

NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS AND SECTION 106
NATIONAL HISTORIC PRESERVATION ACT DETERMINATION
April 2, 2025

New York State Homes & Community Renewal
New York State Housing Trust Fund Corporation (HTFC)
38-40 State Street
Albany, New York 12207
(518) 473-2131

This Notice shall satisfy the above-cited separate but related procedural notification requirements.

REQUEST FOR RELEASE OF FUNDS

On or about **April 10, 2025**, the New York State Homes & Community Renewal (HCR), through the New York State Housing Trust Fund Corporation (HTFC), will submit a request to U. S. Department of Housing and Urban Development (HUD) for the release of \$1,458,846 in HOME funds under Title II of the Cranston-Gonzalez National Affordable Housing Act (NAHA) of 1990, in accordance with section 288 (42 U.S.C. 12838), to authorize the YWCA of the Greater Capital Region to undertake a project known as YWCA-GCR 21 First Street, for purposes of rehabilitation of a 5-story building for families, with 94 supportive housing units on an approximately 0.5-acre site at 21 First Street in the City of Troy, Rensselaer County with an estimated total project cost of \$4,258,846.

The activities proposed are Categorically Excluded under HUD regulations at 24 CFR Part 58 from National Environmental Policy Act requirements. Additional project information is contained in the Environmental Review Record (ERR) which can be obtained by emailing environmental.comments@hcr.ny.gov or at: <https://hcr.ny.gov/hcr-environmental-review>.

SECTION 106 NATIONAL HISTORIC PRESERVATION ACT DETERMINATION

As a part of its responsibilities under 36 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act of 1966 (Section 106), as amended, HCR, in consultation with the New York State Office of Parks, Recreation, and Historic Preservation (OPRHP), acting as the State Historic Preservation Office (SHPO), has determined No Adverse Effect. This information is available for public review in the ERR, as described above.

PUBLIC COMMENTS

Any individual, group, or agency may submit written comments on the ERR to Cody Sargood, either by mail to Environmental Analysis Unit, NYS Housing Trust Fund Corporation, 38-40 State Street, Albany, New York, 12207 or by Email to

environmental.comments@hcr.ny.gov. All comments received by **April 9, 2025**, will be considered by HCR prior to authorizing submission of a request for release of funds. Comments should specify which part of this Notice they are addressing.

ENVIRONMENTAL CERTIFICATION

HCR certifies to HUD that Cody Sargood in their capacity as Certifying Officer 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. HCR's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the YWCA of the Greater Capital Region to use Program funds.

OBJECTIONS TO RELEASE OF FUNDS

HUD will accept objections to its release of funds and HCR's certification received by April 25, 2025 or for a period of fifteen days following 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 HCR; (b) HCR 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 project 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 sent via email to:

CPDRROFNYC@hud.gov

Potential objectors should contact HUD to verify the actual last day of the objection period.

Cody Sargood
Certifying Officer
April 2, 2025

21 FIRST STREET, TROY - YWCA
DISTRIBUTION LIST

**VIA ELECTRONIC MAIL UNLESS OTHERWISE
STATED**

HCR PUBLIC INFORMATION OFFICE/WEBCONTENT

CITY OF TROY –
MAYOR CARMELLA MANTELLO
433 RIVER STREET
TROY, NY 12180
Carmella.Mantello@troyny.gov

COUNTY EXECUTIVE
STEVEN MCLAUGHLIN
99 TROY ROAD, 4TH FLOOR
EAST GREENBUSH, NY 12061
smclaughlin@renesco.com

DIVISION OF ENVIRONMENTAL PERMITS
DEC REGIONAL OFFICE
1130 NORTH WESTCOTT ROAD
SCHENECTADY, NY 12306
R4INFO@DEC.NY.GOV

MARK AUSTIN *
Austin.mark@EPA.GOV

MS. ABIGAIL FORD, DIRECTOR
HUD REGION 2 OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT
26 FEDERAL PLAZA, ROOM 3513
NEW YORK, NY 10278-0068
ABIGAIL.G.FORD@HUD.GOV

COPY TO: AMY.B.APPLE@HUD.GOV

* Includes a copy of the completed ERR Checklist (no attachments)

**Environmental Review for Activity/Project that is
Categorically Excluded Subject to Section 58.5
Pursuant to 24 CFR 58.35(a)**

