

Environmental Assessment



VOA SENIOR RESIDENCES
E. DRAKE RD./JOSEPH
ALLEN DR.
FORT COLLINS, CO

PREPARED FOR
VOLUNTEERS OF AMERICA

PREPARED BY
MINIELLO CONSULTING

Environmental Assessment

Determinations and Compliance Findings for HUD-assisted Projects

24 CFR Part 58

Project Information

Project Name: VOA Senior Residences

Responsible Entity: City of Fort Collins

Grant Recipient (if different than Responsible Entity): Volunteers of America

State/Local Identifier:

Preparer: Kristi H. Miniello, Miniello Consulting

Certifying Officer Name and Title: Beth Sowder, Director of Social Sustainability

Consultant (if applicable): Miniello Consulting

Direct Comments to: Douglas Snyder, Senior Development Director, Volunteers of America; (303) 726-1055, dsnyder@voa.org

Project Location: E. Drake Rd. & Joseph Allen Dr., Fort Collins, CO

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]: Volunteers of America proposes to construct one new building comprised of 55 units for seniors earning incomes between 20% and 80% of the Area Median Income (AMI) for Larimer County. The 53,904 ft² wood-frame structure will be built on top of a slab-on-grade foundation. Vertical access will be through two elevators, as well as two stairways. The project will consist of a three-story stick-framed structure, surface parking, outdoor recreation areas, a gardening area, landscaped areas, sidewalks, and adjustments to an existing detention pond. Exterior materials will include brick and hardi-plank.

The building will house 39 one-bedroom units, 16 two-bedroom units, resident community spaces, and business offices. Unit or apartment amenities are similar to other new affordable and market rate apartment developments and include in-unit storage areas, in-unit washers and dryers, and energy efficient appliances such as built-in microwaves. Resident common area amenities will include a living/community room/kitchen, small resident conference room, business center, library, on-site service coordinator, free Wi-Fi, and bicycle storage. The design incorporates many accessible features to support future residents with disabilities, including three accessible units.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]: The purpose of the proposed action is to construct a three-story building with 55 affordable units for senior citizens. The proposed action is need in order to address several policies and goals identified in the City Plan (2011) and Affordable Housing Strategic Plan (2015-2019), including increasing the inventory of affordable rental units and increasing housing and associated supportive services for people with special needs. Without projects such as this one, there will be a significant unmet demand for more age-qualified affordable rentals.

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Existing Conditions and Trends [24 CFR 58.40(a)]: The site is currently vacant and is surrounded by single-family homes and multi-family apartment buildings. It is ideally located with access to numerous commercial amenities, public transportation, and the Power Trail (pedestrian/bicycle trail). The proposed project would meet the goals identified in the City Plan (2019) and Affordable Housing Strategic Plan (2015-2019) by contributing to affordable housing options.

Funding Information

Grant Number	HUD Program	Funding Amount
—	8 Project-Based Vouchers	\$0

Estimated Total HUD Funded Amount: 8 Project-Based Vouchers (\$0)

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$14,600,000

Determination:

X **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

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

The project may significantly affect the quality of the human environment.

Preparer Signature: Kristi H. Miniello Date: 09/10/2020

Name/Title/Organization: Kristi H. Miniello/Owner – Miniello Consulting

Certifying Officer Signature: Beth Sowder Date: 9/15/2020
DocuSigned by:
B825F842A755460...

Name/Title: Beth Sowder/Director of Social Sustainability

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

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

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No X	According to the Federal Aviation Administration (FAA), the proposed project site is not within 2,500 feet of a civilian airport or 15,000 feet of a military airport. No further action or mitigation is required. <i>See Appendix B for supporting documentation.</i>
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No X	No coastal barriers are identified in HUD Region 8, in the HUD Office of Native Americans, Northern Plains, or within the states of CO, MT, NE, ND, SD, UT and WY. No further action or mitigation is required. <i>See Appendix C for supporting documentation.</i>
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No X	The undertaking is not located in an area where HUD disaster assistance is being made available. The property is not located in a Special Flood Hazard Area (SFA). No further action or mitigation is required. <i>See Appendix C for supporting documentation.</i>
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No X	The Colorado Department of Public Health and Environment (CDPHE) is the primary authority for protecting air quality in Colorado under the Colorado Air Pollution Prevention and Control Act. Per CDPHE, land development construction activities that are greater than 25 acres or more than six months in duration require an Air Pollutant Emissions Notice (APEN) and may require an air permit (see CDPHE, Air Pollution Control Division, Guidelines for Land Development). This undertaking takes place on a site that is less than 25 acres; however, demolition and construction activities are scheduled for a duration of approximately 14 months. As such, the developer will be responsible for submitting a land development APEN to CDPHE before starting construction.

Clean Air (cont.)		<p>According to the EPA Green Book, Larimer County is a nonattainment area for 8-hour ozone (https://www3.epa.gov/airquality/greenbook/jbtc.html). In accordance with EPA guidelines under the Clean Air Act, new development can be established when the source will not cause or exacerbate a violation of a national air quality standard. This project activity is not expected to cause or exacerbate a violation of a national air quality standard or further cause a violation of the State Implementation Plan (SIP).</p> <p><i>See Appendix D for supporting documentation.</i></p>
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No X	<p>Pre-determined by HUD: Not applicable for the states of CO, MT, ND, NE, SD, UT and WY.</p>
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No X	<p>Phase I Environmental Site Assessment (ESA) Summary</p> <p>A.G. Wassenaar, Inc. (AGW) performed a Phase I ESA of the subject property on February 18, 2019 and noted the following in its report:</p> <ul style="list-style-type: none"> • Two Voluntary Cleanup and Redevelopment Program (VCRA) sites • One Emergency Response Notification System (ERNS), was identified within 0.25 mile of the subject property <p>None of the facilities present a recognized environmental condition (REC).</p> <p>The results of a search of hazardous waste generators through NEPAassist revealed the presence of three RCRA facilities within 1.0 mile of the subject property. None of the facilities reported violations and do not present a hazard to the subject property.</p> <p>The subject property is located in U.S. EPA Radon Zone 1, which has a predicted average indoor screening level above the action level of 4.0 pCi/L. A passive radon mitigation system will be included in the building foundation. Post-construction testing will be conducted, and the system will be turned on if levels exceed 4.0 pCi/L.</p> <p><i>See Appendix D for supporting documentation.</i></p>
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No X	<p>An Official Species List was generated on June 15, 2020 through the U.S. Fish and Wildlife Service (USFWS), Colorado Ecological Services Field Office. No critical habitats were identified on or near the project site. The following threatened, endangered, or candidate species were included on the list:</p>

Endangered Species (cont.)		<ul style="list-style-type: none"> • Canada Lynx (<i>Lynx canadensis</i>), prefers classic boreal forest with deep snow and a high-density population of snowshoe hares • Preble's Meadow Jumping Mouse (<i>Zapus hudsonius preblei</i>), prefers riparian vegetation that borders streams and other waterbodies • Least Tern (<i>Sterna antillarum</i>) • Mexican Spotted Owl (<i>Strix occidentalis lucida</i>), prefers canyon and montane forest habitats • Piping Plover (<i>Charadrius melodus</i>) • Whooping Crane (<i>Grus americana</i>) • Greenback Cutthroat Trout (<i>Oncorhynchus clarkii stomias</i>) • Pallid Sturgeon (<i>Scaphirhynchus albus</i>) • Ute Ladies'-tresses (<i>Spiranthes diluvialis</i>), occurs along riparian edges, gravel bars, old oxbows, high flow channels, and moist to wet meadows along perennial streams • Western Prairie Fringed Orchid (<i>Platanthera praeclara</i>), occurs most often in mesic to wet unplowed tall grass prairies and meadows <p>The USFWS IPaC report noted the potential for the presence of several migratory birds. It also states that Least Tern, Piping Plover, Whooping Crane, and Pallid Sturgeon only need to be considered in the event of water-related activities/use in the North Platte, South Platte, and Laramie River Basins. Site characteristics limit the potential for the the presence of the all listed species. The undertaking will have No Effect on threatened, endangered, or candidate species or migratory birds. No further action or mitigation is required.</p> <p>See Appendix E for supporting documentation.</p>
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No X	<p>A search of the Colorado Storage Tank Information System (COSTIS) revealed the presence of three aboveground storage tanks (ASTs) within 1.0 mile or less of the project site. All three are located on the City of Fort Collins Police Services Building property at 2221 Timberline Rd. Two of the tanks each have 1,000-gallon capacities, while the third has an 850-gallon capacity; they are all located approximately 1,525 feet from project site.</p> <p>For the 1,000-gallon tanks, the Acceptable Separation Distance (ASD) for Thermal Radiation for People was calculated at 276.57 feet while the ASD for Thermal Radiation for Buildings was calculated at 50.28 feet.</p>

Explosive and Flammable Hazards (cont.)		For the 850-gallon tank, the Acceptable Separation Distance (ASD) for Thermal Radiation for People was calculated at 258.46 feet while the ASD for Thermal Radiation for Buildings was calculated at 46.64 feet. No further action or mitigation is required. <i>See Appendix F for supporting documentation.</i>
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No X	The vacant land on which the project is proposed is located in Fort Collins, Larimer County, which is an Urbanized Area. As such, the project site is not considered "farmland." No further action or mitigation is required. <i>See Appendix G for supporting documentation.</i>
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No X	This undertaking is not located in a floodplain, as determined by a review of Flood Insurance Rate Map (FIRMette) 08069C1000F (eff. 12/19/2006). <i>See Appendix C for supporting documentation.</i>
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No X	Aboveground resources within the Area of Potential Effects (APE) were evaluated by Kristi H. Miniello, a Secretary of the Interior Qualified Professional in Architectural History. No properties listed in or eligible for the National Register of Historic Places were identified. One previously unevaluated resource older than 50 years of age was evaluated (segment of Union Pacific's Dent Branch). Project information and a request for comments/ concurrence with the determination of no historic properties affected were sent to the Colorado Office of Archaeology and Historic Preservation (SHPO) and City of Fort Collins on June 22, 2020. On June 25, 2020, information was provided to Native American Tribes with an interest in Larimer County projects. The SHPO responded on June 29 and requested a cultural resource report for aboveground resources, as well as an evaluation of the project site by a qualified archaeologist. The archaeologist determined that there is little to no potential for subsurface cultural resources and/or remains in the APE. The results of the archaeological investigation, as well as a justification for why the additional report is not appropriate for a project of this scope and scale, were sent to the consulting parties on July 27, 2020. The SHPO responded on July 29, 2020 and concurred with the finding of No Historic Properties Affected.

Historic Preservation (cont.)		<p>The City of Fort Collins responded on July 15 and concurred with the eligibility of the railroad and finding. No responses were received from the tribes.</p> <p>In the event of unanticipated discovery, work will halt and potentially affected federally-recognized Tribes, the SHPO, and the Advisory Council on Historic Preservation (ACHP) will be notified within forty-eight (48) hours of discovery.</p> <p><i>See Appendix H for supporting documentation.</i></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	Yes No X	<p>Two major roads, E. Drake Ave. (east-west arterial) and S. Timberline Rd. (north-south arterial) are located within 1,000 feet of the project site. One railroad, Union Pacific - Dent Branch, is located within 3,000 feet of the project site with a single set of tracks. One airport, Northern Colorado Regional, is located within 15 miles of the project site. Annual air carrier, air taxi, military, and general aviation operations are all significantly less than the thresholds established by HUD that necessitate consideration for the noise calculation. Traffic volumes were obtained from the City's FC Maps and used for the 2030 project AADT. Railroad information was gathered from the U.S. DOT Crossing Inventory Form for that line, with HUD default values applied to unknown fields.</p> <p>Three Noise Assessment Locations (NALs) at the project site were used to calculate Day/Night Noise Levels. NAL #1 was positioned 6 1/2 feet from the southeast corner of the building where bedrooms will be located. NAL #2 was positioned in the outdoor patio near the building's southwest corner. NAL #3 was positioned 6 1/2 feet from the northwest corner of the buildings where additional bedrooms will be located closer to the railroad tracks. The DNLs were calculated as follows:</p> <ul style="list-style-type: none"> • NAL #1 = 71 dB (Normally Unacceptable) • NAL #2 = 74 dB (Normally Unacceptable) • NAL #3 = 70 dB (Normally Unacceptable) <p>Chapter 5, Article II, Division 2, Section 5-27.3603.3.1.1 titled Exterior Sound Transmission of the Fort Collins Municipal Building Code states that the wall assemblies making up the building thermal envelope shall have a composite sound transmission class (STCc) rating of 39 or greater if located within specific distances of highways, roadways, railways, etc.</p>

Noise Abatement and Control (cont.)			<p>D.L. Adams Associates completed an analysis of sound isolation performance of the proposed wall and window assemblies of the building envelope. The STCc ratings were as follows: 34 (North side), 35 (East), 33 (West), and 35 (South). Collectively, the entire building envelope has a STCc rating of 35, which effectively reduces interior noise levels below HUD's threshold.</p> <p>Regarding noise levels at the outdoor noise sensitive area, D.L. Adams determined through a barrier analysis that construction of a masonry wall measuring eight feet tall that extends around the entire patio area (depicted on plan sheet L2.00 in Appendix I) would reduce noise levels to 64.6 dB, which is within HUD's Acceptable range.</p> <p><i>See Appendix I for supporting documentation.</i></p>
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes	No X	<p>According to the U.S. EPA Region 8, there are currently no sole source aquifers designated in Colorado. No further action or mitigation is required.</p> <p><i>See Appendix C for supporting documentation.</i></p>
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes	No X	<p>This undertaking is not located in a wetland based on the U.S. Fish and Wildlife Services (USFWS) Wetlands Mapper and a site visit made by Kristi H. Miniello of Miniello Consulting on June 18, 2020. An area in the vicinity of the northeast corner of the site serves as water detention for the houses to the north. It was required for the construction of those properties and may need to be adjusted based on storm volumes and impacts from the proposed undertaking. No further action or mitigation is required.</p> <p><i>See Appendix C for supporting documentation.</i></p>
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes	No X	<p>According to the U.S. Department of the Interior, there are no Wild and Scenic Rivers or river segments included in the Nationwide Rivers Inventory (NRI) in Jefferson County. Additionally, there are no nearby Study Rivers. No further action or mitigation is required.</p> <p><i>See Appendix C for supporting documentation.</i></p>
ENVIRONMENTAL JUSTICE			
Environmental Justice Executive Order 12898	Yes	No X	<p>After evaluating demographic and income data using the U.S. EPA's EJSCREEN tool, it was determined that the proposed project is not located within a population of concern. The project site is located in an area with a minority population in the 40th percentile and a low-income population in the 31st percentile (as compared</p>

Environmental Justice (cont.)		<p>to national figures). The project is designed to provide affordable housing to seniors and will not have a disproportionately high and/or adverse human health or environmental impact on minority and/or low-income populations. The project will not exclude participation or deny benefits to persons because of their race, color, religion, sex, national origin, age, disability or veteran status. No further action or mitigation is required.</p> <p><i>See Appendix J for supporting documentation.</i></p>
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Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

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

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	<p>The vacant parcel is currently zoned Low Density Mixed-Use Neighborhood District (LMN), which is intended to be a setting for a predominance of low density housing combined with complementary and supporting land uses that serve a neighborhood and are developed and operated in harmony with the residential characteristics of the neighborhood. The undertaking involves the construction of a three-story residential building and is compatible with surrounding land use.</p> <p><i>Sources: Project narrative, Fort Collins Municipal Code, FC Maps</i></p>

Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>According to the USDA Natural Resource Conservation Service (NRCS), the soils on the property consist of Nunn clay loam (well-drained). The elevation is approximately 4,941 feet above sea level, and the site is level but several feet lower than E. Drake Rd. and the railroad bed.</p> <p>The City of Fort Collins was contacted regarding the proposed project's impacts on storm water runoff, but no response was received. Standard erosion control measures will be implemented during construction. An area in the vicinity of the northeast corner of the site serves as a water detention area for the houses to the north. It was required for the construction of those properties and may need to be adjusted based on storm volumes and impacts from the proposed undertaking.</p> <p><i>Sources: NRCS Web Soil Survey</i></p>
Hazards and Nuisances including Site Safety and Noise	2	<p>Miniello Consulting performed a site visit on June 18, 2020. Conditions were sunny, and temperature was in the mid-70s (Fahrenheit). The site is vacant, and neighboring properties to the north consist of single-family houses, while the properties to the east are occupied by several multi-story apartment buildings. Although the sound of traffic from E. Drake Rd. was noticeable, it was not noted as a nuisance. No hazards or nuisances were observed.</p> <p>Based on information previously discussed under Airport Hazards, Contamination & Toxic Substances, and Explosive and Flammable Hazards, no hazards or nuisances are associated with the project site or nearby properties.</p> <p><i>Source: Site visit</i></p>
Energy Consumption	2	<p>The City of Fort Collins was contacted regarding its ability to accommodate the new construction in terms of electrical and natural gas. The city responded that although there is some work to bring power down the road to the site, Light & Power has adequate facilities and capacity around the construction site to accommodate the proposed project.</p> <p>Infrastructure for three electric vehicle chargers with parking spaces will be included in the site design, and the chargers themselves may be installed if additional funding can be secured for that purpose. The building will include energy efficient light fixtures, appliances, and plumbing fixtures.</p> <p><i>Sources: City of Fort Collins, VOA</i></p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	<p>According to the U.S. Department of Labor's Bureau of Labor Statistics from January 2019, the unemployment rate in the Fort Collins-Loveland area was around 3.8%. Information obtained from the State of Colorado's Demography Office shows that the workforce in Larimer County is diverse, and many individuals are employed in the areas of government, retail trade, accommodation and food services, health services, scientific and technical services, and construction. The proposed project would generate temporary jobs during construction activities for skilled laborers.</p> <p><i>Sources: https://www.bls.gov, https://demography.dola.colorado.gov</i></p>
Demographic Character Changes, Displacement	2	<p>The subject property is located in a mixed-use area in Census Tract 16.05, which has a 2018 ACS 5-Year population estimate of 5,487. Compared to the 2010 figure of 3,767, the tract's population has increased by an estimate of 1,720. As previously stated under Environmental Justice, the area has a minority population in the 40th percentile and a low-income population in the 31st percentile (as compared to national figures). The new construction of 55 residential units would be compatible with surrounding properties and area development. The site is currently vacant, and no individuals or businesses would be displaced as a result of the undertaking.</p> <p><i>Sources: U.S. Census Bureau, VOA</i></p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	<p>The proposed undertaking is focused on providing affordable units to senior citizens, and no impact to primary education facilities is anticipated. Educational and cultural facilities are found throughout the City of Fort Collins and are accessible via public transportation, personal automobile, and established bicycle routes. Several are clustered less than two miles away along College Ave. (US 287), including the main campus for Colorado State University.</p> <p><i>Sources: City of Fort Collins, Google Maps</i></p>

Commercial Facilities	2	<p>The subject property is located in a dense urban area, and the nearest concentration of commercial facilities is located one block away at the southeast intersection of E. Drake Rd. and S. Timberline Rd. Businesses include a large grocery store (King Soopers), restaurants, specialty stores, banks, gas station, and automotive services. Commercial facilities throughout the city are accessible via public transportation, personal automobile, and established bicycle routes.</p> <p><i>Sources: Site visit, Google Maps, http://www.ridetransfort.com</i></p>
Health Care and Social Services	2	<p>UCHealth Poudre Valley Hospital (1024 S. Lemay Ave.) and associated medical services are located approximately 2.3 miles from the subject property. A dentist, optometrist, and pharmacy are located nearby at the southeast intersection of E. Drake Rd. and S. Timberline Rd. All are accessible via public transportation, personal automobile, and established bicycle routes.</p> <p><i>Sources: Site visit, Google Maps</i></p>
Solid Waste Disposal / Recycling	2	<p>Trash and recycling collection in Fort Collins is handled by private haulers, and multi-family housing developments are provided with shared dumpster service.</p> <p><i>Source: https://www.fcgov.com/recycling/trash-rates.php</i></p>
Waste Water / Sanitary Sewers	2	<p>The City of Fort Collins was contacted regarding the infrastructure's ability to handle the anticipated volume of waste water. No response was received, but given the existing and planned infrastructure and relatively small size of the proposed development, no adverse impacts to the current system are anticipated.</p>
Water Supply	2	<p>The city's drinking water supply comes from the Colorado-Big Thompson Project (which includes Horsetooth Reservoir) and the Cache la Poudre River basin (which includes the Michigan Ditch and Joe Wright Reservoir System). In the area where the subject property is located, water is managed by Fort Collins Utilities Water Department, which is responsible for diverting, processing at treatment facilities, and distributing treated water. Given the existing and planned infrastructure, as well as the relatively small size of the proposed development, no adverse impacts to the current system are anticipated.</p> <p><i>Source: https://www.fcgov.com/utilities/what-we-do/water</i></p>

Public Safety - Police, Fire and Emergency Medical	2	<p>The Fort Collins police station is located at 2221 S. Timberline Rd. Poudre Fire Authority Station No. 3 (2000 Matthews St.) is located approximately 2.3 miles from the subject property. The nearest emergency medical center, UC Health Poudre Valley Hospital, is also located 2.3 miles from the subject property. Response times for each vary, but adverse impacts as a result of the project are not anticipated given the expected population increase associated with the 55 units would be within a well-established commercial and residential area.</p> <p><i>Sources: https://www.fcgov.com/police/, https://www.poudre-fire.org</i></p>
Parks, Open Space and Recreation	2	<p>Several parks are located within 1.0 mile of the subject property. Stewart Case Park (2351 Pinecone Circle) is located approximately 0.75 mile from the subject property, while Prospect Ponds, Cottonwood Hollow, and Running Deer Natural Areas are located less than one mile to the northeast. Nearby Edora Park (1420 E. Stuart St.) features ballfields, tennis courts, a skate park, pool, and ice center. All are accessible via public transportation, personal automobile, and established bicycle routes.</p> <p><i>Sources: https://www.fcgov.com/parks/, https://www.fcgov.com/recreation</i></p>
Transportation and Accessibility	2	<p>The project would have little impact on existing traffic volumes and is located near a bus stop for the #7, the Power Trail, and established bike routes. Each provides access to retail, commercial, educational, cultural, and social destinations throughout the city beyond what is immediately accessible in the area surrounding the project site. Additionally, a good network of well-maintained sidewalks are present around the project site, and crosswalks with stoplights and signals allow pedestrians to safely cross roads.</p> <p><i>Sources: Site visit, http://www.ridetranfort.com, Pedestrian Plan (2011), Bicycle Plan (2014)</i></p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	Drainage with associated infrastructure on the northern adjacent property was observed during a site visit on June 18, 2020 by Miniello Consulting. No unique or natural features were observed within or adjacent to the project area.
Vegetation, Wildlife	2	The project site is vacant and covered in scrubby vegetation and grasses. It is located in a dense urban area. No other vegetation or wildlife were observed during a site visit on June 18, 2020 by Miniello Consulting.
Other Factors	2	No other factors were noted during the preparation of this document.

