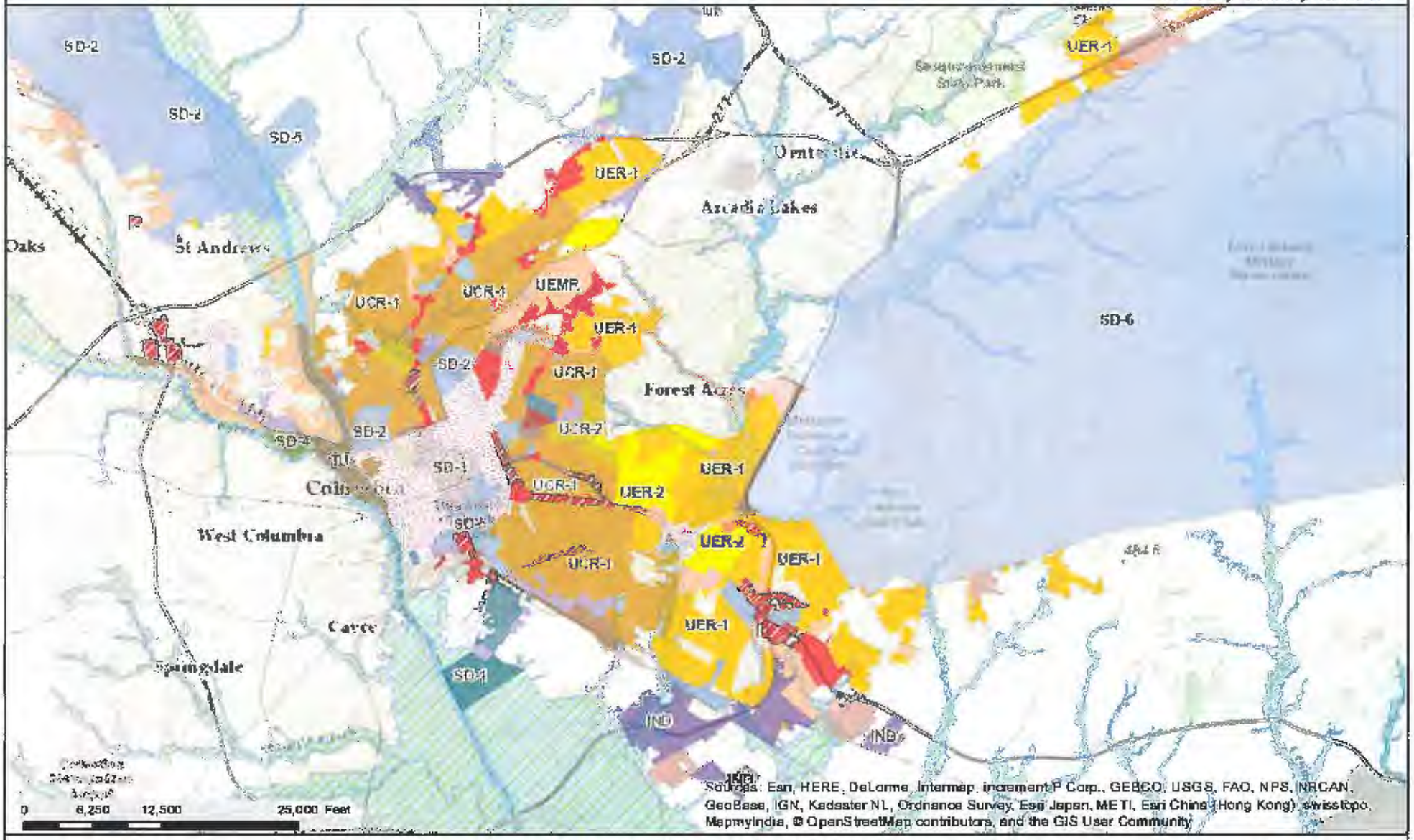
City of Columbia Zoning Maps


MAP 11
MAP 9
MAP 10
MAP 1
MAP 2
MAP 3
MAP 4
MAP 5
MAP 6
MAP 7
MAP 8
26
20
126
277
77
DEPARTMENT OF PLANNING & DEVELOPMENT SERVICES
City of Columbia
SOUTH CAROLINA
CITY ZONING MAP**
MAP KEY
Legend
ZONING MAPS
3000' Buffer Ft Jackson
RIVERS
ZONING
D-1
RS-1
RS-1A
RS-1B
RS-2
RS-3
RD
RG-1
RG-1A
RG-2
RG-3
UTD
MX-1
MX-2
C-1
C-2
C-3
C-3A
C-4
C-5
M-1
M-2
PUD-C
PUD-LS
PUD-R
PUD-LS-R
PUD-LS-E
Out of City
* Please contact the Zoning Division for specific allowances afforded by a PUD.
Prepared by:
A. Livengood
March 24, 2015
T:\DevelopmentServices\GIS\Miscellaneous\Zoning_Update
*** Please refer to
www.columbiasc.net
for frequent updates.
DISCLAIMER
** In accordance with Section 17-163 of the Columbia City Code, this map is hereby declared to be A COPY of the zoning map, and it and the data represented hereon are FOR REFERENCE PURPOSES ONLY. This map is provided without warranty of any kind, either express or implied, including but not limited to the implied warranties of merchantability or fitness for a particular purpose. All dimensions and spatial representations should be independently verified. The OFFICIAL Zoning Map of the City of Columbia, South Carolina is available at all times for inspection by the general public at the Zoning Division of the Development Services Department. In the event that any information upon this copy of the zoning map contradicts any information upon the official zoning map, please be advised that the official zoning map, plus official records of the city clerk regarding actions of the city council to amend district boundaries, shall constitute the only official description of the location of zoning district boundaries, and persons having recourse to Article 17 of the Columbia City Code for any purpose are hereby so notified.