Project Information

Project Name: YWCA-GCR-21-First-Street

HEROS Number: 900000010424708

Start Date: 09/12/2024

Responsible Entity (RE): NEW YORK STATE DIVISION OF HOUSING AND COMMUNITY
RENEWAL, HAMPTON PLAZA ALBANY NY, 12207

State / Local Identifier: 20240034

RE Preparer: Joseph Spaulding

Certifying Officer Cody Sargood
r:

Grant Recipient (if different than Responsible Entity): YWCA of the Greater Capital Region

Point of Contact: Starletta Washington

Point of Contact:
Consultant (if applicable):

40 CFR 1506.5(b)(4): The lead agency or, where appropriate, a cooperating agency shall prepare a disclosure statement for the contractor's execution specifying that the contractor has no financial or other interest in the outcome of the action. Such statement need not include privileged or confidential trade secrets or other confidential business information.

By checking this box, I attest that as a preparer, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

Project Location: 21 First Street, Troy, NY 12180

Additional Location Information:

N/A

Direct Comments to: environmental.comments@hcr.ny.gov

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

YWCA of the Greater Capital Region (YWCA-GCR) proposes rehabilitation of a 5-story building for families, with 94 supportive housing units on an approximately 0.5-acre site at 21 First Street in the City of Troy, Rensselaer County. The project scope includes capital improvements, structural upgrades, environmental hazard remediation, and energy efficiency upgrades. This consists of exterior facade repair, roof replacement, repair of existing deteriorated structural beams in the basement, elevator modernization, flooring replacement, ADA accessible back door, ramp upgrade to meet ADA standards, replacement of fire panel, upgraded door hardware and security systems, lighting replacement, and basement asbestos abatement.

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

[21 1st St - Google Maps.pdf](#)

Level of Environmental Review Determination:

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at 58.5:

58.35(a)(3)(ii)

Determination:

	This categorically excluded activity/project converts to EXEMPT per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; Funds may be committed and drawn down after certification of this part for this (now) EXEMPT project; OR
✓	This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, publish NOI/RROF and obtain "Authority to Use Grant Funds" (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR

	This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).
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Approval Documents:

[21 First Street Troy YWCA - Signature Page.pdf](#)

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
M-24-SG-360100	Community Planning and Development (CPD)	HOME American Rescue Plan (HOME-ARP)	\$1,458,846.00

Estimated Total HUD Funded, Assisted or Insured Amount: \$1,458,846.00

Estimated Total Project Cost: \$4,258,846.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	A Phase I Environmental Site Assessment (ESA) Report, dated November 14, 2024, was prepared by Ambient Environmental Inc. The ESA found that the site comprises 0.61 acres in downtown Troy's west-central district, fully enclosed by chain-link fencing, with a 5-story brick building occupying the majority of the parcel. Other than a crawl space under a portion of the building, a brick and concrete basement occupies most of the structure. The Phase I ESA did not reveal evidence of RECs in connection with the subject property. A March 2017 Hazardous materials Survey

		<p>prepared by Ambient Environmental, Inc. details the locations of lead-based paint (LBP) throughout the building. The sponsor has submitted LBP removal and disposal specifications that must be followed during project construction. Regardless of the age of occupants, LBP encountered during rehabilitation must be handled in accordance with the HUD "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing," 2012, including revisions, which requires that all lead abatement work areas receive work area clearance (by sampling) prior to the continuation of non-lead-abatement work. Work area clearance results must be forwarded to the HTFC Construction Monitor and the assigned HTFC Architect. A qualified third-party must complete the work area testing/clearance. A March 2017 Hazardous materials Survey prepared by Ambient Environmental, Inc. details the locations of asbestos-containing material (ACM) throughout the building. The sponsor has submitted ACM removal and disposal specifications. These specifications must be followed during project construction. All ACM removal must conform to NYS Department of Labor regulations at 12 NYCRR Part 56, as amended January 11, 2006. At the completion of the entire project, evidence of proper ACM removal and disposal must be submitted to the HTFC Environmental Analyst. This must include a report that summarizes the final testing/clearance for the entire project with waste manifests attached. A qualified third-party must complete the final testing/clearance. In the event that ACM is not fully removed (even if enclosed or encapsulated) an ACM O&M Plan must be prepared and submitted to the HTFC Environmental</p>
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		<p>Analyst. A January 2025 Mold Analysis Assessment was prepared by Ambient Environmental, Inc. No mold or damp odors were observed in the areas of concern during the inspection, however, the assessment noted that there is evidence of water infiltration in the project building due to a long-term historical leak in the roof. The assessment recommended that the leak should be address as soon as practical to improve the building's envelope, noting that building envelopes should be watertight. This project site is in an area with a high potential for radon levels to exceed the EPA action level for residential construction. A Radon Assessment was prepared in January 2025 by Ambient Environmental Inc. Sampling was performed by following standard industrial hygiene techniques and best practices based upon sample collection methods, equipment used and ANSI/AARST MA-MFLB 2023. Radon levels in the basement and on floors one through five were well below the current EPA and NYS action level of 4.0 pCi/L. Radon testing must be conducted when the rehabilitation is complete, with test results forwarded to the HTFC Environmental Analyst, prior to re-occupancy.</p>
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project scope of work does not involve ground disturbance or tree cutting. This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act.</p>
<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.</p>

Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: Avoidance, Modification of project. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is modernization or minor rehabilitation of an existing residential property. A Preliminary Screening was performed, and found the following: The site is approximately 2,700 feet from CSX Transportation, Inc. railroad tracks south of the project site. The site is within 1,000 feet River Street, 1st Street, 2nd Street, Congress Street, Ferry Street, and Broadway, roads for which there are NYSDOT Traffic Data Viewer counts.. The project is in compliance with HUD's Noise regulation without mitigation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS or a NYS WSRR River. The project is in compliance with the Wild and Scenic Rivers Act.

HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Adverse environmental impacts that are disproportionately high for low-income and/or minority communities have been identified. With mitigation, identified in the mitigation section of this review, the project will be in compliance with Executive Order 12898.

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Environmental Justice	Mitigation will include abatement Asbestos-Containing Materials (ACM) and Lead-Based Paint (LBP). These measures are detailed in the Contamination and Toxic Substances section of the review. As a condition of environmental clearance, all debris materials must be segregated into appropriate waste streams and be disposed of in accordance with New York State solid waste regulations (6 NYCRR Part 360).	N/A		
Historic Preservation	The SHPO conditions are as follows: Submit proposed basement window drawings for SHPO review and comment, when available. Include existing	N/A		

	window elevation and detail drawings for comparison.			
Contamination and Toxic Substances - Multifamily and Nonresidential Properties	<p>A Phase I Environmental Site Assessment (ESA) Report, dated November 14, 2024, was prepared by Ambient Environmental Inc. The Phase I ESA did not reveal evidence of RECs in connection with the subject property. A March 2017 Hazardous materials Survey prepared by Ambient Environmental, Inc. details the locations of lead-based paint (LBP) throughout the building. The sponsor has submitted LBP removal and disposal specifications that must be followed during project construction. Regardless of the age of occupants, LBP encountered during rehabilitation must be handled in accordance with the HUD "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing," 2012, including revisions, which requires that all lead abatement work areas receive work area clearance (by sampling) prior to the continuation of non-lead-abatement work. Work area clearance results must be forwarded to the HTFC Construction Monitor and the assigned HTFC Architect. A qualified third-party must complete the work area testing/clearance. A March 2017 Hazardous materials Survey prepared by Ambient Environmental, Inc. details the locations of asbestos-containing material (ACM) throughout the building. The sponsor has</p>	N/A		

	<p>submitted ACM removal and disposal specifications. These specifications must be followed during project construction. All ACM removal must conform to NYS Department of Labor regulations at 12 NYCRR Part 56, as amended January 11, 2006. At the completion of the entire project, evidence of proper ACM removal and disposal must be submitted to the HTFC Environmental Analyst. This must include a report that summarizes the final testing/clearance for the entire project with waste manifests attached. A qualified third-party must complete the final testing/clearance. In the event that ACM is not fully removed (even if enclosed or encapsulated) an ACM O&M Plan must be prepared and submitted to the HTFC Environmental Analyst. A January 2025 Mold Analysis Assessment was prepared by Ambient Environmental, Inc. No mold or damp odors were observed in the areas of concern during the inspection, however, the assessment noted that there is evidence of water infiltration in the project building due to a long-term historical leak in the roof. The assessment recommended that the leak should be address as soon as practical to improve the building's envelope, noting that building envelopes should be watertight. This project site is in an area with a high potential for radon levels to exceed the EPA action level for residential</p>			
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	<p>construction. A Radon Assessment was prepared in January 2025 by Ambient Environmental Inc. Sampling was performed by following standard industrial hygiene techniques and best practices based upon sample collection methods, equipment used and ANSI/AARST MA-MFLB 2023. Radon levels in the basement and on floors one through five were well below the current EPA and NYS action level of 4.0 pCi/L. Radon testing must be conducted when the rehabilitation is complete, with test results forwarded to the HTFC Environmental Analyst, prior to re-occupancy.</p>			
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Project Mitigation Plan

The project will accomplish mitigation by following the attached Site Alteration Letter.