Additional Studies Performed:

- *Phase I Environmental Site Assessment* (A.G. Wassenaar Inc., February 2019)
- Evaluation of Aboveground Resources for Section 106 Compliance (OAHF Forms 1400, 1418), Miniello Consulting, June 2020
- Limited-Results Cultural Resource Survey (OAHF Form 1420), Chrysalis Archaeological & Environmental Consulting, LLC; July 2020
- HUD Site Noise Analysis, D.L. Adams Associates

Field Inspection (Date and completed by): June 18, 2020 by Kristi H. Miniello of Miniello Consulting

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

Google Earth Pro
 FAA Circle Search
 FEMA Flood Map Service Center
 CDPHE, Air Pollution Control Division
 NEPAAssist
 Colorado Storage Tank Information System
 U.S. EPA Region 8
 USFWS, Colorado Ecological Services Field Office
 USFWS Wetlands Mapper
 Nationwide Rivers Inventory
 EPA EJSCREEN
 NRCS Web Soil Survey
 USGS Topographic Maps
 Colorado Office of Archaeology and Historic Preservation
 City of Fort Collins Landmark Preservation Commission
 Northern Cheyenne Tribe of the Northern Cheyenne Indian Reservation, Montana
 Apache Tribe of Oklahoma
 Fort Belknap Indian Community of the Fort Belknap Reservation of Montana
 Comanche Nation, Oklahoma
 Cheyenne and Arapaho Tribes, Oklahoma
 Arapaho Tribe of the Wind River Reservation, Wyoming
 U.S. Department of Labor, Bureau of Labor Statistics
 Colorado State Demography Office
 American FactFinder

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Environmental Assessment

City Plan, Fort Collins (2019)
City of Fort Collins Affordable Housing Strategic Plan (2015-2019)
City of Fort Collins GIS
City of Fort Collins Master Street Plan
City of Fort Collins Pedestrian Plan (2011)
City of Fort Collins Bicycle Plan (2014)
https://library.municode.com/co/fort_collins/codes/land_use?nodeId=ART4DI_DIV4.21GECODI
Transfort (public transportation)

List of Permits Obtained: None to-date

Public Outreach [24 CFR 50.23 & 58.43]: As part of the “Modifications to Standards” process to entitle the site, a public outreach session was held that outlined the proposed project and requested that attendees fill out a survey. At the City of Fort Collins Planning and Zoning Board hearing held on May 16, 2019, the public was invited to provide testimony regarding the project and numerous individuals spoke in support of it.

Cumulative Impact Analysis [24 CFR 58.32]: This undertaking would involve the new construction of a three-story building with a total of 55 units. After evaluating the Compliance determinations for 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities, as well as the Environmental Assessment Factors, it has been determined that the proposed project’s impact on the immediate and surrounding areas and services would be limited.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]: The project site was specifically selected as it meets the purpose and need of the project. No other alternatives were evaluated during the project design. This location was considered the best option for the development, and it is consistent with nearby development patterns.

No Action Alternative [24 CFR 58.40(e)]: The No Action Alternative would not align with the affordable housing goals identified by the City of Fort Collins in the City Plan (2019) and Affordable Housing Strategic Plan (2015-2019).

Summary of Findings and Conclusions: The proposed project is suitable for the location, and the scope is in conformance with statutes, executive orders, regulations, and factors as discussed and determined within this document. Future occupants of the new building would not be significantly adversely impacted by environmental conditions.

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

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

Law, Authority, or Factor	Mitigation Measure
Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	This undertaking takes place on a site that is less than 25 acres; however, demolition and construction activities are scheduled for a duration of approximately 14 months. As such, the developer will be responsible for submitting a land development APEN to CDPHE before starting construction.

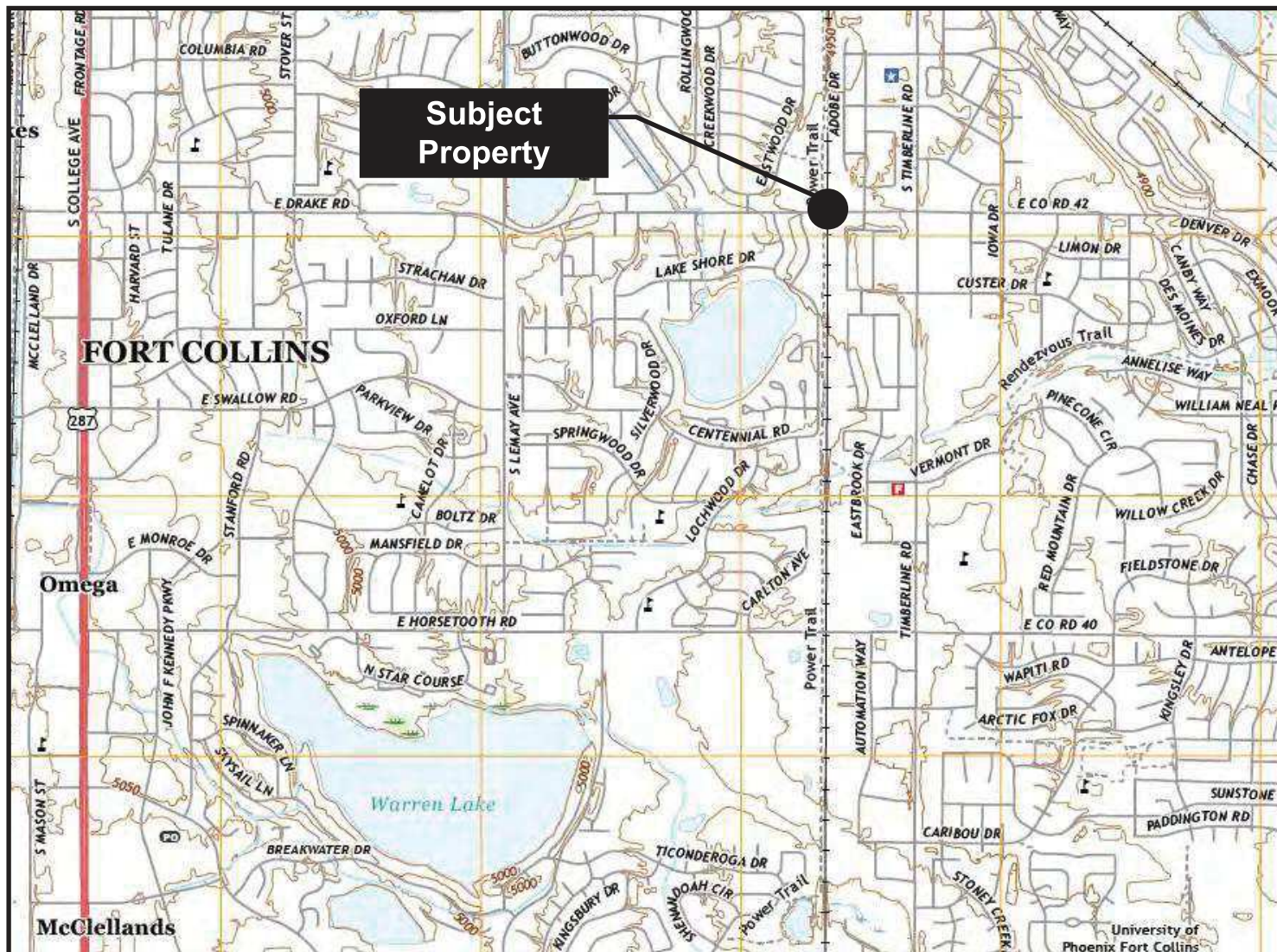
Contamination and Toxic Substances; 24 CFR Part 50.3(i) & 58.5(i)(2)	The subject property is located in U.S. EPA Radon Zone 1, which has a predicted average indoor screening level above the action level of 4.0 pCi/L. A passive radon mitigation system will be included in the building foundation. Post-construction testing will be conducted, and the system will be turned on if levels exceed 4.0 pCi/L.
Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<p>D.L. Adams Associates completed an analysis of sound isolation performance of the proposed wall and window assemblies of the building envelope. The STCc ratings were as follows: 34 (North side), 35 (East), 33 (West), and 35 (South). Collectively, the entire building envelope has a STCc rating of 35, which effectively reduces interior noise levels below HUD's threshold.</p> <p>Regarding noise levels at the outdoor noise sensitive area, D.L. Adams determined through a barrier analysis that construction of a masonry wall measuring eight feet tall that curves around the entire patio area (depicted on plan sheet L2.00 in Appendix I) would reduce noise levels to 64.6 dB, which is within HUD's Acceptable range.</p>

ATTACHMENTS

- Appendix A: Site Identification & Plans
- Appendix B: Airport Hazards
- Appendix C: Water Resources
- Appendix D: Air Quality, Contamination & Toxic Substances
- Appendix E: Endangered Species
- Appendix F: Explosive & Flammable Hazards
- Appendix G: Farmlands Protection
- Appendix H: Section 106 of the NHPA
- Appendix I: Noise Analysis
- Appendix J: Environmental Justice
- Appendix K: Environmental Assessment Factors

APPENDIX A

SITE IDENTIFICATION & PLANS



USGS Fort Collins Quadrangle Map (2019)

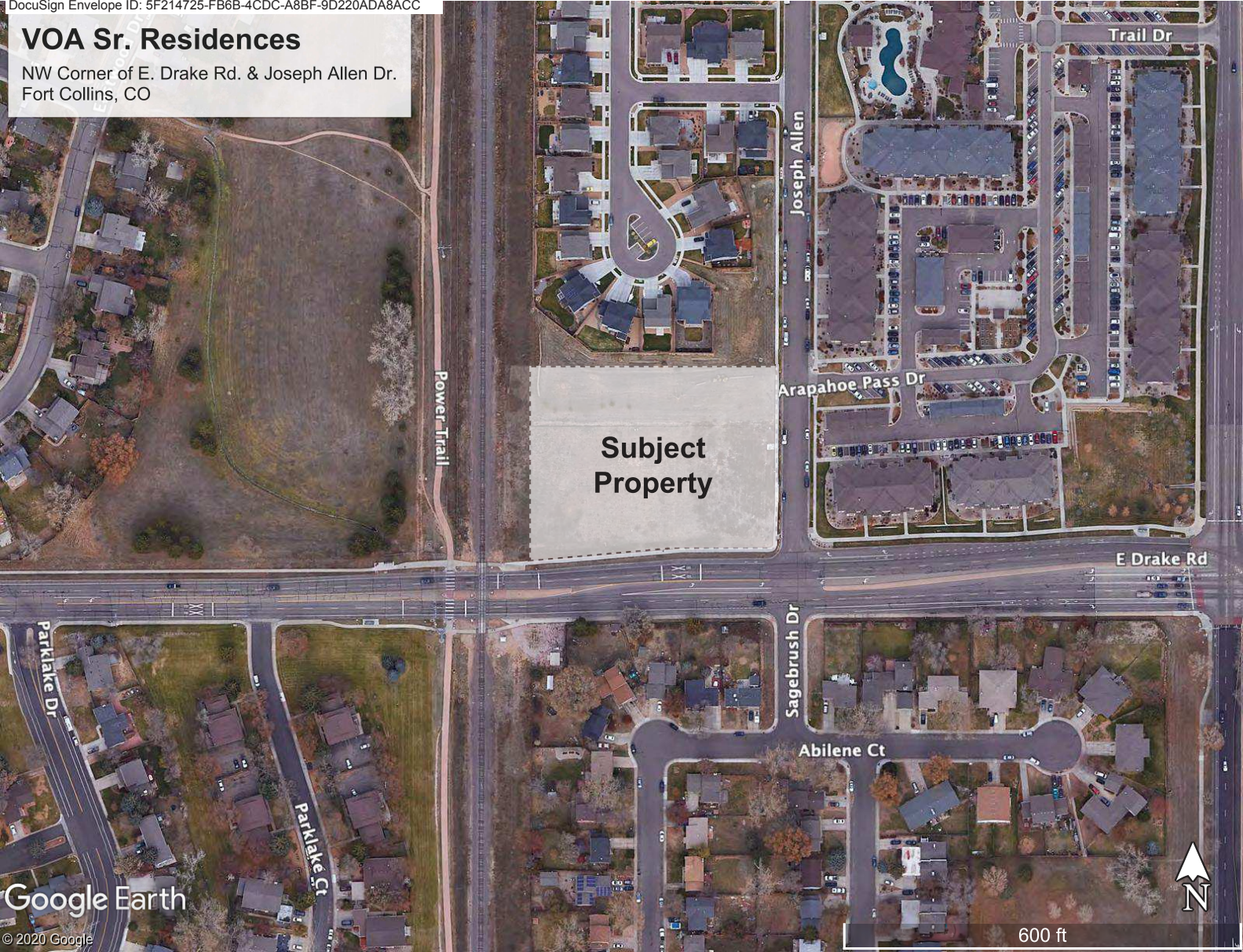
VOA Sr. Residences
NW Corner of E. Drake Rd./Joseph Allen Dr.
Fort Collins, CO

Historic Preservation and
Environmental Compliance



VOA Sr. Residences

NW Corner of E. Drake Rd. & Joseph Allen Dr.
Fort Collins, CO



Site Photographs - VOA Sr. Residences
June 18, 2020



Looking southwest at subject property from its northeast corner



Looking southeast subject property from its northwest corner

Site Photographs - VOA Sr. Residences
June 18, 2020



Looking south at subject property from its northwest corner



Looking northeast subject property from E. Drake Rd.

Site Photographs - VOA Sr. Residences
June 18, 2020



Looking northwest at subject property from E. Drake Rd. and Joseph Allen Dr.

Parcel Number: **8719423002**

Schedule Number: **1641759**

Account Number: **R1641759**

Tax District: 1100 ⓘ

Property Tax Year: 2020

Current Mill Levy: 93.969

Subdivision : 8181 - SPRING CREEK FARMS NORTH, FTC (20060032054)

Property Address:
JOSEPH ALLEN ST
FORT COLLINS, CO
Mobile Home Space: 0

Owner Name & Address:
SC RESIDENTIAL LLC
6300 S SYRACUSE WAY STE 430
CENTENNIAL, CO 801116817

Legal Description: POR OF OUTLOT A, SPRING CREEK FARMS NORTH, COM AT SE COR 19-7-68; TH N 1' 49" W 103.75 FT; TH S 89 58' 11" W 56.96 FT; TH SWRLY 21.84 FT ALG CUR CONC NW RAD 14.00 FT, C/A 89 22' 16" L/C BEARS S 44 40' 1" W 19.69 FT; TH S

Sales Information

Click a Sale Date to recorded document details, or Reception No. to view the document (registration required).

Sale Date (info)	Reception No. (doc)	Sale Price	Deed Type
🕒 2012-04-03	📄 20120022202	\$0	Quit Claim Deed
🕒 2006-07-10	📄 20060051258	\$0	Special Warranty Deed

2020 Value Information

Abstract Code/Description		Value Type	Actual Value	Assessed Value	Net Acres	Net Sq Ft
1119	Res unimp platted	Land	\$658,670	\$191,014	2.32	101,335
Totals:			\$658,670	\$191,014	2.32	101,335

JOSEPH ALLEN ST FORT COLLINS, CO

Building Improvements

No building improvement information is currently available for this property.

Property Attributes & Descriptions

Attribute	Attribute Description
Neg Econ Infl	Railroad LC
Neg Econ Infl	Traffic Heavy LC

* Land Attribute Standard includes: Natural Gas, Public Water, Public Sewer, Electricity, Public Streets, Sidewalks, Streetlights and Curb & Gutter

JOSEPH ALLEN ST FORT COLLINS, CO

Property Tax History

Click a year to view "Tax Due Dates" and "Where My Taxes Go" in the right column.

Year	Total Tax Liability	Property Balance	Owner Tax Liability	State Tax Liability	Total Actual Value	Total Assessed Value
2019	\$17,949.39	\$0.00	\$17,949.39	\$0.00	\$658,670	\$191,014
2018	\$16,364.37	\$0.00	\$16,364.37	\$0.00	\$619,150	\$179,554
2017	\$16,308.53	\$0.00	\$16,308.53	\$0.00	\$619,150	\$179,554
2016	\$9,684.60	\$0.00	\$9,684.60	\$0.00	\$365,810	\$106,085
2015	\$9,614.90	\$0.00	\$9,614.90	\$0.00	\$365,810	\$106,085
2014	\$54,489.67	\$0.00	\$54,489.67	\$0.00	\$2,059,820	\$597,350
2013	\$54,541.65	\$0.00	\$54,541.65	\$0.00	\$2,059,820	\$597,350
2012	\$18,605.47	\$0.00	\$18,605.47	\$0.00	\$2,504,900	\$199,390
2011	\$18,398.89	\$0.00	\$18,398.89	\$0.00	\$2,546,200	\$202,680
2010	\$18,166.21	\$0.00	\$18,166.21	\$0.00	\$2,546,200	\$202,680
2009	\$17,537.91	\$0.00	\$17,537.91	\$0.00	\$2,546,200	\$202,680
2008	\$17,529.80	\$0.00	\$17,529.80	\$0.00	\$2,546,200	\$202,680
2007	\$151.75	\$0.00	\$151.75	\$0.00	\$6,050	\$1,750
2006	\$153.48	\$0.00	\$153.48	\$0.00	\$5,940	\$1,720

Property Tax Status

Tax Liens	No
Treasurer's Deed	No
Tax Deferred	No
Delinquent Prior Year(s) Taxes	No
Certificate of Taxes Due	12/08/2015
Tax Exemption	No

Tax Due Dates

Period	Due	Amount
First Half	6/15/2020	\$8,974.70
Second Half	6/15/2020	\$8,974.69

Where My Taxes Go: 2019

Levy	Tax Authority	Amount
43.527	POUDRE R-1 GENERAL FUND	\$8,314.27
21.863	LARIMER COUNTY	\$4,176.14
12.473	POUDRE R-1 BOND PAYMENT	\$2,382.52
9.797	FT COLLINS	\$1,871.36
3.000	POUDRE RIVER PUBLIC LIBRARY DIST	\$573.04
2.167	HEALTH DIST OF NO LARIMER CTY	\$413.93
1.000	N COLO WATER CONS DIST	\$191.01
0.142	LARIMER CO PEST CTRL DST	\$27.12

NOTE: special assessments, fees and state assessed taxes not shown here

APPENDIX B

AIRPORT HAZARDS



Circle Search for Airports

Searches - Desk Reference Guide V_2018.2.0

- Search for airports as defined in 14 CFR Part 77.9(d) around a center point with a specified radius.
- Note: the system returns a maximum of 2000 records. Search results will only display public use facilities.
- [digital-Terminal Procedures Publication \(d -TPP\)/Airport Diagrams](#)
- [List of Active Special Instrument Flight Procedures](#)

Circle Center Point:		Circle Radius:
<input type="radio"/> An airport:	<input type="text"/> (e.g, IAD, SFO, LAX)	<input type="text" value="2.47"/>
<input type="radio"/> An Off Airport Case:	<input type="text"/> - <input type="text"/> - <input type="text"/> - OE	Nautical miles (50 miles max)
<input type="radio"/> An On Airport Case:	<input type="text"/> - <input type="text"/> - <input type="text"/> - NRA	
<input checked="" type="radio"/> A specific location:	<div><div>Latitude:</div><div><input type="text" value="40"/> Deg <input type="text" value="33"/> M <input type="text" value="10"/> S <input type="text" value="N"/></div></div> <div><div>Longitude:</div><div><input type="text" value="105"/> Deg <input type="text" value="02"/> M <input type="text" value="33"/> S <input type="text" value="W"/></div></div> <div><div>Datum:</div><div>NAD83</div></div>	

Note: this search may take up to 30 seconds to return results.



