

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

Project Information

Project Name: Millington-Senior-Village

HEROS Number: 900000010474728

Start Date: 06/04/2025

Responsible Entity (RE): MARYLAND DEPARTMENT OF HOUSING AND COMMUNITY
DEVELOPMENT, 7800 Harkins Road Lanham MD, 20706

RE Preparer: Jonea Banks

State / Local Identifier:

Certifying Officer: Jack Daniels

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: 172 Sassafras St, Millington, MD 21651

Additional Location Information:

172 Sassafras St, Millington, MD 21651 Geo-coded address: 172 Sassafras St, Millington, MD 21651-2054 Longitude: -75.837477 Latitude: 39.263021

Direct Comments to: dhcd.specialloans@maryland.gov

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

Millington Senior Village is a planned cottage-style development located on 2 parcels subdivided from the former Millington Elementary School property located in the Town of Millington. The project will consist of up to fifty-two (52) one-story apartments, a leasing office and community space. The new units will serve an age-restricted population of households where tenants will be sixty-two (62) years of age or older. All units will be fully accessible, and the entire site will be designed and constructed to universal standards. The leasing space and senior community center will serve the senior residences of the Millington Senior Village community. The site is flat, level with relatively new infrastructure stubbed on Sassafras Street.

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

Millington Senior Village is a planned cottage-style development located on 2 parcels subdivided from the former Millington Elementary School property located in the Town of Millington. The project will consist of up to fifty-two (52) one-story apartments, a leasing office and community space. The new units will serve an age-restricted population of households where tenants will be sixty-two (62) years of age or older. All units will be fully accessible, and the entire site will be designed and constructed to universal standards. The leasing space and senior community center will serve the senior residences of the Millington Senior Village community. The site is flat, level with relatively new infrastructure stubbed on Sassafras Street.

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

The Project is comprised of two parcels as shown on the attached plat - Stage B Millington, prepared by the Atwell Group. The entire property was deeded into the Town of Millington from Kent County Commissioners in November 2022, annexed into the Town in January 2023. Where inially, in the first two submissions to Maryland CDA in December 2019 and December 2022, the project consisted of two parcels bisected by MD Route 313 (Sassafras Street). Now, based on inial comments from CDA, the developer has switched the project so that all development will occur

on the east side of Sassafras Street as depicted in the Karins Stage B plat. All zoning is in place to develop the project as it is currently depicted. The former elementary school building is to be retained in ownership by the Town and used as a regional community center with plans to provide space for a food pantry operation, children's day care and health services.

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:

[Publication DHCD Website.docx](#)

[Millington Public Notice.pdf](#)

[MILLINGTON CLEARINGHOUSE LETTER.pdf](#)

7015.15 certified by Certifying Officer 10/30/2025
on:

7015.16 certified by Authorizing Officer
on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
M-25-SG-24-0100	Community Planning and Development (CPD)	HOME Program	\$1,600,000.00

Estimated Total HUD Funded, Assisted or Insured Amount: \$11,318,400.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$1,600,000.00

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

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determination (See Appendix A for source determinations)</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6</p>		
<p>Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>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.</p>
<p>Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>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. Attached is a site map dated 06/04/2025 from Fish and Wildlife CBRS Mapper indicating the project site is clear. On behalf of Danielle Spendiff (MD Federal Consistency Coordinator), I am responding to your request for CZM consistency concurrence under 15 C.F.R. Part 930, Subpart C (Federal Activity or Development Project) for the following project: Funding from the U.S. Department of Housing and Urban Development (HUD) will facilitate the construction of the Millington Senior Village community, located at 172 Sassafras St, Millington, Maryland. Project plans include building 52 units, along with a leasing center and senior community space that will be centrally located on the site to allow convenient access for tenants. The leasing center will occupy approximately 2200 square feet of renovated space in the former Millington Elementary School building. The leasing space and community center will serve the senior residences. Based on our review of the information provided, the above project is consistent with the enforceable coastal policies of the Maryland Coastal Zone Management Program with the</p>