[20240034 Troy YWCA - Site Alteration Letter.pdf](#)

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

General policy	Legislation	Regulation
It is HUD’s policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site’s proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[Airport Distances Map.PNG](#)

Are formal compliance steps or mitigation required?

Yes

No

Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

1. Is the project located in a CBRS Unit?

No

Document and upload map and documentation below.

Yes

Screen Summary

Compliance Determination

This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

[CBRS Map.PNG](#)

Are formal compliance steps or mitigation required?

Yes

No

Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?

- ✓ No. This project does not require flood insurance or is excepted from flood insurance.

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

Yes

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

Yes

- ✓ No

Screen Summary

Compliance Determination

Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

Supporting documentation

[FIRM Map Panel - Troy YWCA.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

Yes

No

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

Screen Summary

Compliance Determination

Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. The project is in compliance with the Clean Air Act.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

Yes

No

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

Screen Summary

Compliance Determination

This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[Coastal Zone Map.PNG](#)

Are formal compliance steps or mitigation required?

Yes

No

Contamination and Toxic Substances

General Requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)
Reference		
https://www.onecpd.info/environmental-review/site-contamination		

1. How was site contamination evaluated?* Select all that apply.

- ASTM Phase I ESA
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening.
- None of the above

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site. For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD’s toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances* (excluding radon) found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

Provide a map or other documentation of absence or presence of contamination** and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.

- No

Explain:

A Phase I Environmental Site Assessment (ESA) Report, dated November 14, 2024, was prepared by Ambient Environmental Inc. The ESA found that the site comprises 0.61 acres in downtown Troy's west-central district, fully enclosed by chain-link fencing, with a 5-story brick building occupying the majority of the parcel. Other than a crawl space under a portion of the building, a brick and concrete basement occupies most of the structure. The Phase I ESA did not reveal evidence of RECs in connection with the subject property.

Yes

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

** Utilize EPA's Enviromapper, NEPAssist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions* from having to consider radon in the contamination analysis listed in CPD Notice [CPD-23-103](#)?

Yes

Explain:

✓ No

* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.

- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

4. Is the proposed project new construction or substantial rehabilitation where testing will be conducted but cannot yet occur because building construction has not been completed?

Yes

Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be uploaded to the mitigation section within this screen.

No

5. Was radon testing or a scientific data review conducted that provided a radon concentration level in pCi/L?

Yes

No

If no testing was conducted and a review of science-based data offered a lack of science-based data for the project site, then document and upload the steps taken to look for documented test results and science-based data as well as the basis for the conclusion that testing would be infeasible or impracticable.

Explain:

File Upload:

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

Non-radon contamination was found in a previous question.

6. How was radon data collected?

All buildings involved were tested for radon

A review of science-based data was conducted

Enter the Radon concentration value, in pCi/L, derived from the review of science-based data:

Provide the documentation* used to derive this value:

File Upload:

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

Radon concentration value is greater than or equal to 4.0 pCi/L and/or non-radon contamination was found in a previous question. Continue to Mitigation.

* For example, if you conducted radon testing then provide a testing report (such as an ANSI/AARST report or DIY test) if applicable (note: DIY tests are not eligible for use in multifamily buildings), or documentation of the test results. If you conducted a scientific data review, then describe and cite the maps and data used and include copies of all supporting documentation. Ensure that the best available data is utilized, if conducting a scientific data review.

7. Were the radon test results for any dwelling unit tested at or above 4.0 pCi/L?

Yes

Radon Mitigation is required for the question to proceed.

Enter the total number of dwelling units tested:

How many dwelling units tested at or above 4.0 pCi/L:

Enter the highest radon test result value:

Document the test results for all dwelling units tested with a copy of the test results for all dwelling units or testing report(s) covering all units:

File Upload:

✓ No

Provide a copy of the test results for all dwelling units tested or testing report(s) covering all units tested:

File Upload:

[Radon Report - Troy YWCA.pdf](#)

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen:

Non-radon contamination was found in a previous question.