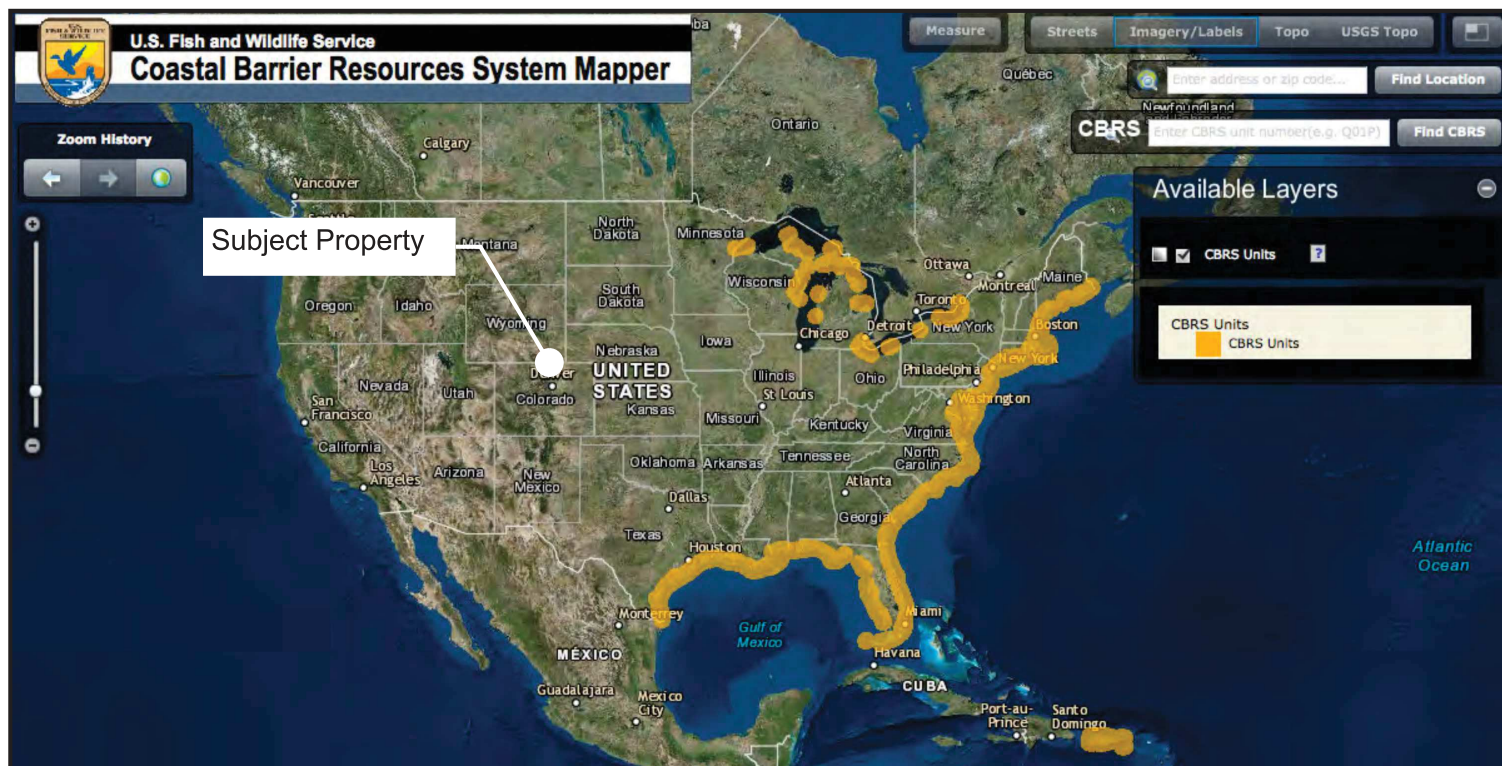
Circle Search For Airports Results

No records found.

 Back

APPENDIX C

WATER RESOURCES



Coastal Barrier Resources System

<http://www.fws.gov/ecological-services/habitat-conservation/cbra/maps/mapper.html>

VOA Sr. Residences
NW Corner of E. Drake Rd./Joseph Allen Dr.
Fort Collins, CO

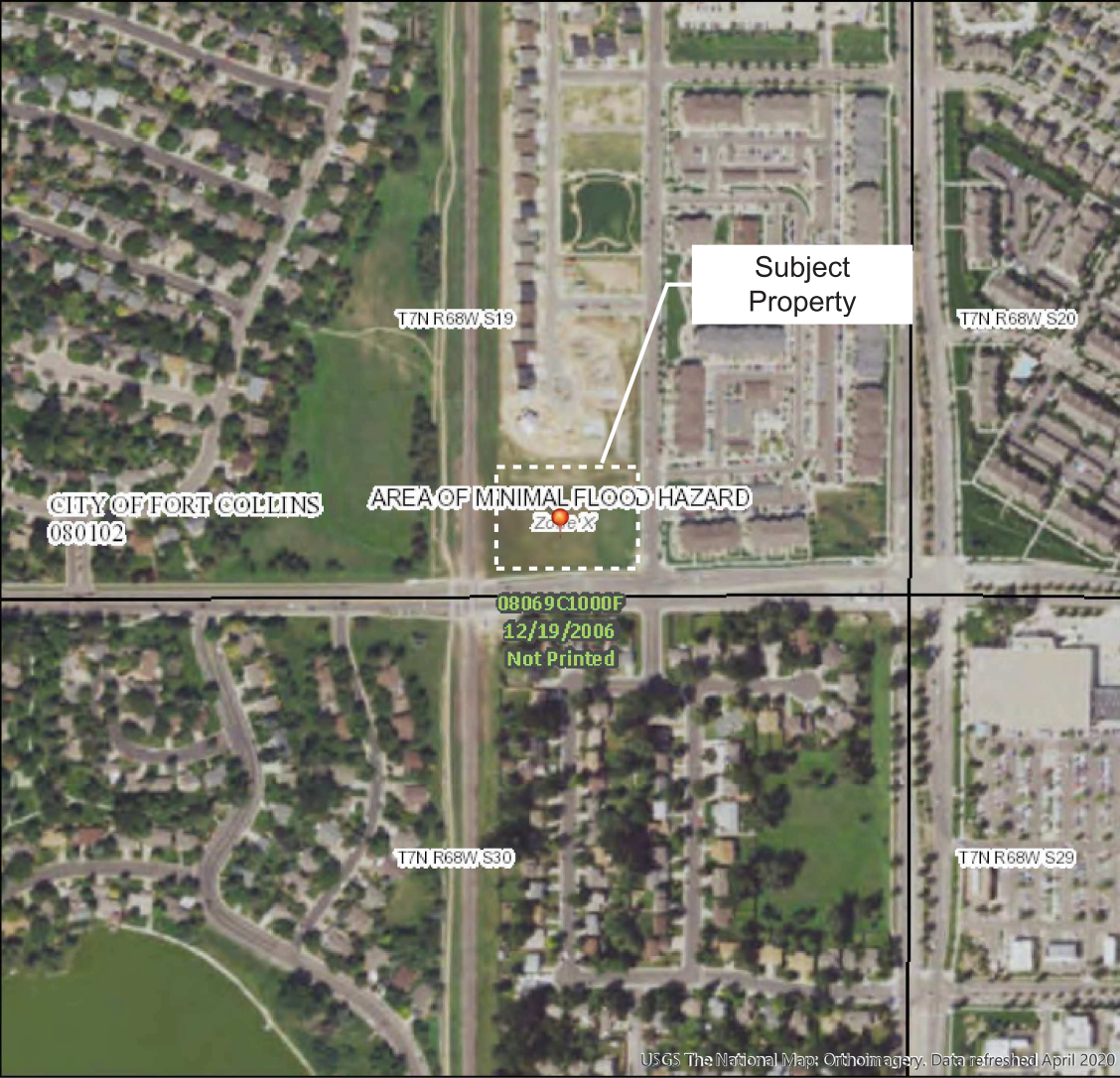
Historic Preservation and
Environmental Compliance



National Flood Hazard Layer FIRMette



105°2'52"W 40°33'24"N



USGS The National Map: Orthoimagery. Data refreshed April 2020. 105°2'14"W 40°32'57"N

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
GENERAL STRUCTURES		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
OTHER FEATURES		Levee, Dike, or Floodwall
		Cross Sections with 1% Annual Chance Water Surface Elevation
MAP PANELS		Coastal Transect
		Base Flood Elevation Line (BFE)
MAP PANELS		Limit of Study
		Jurisdiction Boundary
MAP PANELS		Coastal Transect Baseline
		Profile Baseline
MAP PANELS		Hydrographic Feature
		Digital Data Available
MAP PANELS		No Digital Data Available
		Unmapped

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 6/15/2020 at 4:51 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

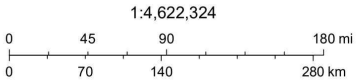
This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Sole Source Aquifer Map



3/16/2020, 4:29:41 PM

Sole_Source_Aquifers



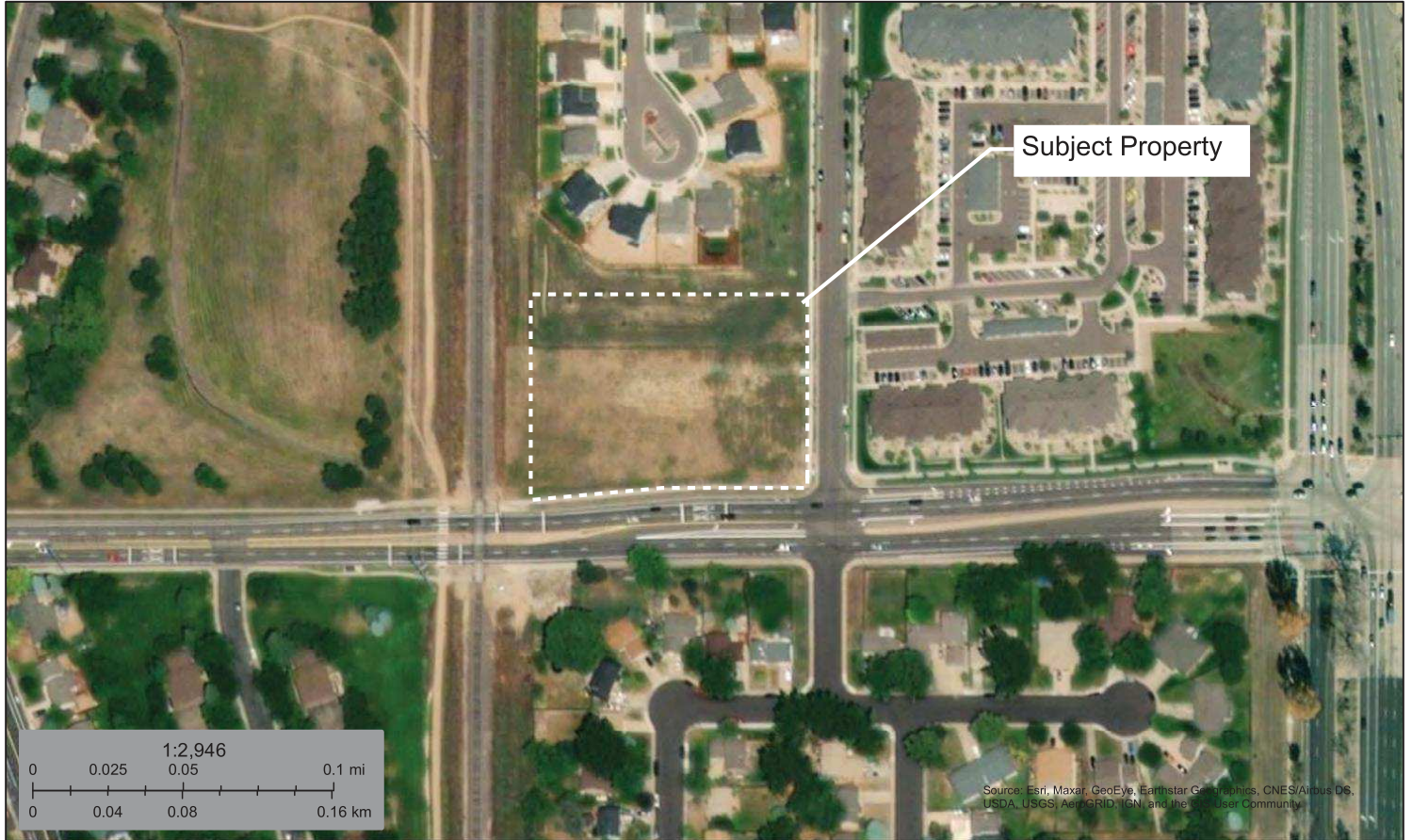
Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community



U.S. Fish and Wildlife Service

National Wetlands Inventory

VOA Senior Residences

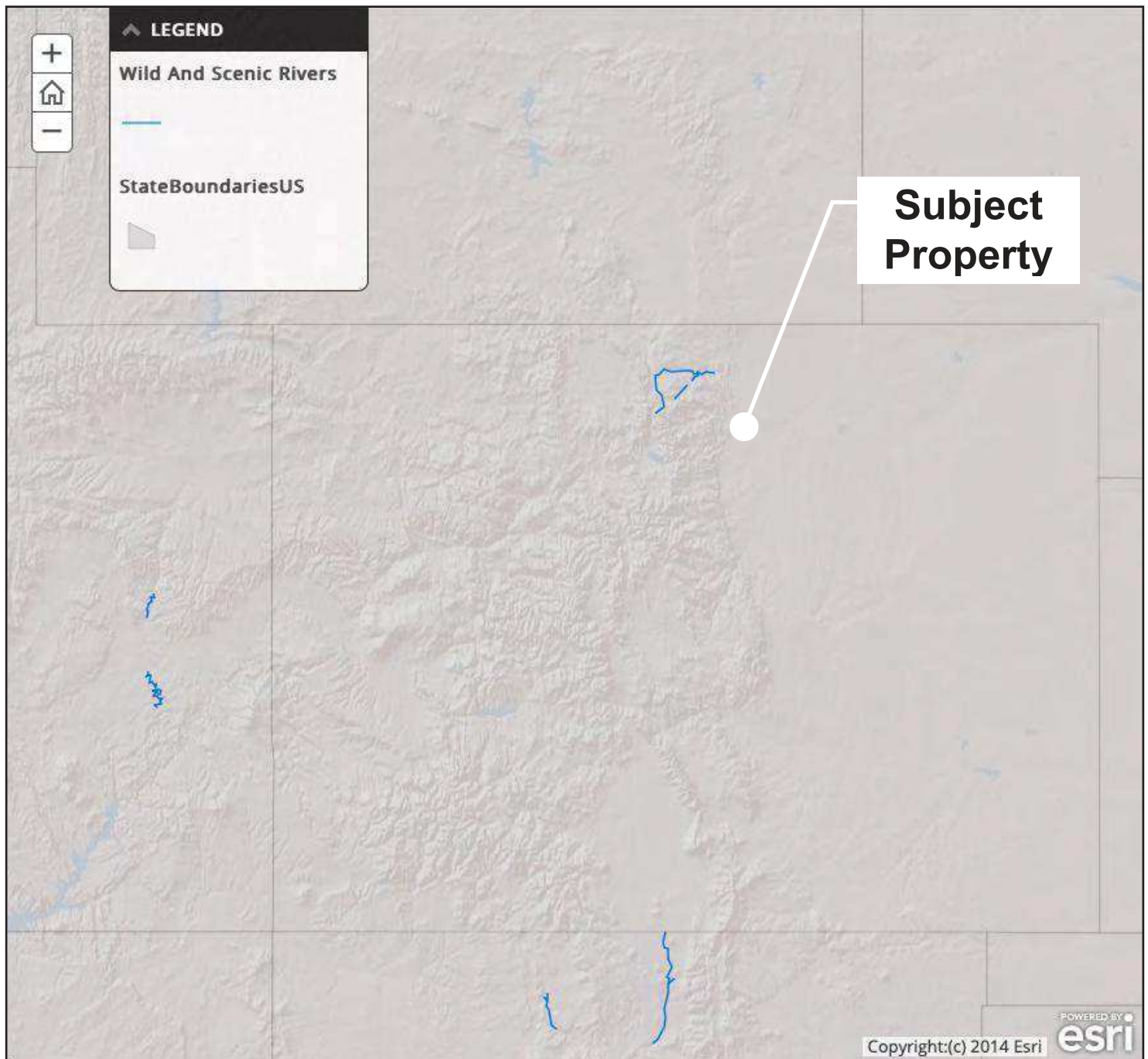


June 15, 2020

Wetlands

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

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



National Wild and Scenic Rivers System
<https://www.rivers.gov>

VOA Sr. Residences
NW Corner of E. Drake Rd./Joseph Allen Dr.
Fort Collins, CO

**Historic Preservation and
Environmental Compliance**



APPENDIX D

AIR QUALITY, CONTAMINATION & TOXIC SUBSTANCES



June 22, 2020

Air Pollution Control Division
4300 Cherry Creek Drive South
Denver, CO 80246-1530

RE: Potential HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO

Dear Mr. Coffin,

This information request is being submitted in accordance with the Clean Air Act, as amended, particularly sections 176(c) & (d); 40 CFR Parts 6, 51, and 93. On behalf of Volunteers of America (VOA), Miniello Consulting is providing information on the above-referenced project for your review and determination.

The intent of the undertaking is to construct a new, three-story building with affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is vacant and was historically used for agricultural purposes (row crops).

According to the EPA Green Book and NEPAassist, the subject property is located within the serious Non-Attainment Area of 2008 and marginal Non-Attainment Area of 2015, respectively, 8-hour Ozone National Ambient Air Quality Standards (NAAQS). Attached you will find supporting documentation to assist with site location.

Your assistance is requested in determining whether or not the proposed project conforms to the EPA-approved State Implementation Plan. If you have any questions, feel free to call me at (303) 531-1414. Please return your determination to kristi@minielloconsulting.com. Thank you for your time and attention to this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Kristi H. Miniello'.

Kristi H. Miniello
Owner



You are here: EPA Home > Green Book > Current Nonattainment Counties for All Criteria Pollutants

Current Nonattainment Counties for All Criteria Pollutants

Data is current as of May 31, 2020

The 8-hour Ozone (1997) standard was revoked on April 6, 2015 and the 1-hour Ozone (1979) standard was revoked on June 15, 2005.

The asterisk (*) indicates only a portion of the county is included in the designated nonattainment area (NA).