City of Columbia

City of Columbia GIS

Thursday, January 12, 2017



CITY OF COLUMBIA GIS DATA DISCLAIMER

The City of Columbia GIS data represented on this map or plan is the product of compilation, as produced by others. It is provided for informational purposes only and the City of Columbia makes no representation as to its accuracy. Its use without field verification is at the sole risk of the user.

We Are Columbia

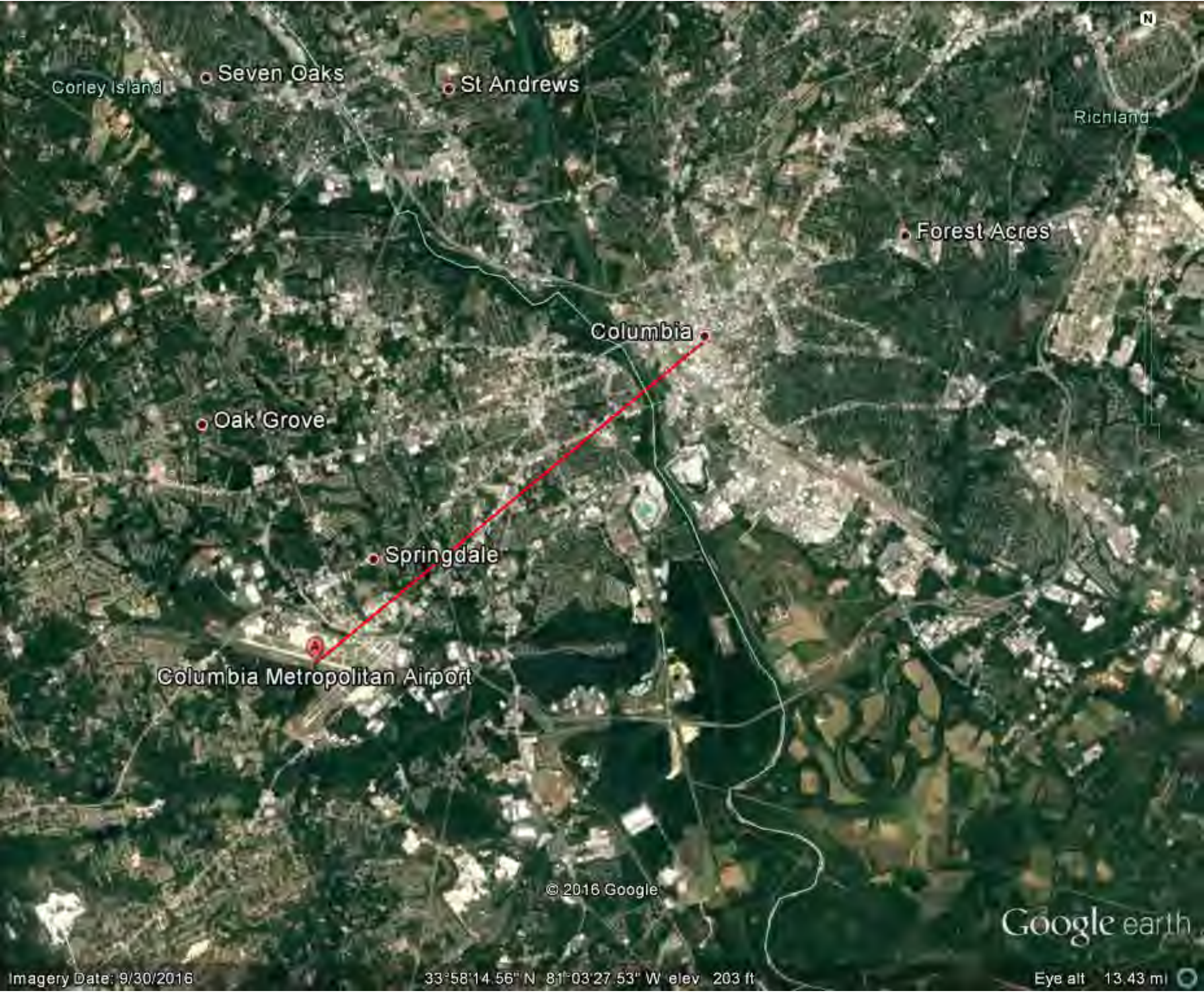
Legend

PDS Info

Future Land Use

- UCMR-1 – Urban Core Mixed Residential-1
- UCMR-2 - Urban Core Mixed Residential-2
- UEMF - Urban Edge Multi-Family
- UCR-1 - Urban Core Residential Small Lot
- UCR-2 - Urban Core Residential Large Lot
- UER-1 - Urban Edge Residential Small Lot
- UER-2 - Urban Edge Residential Large Lot
- UCAC-1 - Urban Core Neighborhood Activity Center
- UCAC-2 - Urban Core Community Activity Center
- UEAC-1 Urban Edge Community Activity Center
- UCAC-3 Urban Core Regional Activity Center
- UEAC-2 - Urban Edge Regional Activity Center
- AC-1 - Neighborhood Activity Corridor
- AC-2 - Community Activity Corridor
- AC-3 - Regional Activity Corridor
- EC - Employment Campus
- IND - Industrial
- TU - Transportation & Utilities
- SD-1 - Sports/Amusement District
- SD-2 - Civic/Institutional Districts
- SD-3 - Central Business District
- SD-4 - Riverbanks Zoo and Garden
- SD-5 - Universities/Colleges
- SD-6 - Fort Jackson