Screen Summary

Compliance Determination

A Phase I Environmental Site Assessment (ESA) Report, dated November 14, 2024, was prepared by Ambient Environmental Inc. The ESA found that the site comprises 0.61 acres in downtown Troy's west-central district, fully enclosed by chain-link fencing, with a 5-story brick building occupying the majority of the parcel. Other than a crawl space under a portion of the building, a brick and concrete basement occupies most of the structure. The Phase I ESA did not reveal evidence of RECs in connection with the subject property. A March 2017 Hazardous materials Survey prepared by Ambient Environmental, Inc. details the locations of lead-based paint (LBP) throughout the building. The sponsor has submitted LBP removal and disposal specifications that must be followed during project construction. Regardless of the age of occupants, LBP encountered during rehabilitation must be handled in accordance with the HUD "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing," 2012, including revisions, which requires that all lead abatement work areas receive work area clearance (by sampling) prior to the continuation of non-lead-abatement work. Work area clearance results must be forwarded to the HTFC Construction Monitor and the assigned HTFC Architect. A qualified third-party must complete the work area testing/clearance. A March 2017 Hazardous materials Survey prepared by Ambient Environmental, Inc. details the locations of asbestos-containing material (ACM) throughout the building. The sponsor has submitted ACM removal and disposal specifications. These specifications must be followed during project construction. All ACM removal must conform to NYS Department of Labor regulations at 12 NYCRR Part 56, as amended January 11, 2006.

At the completion of the entire project, evidence of proper ACM removal and disposal must be submitted to the HTFC Environmental Analyst. This must include a report that summarizes the final testing/clearance for the entire project with waste manifests attached. A qualified third-party must complete the final testing/clearance. In the event that ACM is not fully removed (even if enclosed or encapsulated) an ACM O&M Plan must be prepared and submitted to the HTFC Environmental Analyst. A January 2025 Mold Analysis Assessment was prepared by Ambient Environmental, Inc. No mold or damp odors were observed in the areas of concern during the inspection, however, the assessment noted that there is evidence of water infiltration in the project building due to a long-term historical leak in the roof. The assessment recommended that the leak should be address as soon as practical to improve the building's envelope, noting that building envelopes should be watertight. This project site is in an area with a high potential for radon levels to exceed the EPA action level for residential construction. A Radon Assessment was prepared in January 2025 by Ambient Environmental Inc. Sampling was performed by following standard industrial hygiene techniques and best practices based upon sample collection methods, equipment used and ANSI/AARST MA-MFLB 2023. Radon levels in the basement and on floors one through five were well below the current EPA and NYS action level of 4.0 pCi/L. Radon testing must be conducted when the rehabilitation is complete, with test results forwarded to the HTFC Environmental Analyst, prior to re-occupancy.

Supporting documentation

[Mold Report Troy YWCA.pdf](#)

[Lead in Water Report Troy YWCA.pdf](#)

[March 2017 Hazardous Materials Survey Report.pdf](#)

[ACM and LBP specs.pdf](#)

[YWCA GCR 21 First St Troy Phase I ESA Report.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Endangered Species

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402

1. Does the project involve any activities that have the potential to affect species or habitats?

- ✓ No, the project will have No Effect due to the nature of the activities involved in the project.

This selection is only appropriate if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.
Based on the response, the review is in compliance with this section.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

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

Screen Summary

Compliance Determination

The project scope of work does not involve ground disturbance or tree cutting. This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

Yes

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

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

Yes

Screen Summary

Compliance Determination

Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

Farmlands Protection

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	7 CFR Part 658

1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?

Yes

No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

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

Screen Summary

Compliance Determination

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

1. Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD's floodplain management regulations in Part 55?

Yes

(a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b).

(b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19.

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:

(1) The property is cleared of all existing buildings and walled structures; and

(2) The property is cleared of related improvements except those which:

(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);

(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and

(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

(d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance, or other HUD assistance.

(e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions.

(f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland.

(g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if: (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and (2) the proposed project will not result in any new construction in or modifications of a wetland .

(h) Issuance or use of Housing Vouchers, or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies).