		<p>following conditions: Activities that result in an earth disturbance are subject to the requirements outlined in the Annotated Code of Maryland, Environment Article, Title 4 and COMAR 26.17.01. These activities shall have an erosion and sediment control plan approved by the appropriate approval authority, including following the stabilization requirements set forth in COMAR 26.17.01.07 and "2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control," as may be amended. Enforceable Policy: 5.1.1 Quality of Life Policy 10 - Erosion & Sediment Control. Development or redevelopment of land for residential, commercial, industrial, or institutional use shall include stormwater management compliant with the Environmental Site Design sizing criteria, recharge volume, water quality volume, and channel protection storage volume criteria. MDE (C9) COMAR 26.17.02.01, -.06. Enforceable Policy: 5.3.9 Development Policy 3 - Stormwater Management. For any tree removal, please work with the county to ensure compliance with the Forest Service Conservation Act. MD. Natural Resources Code s. 5-1602 (2023). Enforceable Policy: Forest Policy 2 - Maintain Resource Sustainability & Prevent or Limit Clear-Cutting to Protect Watersheds. Please note that this determination does not obviate the applicant's responsibility to obtain any other State or local approvals that may be necessary for the project.</p>
<p>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</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 does not require flood insurance or is excepted from flood insurance. While flood insurance</p>

		<p>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. Attached is a FEMA Map dated 06/04/2025 map number 24029C0214D with an effective date of 06/09/2014 indicating the project is located in Zone X</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5</p>		
<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>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. The project is in compliance with the Clean Air Act Attached is AirNow.EPA map dated 06/04/2025 indicating the air quality as good.</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act. Attached is the map dated 06/04/2025. The coastal request was submitted on 06/04/2025. On behalf of Danielle Spendiff (MD Federal Consistency Coordinator), I am responding to your request for CZM consistency concurrence under 15 C.F.R. Part 930, Subpart C (Federal Activity or Development Project) for the following project: Funding from the U.S. Department of Housing and Urban Development (HUD) will facilitate the construction of the Millington Senior Village community, located at 172 Sassafras St, Millington, Maryland. Project plans include building 52 units, along with a leasing center and senior community space that will be centrally located on the site to allow convenient access for tenants. The leasing center</p>

		<p>will occupy approximately 2200 square feet of renovated space in the former Millington Elementary School building. The leasing space and community center will serve the senior residences. Based on our review of the information provided, the above project is consistent with the enforceable coastal policies of the Maryland Coastal Zone Management Program with the following conditions: Activities that result in an earth disturbance are subject to the requirements outlined in the Annotated Code of Maryland, Environment Article, Title 4 and COMAR 26.17.01. These activities shall have an erosion and sediment control plan approved by the appropriate approval authority, including following the stabilization requirements set forth in COMAR 26.17.01.07 and "2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control," as may be amended. Enforceable Policy: 5.1.1 Quality of Life Policy 10 - Erosion & Sediment Control. Development or redevelopment of land for residential, commercial, industrial, or institutional use shall include stormwater management compliant with the Environmental Site Design sizing criteria, recharge volume, water quality volume, and channel protection storage volume criteria. MDE (C9) COMAR 26.17.02.01, -.06. Enforceable Policy: 5.3.9 Development Policy 3 - Stormwater Management. For any tree removal, please work with the county to ensure compliance with the Forest Service Conservation Act. MD. Natural Resources Code s. 5-1602 (2023). Enforceable Policy: Forest Policy 2 - Maintain Resource Sustainability & Prevent or Limit Clear-Cutting to Protect Watersheds. Please note that this determination</p>
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		<p>does not obviate the applicant's responsibility to obtain any other State or local approvals that may be necessary for the project.</p>
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA. 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. Construction or renovation of multi-family rental housing developments or facilities owned by the government, such as senior centers, community centers or other multi-use building, then grantees or subrecipients must install generators. The generator should have sufficient capacity to power, at a minimum, lighting in common areas. To properly install electric backup generators a reliable source of energy must be installed in the event of a power outage to operate the generator over the black out period. There are two sources available to the provide energy to the generator: liquid propane and natural gas.</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>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. The U.S. Fish and Wildlife Service (USFWS) Information, Planning and Conservation (IPaC) was accessed at http://ecos.fws.gov/ipac/. According to the IPaC Preliminary Species List generated for the subject property, no threatened, endangered, candidate or potentially endangered species have the potential to be located within the</p>