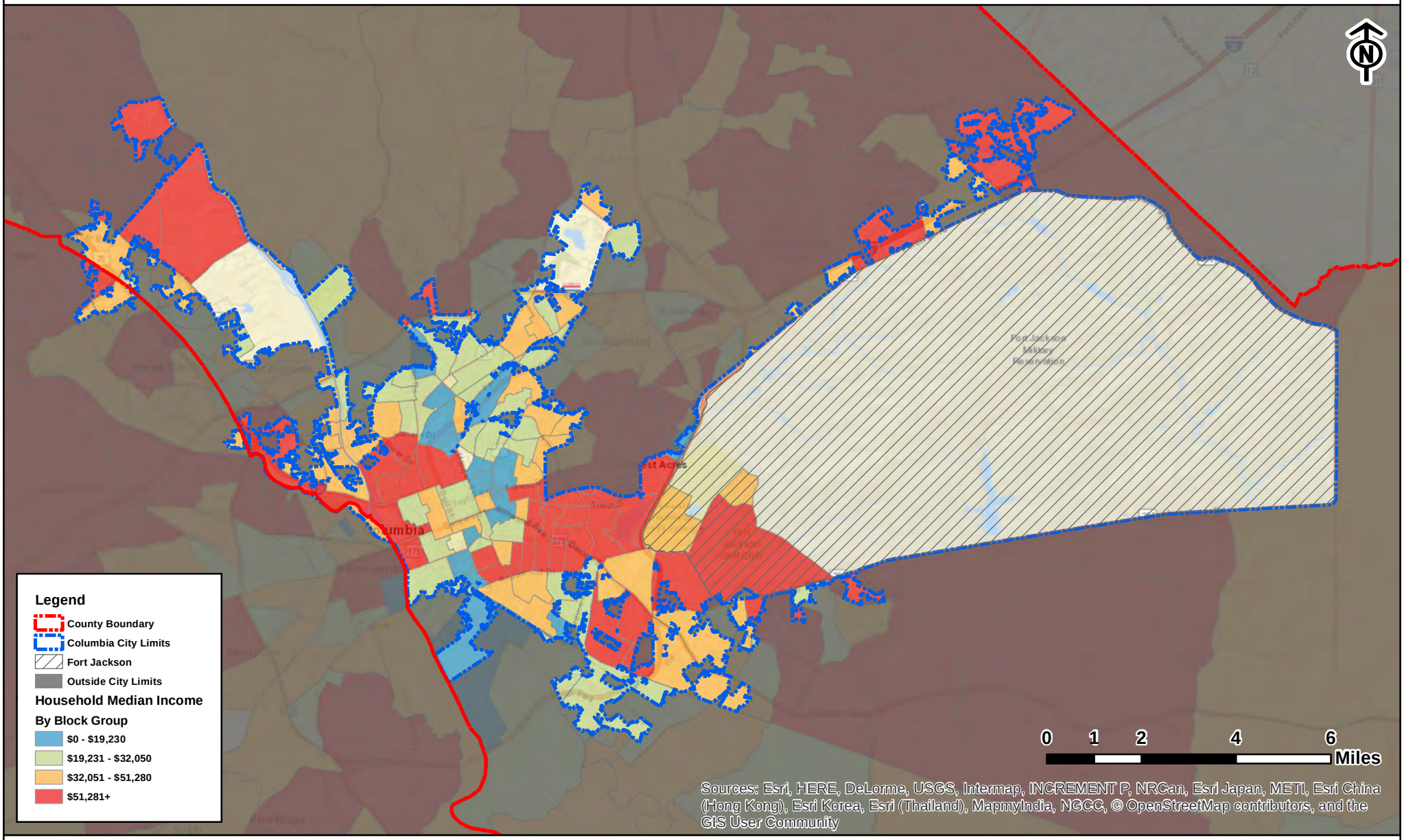
Columbia Metropolitan Airport


Corley Island
Seven Oaks
St Andrews
Richland
Forest Acres
Columbia
Oak Grove
Springdale
Columbia Metropolitan Airport
© 2016 Google
Google earth
Imagery Date: 9/30/2016
33°58'14.56" N 81°03'27.53" W elev 203 ft
Eye alt 13.43 mi

HOUSEHOLD MEDIAN INCOME BY BLOCK GROUP

Household Median Income by Block Groups

City of Columbia, SC



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Letters to Authorities and Agency Responses

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

January 17, 2017

Bill Marshall
South Carolina Department of Natural Resources
PO Box 157
1000 Assembly Street
Columbia, SC 29202

Re: Environmental Compliance with 36 CFR 297, Wild and Scenic Rivers, Columbia, SC

Dear Mr. Marshall:

The City of Columbia has been allocated $19,989,000 in Community Development Block Grant (CDBG) Disaster Recover funds to assist primarily low income households in rehabilitating residences within the Columbia city limits damaged by the Flood of October 2015. In compliance with 24 CFR §58.5 – NEPA-Related Federal laws and authorities, the City is requesting your assistance in determining whether any proposed activities could affect a protected river or endangered species in this geographical area. Eligible improvements include:

- Roof repair/replacement
- Flooring repair/replacement
- Electrical repair/replacement
- Window repair/replacement
- Lead-based paint, asbestos, and mold remediation
- ADA accessibility
- Sheetrock repair/replacement
- Building foundation repair/replacement/elevation
- Repair/replacement unsafe water and sewer supplies
- Drainage improvements

The City of Columbia is using a tiered approach to its environmental review, conducting a broad, city-wide review of scattered sites as required by a Categorical Exclusion Subject to 58.35 until specific addresses can be identified. A site specific environmental review will be completed for each approved property and will assess any environmental issues not addressed in the broad review.