Download National Dataset of all designated areas (currently nonattainment, maintenance, revoked):
dbf | xls | Data dictionary (PDF)

Listed by State, County, NAAQS * Part County NA NA Area Name (Classification, if applicable)

ALASKA

Fairbanks North Star Borough

PM-2.5 (2006) *Fairbanks, AK - (Serious)

ARIZONA

Cochise County

PM-10 (1987) *Paul Spur/Douglas (Cochise County), AZ - (Moderate)

Gila County

Lead (2008) *Hayden, AZ

PM-10 (1987) *Hayden, AZ - (Moderate)

PM-10 (1987) *Miami, AZ - (Moderate)

Sulfur Dioxide (2010) *Hayden, AZ

Sulfur Dioxide (2010) *Miami, AZ

8-Hour Ozone (2015) *Phoenix-Mesa, AZ - (Marginal)

Maricopa County

PM-10 (1987) *Phoenix, AZ - (Serious)

8-Hour Ozone (2008) *Phoenix-Mesa, AZ - (Moderate)

8-Hour Ozone (2015) *Phoenix-Mesa, AZ - (Marginal)

Pima County

PM-10 (1987) *Ajo (Pima County), AZ - (Moderate)

PM-10 (1987) *Rillito, AZ - (Moderate)

Pinal County

Lead (2008) *Hayden, AZ

PM-10 (1987) *Hayden, AZ - (Moderate)

PM-10 (1987) *Miami, AZ - (Moderate)

PM-10 (1987) *Phoenix, AZ - (Serious)

PM-10 (1987) *West Pinal, AZ - (Moderate)

PM-2.5 (2006) *West Central Pinal, AZ - (Moderate)

Sulfur Dioxide (1971) *Hayden (Pinal County), AZ

Sulfur Dioxide (2010) *Hayden, AZ

8-Hour Ozone (2008) *Phoenix-Mesa, AZ - (Moderate)

8-Hour Ozone (2015) *Phoenix-Mesa, AZ - (Marginal)

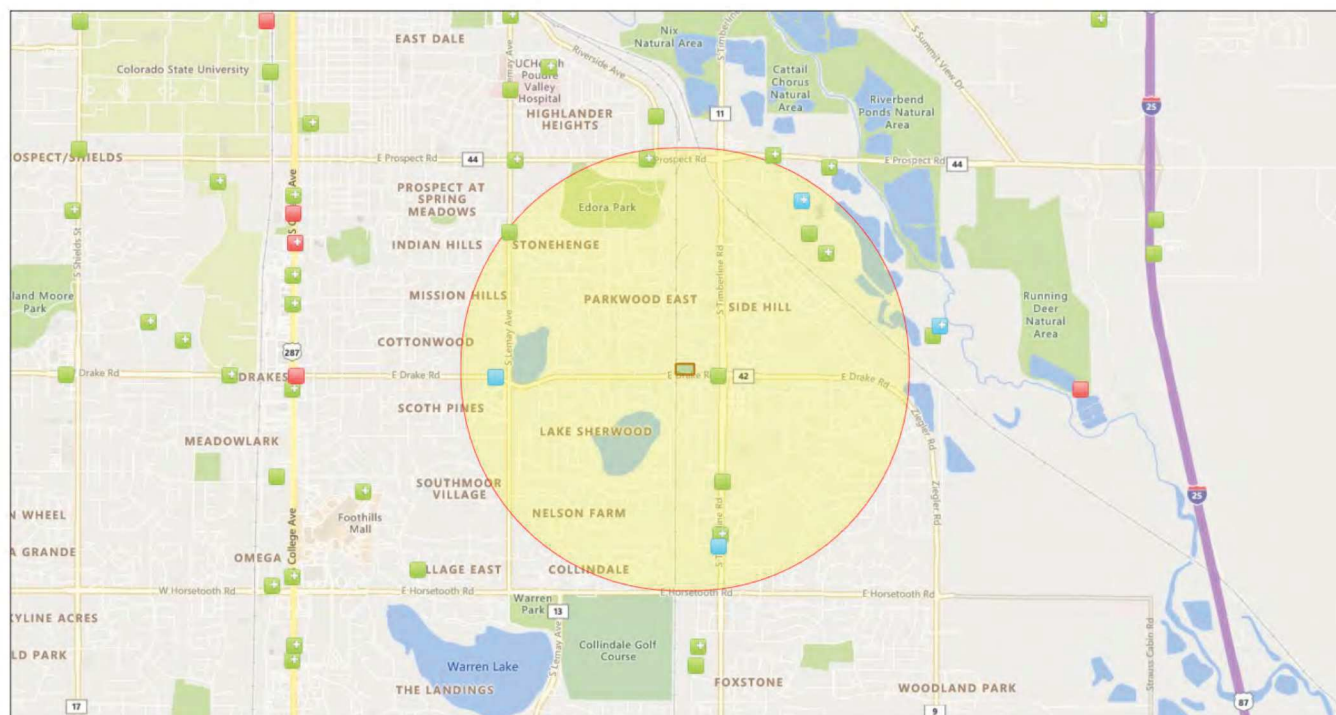
Santa Cruz County

PM-10 (1987) *Nogales, AZ - (Moderate)

Sonoma County*PM-2.5 (2006)* *San Francisco Bay Area, CA - (Moderate)*8-Hour Ozone (2008)* *San Francisco Bay Area, CA - (Marginal)*8-Hour Ozone (2015)* *San Francisco Bay Area, CA - (Marginal)**Stanislaus County***PM-2.5 (1997)* San Joaquin Valley, CA - (Serious)*PM-2.5 (2006)* San Joaquin Valley, CA - (Serious)*PM-2.5 (2012)* San Joaquin Valley, CA - (Moderate)*8-Hour Ozone (2008)* San Joaquin Valley, CA - (Extreme)*8-Hour Ozone (2015)* San Joaquin Valley, CA - (Extreme)**Sutter County***8-Hour Ozone (2008)* *Sacramento Metro, CA - (Severe 15)*8-Hour Ozone (2015)* *Sacramento Metro, CA - (Moderate)*8-Hour Ozone (2015)* *Sutter Buttes, CA - (Marginal)**Tehama County***8-Hour Ozone (2008)* *Tuscan Buttes, CA - (Marginal)*8-Hour Ozone (2015)* *Tuscan Buttes, CA - (Marginal (Rural Transport))**Tulare County***PM-2.5 (1997)* San Joaquin Valley, CA - (Serious)*PM-2.5 (2006)* San Joaquin Valley, CA - (Serious)*PM-2.5 (2012)* San Joaquin Valley, CA - (Moderate)*8-Hour Ozone (2008)* San Joaquin Valley, CA - (Extreme)*8-Hour Ozone (2015)* San Joaquin Valley, CA - (Extreme)**Tuolumne County***8-Hour Ozone (2015)* Tuolumne County, CA - (Marginal)**Ventura County***8-Hour Ozone (2008)* *Ventura County, CA - (Serious)*8-Hour Ozone (2015)* *Ventura County, CA - (Serious)**Yolo County***PM-2.5 (2006)* *Sacramento, CA - (Moderate)*8-Hour Ozone (2008)* Sacramento Metro, CA - (Severe 15)*8-Hour Ozone (2015)* Sacramento Metro, CA - (Moderate)**COLORADO****Adams County***8-Hour Ozone (2008)* Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Serious)*8-Hour Ozone (2015)* Denver Metro/North Front Range, CO - (Marginal)**Arapahoe County***8-Hour Ozone (2008)* Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Serious)*8-Hour Ozone (2015)* Denver Metro/North Front Range, CO - (Marginal)**Boulder County***8-Hour Ozone (2008)* Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Serious)*8-Hour Ozone (2015)* Denver Metro/North Front Range, CO - (Marginal)**Broomfield County***8-Hour Ozone (2008)* Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Serious)*8-Hour Ozone (2015)* Denver Metro/North Front Range, CO - (Marginal)**Denver County***8-Hour Ozone (2008)* Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Serious)*8-Hour Ozone (2015)* Denver Metro/North Front Range, CO - (Marginal)**Douglas County***8-Hour Ozone (2008)* Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Serious)*8-Hour Ozone (2015)* Denver Metro/North Front Range, CO - (Marginal)**Jefferson County***8-Hour Ozone (2008)* Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Serious)*8-Hour Ozone (2015)* Denver Metro/North Front Range, CO - (Marginal)**Larimer County***8-Hour Ozone (2008)* *Denver-Boulder-Greeley-Ft. Collins-Loveland, CO - (Serious)*8-Hour Ozone (2015)* *Denver Metro/North Front Range, CO - (Marginal)

NEPAssist Report

VOA Sr. Residences



July 20, 2020

- Toxic Substances Control Act (TSCA)
- Toxic Releases (TRI)
- Hazardous Waste (RCRAInfo)
- Project Buffer
- VOA Sr. Residences



Input Coordinates: 40.553381,-105.041644,40.552663,-105.041644,40.552663,-105.043275,40.553381,-105.043275,40.553381,-105.041644

Project Area	0.00 sq mi
Within 1 mile of an Ozone 8-hr (1997 standard) Non-Attainment/Maintenance Area?	yes
Within 1 mile of an Ozone 8-hr (2008 standard) Non-Attainment/Maintenance Area?	yes
Within 1 mile of a Lead (2008 standard) Non-Attainment/Maintenance Area?	no
Within 1 mile of a SO ₂ 1-hr (2010 standard) Non-Attainment/Maintenance Area?	no
Within 1 mile of a PM _{2.5} 24hr (2006 standard) Non-Attainment/Maintenance Area?	no
Within 1 mile of a PM _{2.5} Annual (1997 standard) Non-Attainment/Maintenance Area?	no
Within 1 mile of a PM _{2.5} Annual (2012 standard) Non-Attainment/Maintenance Area?	no
Within 1 mile of a PM ₁₀ (1987 standard) Non-Attainment/Maintenance Area?	no
Within 1 mile of a Federal Land?	no
Within 1 mile of an impaired stream?	yes
Within 1 mile of an impaired waterbody?	yes
Within 1 mile of a waterbody?	yes
Within 1 mile of a stream?	yes
Within 1 mile of an NWI wetland?	Available Online
Within 1 mile of a Brownfields site?	no
Within 1 mile of a Superfund site?	no
Within 1 mile of a Toxic Release Inventory (TRI) site?	yes
Within 1 mile of a water discharger (NPDES)?	yes
Within 1 mile of a hazardous waste (RCRA) facility?	yes

Within 1 mile of an air emission facility?	yes
Within 1 mile of a school?	no
Within 1 mile of an airport?	no
Within 1 mile of a hospital?	no
Within 1 mile of a designated sole source aquifer?	no
Within 1 mile of a historic property on the National Register of Historic Places?	no
Within 1 mile of a Toxic Substances Control Act (TSCA) site?	no
Within 1 mile of a Land Cession Boundary?	yes
Within 1 mile of a tribal area (lower 48 states)?	no

Created on: 7/20/2020 3:51:49 PM

February 18, 2019

Phase I Environmental Site Assessment Drake/Timberline Property Fort Collins, Colorado



AGW Project Number 180351

Volunteers of America National Services
1660 Duke Street
Alexandria, Virginia 22314

A.G. WASSENAAR | **INC.**
GEOTECHNICAL • ENVIRONMENTAL
CONSULTANTS

2180 South Ivanhoe Street, Suite 5
Denver, Colorado 80222
www.agwco.com
(303) 759-8373

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ABBREVIATIONS AND ACRONYMS

ACM	Asbestos Containing Material
AGW	A.G. Wassenaar, Inc.
AST	Aboveground Storage Tank
ASTM	American Society for Testing and Materials
AUL	Activity and Use Limitation
BTEX	Benzene, Toluene, Ethylbenzene, and Xylenes
CDPHE	Colorado Department of Public Health and Environment
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
COGCC	Colorado Oil and Gas Conservation Commission
CORRACTS	Resource Conservation & Recovery Act Corrective Action Sites
COVENANTS	Environmental Real Covenants List
CREC	Controlled Recognized Environmental Condition
DNPL	Delisted National Priorities List
EC	Federal Engineering Institutional Control Sites
EPA	United States Environmental Protection Agency
ERNSCO	Emergency Response Notification System
ESA	Environmental Site Assessment
FEMAUST	FEMA Owned Storage Tanks
GIS	Geographic Information System
HISTSWLF	Historical Solid Waste Landfills
HREC	Historical Recognized Environmental Condition
HWSCA	Hazardous Waste Sites – Corrective Action
HWSG	Hazardous Waste Sites – Generator
LST	Leaking Storage Tank
LUCIS	Land Use Control Information System
LUSTTRUST	Leaking Underground Storage Tank Trust Fund Site
NLRRCRAC	No Longer Regulated RCRA Corrective Action Facilities
NLRRCRAT	No Longer Regulated RCRA Non-CORRACTS Treatment, Storage & Disposal Facilities
NPL	National Priorities List
OPS	Colorado Department of Labor and Employment, Division of Oil and Public Safety
PCB	Poly-Chlorinated Biphenyl
PNPL	Proposed National Priorities List
RCRA	Resource Conservation and Recovery Act
RCRAC	RCRA – Corrective Action Facilities
RCRANGRO8	RCRA – Non-Generator
RCRAGRO8	RCRA – Generator
RCRASC	RCRA Sites with Controls
RCRASUBC	RCRA – Subject to Corrective Action Facilities
RCRAT	RCRA – Non-CORRACTS Treatment, Storage & Disposal Facilities
REC	Recognized Environmental Condition
SEMS	Superfund Enterprise Management System
SEMSARCH	Superfund Enterprise Management System Archived Site Inventory
SF	Superfund
SWF	Solid Waste Facility
USGS	United States Geological Survey
UST	Underground Storage Tank
VCRA	Voluntary Cleanup and Redevelopment Program
VOC	Volatile Organic Compound

EXECUTIVE SUMMARY

A.G. Wassenaar, Inc. (AGW) has performed a Phase I Environmental Site Assessment (ESA) in general conformance with the scope of work and limitations of the ASTM International Standard Practice Designation E1527-13 for the subject property, identified as the Drake/Timberline property in Fort Collins, Colorado. Any exceptions or deletions from this practice are described in Section 11.0 of this report.

The subject property was evaluated for the presence of recognized environmental conditions (RECs) through a property inspection, a review of historical property uses, interviews with individuals associated with the property, and a review of environmental records available from government agencies.

The subject property is a rectangular shaped parcel of vacant land approximately two acres in size, located northwest of the intersection of Drake Street and Joseph Allen Drive in Fort Collins, Colorado. The topography of the subject property is relatively flat, with a slight trend in gradient to the east. North of the site is a small drainage area, while railroad tracks mark the extent of the western boundary. The south and east boundaries are made up of Drake Street and Joseph Allen Drive, respectively. None of the visible features of the subject property are identified as RECs.

The subject property is generally located in a mixed area consisting of residential neighborhoods, parks, churches, and commercial/retail buildings. The subject property is bound to the south and east by Drake Street and Joseph Allen Drive, respectively, while the western boundary is marked by a railroad track, with an open space area in place farther west of the tracks. A small drainage with minimal landscaping divides the subject property from residential development to the north. Across Joseph Allen Drive, to the east, are apartment buildings, while across Drake Street, to the south, is a residential neighborhood. None of the visible features of the surrounding properties are identified as RECs in relation to the subject property.

Based on AGW's historical review of the subject property, the site has been largely vacant since at least 1937, with the property appearing as agricultural land until at least 1999. A small drainage was visible on the subject property until sometime before 1953. The property has remained vacant and structurally undeveloped since at least 1937. None of the past uses of the subject property are identified as RECs. The area surrounding the subject property was largely vacant, rural land before sparse residential development began before the 1970s. By 1980, residential development was either under construction or in place to the west, south, and southwest, while the remaining surrounding area was still being used for agricultural purposes. Sometime after 1999, commercial and residential development began to the east of the subject property, along Timberline Road. By 2016, the surrounding properties had been completely developed with a residential neighborhood adjacent to the north and apartment buildings in place to the east, across Joseph Allen Drive. None of the past uses of the surrounding properties are identified as RECs in relation to the subject property.

AGW reviewed publicly available records pertaining to potential sources of contamination within a one-mile radius of the subject property. None of the listings were determined to be RECs in relation to the subject property.

This assessment has revealed no evidence of recognized environmental conditions (RECs) in connection with the subject property.

1.0 INTRODUCTION AND SCOPE OF WORK

On behalf of Volunteers of America National Services, A.G. Wassenaar, Inc. (AGW) has completed a Phase I Environmental Site Assessment (ESA) for the subject property identified as the Drake/Timberline property in Fort Collins, Colorado.

The goal of this Phase I ESA is to identify recognized environmental conditions (RECs), defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. Solid, liquid, and vapor phase contaminants are included when considering potential releases. The term REC is not intended to include de minimis conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of enforcement action if brought to the attention of appropriate government agencies.

AGW's assessment is designed to be in general accordance with practice of performing Phase I ESAs as established by the ASTM International Standard Practice Designation E1527-13. This Practice is intended to permit a user to satisfy one of the requirements to qualify for the "landowner liability protections" or "LLPs" under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 U.S.C. §9601), that is, the practice that constitutes "all appropriate inquiries" into the previous ownership and uses of the property consistent with good commercial and customary practice as defined by CERCLA.

The client named on this report and any lending institutions the client is working with specific to this property may rely on the report for 180 days provided they accept the scope of the original proposal and report as prepared for the client. Reliance on any use of this report by any other group is prohibited and therefore will be at their own risk. No warranties are made to any such party.

This report was written to summarize AGW's findings during a Phase I ESA of the subject property. The subject property was evaluated for potentially significant onsite environmental contamination through a property inspection, a review of historical property uses, interviews with individuals associated with the property, and a review of environmental records available from government agencies. This report identifies RECs (if any) which have been identified in relation to the subject property.

Environmental issues (among others) not included in the scope of work for a Phase I ESA include radon, lead-based paint, asbestos identification, and wetlands and endangered species evaluations. The collection and specific laboratory analyses of environmental samples were not part of the scope of this Phase I ESA; therefore, no specific quantitative environmental data was generated.

2.0 SITE DESCRIPTION

The subject property can generally be described as a portion of the southeast ¼ and the southeast ¼ of Section 19; Township 7 North; Range 68 West of the Sixth Principal Meridian. Physical setting information for the site is described in Table 1, below, and Figure 1 of this report depicts the general location of the subject property.

**Table 1:
Physical Setting**

Property Characteristic	Description	Reference Map
Elevation of Subject Property	Approximately 4,941 feet above mean sea level	USGS Topographic Map Fort Collins Quadrangle 2013
Topographic Gradient	General eastern gradient	
Closest Surface Water	Nelson Reservoir is located approximately 1,500 feet southwest	
Groundwater Flow Direction	Groundwater is assumed to generally follow the topographic gradient in an eastern direction	

3.0 SITE HISTORY

The historic land uses of the subject property and the surrounding areas were examined with the purpose of interpreting, where possible, the past activities that have or may have negatively impacted the natural resources of the site. Copies of the topographic maps and aerial photographs used for reference are included in Attachment A of this report.

3.1 USGS Topographic Maps

**Table 2:
USGS Topographic Maps**

USGS Topographic Map	Description	
15' Fort Collins / Livermore Quadrangle 1906/1907	Subject Property	The general area of the subject property appears to be vacant land.
	Surrounding Properties	The general area is vacant land.
15' Fort Collins / Livermore Quadrangle 1908/1909	Subject Property	No significant changes depicted.
	Surrounding Properties	No significant changes depicted.
7.5' Fort Collins Quadrangle 1960	Subject Property	The property is depicted as vacant land.
	Surrounding Properties	Nelson Reservoir is in place approximately 1,500 feet southwest, while Williams lake is in place approximately 2,500 feet west of the subject property.
7.5' Fort Collins Quadrangle 1969	Subject Property	No significant changes depicted.
	Surrounding Properties	Development has occurred in the vicinity of Williams Lake.
7.5' Fort Collins Quadrangle 1984	Subject Property	No significant changes depicted.
7.5' Fort Collins Quadrangle 1984	Surrounding Properties	Residential development has increased to the west.

USGS Topographic Map	Description	
7.5' Fort Collins Quadrangle 2013	Subject Property	No significant changes depicted.
	Surrounding Properties	The subject property is surrounded by residential developments.

3.2 Aerial Photographs

**Table 3:
Aerial Photographs**

Aerial Photograph	Description	
1937	Subject Property	The property appears to be vacant land. A small drainage appears to transect the property.
	Surrounding Properties	The surrounding area appears to be largely vacant land, some of which appears to be used for agricultural purposes. Farmsteads are visible to the west and east.
1941	Subject Property	No significant visible changes.
	Surrounding Properties	No significant visible changes.
1953	Subject Property	The subject property appears to be in use for agricultural purposes.
	Surrounding Properties	No significant visible changes.
1963	Subject Property	No significant visible changes.
	Surrounding Properties	No significant visible changes.
1969	Subject Property	No significant visible changes.
	Surrounding Properties	Visible as disturbed soil, development has begun to the southwest of the subject property.
1975	Subject Property	No significant visible changes.
	Surrounding Properties	Residential development is in place southwest of the subject property.
1978	Subject Property	No significant visible changes.
	Surrounding Properties	Residential development has begun south of the subject property.
1979	Subject Property	No significant visible changes.
1979	Surrounding Properties	Residential development has begun west of the subject property.
1983/1988	Subject Property	No significant visible changes.

Aerial Photograph	Description	
1983/1988	Surrounding Properties	Residential development is in place to the south, southwest, and west, with the western adjacent property being an open space park.
1993/1999	Subject Property	No significant visible changes.
	Surrounding Properties	No significant visible changes.
2005	Subject Property	No significant visible changes.
	Surrounding Properties	Commercial and residential development has begun to the east.
2006	Subject Property	No significant visible changes.
	Surrounding Properties	Construction for the police station has begun north of the subject property, with more development continuing to the east.
2009	Subject Property	No significant visible changes.
	Surrounding Properties	No significant visible changes.
2011	Subject Property	No significant visible changes.
	Surrounding Properties	No significant visible changes.
2013	Subject Property	No significant visible changes.
	Surrounding Properties	Construction of the apartment buildings on the eastern adjacent property has begun.
2015	Subject Property	A northern portion of the property contains disturbed soil, likely associated with the residential development underway on the northern adjacent property.
	Surrounding Properties	Residential development has begun on the northern adjacent property.

3.3 Summary of Historical Information

The historical research conducted for the subject property indicated that the site has been largely vacant since at least 1937, with the property appearing as agricultural land until at least 1999. A small drainage was visible on the subject property until sometime before 1953. The property has remained vacant and structurally undeveloped since at least 1937. None of the past uses of the subject property are identified as RECs.

The area surrounding the subject property was largely vacant, rural land before sparse residential development began before the 1970s. By 1980, residential development was either under construction or in place to the west, south, and southwest, while the remaining surrounding area was still being used for agricultural purposes. Sometime after 1999, commercial and residential development began to the east of the subject property, along Timberline Road. By 2016, the surrounding properties had been completely developed with a residential neighborhood adjacent to the north and apartment buildings in

place to the east, across Joseph Allen Drive. None of the past uses of the surrounding properties are identified as RECs in relation to the subject property.