		<p>subject property boundaries. The project will have no effect on Federally designated critical habitat. Certain birds are protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures. Migratory Birds found in the area are Bald Eagle <i>Haliaeetus leucocephalus</i>, Bobolink <i>Dolichonyx oryzivorus</i>, Chimney Swift <i>Chaetura pelagica</i>, Kentucky Warbler <i>Oporornis formosus</i>, Lesser Yellowlegs <i>Tringa flavipes</i>, Pectoral Sandpiper <i>Calidris melanotos</i>, Prothonotary Warbler <i>Protonotaria citrea</i>, Rusty Blackbird <i>Euphagus carolinus</i>, Short-billed Dowitcher <i>Limnodromus griseus</i>, Wood Thrush <i>Hylocichla musteli</i>. The NEPA report identifies multiple species of animals that are species of concern, threatened or endangered including Clams, Insects, Amphibians, Birds, Fishes, Crustaceans, Flowering Plants, Mammals and Reptiles.</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. Attached is a NEPA assist map date 06/05/2025 indicating toxic places surrounding the project not in its immediate area</p>
<p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act. Attached is a NEPA assist map dated 06/05/2025.</p>

<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. Attached is a FEMA Flood Map dated 06/04/2025 area map number 24026C0214D with an effective date of 06/09/2014 indicating this project is in Zone X.</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106. MHT Response: Thank you for providing the Maryland Historical Trust the opportunity to comment on the above-referenced undertaking using the MHT e106 system. The Maryland Historical Trust has reviewed the submitted project for its effects on historic and archeological resources, pursuant to Section 106 of the National Historic Preservation Act of 1966 and/or the Maryland Historical Trust Act of 1985. We offer the following comments and/or concurrence with the agency's findings: The undertaking will have no effect on historic properties. Additional consultation with our office may be required if there are any significant changes in project scope or location.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Preliminary Screening identified no noise generators in the vicinity of the project. The project is in compliance with HUD's Noise regulation. Attached are NEPAAssis maps dating 06/05/2025 indicating the project is in compliance. They are two trains, approximately 2,000 feet by Sassafra Street that travels two times as day, with a noise calculation of 52</p>
<p>Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements. NEPAAssist map dated on 06/05/2025 is attached.</p>

