

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

Project Information

Project Name: FY25-Lehi-Sidewalk-Engineering-Project

HEROS Number: 900000010487143

Start Date: 07/29/2025

Responsible Entity (RE): MOUNTAINLAND ASSOCIATION OF GOVERNMENTS, 586 E
800 N OREM UT, 84097

RE Preparer: Claudia Saldana

State / Local Identifier: UT

Certifying Officer: Mayor, Lehi City

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

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

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

Project Location: , Lehi, UT

Additional Location Information:

This environmental review will include both the PY25 and PY26 project locations for the installation of curb & gutter, sidewalk, and pavement on the west side of 400 East between 400 North and 600 North. The PY26 project location, depending on funding, will be on 600 North between 300 East and 400 East in Lehi City, Utah.

Direct Comments to:

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

This project will include the installation of Curb & Gutter, Sidewalk, and pavement on the west side of 400 East between 400 North and 600 North, and 600 N between 300 E and 400 E in Lehi City, Utah. This will improve traffic interaction, add pedestrian ADA ramps, and improve mobility in the downtown area. It will also increase safety and walkability to the nearby schools and parks.

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

The overarching purpose of the proposed action is to improve the safety, mobility, and accessibility of the transportation infrastructure in the project area, specifically on the west side of 400 East between 400 North and 600 North, and 600 North between 300 East and 400 East. The project is set to correct significant safety hazards, achieve federal ADA compliance, and enhance the structural integrity of the public right-of-way. The project is necessary because the current infrastructure is deficient or non-existent, creating critical safety risks and mobility barriers. Specifically, the lack of continuous sidewalks and ADA-compliant ramps forces pedestrians, particularly those with disabilities and children walking to nearby schools and parks, to use the roadway, leading to increased danger and violating federal accessibility mandates. Furthermore, the absence of proper curb and gutter infrastructure results in uncontrolled stormwater runoff, which accelerates pavement degradation, compromises drainage, and creates hazardous driving surfaces, driving up long-term maintenance costs. The proposed installation of new pavement, curb and gutter, and sidewalks will directly resolve these issues by ensuring equitable access, providing safe and defined pedestrian corridors, improving traffic interaction, and establishing a robust system for managing stormwater, all of which are essential for a functional, compliant, and safe downtown environment consistent with local planning goals. This project is consistent with and supports the goals of local

planning efforts, including the Consolidated Plan, by addressing public infrastructure to increase safety, mobility, and accessibility.

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

The existing pedestrian infrastructure in many areas of Lehi City, particularly within its older, established neighborhoods and designated CDBG target areas, is characterized by significant deficiencies that pose barriers to safety and accessibility. Current streets have a severe lack of continuity, where long stretches of sidewalk abruptly cease, forcing pedestrians, including students, to walk within the street right-of-way. Where sidewalks do exist, many are substandard, featuring cracked and heaved surfaces, steep cross-slopes, and trip hazards. Critically, many curb ramps at intersections are either entirely absent or non-compliant with ADA standards, failing to provide the required accessible path of travel. This fragmented and non-ADA-compliant condition creates an unsafe and inequitable environment, limiting mobility for persons with disabilities and children, and directly contributing to the need for CDBG public improvement assistance.

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

Determination:

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

Approval Documents:

7015.15 certified by Certifying Officer
on:

7015.16 certified by Authorizing Officer
on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
B-25-MC-49-0015	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$260,875.00

**Estimated Total HUD Funded,
Assisted or Insured Amount:** \$260,875.00

**Estimated Total Project Cost [24 CFR 58.2 (a)
(5)]:** \$300,000.00

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 located in a state that does not contain CBRS units. Therefore, this project 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. This

		project is to install new curb and gutter, and sidewalks to Lehi City downtown area. It will not be a new source of pollution.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site contamination was evaluated as follows: None of the above. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is exempt from radon consideration. The project is in compliance with contamination and toxic substances requirements.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project has been determined to have No Effect on listed species. This project is in compliance with the Endangered Species Act without mitigation.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is 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	The following exception applies, therefore the project is in compliance with Executive Orders 11988 and 13690: 55.12(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.