(i) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

Describe:

No

2. Does the project include a Critical Action? Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants.

Yes

Describe:

No

3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information¹ to determine flood elevation. Include documentation and an explanation of why this is the best available information² for the site. Note that newly constructed and substantially improved³ structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

CISA for non-critical actions. If using a local tool, data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

- ✓ 0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or — if available — a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

¹ Sources which merit investigation include the files and studies of other federal agencies, such as the U. S. Army Corps of Engineers, the Tennessee Valley Authority, the Soil Conservation Service and the U. S. Geological Survey. These agencies have prepared flood hazard studies for several thousand localities and, through their technical assistance programs, hydrologic studies, soil surveys, and other investigations have collected or developed other floodplain information for numerous sites and areas. States and communities are also sources of information on past flood 'experiences within their boundaries and are particularly knowledgeable about areas subject to high-risk flood hazards such as alluvial fans, high velocity flows, mudflows and mudslides, ice jams, subsidence and liquefaction.

² If you are using best available information, select the FVA option below and provide supporting documentation in the screen summary. Contact your [local environmental officer](#) with additional compliance questions.

³ Substantial improvement means any repair or improvement of a structure which costs at least 50 percent of the market value of the structure before repair or improvement or results in an increase of more than 20 percent of the number of dwelling units. The full definition can be found at [24 CFR 55.2\(b\)\(12\)](#).

5. Does your project occur in the FFRMS floodplain?

Yes

No

Screen Summary

Compliance Determination

This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.

Supporting documentation

[FIRM Map Panel - Troy YWCA\(1\).pdf](#)

[FFRMS - Troy YWCA.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 “Protection of Historic Properties” https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

Threshold

Is Section 106 review required for your project?

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)
 No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

- ✓ Yes, because the project includes activities with potential to cause effects (direct or indirect).

Step 1 – Initiate Consultation

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

- ✓ State Historic Preservation Offer (SHPO) Completed

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

Other Consulting Parties

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

The project sponsor initiated consultation with NY OPRHP and the State Historic Preservation Officer through the Cultural Resources Information System. On October 11, 2024, SHPO responded in a letter indicating that based on this review, it is the opinion of the SHPO that the work will have No Adverse Effect on Historic Resources, with the following condition: Submit proposed basement window drawings for SHPO review and comment, when available. Include existing window elevation and detail drawings for comparison. There are no ground disturbing activities associated with this project, and therefore, THPOs were not contacted.

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

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

- Yes
- No

Step 2 – Identify and Evaluate Historic Properties

1. **Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:**

21 1st Street Troy, NY

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

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

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
21 1st Street Troy, NY	Listed	Yes	✓ Not Sensitive

Additional Notes:

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

project?

Yes

No

Step 3 –Assess Effects of the Project on Historic Properties

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

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

No Historic Properties Affected

No Adverse Effect

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

Document reason for finding:

A No Adverse Effect determination was made because the building is listed and within the Central Troy Historic District. SHPO reviewed the scope of work and determined that the scope would not have an adverse effect on the District.

Does the No Adverse Effect finding contain conditions?

Yes (check all that apply)

Avoidance

Modification of project

Other

Describe conditions here:

The SHPO conditions are as follows:

Submit proposed basement window drawings for SHPO review and comment, when available. Include existing window elevation and detail drawings for comparison.

No

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: Avoidance, Modification of project. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.

Supporting documentation

[YWCA SHPO Review Submission.pdf](#)

[SHPO Letter 10-11-24 Section 106.pdf](#)

[CRIS \(Listed\).PNG](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

General requirements	Legislation	Regulation
HUD’s noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: “Compatible Land Uses at Federal Airfields”	Title 24 CFR 51 Subpart B

1. What activities does your project involve? Check all that apply:

New construction for residential use

Rehabilitation of an existing residential property

NOTE: For modernization projects in all noise zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details. The definition of “modernization” is determined by program office guidance.

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

None of the above

2. Do you have standardized noise attenuation measures that apply to all modernization and/or minor rehabilitation projects, such as the use of double glazed windows or extra insulation?

Yes

No

3. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).

Describe findings of the Preliminary Screening:

The site is approximately 2,700 feet from CSX Transportation, Inc. railroad tracks south of the project site. The site is within 1,000 feet River Street, 1st Street, 2nd Street, Congress Street, Ferry Street, and Broadway, roads for which there are NYSDOT Traffic Data Viewer counts.