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

The City has reviewed the current state and regional lists of rivers in the Nationwide Inventory and determined that three rivers – the Saluda River, Broad River, and Congaree River – could potentially be affected by rehabilitation activities described above. We would greatly appreciate your response to the following questions:

Could the proposed action have an adverse effect on the natural, cultural and recreational values of the Inventory river segment? If yes, please identify those effects. _____
_____

Could the proposed action foreclose options to classify any portion of the Inventory segment as wild, scenic, or recreation river areas. If yes, please identify the segments affected.
_____
_____

What avoidance/mitigation measures could be incorporated into the proposed action to minimize or eliminate adverse effects? _____
_____

Our rehabilitation, repair, and elevation programs will not change the current use of the property. The Buyout Program will focus only on residences in the floodplain that pose a threat to public health and safety. Please see attached program descriptions and maps of the city limits, National Wild and Scenic Rivers System, and State Scenic Rivers.

Your prompt attention to this request is great appreciated. Please do not hesitate to contact me or Maya Gorman, the CDBG Disaster Recovery Manager, who can be reached at magorman@columbiasc.net, or by phone at 803-545-3383, should you need additional information.

Respectfully,

Gloria Saeed, Interim Director
Columbia Community Development

From:	Bill Marshall
To:	Gorman, Maya
Cc:	Greg Mixon; Lorianne Riggin
Subject:	RE: Environmental Compliance with 36 CFR 297, Wild and Scenic Rivers, Columbia, SC
Date:	Wednesday, February 08, 2017 7:02:02 PM
Attachments:	image001.png

Ms. Gorman,

Your email, below, requests a response to three questions about potential effects on the Saluda River, Broad River, and Congaree River which could result from rehabilitation activities at existing residential housing structures in the City of Columbia, as supported by Community Development Block Grant (CDBG) Disaster Recovery funds.

We appreciate the City of Columbia seeking input from the South Carolina Department of Natural Resources (SCDNR) on matters that may affect the State's river resources.

Your questions, followed by my responses are as follows:

1) Could the proposed action have an adverse effect on the natural, cultural and recreational values of the Inventory river segment? If yes, please identify those effects.

   Response: It appears the proposed activities will be restricted to existing developed sites and associated structures, and no changes in land use or expansion of land uses is proposed; therefore, I think there would be little or no adverse effect to the rivers. One exception is the possibility of polluted runoff (such as sediments) flowing from the sites to surface water drainage-ways and to the rivers.

2) Could the proposed action foreclose options to classify any portion of the Inventory segment as wild, scenic, or recreation river areas. If yes, please identify the segments affected.

   Response: As mentioned above, it appears the proposed activities will be restricted to existing developed sites and associated structures, and no changes in land use or expansion of land uses is proposed; therefore, I do not think the proposed action would have a negative effect on the referenced classifications of these rivers.

3) What avoidance/mitigation measures could be incorporated into the proposed action to minimize or eliminate adverse effects?

   Response: Avoid land use changes that result in the removal of forest and associated vegetative cover, particularly in streamside areas where SCDNR recommends the protection of forested buffers along both banks of all streams. The SCDNR's Scenic Rivers Program recommends protection of at least a 100-foot-wide forested buffers on streams to

filter polluted runoff and conserve water quality, provide important habitats for wildlife, and enhance aesthetics.

To further mitigate for potential polluted runoff from work sites, we recommend the application of appropriate Best Management Practices (BMPs) such as those provided by SCDHEC at their BMP Handbook website – http://www.scdhec.gov/Environment/waterquality/stormwater/BMPHandbook/

Thank you for the opportunity to offer these comments. If you need additional information please let me know.

Sincerely,

Bill Marshall
Coordinator, Rivers Program
South Carolina Department of Natural Resources
PO Box 167, 1000 Assembly Street
Columbia, SC 29202
803-734-9096

From: Gorman, Maya [mailto:magorman@columbiasc.net]
Sent: Tuesday, February 07, 2017 2:21 PM
To: Bill Marshall <MarshallB@dnr.sc.gov>
Subject: Environmental Compliance with 36 CFR 297, Wild and Scenic Rivers, Columbia, SC

Bill,

Thanks so much for returning my call. For your convenience, I am copying my letter dated January 17th into this email. As discussed, our rehabilitation, repair, and elevation programs will not change the current use of the property; all activity will take place within the city limits of Columbia; and the Buyout Program will focus on residences in the floodplain that pose a threat to public health and safety. Please don't hesitate to contact me if you have any questions. I greatly appreciate your assistance.