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 there are No Historic Properties Affected because there are no historic properties present. 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	Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. The only two WSR in Utah are the Green and Virgin River. Neither of which is in Utah County, Utah, where this project will take place.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	Sidewalk curb and gutter improvements are consistent with the Lehi City Master Transportation Plan. (Master plan attached)	None
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	1	The sidewalk, curb, and gutter improvements will significantly help with draining and stormwater runoff by defining flow paths and directing rainwater and runoff from streets and sidewalks. This will prevent pooling and help minimise soil erosion.	None
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	While there may be temporary minor adverse impacts, such as the presence of construction zones, the project installs a dedicated sidewalk, separating pedestrians from vehicular traffic, which results in a long-term positive impact on public safety and reduces accident potential.	None
SOCIOECONOMIC			
Employment and Income Patterns	2	The project will not induce population growth, significantly alter the area's income characteristics, or lead to any measurable, long-term employment shifts. The project does not result in disproportionately high and adverse human health or environmental effects on minority or low-income populations, but rather provides an equitable and beneficial outcome by improving infrastructure for the area.	None
Demographic Character Changes / Displacement	2	The project does not result in demographic changes or displacement to current residents in the area. The project does not result in disproportionately high and adverse human health or environmental effects on minority or low-income populations, but rather provides an equitable and beneficial outcome by improving infrastructure for the area.	None
Environmental Justice EA Factor	2	The project does not result in disproportionately high and adverse human health or environmental effects on minority	None

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		or low-income populations, but rather provides an equitable and beneficial outcome by improving infrastructure for the area.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	1	Sidewalk curb and gutter are consistent with the Lehi City Master Plan. This will also serve as a safe walkway to and from Lehi High School, Lehi Elementary School, and Wines Park.	None
Commercial Facilities (Access and Proximity)	1	Sidewalk curb and gutter are consistent with the Lehi City Master Plan. This also provides a safe walkway to and from Lehi High School, Lehi Elementary School, and Wines Park.	None
Health Care / Social Services (Access and Capacity)	2	While there may be temporary minor adverse impacts, such as the presence of construction zones, the project installs a dedicated sidewalk, separating pedestrians from vehicular traffic, which results in a long-term positive impact on public safety and reduces accident potential. There will be no impact on health care or social services.	None
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	While there may be temporary minor adverse impacts, such as the presence of construction zones, the project installs a dedicated sidewalk, separating pedestrians from vehicular traffic, which results in a long-term positive impact on public safety and reduces accident potential. There will be no impact on solid waste disposal or recycling.	None
Waste Water and Sanitary Sewers (Feasibility and Capacity)	1	Sidewalk curb and gutter are consistent with the Lehi City Master Plan and allow proper flow to the storm drain system.	None
Water Supply (Feasibility and Capacity)	2	While there may be temporary minor adverse impacts, such as the presence of construction zones, the project installs a dedicated sidewalk, separating pedestrians from vehicular traffic, which results in a long-term positive impact on public safety	None

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		and reduces accident potential. There will be no impact on the water supply.	
Public Safety - Police, Fire and Emergency Medical	2	While there may be temporary minor adverse impacts, such as the presence of construction zones, the project installs a dedicated sidewalk, separating pedestrians from vehicular traffic, which results in a long-term positive impact on public safety and reduces accident potential. There will be no impact on public safety.	None
Parks, Open Space and Recreation (Access and Capacity)	1	Sidewalk curb and gutter are consistent with the Lehi City Master Plan. This also provides a safe walkway to and from Wines Park.	None
Transportation and Accessibility (Access and Capacity)	1	Sidewalk curb and gutter are consistent with the Lehi City Master Plan. This will also serve as a safe walkway to and from Lehi High School, Lehi Elementary School, Quench it, and Wines Park.	None
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	While there may be temporary minor adverse impacts, such as the presence of construction zones, the project installs a dedicated sidewalk, separating pedestrians from vehicular traffic, which results in a long-term positive impact on public safety and reduces accident potential.	None
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)		While there may be temporary minor adverse impacts, such as the presence of construction zones, the project installs a dedicated sidewalk, separating pedestrians from vehicular traffic, which results in a long-term positive impact on public safety and reduces accident potential.	None
Other Factors 1	2		None
Other Factors 2	2		None
CLIMATE AND ENERGY			
Climate Change	2	While there may be temporary minor adverse impacts, such as the presence of construction zones, the project installs a dedicated sidewalk, separating pedestrians from vehicular traffic, which results in a	None

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		long-term positive impact on public safety and reduces accident potential.	
Energy Efficiency	2	While there may be temporary minor adverse impacts, such as the presence of construction zones, the project installs a dedicated sidewalk, separating pedestrians from vehicular traffic, which results in a long-term positive impact on public safety and reduces accident potential.	None

Supporting documentation

[Master Transportation Plan Lehi City.pdf](#)

[Community Facilities.pdf](#)

[Land Development.pdf](#)