4.0 SITE RECONNAISSANCE

The property was inspected during a site visit on February 11, 2019. The inspection included a thorough visual survey of the subject property (including a physical inspection of the property grounds for visible signs of contamination or contamination sources), as well as a drive-by survey of the nearby area. Photographs taken during the site visit are included in Attachment B. Visible characteristics of the subject property are described in Table 4, below, and depicted in Figure 2.

**Table 4:
Site Reconnaissance**

Exterior Observations	
Current Use of the Subject Property	Vacant land.
Configuration	Rectangular shaped parcel.
Boundaries	North – Residential development/drainage West – Railroad track South – Drake Street East – Joseph Allen Drive
Vegetation	Native grasses.
Topography	Relatively flat with a slight eastern gradient.
Structures or Other Improvements on the Subject Property	None observed.
Roads Adjoining the Property and Roads, Streets, and Parking Facilities on the Subject Property	No roads are present on the subject property. Drake Street and Joseph Allen Drive flank the site to the south and east, respectively.
Sewage Disposal System	None observed.
Debris	None observed.
Hazardous Substances or Petroleum Products Stored on the Subject Property	None observed.
Storage Tanks	None observed.
Vent Pipes	None observed.
Utility Lines	None observed.
Odors	None observed.
Pools of Liquids	None observed.
Drums	None observed.
Unidentified Substance Containers	None observed.
PCBs	None observed.
Pits, Ponds, Lagoons	None observed.
Wetlands	None observed.
Stained Soil or Pavement	None observed.

Stressed Vegetation	None observed.
Solid Waste	None observed.
Wastewater	None observed.
Wells	None observed.
Septic Systems or Cesspools	None observed.

4.1 Property Grounds

The subject property is a rectangular shaped parcel of vacant land approximately two acres in size, located northwest of the intersection of Drake Street and Joseph Allen Drive in Fort Collins, Colorado. The topography of the subject property is relatively flat, with a slight trend in gradient to the east. North of the site is a small drainage area, while railroad tracks mark the extent of the western boundary. The south and east boundaries are made up of Drake Street and Joseph Allen Drive, respectively. None of the visible features of the subject property are identified as RECs.

4.2 Surrounding Properties

The subject property is generally located in a mixed area consisting of residential neighborhoods, parks, churches, and commercial/retail buildings. The subject property is bound to the south and east by Drake Street and Joseph Allen Drive, respectively, while the western boundary is marked by a railroad track, with an open space area in place farther west of the tracks. A small drainage with minimal landscaping divides the subject property from residential development to the north. Across Joseph Allen Drive, to the east, are apartment buildings, while across Drake Street, to the south, is a residential neighborhood. None of the visible features of the surrounding properties are identified as RECs in relation to the subject property.

5.0 PUBLIC RECORDS REVIEW

A review of public records was completed by GeoSearch. This record search was defined to meet or exceed the ASTM guidelines for a Phase I ESA records search. The search area defined by ASTM varies from the subject property to a maximum radius of one mile.

The information reviewed for this assessment includes the following standard environmental record sources, where available: Federal, State, and tribal-equivalent National Priorities List (NPL) site lists; Federal, State, and tribal-equivalent Superfund Enterprise Management System (SEMS) and Superfund Enterprise Management System Archive Listing (SEMSARCH) site lists; Federal Resource Conservation & Recovery Act (RCRA) facilities lists; Federal, State, and tribal-equivalent institutional control/engineering control registries; Federal Emergency Response Notification System (ERNS) list; State and tribal landfill and/or solid waste disposal site lists; State and tribal lists of hazardous waste sites identified for investigation or remediation; State and tribal registered storage tank and leaking storage tank lists; State and tribal voluntary cleanup sites; and State and tribal Brownfield sites. Summarized data follows with specific information and mapping details contained in Attachment C.

Additional Federal, State, and local environmental record sources not required by the ASTM guidelines are also included in the GeoSearch report in Attachment C. Many of these sources contain sites already listed in the standard environmental record sources. These records are discussed below if AGW has determined the listing to be pertinent to the subject property.

The accuracy and completeness of record information varies among information sources, including government sources. Neither the user of this report, nor AGW, is obligated to identify mistakes or insufficiencies in the information provided, however, AGW has made a reasonable effort to compensate for mistakes or insufficiencies that are obvious in light of other information of which AGW has actual knowledge.

Table 5:
Summary of Publicly Available Information

Federal Databases		Search Distance (miles)	Results
LUCIS	Land Use Control Information System	Subject Property	0
RCRANGR08	Resource Conservation & Recovery Act – Non-Generator Facilities	Subject Property	0
ERNSCO	Emergency Response Notification System	0.25	1
FEMAUST	FEMA Owned Storage Tanks	0.25	0
EC	Federal Engineering Institutional Control Sites	0.25	0
RCRASC	RCRA Sites with Controls	0.25	0
RCRAGR08	Resource Conservation & Recovery Act - Generator Facilities	0.25	0
BF	Brownfields Management System	0.50	0
NLRRCRAT	No Longer Regulated RCRA Non-CORRACTS TSD Facilities	0.50	0
RCRAT	Resource Conservation & Recovery Act - Treatment, Storage, & Disposal Facilities	0.50	0
SEMS	Superfund Enterprise Management System	0.50	0
SEMSARCH	Superfund Enterprise Management System Archived Site Inventory	0.50	0
DNPL	Delisted National Priorities List	1.00	0
NPL	National Priorities List	1.00	0
NLRRCRAC	No Longer Regulated RCRA Corrective Action Facilities	1.00	0
PNPL	Proposed National Priorities List	1.00	0
RCRAC	Resource Conservation & Recovery Act - Corrective Action Facilities	1.00	0
RCRASUBC	Resource Conservation & Recovery Act – Subject to Corrective Action Facilities	1.00	0
State Databases		Search Distance (miles)	Results
COVENANTS	Environmental Real Covenants List	Subject Property	0
AST	Aboveground Storage Tank Facilities	0.25	2
HWSG	Hazardous Waste Sites - Generator	0.25	0
UST	Underground Storage Tank Facilities	0.25	0
HISTSWLF	Historical Solid Waste Landfills	0.50	0
LST	Leaking Storage Tank Facilities	0.50	0
LUSTTRUST	Leaking Underground Storage Tank Trust Fund Sites	0.50	0
SWF	Solid Waste Facilities	0.50	0
VCRA	Voluntary Cleanup and Redevelopment Program Sites	0.50	2
HWSCA	Hazardous Waste Sites - Corrective Action	1.00	0
SF	Superfund Sites	1.00	0
Local Databases		Search Distance (miles)	Results
JCMETHANE	Jefferson County Methane Gas Sites	0.50	0
Tribal Databases		Search Distance (miles)	Results
USTR08	Underground Storage Tanks on Tribal Lands	0.25	0

LUSTR08	Leaking Underground Storage Tanks on Tribal Lands	0.50	0
ODINDIAN	Open Dump Inventory on Tribal Lands	0.50	0

5.1 Emergency Response Notification System (ERNSCO)

This National Response Center database contains data on reported releases of oil, chemical, radiological, biological, and/or etiological discharges into the environment anywhere in the United States and its territories. The data comes from spill reports made to the United States Environmental Protection Agency (EPA), United States Coast Guard, the National Response Center (NRC) and/or the United States Department of Transportation (USDOT).

Table 6:
ERNSCO Sites

Map ID	Name and Location	Distance and Direction from Subject Property (miles)	Recognized Environmental Condition?
1	2026 Custer Drive Fort Collins, Colorado 80525	0.193 SSE	No, based on the hydrologically cross-gradient location.

5.2 Aboveground Storage Tank Facilities (AST)

The Colorado Department of Labor and Employment, Division of Oil and Public Safety (OPS) maintains this list of ASTs. The GeoSearch database report lists two registered ASTs within ¼ mile of the subject property. The ASTs are not identified as RECs in relation to the subject property, based on hydrologic position and the lack of reported leaks.

5.3 Voluntary Cleanup and Redevelopment Program Sites (VCRA)

This site listing is provided by the Colorado Department of Public Health and Environment (CDPHE) and includes both voluntary cleanup and brownfield properties. VCRA was created in 1994. The objective of the program is to facilitate the redevelopment and transfer of contaminated properties. Properties that sit untouched because of their real or perceived contamination can be rehabilitated using the CDPHE's Brownfields Program in conjunction with VCUP. Cleanup decisions are based on existing standards and the proposed use of the property. The actual cleanup and verification is the owner's responsibility.

Table 7:
VCRA Sites

Map ID	Name and Location	Distance and Direction from Subject Property (miles)	Recognized Environmental Condition?
2	Encoat Facility 1931 Timberline Road	0.491 N	No, based on the hydrologically cross-gradient location.
2	Encoat Facility II 1931 Timberline Road	0.491 N	No, based on the hydrologically cross-gradient location.

6.0 USER PROVIDED INFORMATION

Mr. Doug Snyder, of Volunteers of America National Services, completed the “User Questionnaire for Landowner Liability Protections” in accordance with the ASTM International Standard Practice Designation E1527-13, on February 7, 2019. A copy of the completed questionnaire is included as Attachment D.

6.1 Environmental Liens and Activity and Use Limitations (AULs)

Mr. Snyder stated, in the User Questionnaire, that a Title Commitment, Schedule B #21 shows a previous land use restriction, however, the restriction has since “burned off”. Based on the information provided by the user in the Title Commitment, it appears that no environmental restrictions are in place.

6.2 User Knowledge

The user has indicated that the purchase price of the subject property will be fair market value. The user does not have any specialized knowledge of the subject property and is unaware of any chemical releases or contamination on the property.

7.0 INTERVIEWS

7.1 Current Owner

Steve A. Maguire, St. Charles Investment Company

AGW corresponded with Mr. Steve Maguire, on February 12, 2019, in regard to the current owners’ knowledge of the subject property. Mr. Maguire stated in his reply, on February 18, 2019, he has been the owner of the property since 1999. He stated he has no knowledge of any environmental concerns or hazards on the subject property or in the surrounding area, nor is he aware of any dumping or disposal ever taking place on the property. Mr. Maguire also stated that the site has been largely vacant and was historically used for agricultural purposes by a nearby family farm.

7.2 Local Government Official

Poudre Fire Authority

AGW corresponded with the Poudre Fire Authority, on February 12, 2019, in regard to a request to search available records to determine if any hazardous material spills or other incidents of environmental concern have been reported for the subject property. AGW is awaiting reply and any pertinent information received will be immediately forwarded under separate cover.

8.0 FINDINGS AND OPINION

- The subject property is a rectangular shaped parcel of vacant land approximately two acres in size, located northwest of the intersection of Drake Street and Joseph Allen Drive in Fort Collins, Colorado. The topography of the subject property is relatively flat, with a slight trend in gradient to the east. North of the site is a small drainage area, while railroad tracks mark the extent of the western boundary. The south and east boundaries are made up of Drake Street and Joseph Allen Drive, respectively. None of the visible features of the subject property are identified as RECs.

- The subject property is generally located in a mixed area consisting of residential neighborhoods, parks, churches, and commercial/retail buildings. The subject property is bound to the south and east by Drake Street and Joseph Allen Drive, respectively, while the western boundary is marked by a railroad track, with an open space area in place farther west of the tracks. A small drainage with minimal landscaping divides the subject property from residential development to the north. Across Joseph Allen Drive, to the east, are apartment buildings, while across Drake Street, to the south, is a residential neighborhood. None of the visible features of the surrounding properties are identified as RECs in relation to the subject property.
- Based on AGW's historical review of the subject property, the site has been largely vacant since at least 1937, with the property appearing as agricultural land until at least 1999. A small drainage was visible on the subject property until sometime before 1953. The property has remained vacant and structurally undeveloped since at least 1937. None of the past uses of the subject property are identified as RECs.
- Based on AGW's historical review, the surrounding area was largely vacant, rural land before sparse residential development began before the 1970s. By 1980, residential development was either under construction or in place to the west, south, and southwest, while the remaining surrounding area was still being used for agricultural purposes. By 2016, the surrounding properties had been completely developed with a residential neighborhood adjacent to the north and apartment buildings in place to the east, across Joseph Allen Drive. None of the past uses of the surrounding properties are identified as RECs in relation to the subject property.
- AGW reviewed publicly available records pertaining to potential sources of contamination within a one-mile radius of the subject property. None of the listings were determined to be RECs in relation to the subject property.

9.0 CONCLUSION

We have performed a Phase I ESA in general conformance with the scope of work and limitations of the ASTM International Standard Practice Designation E1527-13 for the property, identified as the Drake/Timberline property in Fort Collins, Colorado. Any exceptions to, or deletions from, this practice are described in Section 11.0 of this report.

This assessment has revealed NO evidence of recognized environmental conditions (RECs) in connection with the property.

10.0 LIMITATIONS

The professional judgments expressed in this report meet the standard of care for our profession. AGW has completed the services in a manner consistent with the level of care and skill ordinarily exercised by other consultants practicing in the same locality and under similar circumstances and time. The opinions derived within this report are time dependent and conditions can and will change.

AGW's assessment is limited to identifying potential environmental liabilities associated with the property of concern. Not identifying hazardous substances or petroleum products on the property should not be interpreted as a guarantee that the materials do not exist. It is merely a statement indicating that the probability of contamination on the subject property should be minimal based on site characteristics, and the historical and current uses of the site and surrounding areas. This opinion is rendered based upon property inspection, client-provided information, information from interviews with knowledgeable persons regarding property history, and information provided by governmental and regulatory agencies. Information is obtained on a reasonably ascertainable basis as it pertains to costs, timeliness, and availability, and is believed to be from reliable sources; however no responsibility is assumed for its accuracy since AGW was not retained to verify publicly available information.

No environmental site assessment can wholly eliminate uncertainty regarding the potential for RECs in connection with the property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a property, and recognizes reasonable limits of time and cost. All appropriate inquiry does not mean an exhaustive assessment of a property.

11.0 DATA GAPS

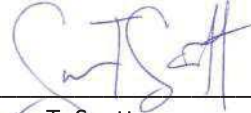
This Phase I ESA has been completed in general accordance with ASTM International Standard Practice E1527-13. The inability to obtain specific information required by this Standard despite good efforts by the environmental professional is considered a data gap. This may occur when a review of standard historical sources fails to achieve the historical research objectives (data failure), interviews are not available, or a site visit is not able to be conducted. The environmental professional has the discretion to determine if, in their opinion, a significant data gap has occurred, impacting the ability of the environmental professional to identify RECs.

AGW has identified the lack of a government official interview as a data gap, however this data gap is not considered significant and is not expected to alter the findings and conclusions of this report.

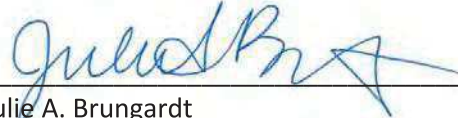
Thank you for your review of this report. If you have any questions regarding the contents of this report, or other environmental issues, please contact us at (303) 759-8373.

Sincerely,

A.G. WASSENAAR, INC.



Spencer T. Scott
Environmental Scientist



Julie A. Brungardt
Environmental Scientist

I, Julie A. Brungardt, declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 312.10 of 40 CFR 312 and I have specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

STS/JAB

APPENDIX E

ENDANGERED SPECIES



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Colorado Ecological Services Field Office
Denver Federal Center
P.O. Box 25486
Denver, CO 80225-0486
Phone: (303) 236-4773 Fax: (303) 236-4005
<http://www.fws.gov/coloradoES>
<http://www.fws.gov/platteriver>

In Reply Refer To:

June 15, 2020

Consultation Code: 06E24000-2020-SLI-1346

Event Code: 06E24000-2020-E-03658

Project Name: VOA Senior Residences

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered

species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
 - USFWS National Wildlife Refuges and Fish Hatcheries
 - Migratory Birds
 - Wetlands
-

06/15/2020

Event Code: 06E24000-2020-E-03658

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Colorado Ecological Services Field Office

Denver Federal Center
P.O. Box 25486
Denver, CO 80225-0486
(303) 236-4773

Project Summary

Consultation Code: 06E24000-2020-SLI-1346

Event Code: 06E24000-2020-E-03658

Project Name: VOA Senior Residences

Project Type: DEVELOPMENT

Project Description: New construction of three-story senior residences on vacant parcel of land.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/40.55306164460526N105.0423667046013W>



Counties: Larimer, CO

Endangered Species Act Species

There is a total of 10 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Note that 5 of these species should be considered only under certain conditions.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Canada Lynx <i>Lynx canadensis</i> Population: Wherever Found in Contiguous U.S. There is final critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3652	Threatened
Preble's Meadow Jumping Mouse <i>Zapus hudsonius preblei</i> There is final critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4090	Threatened

Birds

NAME	STATUS
<p>Least Tern <i>Sterna antillarum</i></p> <p>Population: interior pop.</p> <p>No critical habitat has been designated for this species.</p> <p>This species only needs to be considered under the following conditions:</p> <ul style="list-style-type: none"> Water-related activities/use in the N. Platte, S. Platte and Laramie River Basins may affect listed species in Nebraska. <p>Species profile: https://ecos.fws.gov/ecp/species/8505</p>	Endangered
<p>Mexican Spotted Owl <i>Strix occidentalis lucida</i></p> <p>There is final critical habitat for this species. Your location is outside the critical habitat.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/8196</p>	Threatened
<p>Piping Plover <i>Charadrius melodus</i></p> <p>Population: [Atlantic Coast and Northern Great Plains populations] - Wherever found, except those areas where listed as endangered.</p> <p>There is final critical habitat for this species. Your location is outside the critical habitat.</p> <p>This species only needs to be considered under the following conditions:</p> <ul style="list-style-type: none"> Water-related activities/use in the N. Platte, S. Platte and Laramie River Basins may affect listed species in Nebraska. <p>Species profile: https://ecos.fws.gov/ecp/species/6039</p>	Threatened
<p>Whooping Crane <i>Grus americana</i></p> <p>Population: Wherever found, except where listed as an experimental population</p> <p>There is final critical habitat for this species. Your location is outside the critical habitat.</p> <p>This species only needs to be considered under the following conditions:</p> <ul style="list-style-type: none"> Water-related activities/use in the N. Platte, S. Platte and Laramie River Basins may affect listed species in Nebraska. <p>Species profile: https://ecos.fws.gov/ecp/species/758</p>	Endangered

Fishes

NAME	STATUS
<p>Greenback Cutthroat Trout <i>Oncorhynchus clarkii stomias</i></p> <p>No critical habitat has been designated for this species.</p> <p>Species profile: https://ecos.fws.gov/ecp/species/2775</p>	Threatened
<p>Pallid Sturgeon <i>Scaphirhynchus albus</i></p> <p>No critical habitat has been designated for this species.</p> <p>This species only needs to be considered under the following conditions:</p> <ul style="list-style-type: none"> Water-related activities/use in the N. Platte, S. Platte and Laramie River Basins may affect listed species in Nebraska. <p>Species profile: https://ecos.fws.gov/ecp/species/7162</p>	Endangered

Flowering Plants

NAME	STATUS
Ute Ladies'-tresses <i>Spiranthes diluvialis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2159	Threatened
Western Prairie Fringed Orchid <i>Platanthera praeclara</i> No critical habitat has been designated for this species. This species only needs to be considered under the following conditions: <ul style="list-style-type: none">▪ Water-related activities/use in the N. Platte, S. Platte and Laramie River Basins may affect listed species in Nebraska. Species profile: https://ecos.fws.gov/ecp/species/1669	Threatened

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

USFWS National Wildlife Refuge Lands And Fish Hatcheries

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

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, as described [below](#).

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1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Oct 15 to Jul 31
Burrowing Owl <i>Athene cunicularia</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9737	Breeds Mar 15 to Aug 31

NAME	BREEDING SEASON
Cassin's Sparrow <i>Aimophila cassinii</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9512	Breeds Aug 1 to Oct 10
Golden Eagle <i>Aquila chrysaetos</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/1680	Breeds Jan 1 to Aug 31
Lark Bunting <i>Calamospiza melanocorys</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds May 10 to Aug 15
Lesser Yellowlegs <i>Tringa flavipes</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9679	Breeds elsewhere
Long-billed Curlew <i>Numenius americanus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/5511	Breeds Apr 1 to Jul 31
Semipalmated Sandpiper <i>Calidris pusilla</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Whimbrel <i>Numenius phaeopus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9483	Breeds elsewhere
Willet <i>Tringa semipalmata</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 20 to Aug 5
Willow Flycatcher <i>Empidonax traillii</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/3482	Breeds May 20 to Aug 31

Probability Of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the

FAQ “Proper Interpretation and Use of Your Migratory Bird Report” before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

No Data (—)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) and/or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your

project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that

overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the “no data” indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ “Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds” at the bottom of your migratory bird trust resources page.

Wetlands

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.