Dear Mr. Marshall:

The City of Columbia has been allocated $19,989,000 in Community Development Block Grant (CDBG) Disaster Recovery funds to assist primarily low income households in rehabilitating residences within the Columbia city limits damaged by the Flood of October 2015. In compliance with 24 CFR §58.5 – NEPA-Related Federal laws and authorities, the City is requesting your assistance in determining whether any proposed activities could affect a protected river or endangered species in this geographical area. Eligible improvements

include:

- Roof repair/replacement
- Flooring repair/replacement
- Electrical repair/replacement
- Window repair/replacement
- Lead-based paint, asbestos, and mold remediation
- ADA accessibility
- Sheetrock repair/replacement
- Building foundation repair/replacement/elevation
- Repair/replacement unsafe water and sewer supplies
- Drainage improvements

The City of Columbia is using a tiered approach to its environmental review, conducting a broad, city-wide review of scattered sites as required by a Categorical Exclusion Subject to 58.35 until specific addresses can be identified. A site specific environmental review will be completed for each approved property and will assess any environmental issues not addressed in the broad review.

The City has reviewed the current state and regional lists of rivers in the Nationwide Inventory and determined that three rivers – the Saluda River, Broad River, and Congaree River – could potentially be affected by rehabilitation activities described above. We would greatly appreciate your response to the following questions:

Could the proposed action have an adverse effect on the natural, cultural and recreational values of the Inventory river segment? If yes, please identify those effects.

Could the proposed action foreclose options to classify any portion of the Inventory segment as wild, scenic, or recreation river areas. If yes, please identify the segments affected.

What avoidance/mitigation measures could be incorporated into the proposed action to minimize or eliminate adverse effects?

Respectfully,

Maya Gorman
CDBG Disaster Recovery Manager
T: 803-545-3383
landmark
CONSULTING

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

January 19, 2017

Rhonda Thompson, Chief
Bureau of Air Quality
South Carolina Department of Health and Environmental Control
2600 Bull Street
Columbia, SC 29201

Re: Environmental Compliance with 40 CFR Parts 6, 51, 61, and 93, Air Quality

Dear Ms. Thompson:

The City of Columbia has been allocated $19,989,000 in Community Development Block Grant (CDBG) Disaster Recover funds to assist primarily low income households in rehabilitating residences within the Columbia city limits damaged by the Flood of October 2015. In compliance with 24 CFR §58.5 – NEPA-Related Federal laws and authorities, the City is requesting your assistance in determining whether proposed activities are compliant with national emissions standards for hazardous air pollutants. Eligible improvements include:

- Roof repair/replacement
- Flooring repair/replacement
- Electrical repair/replacement
- Window repair/replacement
- Lead-based paint, asbestos, and mold remediation
- ADA accessibility
- Sheetrock repair/replacement
- Building foundation repair/replacement/elevation
- Repair/replacement unsafe water and sewer supplies
- Drainage improvements
- Demolition/disposition of severely damaged residences

The City of Columbia is using a tiered approach to its environmental review, conducting a broad, city-wide review of scattered sites as required by a Categorical Exclusion Subject to 58.35 until specific addresses can be identified. A site specific environmental review will be

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

completed for each approved property and will assess any environmental issues not addressed in the broad review including the presence of lead-based paint and asbestos containing materials.

The City of Columbia proposes to buy approximately 38 severely damaged residential properties within the floodway or floodplain with the intent of demolishing the structures and creating park amenities, open space, or flood storage/overflow areas. All properties will be located within the Columbia city limits, which is outside a Non-Attainment area. We would greatly appreciate your response to the following questions:

Is the project consistent with the air quality State Implementation Plan? _____

Does the proposed activity require a permit under the SIP?
_____

Will the project exceed any of the *de minimis* emissions levels of all non-attainment and maintenance level pollutants? _____

Will the project exceed the screening level established by the state or air quality management district? _____

Our rehabilitation, repair, and elevation programs will not change the current use of the property. Please see attached program descriptions and maps of the city limits and counties designated nonattainment or maintenance .

Your prompt attention to this request is great appreciated. Please do not hesitate to contact me or Maya Gorman, the CDBG Disaster Recovery Manager, who can be reached at magorman@columbiasc.net, or by phone at 803-545-3383, should you need additional information.

Respectfully,

Gloria Saeed, Interim Director
Columbia Community Development

RECEIVED JAN 27 2017

dhec
Healthy People. Healthy Communities.

Gloria Saeed, Interim Director
Columbia Community Development
P.O. Box 147
Columbia, SC 29217

January 25, 2017

Dear Ms. Saeed:

We have received and reviewed your January 19, 2017, Columbia Housing Initiative CDBG Disaster Recover Environmental Review Project Description. Below are the responses to the air quality questions you asked us to address:

- Based on the information provided in the project description, the project is consistent with the air quality State Implementation Plan (SIP) and no air quality permits will be needed.

- The entire state of South Carolina is attaining the National Ambient Air Quality Standards (NAAQS) for all criteria pollutants; therefore, there are no applicable de minimis levels of non-attaining or maintenance level pollutants, and there are no applicable screening levels.

The project description provided specifies that a site-specific environmental review will be completed that will address the presence of asbestos containing materials. Although our asbestos regulations are not a part of the SIP, all state and federal asbestos regulations must be complied with. Asbestos permits for demolishing and renovating multifamily structures will likely be needed for this project. Please be sure to contact our Asbestos Section Manager, Marc McKenna, at 803-898-1781 or mckennmt@dhec.sc.gov, to discuss asbestos inspections, materials testing, demolition notifications, and asbestos permits and obtain compliance assistance.

If you need other information, please contact me at 803-898-4391 or thompsrb@dhec.sc.gov.