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. Attached is a NEPAAssist maps dating 06/05/2025
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. Attached is a NEPAAssist map indicating this project is clear of any rivers.
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	2	There are no zoning, building, safety, environmental or other federal, state or local laws, regulations or codes which would prohibit or impair the development. The subject project will be developed, marketed and operated in compliance with all applicable laws, regulations and codes	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	There are no zoning, building, safety, environmental or other federal, state or local laws, regulations or codes which would prohibit or impair the development.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		The subject project will be developed, marketed and operated in compliance with all applicable laws, regulations and codes	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	No hazardous structures are currently located on this subject property	
SOCIOECONOMIC			
Employment and Income Patterns	2	A small, predominantly owner-occupied community with a mix of manufacturing and service-based employment. The largest employment sectors for Millington residents are Manufacturing (64 people), Educational Services (49 people), and accommodation & Food Services (47 people) Production occupations are most common (53 people), followed by Office & Administrative Support (44 people) and Food Preparation & Serving (44 people). The vast majority of workers (79.3%) drive alone to work, with an average commute time of 22.1 minutes, which is shorter than the national average. The median household income in Millington was \$60,625 in 2023, rising from \$51,016 in 2022, representing an 18.8% increase. In 2023, median earnings for men were \$45,250, while women earned a median of \$37,708. The poverty rate in Millington is approximately 14.3%-15.78% of the population, which is higher than the national average of 12.4%.	
Demographic Character Changes / Displacement	2	The project explicitly targets senior residents, potentially shifting the local demographic towards an older population, supplementing the current median age of 37.8 in Millington. The project is characterized as adaptive reuse of a former school rather than the demolition of existing residential housing. The investment is expected to act as a catalyst for future development, with plans to attract new, more diverse housing within three years.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Environmental Justice EA Factor	1	Unforeseen issues will acquire adoptive language.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	Replacing the former elementary school to provide residential, social, and cultural amenities. The project includes walking trails and a community garden, fostering community interaction and improved quality of life for residents. Educational and cultural access is supported by proximity to town services and neighboring Kent County facilities.	
Commercial Facilities (Access and Proximity)	2	Benefits from close proximity to local amenities, including the Millington Pool (with pickleball/tennis courts and picnic areas) on N Sassafras St. Planned developments nearby include a food bank, library, post office, hair salon, and a commercial kitchen. A food bank and the Town Office/Library are included in nearby revitalization plans. The location is adjacent to Cypress Branch State Park, featuring planned trails.	
Health Care / Social Services (Access and Capacity)	2	The town focuses on maintaining adequate public services to support the health, safety, and welfare of residents. Key health care, social services, and related emergency capacities for 172 Sassafras Street, Millington, MD include proximity to regional medical centers, local fire/EMS services, and Kent County social service resources. The Millington Volunteer Fire Company provides fire and emergency medical services (EMS) for the town, ensuring quick response times for residents on Sassafras Street. While Millington has limited direct healthcare facilities, it is served by regional hospitals in surrounding counties, including Chester River Hospital Center in Chestertown. Local access is supplemented by nearby clinics and providers in Kent County, which are monitored by the town for capacity. Services, including specialized care for	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>seniors or low-income residents, are largely managed through Kent County agencies, which are accessible to Millington residents. The area relies on regional support for community facilities, focusing on maintaining existing, reliable services rather than building large new facilities within the town limits.</p>	
<p>Solid Waste Disposal and Recycling (Feasibility and Capacity)</p>	<p>2</p>	<p>Solid waste disposal and recycling services for 172 Sassafras Street in Millington, MD, are managed through Kent County, which provides comprehensive, feasible, and capacity-sufficient services to the residential and commercial properties in the town. Residents in Millington typically have access to weekly curbside trash pickup and regular recycling services provided by contracted waste management companies, as overseen by the Kent County Department of Public Works. The town, as part of Kent County, participates in a single-stream recycling program, which supports the reduction of waste entering landfills. The county manages waste disposal capacity through designated, regulated, and permitted facilities. The infrastructure is robust enough to accommodate the current and planned growth in the Millington area, including initiatives for community development.</p>	
<p>Waste Water and Sanitary Sewers (Feasibility and Capacity)</p>	<p>2</p>	<p>Located in an area serviced by the town's municipal wastewater system, which is currently undergoing a significant, \$15.8 million upgrade to an Enhanced Nutrient Removal plant. This new facility will increase capacity to 350,000 gallons per day to support planned growth. The existing wastewater treatment plant has a capacity of 105,000 gallons per day, with recent average flows around 73,000 gallons per day. A new, larger facility is being constructed to replace the old plant, enhancing capacity to 350,000 gallons per day. Sewer service for this area is managed</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		under the town's 10-year Water and Sewerage Plan, aimed at promoting efficient land use.	
Water Supply (Feasibility and Capacity)	2	Is serviced by the municipal system, which is undergoing upgrades to expand capacity. The town is replacing its wastewater system to handle 100,000 gallons per day, ensuring improved service feasibility, as detailed in the Maryland Department of the Environment website. The town is actively upgrading its facilities, including building a new, flood-proof wastewater treatment plant, as mentioned on the Kent County, MD website. The wastewater plant capacity is being expanded to gallons per day, notes the Maryland Department of the Environment website. Future development and water supply needs are addressed in the Town of Millington's Comprehensive Plan, which examines existing community facilities.	
Public Safety - Police, Fire and Emergency Medical	2	Primarily provided by local volunteer and county agencies. Key services include the Community Fire Company of Millington located at 185 Sassafras St for fire/EMS and Kent County Sheriff/Maryland State Police for law enforcement. Police services are covered by the Kent County Sheriff's Office and the Maryland State Police (Centerville Barrack).	
Parks, Open Space and Recreation (Access and Capacity)	2	Incorporates new, accessible, on-site community facilities, including walking trails and a community garden. This project adds dedicated open space, enhancing existing town recreation, while supporting the surrounding area's need for accessible, senior-friendly amenities. The development includes walking trails and a community garden, designed to provide accessible recreation for residents. The site is being transformed into a vibrant area, improving accessibility to community facilities for residents.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Transportation and Accessibility (Access and Capacity)	2	The project aims to enhance community accessibility and connects to the town's existing infrastructure and services. The location supports local, walkable access to amenities. Situated in the center of Millington, providing walkable access to local businesses and services.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	Located within Kent County, a region characterized by rich agricultural soils, significant tidal marshes, non-tidal wetlands, and woodlands. Water resources nearby include the Chester River and its tributaries, which are central to the local ecosystem, alongside the Chesapeake Bay and various small ponds	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	Located in a rural, environmentally area near the Chester River watershed. Development requires compliance with town policies aimed at conserving habitats, protecting wetlands, and minimizing disruption to local vegetation and wildlife through careful design.	
Other Factors 1			
Other Factors 2			
CLIMATE AND ENERGY			
Climate Change	1	This project will have no impact to the climate change	
Energy Efficiency	1	Base Level Energy Standards will be incorporated into the project design and final work product.	