[Socioeconomic.pdf](#)

[Natural Features.pdf](#)

[Climate.pdf](#)

Additional Studies Performed:

Field Inspection [Optional]: Date and completed
by:

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

Lehi City Engineering Department

List of Permits Obtained:

NA

Public Outreach [24 CFR 58.43]:

Cumulative Impact Analysis [24 CFR 58.32]:

The individually minor, short-term adverse impacts, such as localized dust, noise, and traffic disruption during construction, are limited to a brief phase and are readily managed through standard construction mitigation practices and adherence to city ordinances. When these temporary impacts are aggregated with those from other past, present, and reasonably foreseeable infrastructure and development projects in Lehi, the cumulative adverse effect remains temporary and insignificant. Conversely, the long-term benefits of the proposed action--improved stormwater management through new curb and gutter, reduced erosion, and enhanced safety and accessibility via ADA-compliant sidewalks collectively contribute to a sustainable, more resilient, and equitable infrastructure network. Therefore, the incremental positive impact of this action, when added to other community development efforts, results in an overall positive cumulative impact on the suitable living environment.

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

This project is fundamentally site-dependent and location-specific to target the precise areas along the corridor that are currently missing adequate sidewalks, curbs, and gutter infrastructure. The overall objective is to achieve a wholistic and sustainable improvement to the corridor. Isolated patch repairs or minor resurfacing would not provide a long-term solution, fail to correct the underlying drainage issues, and would not establish continuous, ADA-compliant accessibility. Choosing partial solutions would necessitate repeated, costly, and disruptive maintenance in the near future, negating the efficiency and purpose of utilizing CDBG funds for comprehensive improvement.

No Action Alternative [24 CFR 58.40(e)]

The No Action Alternative was considered but not selected. This course would involve taking no action to replace or improve the failing infrastructure. Reason for Rejection: The No Action Alternative would fail to address the critical public safety hazards posed by damaged and uneven sidewalks, continuing to violate Americans with Disabilities Act (ADA) accessibility standards. It would also perpetuate poor street drainage, leading to further roadway deterioration, ponding, and erosion. Since the project's primary goal is to address existing deficiencies, failing to act would contradict the city's commitment to community development and safety goals.

Summary of Findings and Conclusions:

The Environmental Assessment (EA) for the Lehi City sidewalk project located on 400 E from 400 N to 600 N and 600 N from 300 E to 400 E, concluded that the project will result in no long-term adverse impacts on the human environment. Temporary and minor nuisances, such as localized noise and dust, will occur during the construction phase but will be mitigated through standard construction practices and adherence to local ordinances. The overall outcome of the project is a beneficial impact to the area. This benefit is realized through improved pedestrian safety, enhanced mobility and

accessibility via ADA-compliant sidewalks, and better neighborhood livability due to effective stormwater management achieved by the new curb and gutter installation.

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	None	N/A	No mitigation necessary.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	None	N/A	No mitigation necessary.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	None	N/A	No mitigation necessary.	
Employment and Income Patterns	None	N/A	No mitigation necessary.	
Demographic Character Changes / Displacement	None	N/A	No mitigation necessary.	
Environmental Justice EA Factor	None	N/A	No mitigation necessary.	

Educational and Cultural Facilities (Access and Capacity)	None	N/A	No mitigation necessary.	
Commercial Facilities (Access and Proximity)	None	N/A	No mitigation necessary.	
Health Care / Social Services (Access and Capacity)	None	N/A	No mitigation necessary.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	None	N/A	No mitigation necessary.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	None	N/A	No mitigation necessary.	
Water Supply (Feasibility and Capacity)	None	N/A	No mitigation necessary.	
Public Safety - Police, Fire and Emergency Medical	None	N/A	No mitigation necessary.	
Parks, Open Space and Recreation (Access and Capacity)	None	N/A	No mitigation necessary.	
Transportation and Accessibility (Access and Capacity)	None	N/A	No mitigation necessary.	
Unique Natural Features	None	N/A	No mitigation necessary.	

/Water Resources				
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	None	N/A	No mitigation necessary.	
Other Factors 1	None	N/A	No mitigation necessary.	
Other Factors 2	None	N/A	No mitigation necessary.	
Climate Change	None	N/A	No mitigation necessary.	
Energy Efficiency	None	N/A	No mitigation necessary.	

Project Mitigation Plan

No mitigation necessary.

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

[Lehi City PY25 ER_Airports .pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

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

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

Compliance Determination

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

Supporting documentation

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

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. This project is to install new curb and gutter, and sidewalks to Lehi City downtown area. It will not be a new source of pollution.