Sincerely,

Rhonda B. Thompson, P.E.
Chief, Bureau of Air Quality

EMISSIONS, EVALUATION, & SUPPORT

D H E C

PROMOTE PROTECT PROSPER

2600 Bull Street
Columbia, SC 29201

Return Service Requested

Gloria Saeed, Interim Director
Columbia Community Development
P.O. Box 147
Columbia, SC 29217

LYY-SHP 29202

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

January 19, 2017

Michael Gula
Director of Operations, Planning and Facilities
Columbia Metropolitan Airport
125A Summer Lake Drive
West Columbia, SC 29170

Re: Environmental Compliance with 24 CFR 51D, Airport Hazards

Dear Mr. Gula:

The City of Columbia has been allocated $19,989,000 in Community Development Block Grant (CDBG) Disaster Recover funds to assist primarily low income households in rehabilitating residences within the Columbia city limits damaged by the Flood of October 2015. In compliance with 24 CFR §58.5 – NEPA-Related Federal laws and authorities, the City is requesting your assistance in determining whether any proposed activities are located in a Runway Clear Zone, Clear Zone or Accident Potential Zone.

The City of Columbia has developed five housing programs to assist primarily low-to-moderate (LMI) income households suffering the most severe impact from the October 2015 flooding in the rehabilitation, elevation, remediation, and repair of single family and multifamily (1-4 units) storm-damaged residences. Through the homeowner Buyout Program the City will acquire and demolish severely damaged residential properties in the floodway or floodplain. These properties will dedicated in perpetuity to a public use compatible with open space, recreation, natural floodplain functions, ecosystem restoration, or wetlands management practices.

The City of Columbia is using a tiered approach to its environmental review, conducting a broad, city-wide review of scattered sites as required by a Categorical Exclusion Subject to 58.35 until specific addresses can be identified. A site specific environmental review will be

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

completed for each approved property and will assess any environmental issues not addressed in the broad review.

These programs will not change the current use of the property, prolong the physical or economic life of the structures, or increase the unit density or number of people at the site. All properties will be located within the city limits. We would greatly appreciate your response to the following question:

Are any properties within the Columbia city limits within 2500 feet of a civilian airport, the Runway Clear Zone or Clear Zone or Accident Potential Zone? _____
_____
If so, please identify those areas._____
_____

Your prompt attention to this request is great appreciated. Please do not hesitate to contact me or Maya Gorman, the CDBG Disaster Recovery Manager, who can be reached at magorman@columbiasc.net, or by phone at 803-545-3383, should you need additional information.

Respectfully,

Gloria Saeed, Interim Director
Columbia Community Development

We Are Columbia

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

completed for each approved property and will assess any environmental issues not addressed in the broad review.

These programs will not change the current use of the property, prolong the physical or economic life of the structures, or increase the unit density or number of people at the site. All properties will be located within the city limits. We would greatly appreciate your response to the following question:

Are any properties within the Columbia city limits within 2500 feet of a civilian airport, the Runway Clear Zone or Clear Zone or Accident Potential Zone? No part of the City is within 2500ft of our Airport Clear zones / RPZ

If so, please identify those areas.

Your prompt attention to this request is great appreciated. Please do not hesitate to contact me or Maya Gorman, the CDBG Disaster Recovery Manager, who can be reached at magorman@columbiasc.net, or by phone at 803-545-3383, should you need additional information.

Respectfully,

Gloria Saeed

Gloria Saeed, Interim Director
Columbia Community Development

From:	Gorman, Maya
To:	"Peurifoy.cynthia@epa.gov"
Cc:	Maya Gorman
Subject:	Environmental Compliance with 24 CFR 58.5(J), Environmental Justice
Date:	Tuesday, March 07, 2017 12:21:00 PM
Attachments:	EPA EJ Letter 3-6-17.pdf ERR Program Descriptions.pdf image002.png

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Ms. Peurifoy,

I am completing the Statutory Checklist required by NEPA for the City of Columbia's CDBG Disaster Recovery Housing Programs. Please review the attached letter and respond at your earliest convenience.

Seventy percent of our CDBG Disaster Recovery funding ($19,989,000) will benefit low to moderate income households, those earning $64,100 or less annually in the City of Columbia. We are seeking your assistance in determining whether an adverse environmental impact on low income or minority populations would result from any of the activities described in the attached ERR Program Descriptions.

Please don't hesitate to contact me should you need additional program information to make your determination. We look forward to hearing from you soon.

Regards,

Maya Gorman
CDBG Disaster Recovery Manager
T: 803-545-3383
landmark
CONSULTING

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

March 6, 2017

Cynthia Peurifoy
US EPA Region IV
61 Forsyth Street
Atlanta, GA 30303

Re: Environmental Compliance with 24 CFR 58.5(J), Environmental Justice

Dear Ms. Peurifoy:

The City of Columbia has been allocated $19,989,000 in Community Development Block Grant (CDBG) Disaster Recover funds to assist primarily low income households in rehabilitating residences within the city limits damaged by the Flood of October 2015. In compliance with 24 CFR §58.5 – NEPA-Related Federal laws and authorities and EO 12898, the City is requesting your assistance in determining whether an adverse environmental impact on low income or minority populations would result from any of the activities described below.

The City has developed five housing programs to assist primarily low-to-moderate income (LMI) households severely impacted by the October 2015 Flood in rehabilitating, elevating, remediating, and repairing single family (1-4 units) storm-damaged residences. Through its Buyout Program the City will acquire and demolish severely damaged residential properties in the floodway or floodplain. These properties will dedicated in perpetuity to a public use compatible with open space, recreation, natural floodplain functions, ecosystem restoration, or wetlands management practices.