Supporting documentation
[Millington Aerial Photos.pdf](#)

Additional Studies Performed:

Field Inspection [Optional]: Date and completed by:

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

Interview with Town of Millington Town Administrator, Elizabeth Jo Manning, identified no records or history of hazardous materials on this property. Discussion with State of Maryland Department of Environmental personnel identified no records of history of hazardous materials on this or surrounding properties. Maryland Historical Trust (MHT) Maryland Department of Natural Resources/Wildlife & Heritage Service US Fish & Wildlife Service

List of Permits Obtained:

All required permits will be obtained before construction starts.

Public Outreach [24 CFR 58.43]:

Public notice (FONSI) published Kent County News & DHCD website. Copies of the published notice (FONSI/RROF) sent to: US Environmental Protection Agency (EPA) NEPA Team Leader-EPA -Region III Maryland State Clearinghouse Environmental Review Unit. Maryland Department of Natural Resources environmentreview@dhr.state.md.us Maryland Department of Environment Maryland Historical Trust MDOT

Cumulative Impact Analysis [24 CFR 58.32]:

This project does not constitute an environmental risk- The natural environment will not be adversely affected by the undertaking of the project.

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

No alternatives to the action were considered

No Action Alternative [24 CFR 58.40(e)]

No alternatives to the action were considered

Summary of Findings and Conclusions:

Sussex Environmental Consultants, LLC (SEC) performed a Phase 1 Environmental Site Assessment (ESA) in conformance with the scope and limitations of ASTM Practice E1527-21 of the property at 172 Sassafras Street, Millington, Maryland (subject property). This assessment has revealed no evidence of recognized environmental conditions (RECs) in connection with the subject property.

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
<p>Any above ground or underground petroleum storage tanks, which may be utilized, must be installed and maintained in accordance with applicable State and federal laws and regulations. Underground storage tanks must be registered and the installation must be conducted and performed by a contractor certified to install underground storage tanks by the Land and Materials Administration</p>	<p>To properly install electric backup generators a reliable source of energy must be installed in the event of a power outage to operate the generator over the black out period. For the Millington learning center, there are two sources available to the provide energy to the generator: liquid propane and natural gas.</p>	<p>N/A</p>	<p>HPCC proposes to install a propane tank to provide the backup energy like what was installed at the Cecilton Early Childhood Learning Center. The design and permitting of the system will follow all local and state regulations for such a commercial application. The exact placement and location of the generator and accompanying energy system, including the LP tank, will be reviewed and approved with the</p>	

			owner of the building - The Town of Millington - and comply with all code requirements.	
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Project Mitigation Plan

HPCC proposes to install a propane tank to provide the backup energy like what was installed at the Cecilton Early Childhood Learning Center. The design and permitting of the system will follow all local and state regulations for such a commercial application. The exact placement and location of the generator and accompanying energy system, including the LP tank, will be reviewed and approved with the owner of the building - The Town of Millington - and comply with all code requirements.

[Millington Senior Village Response Letter\(1\).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 Millington.docx](#)

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

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. Attached is a site map dated 06/04/2025 from Fish and Wildlife CBRS Mapper indicating the project site is clear. On behalf of Danielle Spendiff (MD Federal Consistency Coordinator), I am responding to your request for CZM consistency concurrence under 15 C.F.R. Part 930, Subpart C (Federal Activity or Development Project) for the following project: Funding from the U.S. Department of Housing and Urban Development (HUD) will facilitate the construction of the Millington Senior Village community, located at 172 Sassafras St, Millington, Maryland. Project plans include building 52 units, along with a leasing center and senior community space that will be centrally located on the site to allow convenient access for tenants. The leasing center will occupy approximately 2200 square feet of renovated space in the former Millington Elementary School building. The leasing space and community center will serve the senior residences. Based on our review of the information provided, the above project is consistent with the enforceable coastal policies of the Maryland Coastal Zone Management Program with the following conditions: Activities that result in an earth disturbance are subject to the requirements outlined in the Annotated Code of Maryland, Environment Article, Title 4 and COMAR 26.17.01. These activities shall have an erosion and sediment control plan approved by the appropriate approval authority, including following the stabilization requirements set forth in COMAR 26.17.01.07 and "2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control," as may be amended. Enforceable Policy: 5.1.1 Quality of Life Policy 10 - Erosion & Sediment Control. Development or redevelopment of land for residential, commercial, industrial, or institutional use shall