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

This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.

Screen Summary

Compliance Determination

This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

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

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

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

☒ None of the above

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.

For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

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

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

✓ No

Explain:

There were no on-site or nearby toxic, hazardous, or radioactive substances found. The sidewalks will be in existing communities. These are all residential neighborhoods. One segment will take place

Yes

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

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

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

✓ Yes

Explain:

There are no buildings involved in this project. Sidewalks will be replaced or installed depending on the section, on either 400 E between 600 N and 400 N or 600 N between 300 E and 400 E. The addition of a sidewalk will not pose a hazard to residents.

No

* Notes:

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

does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.

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

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: None of the above. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is exempt from radon consideration. The project is in compliance with contamination and toxic substances requirements.

Supporting documentation

[Lehi FY25 EPA Facilities Map.pdf](#)

[Lehi FY25 Sidewalk Google Earth View.png](#)

[Sidewalks Missing-Done Old Town 8-7-25 \(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

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

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

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

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

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

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

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

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

3. What effects, if any, will your project have on federally listed species or designated critical habitat?

- ✓ No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat. in the action area.

Document and upload all documents used to make your determination below. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate

May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

6. For the project to be brought into compliance with this section, all adverse impacts must 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:

- ✓ No mitigation is necessary.

Explain why mitigation will not be made here:

Based on the level of small construction taking place in an existing urban environment, it is unlikely to jeopardize the continued existence of the monarch butterfly or Suckley's cuckoo bumblebee. The project area is almost all gravel. FWS was informally consulted and agreed.

Screen
Compliance Determination

Summary

This project has been determined to have No Effect on listed species. This project is in compliance with the Endangered Species Act without mitigation.

Supporting documentation

[Monarch butterfly and Suckleys cuckoo bumblebee project review.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

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

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

✓ No

Yes

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

✓ No

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

Yes

Screen Summary

Compliance Determination

Based on the project description the project includes no activities that would require further evaluation under this section. 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

[Tigerweb\(1\).png](#)

[Tigerweb.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

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

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

✓ Yes

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

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

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

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

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

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

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

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

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

or other HUD assistance.

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

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

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

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

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

Describe:

Sidewalks will be added in downtown Lehi to increase pedestrian safety and mobility by installing a continuous sidewalk, but most importantly, ensuring accessibility compliance. The project will integrate ADA-compliant ramps at all necessary intersections and access points will meeting federal mandates and ensuring equitable access for all community members.

No

Screen Summary

Compliance Determination

The following exception applies, therefore the project is in compliance with Executive Orders 11988 and 13690: 55.12(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.

Supporting documentation

[FIRMETTE \(Lehi City Sidewalk\).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

- ✓ Advisory Council on Historic Preservation Not Required

- ✓ 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:

Consulted with SHPO, no historic properties will be impacted. ACHP not required.
Tribe checklist completed. No consult necessary.

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:**

400 East between 400 North and 600 North, and 600 N between 300 E and 400 E in Lehi City, Utah

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
400 East 400 North and 600 North Lehi City Utah	Not Eligible	Yes	✓ Not Sensitive
600 N 300 E and 400 E Lehi City, Utah	Not Eligible	Yes	✓ Not Sensitive

Additional Notes:

400 East between 400 North and 600 North, and 600 N between 300 E and 400 E in Lehi City, Utah

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

Yes

✓ No

Step 3 –Assess Effects of the Project on Historic Properties

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

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

✓ No Historic Properties Affected

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

Document reason for finding:

✓ No historic properties present.

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

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106.

Supporting documentation

[25-2183.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

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

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

New construction for residential use

Rehabilitation of an existing residential property

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

An interstate land sales registration

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

✓ None of the above

Screen Summary

Compliance Determination

Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

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

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

Yes

✓ No

2. Is the project located on a sole source aquifer (SSA)?

A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

✓ No

Based on the response, the review is in compliance with this section. Document and upload documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area, below.

Yes

Screen Summary

Compliance Determination

The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[Lehi FY25 Sole Source Aquifer Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

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

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

No

✓ Yes

2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.

"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."

✓ No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.

Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination

Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

Screen Summary

Compliance Determination

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.

Supporting documentation

[Lehi City Wetlands.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

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

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

✓ No

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

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

Screen Summary

Compliance Determination

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. The only two WSR in Utah are the Green and Virgin River. Neither of which is in Utah County, Utah, where this project will take place.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Environmental Justice

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

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

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

Yes

✓ No

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

Screen Summary

Compliance Determination

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

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No