Your prompt attention to this request is great appreciated. Please don't hesitate to contact me or Maya Gorman, the CDBG Disaster Recovery Manager, who can be reached at magorman@columbiasc.net, or by phone at 803-545-3383, should you need additional information.

Respectfully,

Gloria Saeed, Interim Director

Categorical Exclusion

Not Subject to 58.5

We Are Columbia

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

Categorical Exclusion Not subject to §58.5 Determination for Activities Listed at 24 CFR §58.35(b)

Grant Recipient: City of Columbia Project Name: Small Business Disaster Recovery Program

Project Description (Include all actions which are either geographically or functionally related):
Environmental clearance is requested for the provision of forgivable loans to small businesses located in the City's most heavily damaged areas. Funding in the amount of $200,000 for this economic development activity may be used for working capital, inventory, furnishings and equipment, remediation, and clean up and repair. Total program funding in the amount of $20,989,000, which includes $1 million in CDBG program income funds, will finance administration, planning and project delivery ; rehabilitation, elevation, remediation, and repair of single family and multi-family (1-4 units) residences; and financial assistance to small businesses severely damaged by the SC Flood of 2015.

Location: City of Columbia

Funding Source: CDBG HOME ESG HOPWA EDI Capital Fund Operating Subsidy Hope VI
Other: CDBG Disaster Recovery
Estimated Funding Amount: $200,000 Grant Number: B-16-MH-45-0001

I have reviewed and determined that the abovementioned project is a Categorically Excluded activity (not subject to §58.5) per 24 CFR §58.35(b) as follows:

☐	58.35(b).1. Tenant-based rental assistance;
☐	58.35(b) 2. Supportive services including, but not limited to, health care, housing services, permanent housing placement, day care, nutritional services, short-term payments for rent/mortgage/utility costs, and assistance in gaining access to local, State, and Federal government benefits and services;
☐	58.35(b) 3. Operating costs including maintenance, security, operation, utilities, furnishings, equipment, supplies, staff training and recruitment and other incidental costs;
☒	58.35(b) 4. Economic development activities, including but not limited to, equipment purchase, inventory financing, interest subsidy, operating expenses and similar costs not associated with construction or expansion of existing operations;
☐	58.35(b) 5. Activities to assist homebuyers to purchase existing dwelling units or dwelling units under construction, including closing costs and down payment assistance, interest buy-downs, and similar activities that result in the transfer of title.
☐	58.35(b). 6. Affordable housing pre-development costs including legal, consulting, developer and other costs related to obtaining site options, project financing, administrative costs and fees for loan commitments, zoning approvals, and other related activities which do not have a physical impact.

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1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

☐	58.35(b). 7. Approval of supplemental assistance (including insurance or guarantee) to a project previously approved under this part, if the approval is made by the same responsible entity that conducted the environmental review on the original project and re-evaluation of the environmental findings is not required under §58.47.

The responsible entity must also complete and attach the **§58.6 Compliance Checklist.** By signing below the Responsible Entity officially determines in writing that each activity or project is Categorically Excluded (not subject to §58.5) and meets the conditions specified for such exclusion under section 24 CFR §58.35(b). This document must be maintained in the ERR.

AUTHORIZED RESPONSIBLE ENTITY OFFICIAL:

Teresa Wilson — 2/20/2017

Authorized Responsible Entity Signature — Date

Teresa Wilson — City Manager, City of Columbia, SC

Authorized Responsible Entity Name (printed) — Title (printed)

Compliance Documentation Checklist
24 CFR 58.6

Grant Recipient: City of Columbia____ Project Name: Small Business Disaster Recovery Program___
Project Description (Include all actions which are either geographically or functionally related):
Environmental clearance is requested for the provision of forgiveable loans to small businesses located in the City's most heavily damaged areas. Funding in the amount of $200,000 for this economic development activity may be used for working capital, inventory, furnishings and equipment, remediation and clean up and repair. Total program allocation of $20,989,000 includes $1 million in CDBG Program Income funds._____

Level of Environmental Review Determination: Select One of the following:

☐(1) Exempt per 24 CFR 58.34, or
☒(2) Categorically Excluded not subject to statutes per §58.35(b), or
☐(3) Categorically Excluded subject to statutes per §58.35(a), or
☐(4) Environmental Assessment per §58.36, or
☐(5) EIS per 40 CFR 1500

STATUTES and REGULATIONS listed at 24 CFR 58.6

FLOOD DISASTER PROTECTION ACT

1. Does the project involve acquisition, construction or rehabilitation of structures located in a FEMA-identified Special Flood Hazard?

☒No; Cite Source Document: This is a financial assistance only project._____

☐Yes; Source Document: _____

2. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☒Yes (Flood Insurance under the National Flood Insurance Program must be obtained and maintained for the economic life of the project, in the amount of the total project cost. A copy of the flood insurance policy declaration must be kept on file). **(Appendix I)**

☐No **(Federal assistance may not be used in the Special Flood Hazards Area).**

COASTAL BARRIERS RESOURCES ACT

1. Is the project located in a coastal barrier resource area?

☒ No; Cite Source Documentation: The City of Columbia is not located within a coastal barrier resource area._ (This element is completed).

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of existing property within a Civil Airport's Runway Clear Zone or a Military Installation's Clear Zone?

☒ No; Source Documentation: No part of the city is within 2500 feet of the CAE Airport Clear Zone or Runway Clear Zone._____
Project complies with 24 CFR 51.303(a)(3).