include stormwater management compliant with the Environmental Site Design sizing criteria, recharge volume, water quality volume, and channel protection storage volume criteria. MDE (C9) COMAR 26.17.02.01, -.06. Enforceable Policy: 5.3.9 Development Policy 3 - Stormwater Management. For any tree removal, please work with the county to ensure compliance with the Forest Service Conservation Act. MD. Natural Resources Code s. 5-1602 (2023). Enforceable Policy: Forest Policy 2 - Maintain Resource Sustainability & Prevent or Limit Clear-Cutting to Protect Watersheds. Please note that this determination does not obviate the applicant's responsibility to obtain any other State or local approvals that may be necessary for the project.

Supporting documentation

[CZM Conditional Concurrence 172 Sassafras Street MillingtonMD 21651.pdf](#)
[Coastal Millington.docx](#)

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. Attached is a FEMA Map dated 06/04/2025 map number 24029C0214D with an effective date of 06/09/2014 indicating the project is located in Zone X

Supporting documentation

[Flood Millington.pdf](#)

Are formal compliance steps or mitigation required?

Millington-Senior-Village

Millington, MD

900000010474728

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. The project is in compliance with the Clean Air Act Attached is AirNow.EPA map dated 06/04/2025 indicating the air quality as good.

Supporting documentation

[Air Quality Millington.docx](#)

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. Attached is the map dated 06/04/2025. The coastal request was submitted on 06/04/2025. On behalf of Danielle Spendiff (MD Federal Consistency Coordinator), I am responding to your request for CZM consistency concurrence under 15 C.F.R. Part 930, Subpart C (Federal Activity or Development Project) for the following project: Funding from the U.S. Department of Housing and Urban Development (HUD) will facilitate the construction of the Millington Senior Village community, located at 172 Sassafras St, Millington, Maryland. Project plans include building 52 units, along with a leasing center and senior community space that will be centrally located on the site to allow convenient access for tenants. The leasing center will occupy approximately 2200 square feet of renovated space in the former Millington Elementary School building. The leasing space and community center will serve the senior residences. Based on our review of the information provided, the above project is consistent with the enforceable coastal policies of the Maryland Coastal Zone Management Program with the following conditions: Activities that result in an earth disturbance are subject to the requirements outlined in the

Annotated Code of Maryland, Environment Article, Title 4 and COMAR 26.17.01. These activities shall have an erosion and sediment control plan approved by the appropriate approval authority, including following the stabilization requirements set forth in COMAR 26.17.01.07 and "2011 Maryland Standards and Specifications for Soil Erosion and Sediment Control," as may be amended. Enforceable Policy: 5.1.1 Quality of Life Policy 10 - Erosion & Sediment Control. Development or redevelopment of land for residential, commercial, industrial, or institutional use shall include stormwater management compliant with the Environmental Site Design sizing criteria, recharge volume, water quality volume, and channel protection storage volume criteria. MDE (C9) COMAR 26.17.02.01, -.06. Enforceable Policy: 5.3.9 Development Policy 3 - Stormwater Management. For any tree removal, please work with the county to ensure compliance with the Forest Service Conservation Act. MD. Natural Resources Code s. 5-1602 (2023). Enforceable Policy: Forest Policy 2 - Maintain Resource Sustainability & Prevent or Limit Clear-Cutting to Protect Watersheds. Please note that this determination does not obviate the applicant's responsibility to obtain any other State or local approvals that may be necessary for the project.

Supporting documentation

[CZM Conditional Concurrence 172 Sassafras Street MillingtonMD 21651\(1\).pdf](#)
[Coastal Millington\(1\).docx](#)

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:

Per ESA, no findings of nearby toxic, hazardous, or radioactive substances
Tooltip (excluding radon) not found that could affect the health and safety of
project occupants or conflict with the intended use of the property

Yes

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

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

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

✓ Yes

Explain:

No findings of Radon gas per the ESA Phase 1

No

* Notes:

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

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

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA. 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. Construction or renovation of multi-family rental housing developments or facilities owned by the government, such as senior centers, community centers or other multi-use building, then grantees or subrecipients must install generators. The generator should have sufficient capacity to power, at a minimum, lighting in common areas. To properly install electric backup generators a reliable source of energy must be installed in the event of a power outage to operate the generator over the black out period. There are two sources available to provide energy to the generator: liquid propane and natural gas.