Screen Summary

Compliance Determination

The project is modernization or minor rehabilitation of an existing residential property. A Preliminary Screening was performed, and found the following: The site is approximately 2,700 feet from CSX Transportation, Inc. railroad tracks south of the project site. The site is within 1,000 feet River Street, 1st Street, 2nd Street, Congress Street, Ferry Street, and Broadway, roads for which there are NYSDOT Traffic Data Viewer counts.. The project is in compliance with HUD's Noise regulation without mitigation.

Supporting documentation

[Schenectady County Airport DNL Contour.pdf](#)

[Roads Map.PNG](#)

[Railroad Distances Map.PNG](#)

[DNL Calculator - Roads and Rail Calcs.pdf](#)

[Albany 2020 Noise Exposure Map.pdf](#)

[Airport Distances Map\(1\).PNG](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

General requirements	Legislation	Regulation
<p>The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.</p>	<p>Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)</p>	<p>40 CFR Part 149</p>

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

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

No

Screen Summary

Compliance Determination

Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[Sole Source Aquifer Map.PNG](#)

Are formal compliance steps or mitigation required?

Yes

No

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service’s National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building’s footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order

No

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

Yes

Screen Summary

Compliance Determination

Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990.

Supporting documentation

[State Wetlands Map.PNG](#)

[NWI Wetlands Map.PNG](#)

Are formal compliance steps or mitigation required?

Yes

No

Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

1. Is your project within proximity of a NWSRS river?

No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

Screen Summary

Compliance Determination

This project is not within proximity of a NWSRS or a NYS WSRR River. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[YWCA 21 First Street Troy - WSRR NYS Map.PNG](#)

[YWCA 21 First Street Troy - NWSRS Map.PNG](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project’s total environmental review?

Yes

No

2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?

Yes

Explain:

The project site is located in a HUD-designated Qualified Census Tract.

Document and upload any supporting documentation below.

No

3. All adverse impacts should be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen.

Mitigation as follows will be implemented:

Mitigation will include abatement Asbestos-Containing Materials (ACM) and Lead-Based Paint (LBP). These measures are detailed in the Contamination and Toxic Substances section of the review. As a condition of environmental clearance, all debris materials must be segregated into appropriate waste streams and be disposed of in accordance with New York State solid waste regulations (6 NYCRR Part 360).

No mitigation is necessary.

4. Describe how the affected low-income or minority community was engaged or meaningfully involved in the decision on what mitigation actions, if any, will be taken.

The project is subject to the NEPA public review and comment process for the Environmental Assessment.

Screen Summary

Compliance Determination

Adverse environmental impacts that are disproportionately high for low-income and/or minority communities have been identified. With mitigation, identified in the mitigation section of this review, the project will be in compliance with Executive Order 12898.

Supporting documentation

[NYSDEC EJ Mapper.PNG](#)

[HUD QCT.PNG](#)

Are formal compliance steps or mitigation required?

Yes

No



U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

**Environmental Review for Activity/Project that is
Categorically Excluded Subject to Section 58.5
Pursuant to 24 CFR 58.35(a)**

Project Information

Project Name: YWCA-GCR-21-First-Street

HEROS Number: 900000010424708

Start Date: 09/12/2024

State / Local Identifier: 20240034

Project Location: 21 First Street, Troy, NY 12180

Additional Location Information:

N/A

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

YWCA of the Greater Capital Region (YWCA-GCR) proposes rehabilitation of a 5-story building for families, with 94 supportive housing units on an approximately 0.5-acre site at 21 First Street in the City of Troy, Rensselaer County. The project scope includes capital improvements, structural upgrades, environmental hazard remediation, and energy efficiency upgrades. This consists of exterior facade repair, roof replacement, repair of existing deteriorated structural beams in the basement, elevator modernization, flooring replacement, ADA accessible back door, ramp upgrade to meet ADA standards, replacement of fire panel, upgraded door hardware and security systems, lighting replacement, and basement asbestos abatement.

Level of Environment Review Determination:

Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:

Funding Information

Grant Number	HUD Program	Program Name	
M-24-SG-360100	Community Planning and Development (CPD)	HOME American Rescue Plan (HOME-ARP)	\$1,458,846.00

Estimated Total HUD Funded Amount: \$1,458,846.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$4,258,846.00

Mitigation Measures and Conditions [CFR 1505.2(c)]:

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

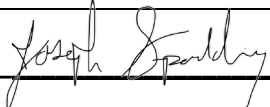
Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Complete
Environmental Justice	Mitigation will include abatement Asbestos-Containing Materials (ACM) and Lead-Based Paint (LBP). These measures are detailed in the Contamination and Toxic Substances section of the review. As a condition of environmental clearance, all debris materials must be segregated into appropriate waste streams and be disposed of in accordance with New York State solid waste regulations (6 NYCRR Part 360).	N/A	
Historic Preservation	The SHPO conditions are as follows: Submit proposed basement window drawings for SHPO review and comment, when available. Include existing window elevation and detail drawings for comparison.	N/A	
Contamination and Toxic Substances - Multifamily and Nonresidential Properties	A Phase I Environmental Site Assessment (ESA) Report, dated November 14, 2024, was prepared by Ambient Environmental Inc. The Phase I ESA did not reveal evidence of RECs in connection with the subject property. A March 2017 Hazardous materials Survey prepared by Ambient Environmental, Inc. details the locations of lead-based paint (LBP) throughout the building. The sponsor has submitted LBP removal and disposal specifications that must be followed during project construction. Regardless of the age of occupants, LBP encountered during rehabilitation must be handled in accordance with the HUD "Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing," 2012, including revisions, which requires that all lead abatement work areas receive work area	N/A	

	<p>clearance (by sampling) prior to the continuation of non-lead-abatement work. Work area clearance results must be forwarded to the HTFC Construction Monitor and the assigned HTFC Architect. A qualified third-party must complete the work area testing/clearance. A March 2017 Hazardous materials Survey prepared by Ambient Environmental, Inc. details the locations of asbestos-containing material (ACM) throughout the building. The sponsor has submitted ACM removal and disposal specifications. These specifications must be followed during project construction. All ACM removal must conform to NYS Department of Labor regulations at 12 NYCRR Part 56, as amended January 11, 2006. At the completion of the entire project, evidence of proper ACM removal and disposal must be submitted to the HTFC Environmental Analyst. This must include a report that summarizes the final testing/clearance for the entire project with waste manifests attached. A qualified third-party must complete the final testing/clearance. In the event that ACM is not fully removed (even if enclosed or encapsulated) an ACM O&M Plan must be prepared and submitted to the HTFC Environmental Analyst. A January 2025 Mold Analysis Assessment was prepared by Ambient Environmental, Inc. No mold or damp odors were observed in the areas of concern during the inspection, however, the assessment noted that there is evidence of water infiltration in the project building due to a long-term historical leak in the roof. The assessment recommended that the leak should be address as soon as practical to improve the building's envelope, noting that building envelopes should be watertight. This project site is in an area with a high potential for radon levels to exceed the EPA action level for residential construction. A Radon Assessment was prepared in January 2025 by Ambient</p>		
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	<p>Environmental Inc. Sampling was performed by following standard industrial hygiene techniques and best practices based upon sample collection methods, equipment used and ANSI/AARST MA-MFLB 2023. Radon levels in the basement and on floors one through five were well below the current EPA and NYS action level of 4.0 pCi/L. Radon testing must be conducted when the rehabilitation is complete, with test results forwarded to the HTFC Environmental Analyst, prior to re-occupancy.</p>		
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Determination:

<input type="checkbox"/>	<p>This categorically excluded activity/project converts to EXEMPT per Section 58.34(a)(12), because it does not require any mitigation for compliance with any listed statutes or authorities, nor requires any formal permit or license; Funds may be committed and drawn down after certification of this part for this (now) EXEMPT project; OR</p>
<input checked="" type="checkbox"/>	<p>This categorically excluded activity/project cannot convert to Exempt status because one or more statutes or authorities listed at Section 58.5 requires formal consultation or mitigation. Complete consultation/mitigation protocol requirements, publish NOI/RROF and obtain "Authority to Use Grant Funds" (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds; OR</p>
<input type="checkbox"/>	<p>This project is not categorically excluded OR, if originally categorically excluded, is now subject to a full Environmental Assessment according to Part 58 Subpart E due to extraordinary circumstances (Section 58.35(c)).</p>

Preparer Signature:  Date: April 2, 2025

Name / Title/ Organization: Joseph Spaulding / Environmental Analyst/ New York State Homes and Community Renewal

Responsible Entity Agency Official Signature:  Date: April 2, 2025

Name/ Title: Cody Sargood / Supervisory Environmental Analyst

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

21 FIRST STREET, TROY - YWCA

**21 First Street, City of Troy,
Rensselaer County**

NEPA Environmental Review Record

**Appendices and Supporting Documents are available
by emailing environmental.comments@hcr.ny.gov**