☐ Yes; **Disclosure statement must be provided** to buyer and a copy of the signed disclosure must be maintained in this Environmental Review Record **(Appendix II)**

Prepared by (name and title, please print): Gloria Saeed, Interim Director, Community Development, _____

Signature: Gloria Saeed, Director Date: 3/2/17

Exemption

We Are Columbia

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

Exemption Determination for Activities Listed at 24 CFR §58.34

Grant Recipient: City of Columbia, South Carolina
Project Name: Columbia CDBG Disaster Recovery Program

Project Description (Include all actions which are either geographically or functionally related): Exemption is requested for administration, planning, and project delivery activities including program design and implementation; translation, environmental and title/legal services; and technical assistance and training totaling $1,998,900. Total program funding of $20,989,000, which includes $1 million in CDBG program income funds, will finance rehabilitation, elevation, remediation, and repair of single family and multi-family (1-4 units) residences and financial assistance to small businesses severely damaged by the South Carolina Flood of 2015.

Location: City limits, Columbia, South Carolina

Funding Source: CDBG HOME ESG HOPWA EDI Capital Fund Operating Subsidy Hope VI
Other: CDBG Disaster Recovery
Estimated Funding Amount: $1,998,900 Grant Number: B-16-MH-45-0001

I have reviewed and determined that the abovementioned project is Exempt per 24 CFR §58.34 as follows:

☒	58.34(a) (1). Environmental & other studies, resource identification & the development of plans & strategies;
☒	58.34(a) (2) Information and financial services;
☒	58.34(a) (3) Administrative and management activities;
☐	58.34(a) (4) Public services that will not have a physical impact or result in any physical changes, including but not limited to services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation and welfare or recreational needs;
☐	58.34(a) (5) Inspections and testing of properties for hazards or defects;
☐	58.34(a) (6) Purchase of insurance;
☐	58.34(a) (7) Purchase of tools;
☐	58.34(a) (8) Engineering or design costs;
☒	58.34(a) (9) Technical assistance and training;
☐	58.34(a) (10) Assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety including those resulting from physical deterioration;
☐	58.34(a) (11) Payment of principal and interest on loans made or obligations guaranteed by HUD;
☐	58.34(a) (12) Any of the categorical exclusions listed in §58.35(a) provided that there are no circumstances that require compliance with any other Federal laws and authorities cited in §58.5.

We Are Columbia

Community Development Department
1225 Lady Street, Suite #102, P. O. Box 147, Columbia, SC 29217
Office Phone: 803-545-3373

The responsible entity must also complete and attach the **58.6 Compliance Checklist**. By signing below the Responsible Entity officially determines in writing that all activities covered by this determination are Exempt and meets the conditions specified for such exemption under section 24 CFR §58.34. This document must be maintained in the ERR.

AUTHORIZED RESPONSIBLE ENTITY OFFICIAL:

Teresa Wilson	2/20/2017
Authorized Responsible Entity Signature	Date
Teresa Wilson	City Manager
Authorized Responsible Entity Name (printed)	Title (printed)

Compliance Documentation Checklist
24 CFR 58.6

Grant Recipient: City of Columbia____ Project Name: Columbia Housing Initiative_____
Project Description (Include all actions which are either geographically or functionally related):
Exemption is requested for administration, planning, and project delivery activities including program design and implementation; translation, environmental and title/legal services; and technical assistance and training totaling $1,998,900. Total program allocation of $20,989,000, which includes $1 million in CDBG program income funds, will fund rehabilitation, elevation, remediation, and repair of single family and multi-family (1-4 units) residences and financial assistance to small businesses severely damaged by the SC Flood of 2015.____

Level of Environmental Review Determination: Select One of the following:

☒(1) Exempt per 24 CFR 58.34, or
☐(2) Categorically Excluded not subject to statutes per §58.35(b), or
☐(3) Categorically Excluded subject to statutes per §58.35(a), or
☐(4) Environmental Assessment per §58.36, or
☐(5) EIS per 40 CFR 1500

STATUTES and REGULATIONS listed at 24 CFR 58.6

FLOOD DISASTER PROTECTION ACT

1. Does the project involve acquisition, construction or rehabilitation of structures located in a FEMA-identified Special Flood Hazard?

☒No; Cite Source Document: Not applicable to this administration and planning activity. _____

☐Yes; Source Document: _____

2. Is the community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?

☒Yes (Flood Insurance under the National Flood Insurance Program must be obtained and maintained for the economic life of the project, in the amount of the total project cost. A copy of the flood insurance policy declaration must be kept on file). **(Appendix I)**

☐No **(Federal assistance may not be used in the Special Flood Hazards Area).**

COASTAL BARRIERS RESOURCES ACT

1. Is the project located in a coastal barrier resource area?

☒ No; Cite Source Documentation: The City of Columbia is not located within a coastal barrier resource area._ (This element is completed).

☐ Yes - **Federal assistance may not be used in such an area.**

AIRPORT RUNWAY CLEAR ZONES AND CLEAR ZONES DISCLOSURES

1. Does the project involve the sale or acquisition of existing property within a Civil Airport's Runway Clear Zone or a Military Installation's Clear Zone?

☒ No; Source Documentation: No property within the city limits is within 2500 feet of a Clear Zone or Runway Clear Zone _____
Project complies with 24 CFR 51.303(a)(3).

☐ Yes; **Disclosure statement must be provided** to buyer and a copy of the signed disclosure must be maintained in this Environmental Review Record **(Appendix II)**

Prepared by (name and title, please print): Gloria Saeed, Interim Director, Community Development, _____

Signature: Gloria Saeed, Director Date: 3/2/17