Supporting documentation

[ASTM SUMMARY MILLINGTON.pdf](#)

[MSV School Building NEPA.pdf](#)

[MSV LAND Phase I NEPA.docx](#)

[ASTM Millington.pdf](#)

[Millington Senior Village Response Letter.pdf](#)

[Radon Millington.docx](#)

[Contamination and Toxic Substances Millington.docx](#)

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

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. The U.S. Fish and Wildlife Service (USFWS) Information, Planning and Conservation (IPaC) was accessed at <http://ecos.fws.gov/ipac/>. According to the IPaC Preliminary Species List generated for the subject property, no threatened, endangered,

candidate or potentially endangered species have the potential to be located within the subject property boundaries. The project will have no effect on Federally designated critical habitat. Certain birds are protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act. Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures. Migratory Birds found in the area are Bald Eagle *Haliaeetus leucocephalus*, Bobolink *Dolichonyx oryzivorus*, Chimney Swift *Chaetura pelagica*, Kentucky Warbler *Oporornis formosus*, Lesser Yellowlegs *Tringa flavipes*, Pectoral Sandpiper *Calidris melanotos*, Prothonotary Warbler *Protonotaria citrea*, Rusty Blackbird *Euphagus carolinus*, Short-billed Dowitcher *Limnodromus griseus*, Wood Thrush *Hylocichla musteli*. The NEPA report identifies multiple species of animals that are species of concern, threatened or endangered including Clams, Insects, Amphibians, Birds, Fishes, Crustaceans, Flowering Plants, Mammals and Reptiles.

Supporting documentation

[Endangered Species Millington.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. Attached is a NEPAassist map date 06/05/2025 indicating toxic places surrounding the project not in its immediate area

Supporting documentation

[Explosive and Flammable Millington.docx](#)

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. Attached is a NEPAassist map dated 06/05/2025.

Supporting documentation

[Farmland Millington.docx](#)

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. Attached is a FEMA Flood Map dated 06/04/2025 area map number 24026C0214D with an effective date of 06/09/2014 indicating this project is in Zone X.

Supporting documentation

[Flood Millington\(1\).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).

Threshold (b). Document and upload the memo or explanation/justification of the other determination below:

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

Screen Summary

Compliance Determination

Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106. MHT Response: Thank you for providing the Maryland Historical Trust the opportunity to comment on the above-referenced undertaking using the MHT e106 system. The Maryland Historical Trust has reviewed the submitted project for its effects on historic and archeological resources, pursuant to Section 106 of the National Historic Preservation Act of 1966 and/or the Maryland Historical Trust Act of 1985. We offer the following comments and/or concurrence

with the agency's findings: The undertaking will have no effect on historic properties. Additional consultation with our office may be required if there are any significant changes in project scope or location.

Supporting documentation

[MHT e106 project review MHT Completed Comments.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

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

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

4. 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).

Indicate the findings of the Preliminary Screening below:

- There are no noise generators found within the threshold distances above.

Based on the response, the review is in compliance with this section. Document and upload a map showing the location of the project relative to any noise generators below.

Noise generators were found within the threshold distances.

Screen Summary

Compliance Determination

The Preliminary Screening identified no noise generators in the vicinity of the project. The project is in compliance with HUD's Noise regulation. Attached are NEPAAssis maps dating 06/05/2025 indicating the project is in compliance. They are two trains, approximately 2,000 feet by Sassafras Street that travels two times as day, with a noise calculation of 52

Supporting documentation

[Noise Abatement Millington.docx](#)

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

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. NEPAassist map dated on 06/05/2025 is attached.

Supporting documentation

[Sole Source Aquifers Millington.docx](#)

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. Attached is a NEPAAssist maps dating 06/05/2025

Supporting documentation

[Wetlands Millington 1.docx](#)

[Wetlands Millington.docx](#)

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. Attached is a NEPAassist map indicating this project is clear of any rivers.

Supporting documentation

[Wild and Scenic Rivers Millington .docx](#)

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