APPENDIX F

EXPLOSIVE & FLAMMABLE HAZARDS

80525

tankid	TankCount	facilityid	ownerid	tanktag	capacity	productname	tanktypedesc	facilitynameaddress	facilityowner	tankowner	county
	27	1838	5269	'1838-1	2000	Lube Oil	AST	Harmony Grease Monkey 1036 Oakridge Dr Fort Collins 80525	Harmony Grease Monkey Inc.		Larimer
5183	27	1838	5269	'1838-2	1500	Used Oil (Waste Oil)	AST	Harmony Grease Monkey 1036 Oakridge Dr Fort Collins 80525	Harmony Grease Monkey Inc.		Larimer
6121	27	2186	21623	'2186-1	1000	Used Oil (Waste Oil)	AST	Jiffy Lube #17/Front Range Lube 2549 S College Ave Fort Collins 80525	Enitor Enterprises LLC		Larimer
29420	27	10797	1728	'10797-1	1000	Used Oil (Waste Oil)	AST	Dellenbach Chevrolet 3111 S College Ave Fort Collins 80525	Dellenbach Chevrolet		Larimer
32570	27	14765	18063	'14765-1	1000	Unleaded Regular (RUL)	AST	Pedersen Auto Plaza 4455 S Mason Fort Collins 80525	Pedersen Auto Plaza Aka Pedersen Properties LTD		Larimer
34226	27	15534	19427	'15534-1	10000	Diesel/Diesel (Multi-Comp)	AST	Drake Ready Mix 3000 E Drake Rd Fort Collins 80525	Aggregate Industries WCR Inc		Larimer
34558	27	15847	18941	'15847-1	1000	Diesel	AST	Hageman Earth Cycle Inc 3501 E Prospect Fort Collins 80525	Roger Hageman/Hageman Earth Cycle		Larimer
34559	27	15847	18941	'15847-2	1000	Unleaded Regular (RUL)	AST	Hageman Earth Cycle Inc 3501 E Prospect Fort Collins 80525	Roger Hageman/Hageman Earth Cycle		Larimer
38435	27	17613	20077	'17613-1	1500	Diesel/Gas (Multi-Comp)	AST	Horsetooth South Bay 4200 W CR 38e Fort Collins 80525	Larimer County Fleet Services		Larimer
38620	27	9655	8025	'9655-2	2200	Diesel	AST	Harmony Central Office 4620 S College Ave Fort Collins 80525	Centurylink QC		Larimer
40347	27	2186	21623	'2186-2	1000	Lube Oil	AST	Jiffy Lube #17/Front Range Lube 2549 S College Ave Fort Collins 80525	Enitor Enterprises LLC		Larimer
40348	27	2186	21623	'2186-3	1000	Used Oil (Waste Oil)	AST	Jiffy Lube #17/Front Range Lube 2549 S College Ave Fort Collins 80525	Enitor Enterprises LLC		Larimer
41983	27	2122	20446	'2122-2	1000	Diesel	AST	Avago Technologies 4380 Ziegler Rd Fort Collins 80525	Avago Technologies		Larimer
42251	27	18886	1120	'18886-1	1000	Unleaded Regular (RUL)	AST	Police Services City Of Fort Collins 2221 Timberline Rd Fort Collins 80525	City Of Fort Collins		Larimer
42252	27	18886	1120	'18886-2	1000	E-85	AST	Police Services City Of Fort Collins 2221 Timberline Rd Fort Collins 80525	City Of Fort Collins		Larimer
44796	27	19458	21718	'19458-1	850	Diesel Dyed #2	AST	City Of Fort Collins - Police Services Building 2221 Timberline Rd Fort Collins 80525	City Of Fort Collins		Larimer
45739	27	2122	20446	'2122-3	3900	Diesel	AST	Avago Technologies 4380 Ziegler Rd Fort Collins 80525	Avago Technologies		Larimer
47541	27	12741	18648	'12741-3	6000	Diesel/Gas (Multi-Comp)	AST	United Rentals 1926 Frontage Rd Fort Collins 80525	United Rentals Northwest Inc		Larimer
47590	27	20314	21623	'20314-1	1500	Used Oil (Waste Oil)	AST	Jiffy Lube #1383 121 Kensington Fort Collins 80525	Enitor Enterprises LLC		Larimer
47591	27	20314	21623	'20314-2	1500	Oil/Other (Multi-Comp)	AST	Jiffy Lube #1383 121 Kensington Fort Collins 80525	Enitor Enterprises LLC		Larimer
47622	27	20314	21623	'20314-3	1500	Oil/Other (Multi-Comp)	AST	Jiffy Lube #1383 121 Kensington Fort Collins 80525	Enitor Enterprises LLC		Larimer
47681	27	20368	21623	'20368-1	1000	Used Oil (Waste Oil)	AST	Jiffy Lube 3703 S Timberline Rd Fort Collins 80525	Enitor Enterprises LLC		Larimer
47682	27	20368	21623	'20368-2	1000	Lube Oil	AST	Jiffy Lube 3703 S Timberline Rd Fort Collins 80525	Enitor Enterprises LLC		Larimer
47683	27	20368	21623	'20368-3	1000	Oil/Other (Multi-Comp)	AST	Jiffy Lube 3703 S Timberline Rd Fort Collins 80525	Enitor Enterprises LLC		Larimer
48407	27	20589	1120	'20589-1	1000	Unleaded Regular (RUL)	AST	Hoffman Mill Fuel Site 1380 Hoffman mill road Fort Collins 80525	City Of Fort Collins		Larimer
48408	27	20589	1120	'20589-2	1000	Diesel	AST	Hoffman Mill Fuel Site 1380 Hoffman mill road Fort Collins 80525	City Of Fort Collins		Larimer
48409	27	20589	1120	'20589-3	1000	Diesel	AST	Hoffman Mill Fuel Site 1380 Hoffman mill road Fort Collins 80525	City Of Fort Collins		Larimer

Aboveground Storage Tanks

VOA Sr. Residences



Acceptable Separation Distance (ASD) Electronic Assessment Tool

The Environmental Planning Division (EPD) has developed an electronic-based assessment tool that calculates the Acceptable Separation Distance (ASD) from stationary hazards. The ASD is the distance from above ground stationary containerized hazards of an explosive or fire prone nature, to where a HUD assisted project can be located. The ASD is consistent with the Department's standards of blast overpressure (0.5 psi-buildings) and thermal radiation (450 BTU/ft² - hr - people and 10,000 BTU/ft² - hr - buildings). Calculation of the ASD is the first step to assess site suitability for proposed HUD-assisted projects near stationary hazards. Additional guidance on ASDs is available in the Department's guidebook "Siting of HUD- Assisted Projects Near Hazardous Facilities" and the regulation 24 CFR Part 51, Subpart C, Sitting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature.

Note: Tool tips, containing field specific information, have been added in this tool and may be accessed by hovering over the ASD result fields with the mouse.

Acceptable Separation Distance Assessment Tool

Is the container above ground?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="850"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="258.46"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="46.64"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

For mitigation options, please click on the following link: Mitigation Options (/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/)

Providing Feedback & Corrections

After using the ASD Assessment Tool following the directions in this User Guide, users are encouraged to provide feedback on how the ASD Assessment Tool may be improved. Users are also encouraged to send comments or corrections for the improvement of the tool.

Please send comments or other input using the **Contact Us** (<https://www.hudexchange.info/contact-us/>) form.

Related Information

- ASD User Guide (</resource/3839/acceptable-separation-distance-asd-assessment-tool-user-guide/>)
- ASD Flow Chart (</resource/3840/acceptable-separation-distance-asd-flowchart/>)

Acceptable Separation Distance (ASD) Electronic Assessment Tool

The Environmental Planning Division (EPD) has developed an electronic-based assessment tool that calculates the Acceptable Separation Distance (ASD) from stationary hazards. The ASD is the distance from above ground stationary containerized hazards of an explosive or fire prone nature, to where a HUD assisted project can be located. The ASD is consistent with the Department's standards of blast overpressure (0.5 psi-buildings) and thermal radiation (450 BTU/ft² - hr - people and 10,000 BTU/ft² - hr - buildings). Calculation of the ASD is the first step to assess site suitability for proposed HUD-assisted projects near stationary hazards. Additional guidance on ASDs is available in the Department's guidebook "Siting of HUD- Assisted Projects Near Hazardous Facilities" and the regulation 24 CFR Part 51, Subpart C, Sitting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature.

Note: Tool tips, containing field specific information, have been added in this tool and may be accessed by hovering over the ASD result fields with the mouse.

Acceptable Separation Distance Assessment Tool

Is the container above ground?	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Is the container under pressure?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="1000"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<div>Calculate Acceptable Separation Distance</div>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDBOP)	<input type="text"/>
ASD for Thermal Radiation for People (ASDPPU)	<input type="text" value="276.57"/>
ASD for Thermal Radiation for Buildings (ASDBPU)	<input type="text" value="50.28"/>
ASD for Thermal Radiation for People (ASDPNPD)	<input type="text"/>
ASD for Thermal Radiation for Buildings (ASDBNPD)	<input type="text"/>

For mitigation options, please click on the following link: Mitigation Options (/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/)

Providing Feedback & Corrections

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Related Information

- ASD User Guide (/resource/3839/acceptable-separation-distance-asd-assessment-tool-user-guide/)
- ASD Flow Chart (/resource/3840/acceptable-separation-distance-asd-flowchart/)

APPENDIX G

FARMLANDS PROTECTION

VOA Senior Residences



June 15, 2020

2010 Census Urbanized Areas	2010 Census Urbanized Areas
States	States
Counties	Counties

1:96,374

0 0.75 1.5 3 mi

0 1.25 2.5 5 km

Source: U.S. Census Bureau
Sources: Esri, USGS, NOAA

Created with: TIGERweb
(c) Copyright 2020 - US Census Bureau

APPENDIX H

SECTION 106 OF THE NHPA



June 22, 2020

Mr. Steve Turner
State Historic Preservation Officer
1200 Broadway
Denver, CO 80203

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO

Dear Mr. Turner,

The City of Fort Collins may assist a project with funds from the U.S. Department of Housing and Urban Development (HUD). In accordance with 36 CFR Part 800, "Protection of Historic Properties", regulations that implement Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470f), Miniello Consulting is contacting you on their behalf to request comments on historic properties affected by the proposed project.

The proposed federal activity would involve the construction of a new, three-story building with affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The wood-frame building would be built on a slab-on-grade foundation, and the exterior would be clad in brick and hardi-plank.

The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant. Based on a review of historic aerial imagery and topographic maps, the land had two significant drainages traversing it in 1937. By 1953, those no longer appear, and the land was being used for agricultural purposes (row crops). It remained in that use until about the mid-1980s.

The Area of Potential Effects (APE) is defined as the "...geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties. The area of potential effects is influenced by the scale and nature of the undertaking..." (36 CFR § 800.9[a]). The APE, which includes the subject property and surrounding properties in all directions, encompasses an area of approximately 21.66 acres. Single-family homes (built within past five years) are located to the north; three-story apartment buildings (built within past five years) are located to the east; single-family homes (built late 1970s to early 1980s) are located across E. Drake Rd. to the south and southwest; and railroad tracks, a multi-use trail, and mature vegetation are located to the west.

No properties currently listed in the National Register of Historic Places (NRHP) or Colorado State Register were identified within the APE. A segment of the Union Pacific-Dent Branch (5LR.10918.4) is located within the APE, and it was determined to be eligible for listing in the NRHP. The project will have no direct impact on the railroad segment, and given the amount of development along its corridor since the mid-1970s, any view shed impacts will be minimal and in keeping with previous construction of residential properties.

None of the remaining properties within the APE are associated with events that have made a significant contribution to the broad pattern of our history; associated with the lives of persons significant in our past; embody the distinctive characteristics of a type, period, method of construction or represent the work of a master, or possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction; or have yielded, or may be likely to yield, information important in history or prehistory.

Based on this information, the City of Fort Collins has determined that one linear resource (5LR. 10918.4) within the APE is eligible for listing in the NRHP and that **no historic properties will be affected** by the proposed project. Please review this undertaking's potential impacts and effects upon historic properties and provide comments within thirty (30) calendar days of receipt of this letter. Your assistance is valued, and we look forward to consulting further if there are historic properties of significance affected by this project. If you have questions or need additional information regarding this request, please contact Miniello Consulting by email at kristi@minielloconsulting.com or phone at (303) 531-1414.

Sincerely,

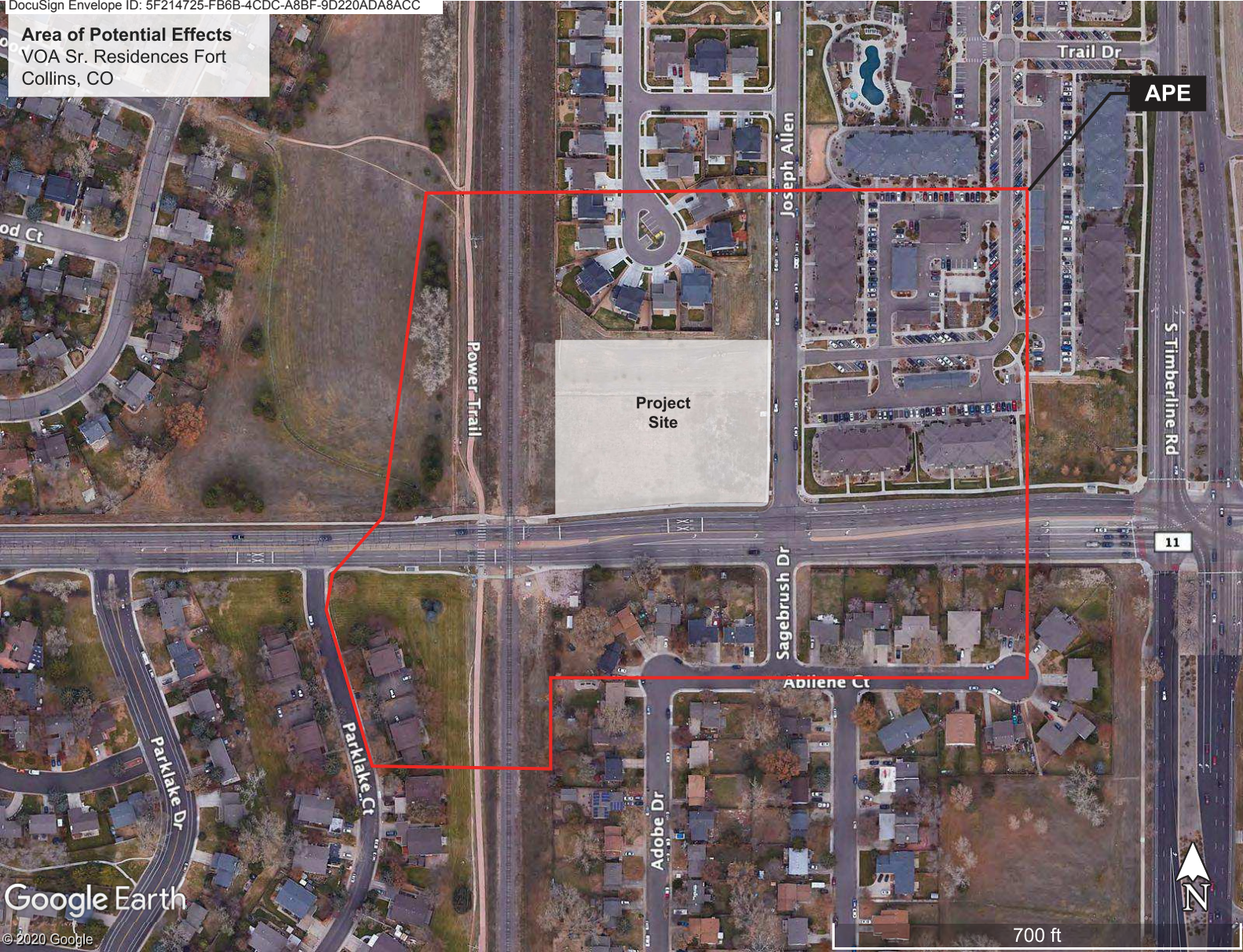
A handwritten signature in blue ink that reads "Kristi H. Miniello". The signature is written in a cursive, flowing style.

Kristi H. Miniello
Owner

Attachments: APE map, site photographs, project renderings, 1400 and 1418 Forms

Cc: Karen McWilliams, City of Fort Collins

Area of Potential Effects
VOA Sr. Residences Fort
Collins, CO





Social Sustainability
222 Laporte Ave.
PO Box 580
Fort Collins, CO 80522
www.fcgov.com

June 25, 2020

Andrew Werk
President
Fort Belknap Indian Community of the Fort Belknap Reservation of Montana
656 Agency Main
Harlem, MT

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO
Request for Tribal Comments Regarding Concerns of Traditional, Religious, or Cultural
Importance

Dear Andrew,

The City of Fort Collins may assist a project with funds from the U.S. Department of Housing and Urban Development (HUD). The proposed federal activity would involve the construction of a new, three-story building with affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The wood-frame building would be on top of a slab-on-grade foundation, and the exterior would be clad in brick and hardi-plank. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant. Based on a review of historic aerial imagery and topographic maps, the land had two significant drainages traversing it in 1937. By 1953, those no longer appear, and the land was being used for agricultural purposes (row crops). It remained in that use until about the mid-1980s.

Attached please find a USGS Quadrangle map, Area of Potential Effects (APE) map, photographs and project renderings. In accordance with 36 CFR Part 800, "Protection of Historic Properties", regulations that implement Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470f), the City of Fort Collins is contacting you to determine if your tribe may attach traditional, religious or cultural importance to any historic resources affected by the proposed project/activity.

The goal of consultation under Section 106 is to allow your tribe the opportunity to help identify historic properties potentially affected by this HUD-assisted project; assess the effects of the project on any historic resources; and consider ways to avoid, minimize or mitigate any adverse effects. We have also initiated consultation with the Colorado SHPO and, based on the information we have to-date, we believe this project/activity will not affect cultural or historic resources, resulting in a finding of **no historic properties affected**. However, we would appreciate hearing from you regarding any known archeological, historical, or cultural resources you are aware of at the proposed project/activity site(s).

Please also note that, regardless, we will require all partners to halt work and contact any potentially affected federally-recognized Tribes, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation within forty-eight (48) hours of discovery (pursuant to the protocol established at 36 C.F.R. Part 800, Section 800.13(b)(3)) should human remains or cultural artifacts be discovered during the construction period for this project.



We respectfully request that your comments be forwarded to us within thirty (30) calendar days of receipt of this letter. Please be as specific as you can with any comments or information to assist our decision-making. Thank you in advance for your assistance with this endeavor. If you have any questions or need any additional information, please contact Beth Rosen by email at brosen@fcgov.com or phone at 970-221-6812.

Sincerely,

A handwritten signature in blue ink that reads "Beth Rosen".

Beth Rosen
Grants Compliance & Policy Manager

Enclosures: USGS Quadrangle map, APE map, site photographs, project renderings



Social Sustainability
222 Laporte Ave.
PO Box 580
Fort Collins, CO 80522
www.fcgov.com

June 25, 2020

Ben Ridgley
THPO
Arapaho Tribe of the Wind River Reservation, Wyoming
PO Box 67
St. Stevens, WY 82524

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO
Request for Tribal Comments Regarding Concerns of Traditional, Religious, or Cultural
Importance

Dear Ben,

The City of Fort Collins may assist a project with funds from the U.S. Department of Housing and Urban Development (HUD). The proposed federal activity would involve the construction of a new, three-story building with affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The wood-frame building would be on top of a slab-on-grade foundation, and the exterior would be clad in brick and hardi-plank. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant. Based on a review of historic aerial imagery and topographic maps, the land had two significant drainages traversing it in 1937. By 1953, those no longer appear, and the land was being used for agricultural purposes (row crops). It remained in that use until about the mid-1980s.

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Sincerely,

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Beth Rosen
Grants Compliance & Policy Manager

Enclosures: USGS Quadrangle map, APE map, site photographs, project renderings



Social Sustainability
222 Laporte Ave.
PO Box 580
Fort Collins, CO 80522
www.fcgov.com

June 25, 2020

Bobby Komardley
Chairman
Apache Tribe of Oklahoma
PO Box 1330
Anadarko, OK 73005

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO
Request for Tribal Comments Regarding Concerns of Traditional, Religious, or Cultural
Importance

Dear Bobby,

The City of Fort Collins may assist a project with funds from the U.S. Department of Housing and Urban Development (HUD). The proposed federal activity would involve the construction of a new, three-story building with affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The wood-frame building would be on top of a slab-on-grade foundation, and the exterior would be clad in brick and hardi-plank. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant. Based on a review of historic aerial imagery and topographic maps, the land had two significant drainages traversing it in 1937. By 1953, those no longer appear, and the land was being used for agricultural purposes (row crops). It remained in that use until about the mid-1980s.

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Sincerely,

A handwritten signature in blue ink that reads "Beth Rosen".

Beth Rosen
Grants Compliance & Policy Manager

Enclosures: USGS Quadrangle map, APE map, site photographs, project renderings



Social Sustainability
222 Laporte Ave.
PO Box 580
Fort Collins, CO 80522
www.fcgov.com

June 25, 2020

Lee Spoonhunter
Chairperson
Arapaho Tribe of the Wind River Reservation, Wyoming
PO Box 396
Fort Washakie, WY

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO
Request for Tribal Comments Regarding Concerns of Traditional, Religious, or Cultural
Importance

Dear Lee,

The City of Fort Collins may assist a project with funds from the U.S. Department of Housing and Urban Development (HUD). The proposed federal activity would involve the construction of a new, three-story building with affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The wood-frame building would be on top of a slab-on-grade foundation, and the exterior would be clad in brick and hardi-plank. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant. Based on a review of historic aerial imagery and topographic maps, the land had two significant drainages traversing it in 1937. By 1953, those no longer appear, and the land was being used for agricultural purposes (row crops). It remained in that use until about the mid-1980s.

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Sincerely,

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Beth Rosen
Grants Compliance & Policy Manager

Enclosures: USGS Quadrangle map, APE map, site photographs, project renderings



Social Sustainability
222 Laporte Ave.
PO Box 580
Fort Collins, CO 80522
www.fcgov.com

June 25, 2020

Martina Minthorn
THPO
Comanche Nation, Oklahoma
6 SW D Avenue
Lawton, OK 73502

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO
Request for Tribal Comments Regarding Concerns of Traditional, Religious, or Cultural
Importance

Dear Martina,

The City of Fort Collins may assist a project with funds from the U.S. Department of Housing and Urban Development (HUD). The proposed federal activity would involve the construction of a new, three-story building with affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The wood-frame building would be on top of a slab-on-grade foundation, and the exterior would be clad in brick and hardi-plank. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant. Based on a review of historic aerial imagery and topographic maps, the land had two significant drainages traversing it in 1937. By 1953, those no longer appear, and the land was being used for agricultural purposes (row crops). It remained in that use until about the mid-1980s.

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Sincerely,

A handwritten signature in blue ink that reads "Beth Rosen".

Beth Rosen
Grants Compliance & Policy Manager

Enclosures: USGS Quadrangle map, APE map, site photographs, project renderings



Social Sustainability
222 Laporte Ave.
PO Box 580
Fort Collins, CO 80522
www.fcgov.com

June 25, 2020

Max Bear
THPO
Cheyenne and Arapaho Tribes, Oklahoma
700 Black Kettle Blvd
Concho, OK 73022

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO
Request for Tribal Comments Regarding Concerns of Traditional, Religious, or Cultural
Importance

Dear Max,

The City of Fort Collins may assist a project with funds from the U.S. Department of Housing and Urban Development (HUD). The proposed federal activity would involve the construction of a new, three-story building with affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The wood-frame building would be on top of a slab-on-grade foundation, and the exterior would be clad in brick and hardi-plank. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant. Based on a review of historic aerial imagery and topographic maps, the land had two significant drainages traversing it in 1937. By 1953, those no longer appear, and the land was being used for agricultural purposes (row crops). It remained in that use until about the mid-1980s.

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Sincerely,

A handwritten signature in blue ink that reads "Beth Rosen".

Beth Rosen
Grants Compliance & Policy Manager

Enclosures: USGS Quadrangle map, APE map, site photographs, project renderings



Social Sustainability
222 Laporte Ave.
PO Box 580
Fort Collins, CO 80522
www.fcgov.com

June 25, 2020

Michael Blackwolf
THPO
Fort Belknap Indian Community of the Fort Belknap Reservation of Montana
656 Agency Main Street
Harlem, MT

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO
Request for Tribal Comments Regarding Concerns of Traditional, Religious, or Cultural
Importance

Dear Michael,

The City of Fort Collins may assist a project with funds from the U.S. Department of Housing and Urban Development (HUD). The proposed federal activity would involve the construction of a new, three-story building with affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The wood-frame building would be on top of a slab-on-grade foundation, and the exterior would be clad in brick and hardi-plank. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant. Based on a review of historic aerial imagery and topographic maps, the land had two significant drainages traversing it in 1937. By 1953, those no longer appear, and the land was being used for agricultural purposes (row crops). It remained in that use until about the mid-1980s.

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Sincerely,

A handwritten signature in blue ink that reads "Beth Rosen".

Beth Rosen
Grants Compliance & Policy Manager

Enclosures: USGS Quadrangle map, APE map, site photographs, project renderings



Social Sustainability
222 Laporte Ave.
PO Box 580
Fort Collins, CO 80522
www.fcgov.com

June 25, 2020

Reggie Wassana
Governor
Cheyenne and Arapaho Tribes, Oklahoma
P.O. Box 167
Concho, OK 73022

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO
Request for Tribal Comments Regarding Concerns of Traditional, Religious, or Cultural
Importance

Dear Reggie,

The City of Fort Collins may assist a project with funds from the U.S. Department of Housing and Urban Development (HUD). The proposed federal activity would involve the construction of a new, three-story building with affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The wood-frame building would be on top of a slab-on-grade foundation, and the exterior would be clad in brick and hardi-plank. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant. Based on a review of historic aerial imagery and topographic maps, the land had two significant drainages traversing it in 1937. By 1953, those no longer appear, and the land was being used for agricultural purposes (row crops). It remained in that use until about the mid-1980s.

Attached please find a USGS Quadrangle map, Area of Potential Effects (APE) map, photographs and project renderings. In accordance with 36 CFR Part 800, "Protection of Historic Properties", regulations that implement Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470f), the City of Fort Collins is contacting you to determine if your tribe may attach traditional, religious or cultural importance to any historic resources affected by the proposed project/activity.

The goal of consultation under Section 106 is to allow your tribe the opportunity to help identify historic properties potentially affected by this HUD-assisted project; assess the effects of the project on any historic resources; and consider ways to avoid, minimize or mitigate any adverse effects. We have also initiated consultation with the Colorado SHPO and, based on the information we have to-date, we believe this project/activity will not affect cultural or historic resources, resulting in a finding of **no historic properties affected**. However, we would appreciate hearing from you regarding any known archeological, historical, or cultural resources you are aware of at the proposed project/activity site(s).

Please also note that, regardless, we will require all partners to halt work and contact any potentially affected federally-recognized Tribes, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation within forty-eight (48) hours of discovery (pursuant to the protocol established at 36 C.F.R. Part 800, Section 800.13(b)(3)) should human remains or cultural artifacts be discovered during the construction period for this project.



We respectfully request that your comments be forwarded to us within thirty (30) calendar days of receipt of this letter. Please be as specific as you can with any comments or information to assist our decision-making. Thank you in advance for your assistance with this endeavor. If you have any questions or need any additional information, please contact Beth Rosen by email at brosen@fcgov.com or phone at 970-221-6812.

Sincerely,

A handwritten signature in blue ink that reads "Beth Rosen".

Beth Rosen
Grants Compliance & Policy Manager

Enclosures: USGS Quadrangle map, APE map, site photographs, project renderings



Social Sustainability
222 Laporte Ave.
PO Box 580
Fort Collins, CO 80522
www.fcgov.com

June 25, 2020

Rynalea Whiteman Pena
President
Northern Cheyenne Tribe of the Northern Cheyenne Indian Reservation, Montana
PO Box 128
Lame Deer, MT

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO
Request for Tribal Comments Regarding Concerns of Traditional, Religious, or Cultural
Importance

Dear Rynalea,

The City of Fort Collins may assist a project with funds from the U.S. Department of Housing and Urban Development (HUD). The proposed federal activity would involve the construction of a new, three-story building with affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The wood-frame building would be on top of a slab-on-grade foundation, and the exterior would be clad in brick and hardi-plank. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant. Based on a review of historic aerial imagery and topographic maps, the land had two significant drainages traversing it in 1937. By 1953, those no longer appear, and the land was being used for agricultural purposes (row crops). It remained in that use until about the mid-1980s.

Attached please find a USGS Quadrangle map, Area of Potential Effects (APE) map, photographs and project renderings. In accordance with 36 CFR Part 800, "Protection of Historic Properties", regulations that implement Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470f), the City of Fort Collins is contacting you to determine if your tribe may attach traditional, religious or cultural importance to any historic resources affected by the proposed project/activity.

The goal of consultation under Section 106 is to allow your tribe the opportunity to help identify historic properties potentially affected by this HUD-assisted project; assess the effects of the project on any historic resources; and consider ways to avoid, minimize or mitigate any adverse effects. We have also initiated consultation with the Colorado SHPO and, based on the information we have to-date, we believe this project/activity will not affect cultural or historic resources, resulting in a finding of **no historic properties affected**. However, we would appreciate hearing from you regarding any known archeological, historical, or cultural resources you are aware of at the proposed project/activity site(s).

Please also note that, regardless, we will require all partners to halt work and contact any potentially affected federally-recognized Tribes, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation within forty-eight (48) hours of discovery (pursuant to the protocol established at 36 C.F.R. Part 800, Section 800.13(b)(3)) should human remains or cultural artifacts be discovered during the construction period for this project.



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Sincerely,

A handwritten signature in blue ink that reads "Beth Rosen".

Beth Rosen
Grants Compliance & Policy Manager

Enclosures: USGS Quadrangle map, APE map, site photographs, project renderings



Social Sustainability
222 Laporte Ave.
PO Box 580
Fort Collins, CO 80522
www.fcgov.com

June 25, 2020

Teanna Limpy
THPO

Northern Cheyenne Tribe of the Northern Cheyenne Indian Reservation, Montana
PO Box 128
Lame Deer, MT 59043

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO
Request for Tribal Comments Regarding Concerns of Traditional, Religious, or Cultural
Importance

Dear Teanna,

The City of Fort Collins may assist a project with funds from the U.S. Department of Housing and Urban Development (HUD). The proposed federal activity would involve the construction of a new, three-story building with affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The wood-frame building would be on top of a slab-on-grade foundation, and the exterior would be clad in brick and hardi-plank. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant. Based on a review of historic aerial imagery and topographic maps, the land had two significant drainages traversing it in 1937. By 1953, those no longer appear, and the land was being used for agricultural purposes (row crops). It remained in that use until about the mid-1980s.

Attached please find a USGS Quadrangle map, Area of Potential Effects (APE) map, photographs and project renderings. In accordance with 36 CFR Part 800, "Protection of Historic Properties", regulations that implement Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470f), the City of Fort Collins is contacting you to determine if your tribe may attach traditional, religious or cultural importance to any historic resources affected by the proposed project/activity.

The goal of consultation under Section 106 is to allow your tribe the opportunity to help identify historic properties potentially affected by this HUD-assisted project; assess the effects of the project on any historic resources; and consider ways to avoid, minimize or mitigate any adverse effects. We have also initiated consultation with the Colorado SHPO and, based on the information we have to-date, we believe this project/activity will not affect cultural or historic resources, resulting in a finding of **no historic properties affected**. However, we would appreciate hearing from you regarding any known archeological, historical, or cultural resources you are aware of at the proposed project/activity site(s).

Please also note that, regardless, we will require all partners to halt work and contact any potentially affected federally-recognized Tribes, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation within forty-eight (48) hours of discovery (pursuant to the protocol established at 36 C.F.R. Part 800, Section 800.13(b)(3)) should human remains or cultural artifacts be discovered during the construction period for this project.



We respectfully request that your comments be forwarded to us within thirty (30) calendar days of receipt of this letter. Please be as specific as you can with any comments or information to assist our decision-making. Thank you in advance for your assistance with this endeavor. If you have any questions or need any additional information, please contact Beth Rosen by email at brosen@fcgov.com or phone at 970-221-6812.

Sincerely,

A handwritten signature in blue ink that reads "Beth Rosen".

Beth Rosen
Grants Compliance & Policy Manager

Enclosures: USGS Quadrangle map, APE map, site photographs, project renderings



Social Sustainability
222 Laporte Ave.
PO Box 580
Fort Collins, CO 80522
www.fcgov.com

June 25, 2020

William Nelson
Chairman
Comanche Nation, Oklahoma
PO Box 908
Lawton, OK 73502

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO
Request for Tribal Comments Regarding Concerns of Traditional, Religious, or Cultural
Importance

Dear William,

The City of Fort Collins may assist a project with funds from the U.S. Department of Housing and Urban Development (HUD). The proposed federal activity would involve the construction of a new, three-story building with affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The wood-frame building would be on top of a slab-on-grade foundation, and the exterior would be clad in brick and hardi-plank. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant. Based on a review of historic aerial imagery and topographic maps, the land had two significant drainages traversing it in 1937. By 1953, those no longer appear, and the land was being used for agricultural purposes (row crops). It remained in that use until about the mid-1980s.

Attached please find a USGS Quadrangle map, Area of Potential Effects (APE) map, photographs and project renderings. In accordance with 36 CFR Part 800, "Protection of Historic Properties", regulations that implement Section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470f), the City of Fort Collins is contacting you to determine if your tribe may attach traditional, religious or cultural importance to any historic resources affected by the proposed project/activity.

The goal of consultation under Section 106 is to allow your tribe the opportunity to help identify historic properties potentially affected by this HUD-assisted project; assess the effects of the project on any historic resources; and consider ways to avoid, minimize or mitigate any adverse effects. We have also initiated consultation with the Colorado SHPO and, based on the information we have to-date, we believe this project/activity will not affect cultural or historic resources, resulting in a finding of **no historic properties affected**. However, we would appreciate hearing from you regarding any known archeological, historical, or cultural resources you are aware of at the proposed project/activity site(s).

Please also note that, regardless, we will require all partners to halt work and contact any potentially affected federally-recognized Tribes, the State Historic Preservation Officer, and the Advisory Council on Historic Preservation within forty-eight (48) hours of discovery (pursuant to the protocol established at 36 C.F.R. Part 800, Section 800.13(b)(3)) should human remains or cultural artifacts be discovered during the construction period for this project.



We respectfully request that your comments be forwarded to us within thirty (30) calendar days of receipt of this letter. Please be as specific as you can with any comments or information to assist our decision-making. Thank you in advance for your assistance with this endeavor. If you have any questions or need any additional information, please contact Beth Rosen by email at brosen@fcgov.com or phone at 970-221-6812.

Sincerely,

A handwritten signature in blue ink that reads "Beth Rosen".

Beth Rosen
Grants Compliance & Policy Manager

Enclosures: USGS Quadrangle map, APE map, site photographs, project renderings



HISTORY Colorado

Kristi Miniello
Miniello Consulting

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. and Joseph Allen Dr., Fort Collins, CO (HC# 78033)

Dear Ms. Miniello,

Thank you for your correspondence dated and received by our office on June 22, 2020 regarding the review of the above referenced project. As project funding originates from the U.S. Department of Housing and Urban Development and due to the type of activities involved, the project comprises an undertaking subject to Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800.

We thank you for the documentation you have provided including the general site plan. We note that the proposed project consists of the construction of a three-story building with an associated parking lot, detention pond, and associated site/infrastructure. After review of the provided documentation, we do not object to the defined area of potential effects (APE). The documentation included a cultural resource inventory form for a resource (5LR.10918.4) identified in the APE. The provided documentation, however, did not discuss the completion of an inventory or include an inventory report. In order to complete our review, we request that you complete an inventory report including details on the type of inventory completed, the methods used, the inventory area, and results.

We also note that the documentation of the resources appears to comprise a selective effort to document historic structures in the APE. While this comprises an important step, we note that the APE and the surrounding area has not been previously inventoried and that historic properties, as defined by 36 CFR 800.16 (l)(1), include prehistoric and historic districts, sites, buildings, structure, or object. Surface and subsurface cultural remains could sit in the APE. The area could contain previously unidentified cultural resources including archaeological sites. As a result of the fact that the APE has not been fully inventoried and the proposed undertaking has the potential to affect historic properties, it is our recommendation that a cultural resource inventory be completed by an archaeologist who meets the Secretary of the Interior's Standards for Archaeology prior to construction activities to determine the presence of cultural resources within the APE and the potential effects to these resources as a result of the proposed project. This level of effort is recommended in accordance with 36 CFR 800.4(b)(1).

A list of qualified contractors that may provide the above services is available on our website: <https://www.historycolorado.org/sites/default/files/media/document/2017/1502.pdf>. Upon completion of the appropriate identification efforts, our office should be provided with the results of the cultural resource inventory for review of professional adequacy and compliance with regulations, as well as to evaluate the appropriateness of the recommended effect finding.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings. Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

Thank you for the opportunity to comment. If you have any questions, please contact Matthew Marques, Section 106 Compliance Manager, at (303) 866-4678, or matthew.marques@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer



July 27, 2020

Mr. Matthew Marques
Section 106 Compliance Manager
OAHP
matthew.marques@state.co.us

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO

Dear Mr. Marques,

In response to the comments in your letter received June 29, 2020, the following additional information is being provided. Regarding the request via email communication to prepare a cultural resource report for aboveground resources, the scale and nature of the undertaking are limited to a 2.32-acres parcel and do not warrant such an intensive or cost-prohibitive effort. However, the following additional information is being provided to your office to provide a better understanding of the methodology and identification efforts:

Kristi H. Miniello, a Secretary of the Interior Qualified Professional in Architectural History, identified and evaluated historic resources located within the Area of Potential Effects (APE). Ms. Miniello performed initial research through the City of Fort Collins Maps property records; digital records through the Stephen Hart Library at History Colorado; historic aerial imagery and topographic maps; and the Office of Archaeology and Historic Preservation's *Compass* database. No previously evaluated properties within the APE were identified in *Compass*. All of this information was taken into account while developing the APE and determining the extent of survey and identification work. A field assessment of buildings and structures built more than 50 years ago within the APE was undertaken in June 2020. In total, one resource that is at least 50 years of age was identified within the APE. The segment of a linear resource, 5LR.10918.4, was evaluated at an intensive level (OAHP Forms 1400 and 1418 provided previously) and Ms. Miniello consulted the *Colorado Plains Historic Context: Development and Expansion of the Rail Network (1965-1895)* and "Railroads in Colorado, 1858-1948" Multiple Property Listing Nomination Form prepared by Clayton B. Fraser to assist in development of those forms and evaluation of the resource's eligibility.

A qualified archaeologist performed a cultural resource inventory and determined that there is little to no potential for subsurface cultural resources and/or remains in the project APE. The three previously evaluated resources identified by the archaeologist through a *Compass* search are well removed from the project area and APE. The only eligible property on that list, 5LR.1571, is recorded as being 0.71 mile to the south.

Based on the proposed scope of work, this evaluation, and information previously submitted to your office on June 22, 2020, the City of Fort Collins has determined that a finding of **no historic properties affected** is appropriate.

Sincerely,

A handwritten signature in blue ink that reads "Kristi H. Miniello". The signature is written in a cursive style and is positioned above the printed name.

Kristi H. Miniello
Owner

Attachment: OAHP Form 1420

Emc: Bret Hillberry, Colorado Department of Local Affairs

**DUE TO POTENTIALLY SENSITIVE INFORMATION, THE LIMITED-RESULTS
CULTURAL RESOURCE SURVEY WAS NOT INCLUDED IN THE APPENDIX**



HISTORY Colorado

Kristi Miniello
Miniello Consulting

RE: Proposed HUD-Funded Undertaking at E. Drake Rd. and Joseph Allen Dr., Fort Collins, CO (HC# 78033)

Dear Ms. Miniello,

Thank you for your correspondence dated and received by our office on July 27, 2020 continuing consultation regarding the above referenced project. As project funding originates from the U.S. Department of Housing and Urban Development and due to the type of activities involved, the project comprises an undertaking subject to Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR 800. The July 2020 correspondence continues consultation initiated in July 2020 and in response to our June 22, 2020 letter requesting the completion of a cultural resource inventory.

We thank you for the documentation you have provided including the results of a class III cultural resource inventory. We note that the proposed project consists of the construction of a three-story building with an associated parking lot, detention pond, and associated site/infrastructure. After review of the provided documentation, we do not object to the defined area of potential effects (APE). A cultural resource (5LR.10918.4) sits in the APE. We concur with your finding that 5LR.10918.4 supports the eligibility of 5LR.10918 for the National Register of Historic Places. The documentation notes that the proposed undertaking will avoid 5LR.10918.4. Based on the documentation provided, we concur that your finding of no historic properties affected [36 CFR 800.4(d)(1)] is appropriate for the proposed undertaking.

Should unidentified archaeological resources be discovered in the course of the project, work must be interrupted until the resources have been evaluated in terms of the National Register eligibility criteria (36 CFR 60.4) in consultation with our office pursuant to 36 CFR 800.13. Also, should the consulted-upon scope of the work change, please contact our office for continued consultation under Section 106 of the National Historic Preservation Act.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings. Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

Thank you for the opportunity to comment. If you have any questions, please contact Matthew Marques, Section 106 Compliance Manager, at (303) 866-4678, or matthew.marques@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer

APPENDIX I

NOISE ANALYSIS



Circle Search for Airports

Searches - Desk Reference Guide V_2018.2.0

- Search for airports as defined in 14 CFR Part 77.9(d) around a center point with a specified radius.
- Note: the system returns a maximum of 2000 records. Search results will only display public use facilities.
- [digital-Terminal Procedures Publication \(d -TPP\)/Airport Diagrams](#)
- [List of Active Special Instrument Flight Procedures](#)

Circle Center Point:		Circle Radius:
<input type="radio"/> An airport:	<input type="text"/> (e.g, IAD, SFO, LAX)	<input type="text" value="13.03"/>
<input type="radio"/> An Off Airport Case:	<input type="text"/> - <input type="text"/> - <input type="text"/> - OE	Nautical miles (50 miles max)
<input type="radio"/> An On Airport Case:	<input type="text"/> - <input type="text"/> - <input type="text"/> - NRA	
<input checked="" type="radio"/> A specific location:	<div><div>Latitude:</div><div><input type="text" value="40"/> Deg <input type="text" value="33"/> M <input type="text" value="10"/> S <input type="text" value="N"/></div></div> <div><div>Longitude:</div><div><input type="text" value="105"/> Deg <input type="text" value="02"/> M <input type="text" value="33"/> S <input type="text" value="W"/></div></div> <div><div>Datum:</div><div>NAD83</div></div>	

Note: this search may take up to 30 seconds to return results.



Circle Search For Airports Results

Records 1 to 1 of 1

Page 1 of 1

Locator Id	Name	Site Type	City	State	Latitude	Longitude	Distance(NM)	Azimuth
FNL	NORTHERN COLORADO RGNL	Airport	FORT COLLINS/LOVELAND	CO	40° 27' 6.58" N	105° 0' 40.81" W	6.21	346.75°

Rows per Page: 20

Records 1 to 1 of 1

Page: 1

Page 1 of 1



FEDERAL AVIATION ADMINISTRATION

AIRPORT MASTER RECORD

PRINT DATE: 6/29/2020
AFD EFF 06/18/2020
FORM APPROVED OMB 2120-0015

> 1 ASSOC CITY: FORT COLLINS/LOVELAND 4 STATE: CO LOC ID: FNL FAA SITE NR: 02603.1*A
> 2 AIRPORT NAME: NORTHERN COLORADO RGNL 5 COUNTY: LARIMER CO
3 CBD TO AIRPORT (NM): 09 SE 6 REGION/ADO: ANM/DEN 7 SECT AERO CHT: CHEYENNE

GENERAL		SERVICES		BASED AIRCRAFT	
10 OWNERSHIP: PUBLIC		> 70 FUEL: 100LL A		90 SINGLE ENG: 213	
> 11 OWNER: FORT COLLINS & LOVELAND				91 MULTI ENG: 14	
> 12 ADDRESS: 4900 EARHART ROAD		> 71 AIRFRAME RPRS: MAJOR		92 JET: 10	
LOVELAND, CO 80538		> 72 PWR PLANT RPRS: MAJOR		TOTAL: 237	
> 13 PHONE NR: 970-962-2850		> 73 BOTTLE OXYGEN: NONE			
> 14 MANAGER: JASON LICON		> 74 BULK OXYGEN: HIGH/LOW		93 HELICOPTERS: 17	
> 15 ADDRESS: 4900 EARHART ROAD		75 TSNT STORAGE: HGR, TIE		94 GLIDERS: 1	
LOVELAND, CO 80538		76 OTHER SERVICES: CHTR, INSTR, RNTL, SALES, SURV		95 MILITARY: 0	
> 16 PHONE NR: 970-962-2852				96 ULTRA-LIGHT: 0	
> 17 ATTENDANCE SCHEDULE:					
ALL	ALL	ALL			
18 AIRPORT USE: PUBLIC		> 80 ARPT BCN: CG		100 AIR CARRIER: 46	
19 ARPT LAT: 40-27-06.5780N ESTIMATED		> 81 ARPT LGT SKED: SEE RMK		102 AIR TAXI: 3,500	
20 ARPT LONG: 105-00-40.8080W		BCN LGT SKED: SS-SR		103 G A LOCAL: 35,150	
21 ARPT ELEV: 5015.7 SURVEYED		> 82 UNICOM: 122.700		104 G A ITNRNT: 56,000	
22 ACREAGE: 1,065		> 83 WIND INDICATOR: YES-L		105 MILITARY: 200	
> 23 RIGHT TRAFFIC: NO		84 SEGMENTED CIRCLE: YES		TOTAL: 94,896	
> 24 NON-COMM LANDING: NO		85 CONTROL TWR: NO			
		86 FSS: DENVER		OPERATIONS FOR	
25 NPIAS/FED AGREEMENTS: NGY		87 FSS ON ARPT: NO		12 MONTHS	
> 26 FAR 139 INDEX: I B S 08/1993		88 FSS PHONE NR:		ENDING: 12/31/2018	
		89 TOLL FREE NR: 1-800-WX-BRIEF			
RUNWAY DATA					
> 30 RUNWAY INDENT:	06/24	15/33			
> 31 LENGTH:	2,273	8,500			
> 32 WIDTH:	40	100			
> 33 SURF TYPE-COND:	ASPH-G	ASPH-G			
> 34 SURF TREATMENT:		GRVD			
35 GROSS WT: S		50.0			
36 (IN THSDS) D		65.0			
37 2D		130.0			
38 2D/2D2					
> 39 PCN:		49 /F/C/W/T			
LIGHTING/APCH AIDS					
> 40 EDGE INTENSITY:		HIGH			
> 42 RWY MARK TYPE-COND:	BSC - G / BSC - G	PIR - G / PIR - G	- / -	- / -	
> 43 VGSI:	/	P4L / P4L	/	/	
44 THR CROSSING HGT	/	54 / 52	/	/	
45 VISUAL GLIDE ANGLE:	/	3.00 / 3.00	/	/	
> 46 CNTRLN-TDZ:	- / -	- / -	- / -	- / -	
> 47 RVR-RVV:	- / -	- / -	- / -	- / -	
> 48 REIL:	N / N	Y / N	/	/	
> 49 APCH LIGHTS:	/	/ MALSR	/	/	
OBSTRUCTION DATA					
50 FAR 77 CATEGORY	A(V) / A(V)	C / PIR	/	/	
> 51 DISPLACED THR:	/	/	/	/	
> 52 CTLG OBSTN:	/	/	/	/	
> 53 OBSTN MARKED/LGTD:	/	/	/	/	
> 54 HGT ABOVE RWY END:	/	/	/	/	
> 55 DIST FROM RWY END:	/	/	/	/	
> 56 CNTRLN OFFSET:	/	/	/	/	
57 OBSTN CLNC SLOPE:	50:1 / 50:1	50:1 / 50:1	/	/	
58 CLOSE-IN OBSTN:	N / Y	N / N	/	/	
DECLARED DISTANCES					
> 60 TAKE OFF RUN AVBL (TORA):	2,273 / 2,273	8,500 / 8,500	/	/	
> 61 TAKE OFF DIST AVBL (TODA):	2,273 / 2,273	8,500 / 8,500	/	/	
> 62 ACLT STOP DIST AVBL (ASDA):	2,273 / 2,273	8,500 / 8,500	/	/	
> 63 LNDG DIST AVBL (LDA):	2,273 / 2,273	8,500 / 8,500	/	/	

(>) ARPT MGR PLEASE ADVISE FSS IN ITEM 86 WHEN CHANGES OCCUR TO ITEMS PRECEDED BY >

> 110 REMARKS

A 026 24 HR PPR FOR UNSKED ACR OPNS WITH MORE THAN 30 PSGR SEATS CALL AMGR 970-962-2852.
A 058 RWY 24 -2'-4' DITCH WITHIN 55' L & R OF CNTRLN FULL LENGTH OF RY, CONCRETE HEADWALL 43' L & R OF CNTRLN, 815' FM RY 06 THR.
A 081 DUSK-DAWN; ACTVT & INCR INTST MALSR RWY 33; REIL RWY 15; PAPI RWY 33; HIRL RWY 15/33; TWY LGTS - CTAF. PAPI RWY 15 ON CONSLY.
A 110 THIS AIRPORT HAS BEEN SURVEYED BY THE NATIONAL GEODETIC SURVEY.
A 110-002 RY 33 PREFERRED TKOF AND LNDG WITH WINDS 5 KNOTS OR LESS ANY DIRECTION.
A 110-003 TWY A2 & A3 WT BRG LMT 12,500 LBS SWA.
A 110-004 SFC CONDITION UNMONITORED 0500-1300Z++.
A 110-005 RY 6/24 RUNWAY EDGE REFLECTORS FULL LENGTH.
A 110-006 FOR CD CTC DENVER APCH AT 303-342-1916.

111 INSPECTOR: (F) 112 LAST INSP: 05/15/2019 113 LAST INFO REQ:

U. S. DOT CROSSING INVENTORY FORM

DEPARTMENT OF TRANSPORTATION

FEDERAL RAILROAD ADMINISTRATION

OMB No. 2130-0017

Instructions for the initial reporting of the following types of new or previously unreported crossings: For public highway-rail grade crossings, complete the entire inventory Form. For private highway-rail grade crossings, complete the Header, Parts I and II, and the Submission Information section. For public pathway grade crossings (including pedestrian station grade crossings), complete the Header, Parts I and II, and the Submission Information section. For Private pathway grade crossings, complete the Header, Parts I and II, and the Submission Information section. For grade-separated highway-rail or pathway crossings (including pedestrian station crossings), complete the Header, Part I, and the Submission Information section. For changes to existing data, complete the Header, Part I Items 1-3, and the Submission Information section, in addition to the updated data fields. Note: For private crossings only, Part I Item 20 and Part III Item 2.K. are required unless otherwise noted. An asterisk * denotes an optional field.

A. Revision Date (MM/DD/YYYY) 05 / 02 / 2019	B. Reporting Agency <input checked="" type="checkbox"/> Railroad <input type="checkbox"/> Transit <input type="checkbox"/> State <input type="checkbox"/> Other	C. Reason for Update (Select only one) <input type="checkbox"/> Change in Data <input type="checkbox"/> New Crossing <input type="checkbox"/> Closed <input type="checkbox"/> Re-Open <input type="checkbox"/> Date Change Only <input type="checkbox"/> Change in Primary Operating RR <input type="checkbox"/> No Train Traffic <input type="checkbox"/> Quiet Zone Update <input checked="" type="checkbox"/> Admin. Correction	D. DOT Crossing Inventory Number 804505E
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Part I: Location and Classification Information

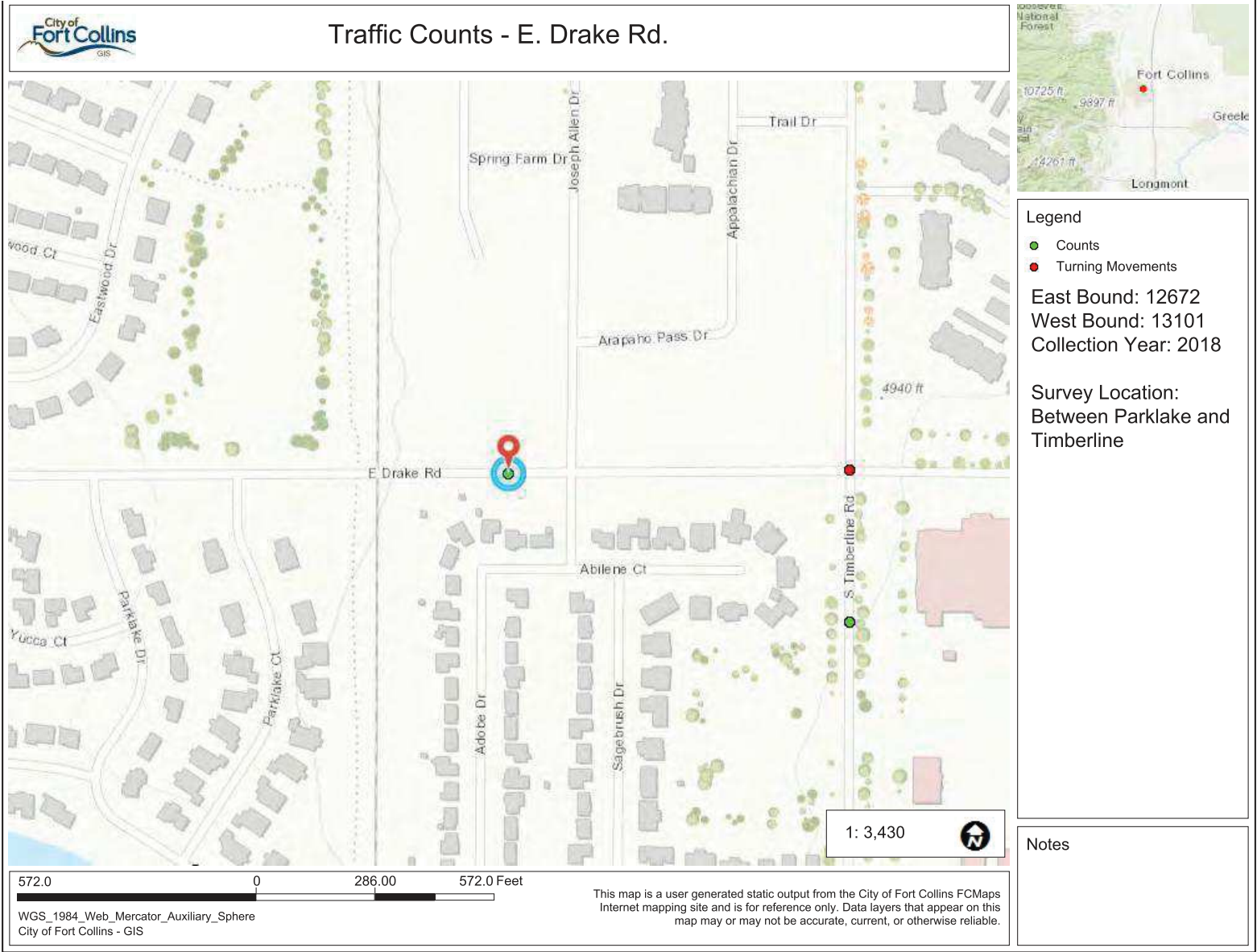
1. Primary Operating Railroad Union Pacific Railroad Company [UP]		2. State COLORADO		3. County LARIMER	
4. City / Municipality <input type="checkbox"/> In <input checked="" type="checkbox"/> Near FORT COLLINS		5. Street/Road Name & Block Number DRAKE ROAD (Street/Road Name) * (Block Number)		6. Highway Type & No. FAU5010	
7. Do Other Railroads Operate a Separate Track at Crossing? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Specify RR			8. Do Other Railroads Operate Over Your Track at Crossing? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Specify RR		
9. Railroad Division or Region <input type="checkbox"/> None GREAT PLAINS		10. Railroad Subdivision or District <input type="checkbox"/> None Fort Collins Sub		11. Branch or Line Name <input checked="" type="checkbox"/> None	
12. RR Milepost 0028.540 (prefix) (nnnn.nnn) (suffix)					
13. Line Segment *		14. Nearest RR Timetable Station *		15. Parent RR (if applicable) <input checked="" type="checkbox"/> N/A	
16. Crossing Owner (if applicable) <input type="checkbox"/> N/A UP					
17. Crossing Type <input checked="" type="checkbox"/> Public <input type="checkbox"/> Private	18. Crossing Purpose <input checked="" type="checkbox"/> Highway <input type="checkbox"/> Pathway, Ped. <input type="checkbox"/> Station, Ped.	19. Crossing Position <input checked="" type="checkbox"/> At Grade <input type="checkbox"/> RR Under <input type="checkbox"/> RR Over	20. Public Access (if Private Crossing) <input type="checkbox"/> Yes <input type="checkbox"/> No	21. Type of Train <input checked="" type="checkbox"/> Freight <input type="checkbox"/> Intercity Passenger <input type="checkbox"/> Commuter	22. Average Passenger Train Count Per Day <input type="checkbox"/> Transit <input type="checkbox"/> Shared Use Transit <input type="checkbox"/> Tourist/Other <input type="checkbox"/> Less Than One Per Day <input type="checkbox"/> Number Per Day 0
23. Type of Land Use <input type="checkbox"/> Open Space <input type="checkbox"/> Farm <input checked="" type="checkbox"/> Residential <input type="checkbox"/> Commercial <input type="checkbox"/> Industrial <input type="checkbox"/> Institutional <input type="checkbox"/> Recreational <input type="checkbox"/> RR Yard					
24. Is there an Adjacent Crossing with a Separate Number? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Provide Crossing Number			25. Quiet Zone (FRA provided) <input checked="" type="checkbox"/> No <input type="checkbox"/> 24 Hr <input type="checkbox"/> Partial <input type="checkbox"/> Chicago Excused Date Established		
26. HSR Corridor ID <input checked="" type="checkbox"/> N/A	27. Latitude in decimal degrees (WGS84 std: nn.nnnnnnn) 40.5525415		28. Longitude in decimal degrees (WGS84 std: -nnn.nnnnnnn) -105.0432880		29. Lat/Long Source <input checked="" type="checkbox"/> Actual <input type="checkbox"/> Estimated
30.A. Railroad Use *			31.A. State Use *		
30.B. Railroad Use *			31.B. State Use *		
30.C. Railroad Use *			31.C. State Use *		
30.D. Railroad Use *			31.D. State Use *		
32.A. Narrative (Railroad Use) *			32.B. Narrative (State Use) *		
33. Emergency Notification Telephone No. (posted) 800-848-8715		34. Railroad Contact (Telephone No.) 402-544-3721		35. State Contact (Telephone No.) 303-757-9425	

Part II: Railroad Information

1. Estimated Number of Daily Train Movements				
1.A. Total Day Thru Trains (6 AM to 6 PM) 1	1.B. Total Night Thru Trains (6 PM to 6 AM) 1	1.C. Total Switching Trains 2	1.D. Total Transit Trains 0	1.E. Check if Less Than One Movement Per Day How many trains per week? <input type="checkbox"/>
2. Year of Train Count Data (YYYY) 2016		3. Speed of Train at Crossing 3.A. Maximum Timetable Speed (mph) 25 3.B. Typical Speed Range Over Crossing (mph) From 12 to 25		
4. Type and Count of Tracks Main 1 Siding 0 Yard 0 Transit 0 Industry 0				
5. Train Detection (Main Track only) <input type="checkbox"/> Constant Warning Time <input checked="" type="checkbox"/> Motion Detection <input type="checkbox"/> AFO <input type="checkbox"/> PTC <input type="checkbox"/> DC <input type="checkbox"/> Other <input type="checkbox"/> None				
6. Is Track Signaled? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		7.A. Event Recorder <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		7.B. Remote Health Monitoring <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

U. S. DOT CROSSING INVENTORY FORM

A. Revision Date (MM/DD/YYYY) 05/02/2019		PAGE 2		D. Crossing Inventory Number (7 char.) 804505E	
Part III: Highway or Pathway Traffic Control Device Information					
1. Are there Signs or Signals? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		2. Types of Passive Traffic Control Devices associated with the Crossing			
2.A. Crossbuck Assemblies (count) 0		2.B. STOP Signs (R1-1) (count) 0	2.C. YIELD Signs (R1-2) (count)	2.D. Advance Warning Signs (Check all that apply; include count) <input type="checkbox"/> None <input checked="" type="checkbox"/> W10-1 2 <input type="checkbox"/> W10-3 <input type="checkbox"/> W10-11 <input type="checkbox"/> W10-2 <input type="checkbox"/> W10-4 <input type="checkbox"/> W10-12	
2.E. Low Ground Clearance Sign (W10-5) <input type="checkbox"/> Yes (count 0) <input checked="" type="checkbox"/> No		2.F. Pavement Markings <input checked="" type="checkbox"/> Stop Lines <input type="checkbox"/> Dynamic Envelope <input checked="" type="checkbox"/> RR Xing Symbols <input type="checkbox"/> None		2.G. Channelization Devices/Medians <input checked="" type="checkbox"/> All Approaches <input checked="" type="checkbox"/> Median <input type="checkbox"/> One Approach <input type="checkbox"/> None	
				2.H. EXEMPT Sign (R15-3) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
				2.I. ENS Sign (I-13) Displayed <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
2.J. Other MUTCD Signs Specify Type _____ Count 0 Specify Type _____ Count 0 Specify Type _____ Count 0		2.K. Private Crossing Signs (if private) <input type="checkbox"/> Yes <input type="checkbox"/> No		2.L. LED Enhanced Signs (List types)	
3. Types of Train Activated Warning Devices at the Grade Crossing (specify count of each device for all that apply)					
3.A. Gate Arms (count) Roadway 4 Pedestrian 0	3.B. Gate Configuration <input checked="" type="checkbox"/> 2 Quad <input type="checkbox"/> Full (Barrier) Resistance <input type="checkbox"/> 3 Quad <input checked="" type="checkbox"/> Median Gates <input type="checkbox"/> 4 Quad	3.C. Cantilevered (or Bridged) Flashing Light Structures (count) Over Traffic Lane 0 <input type="checkbox"/> Incandescent Not Over Traffic Lane 0 <input type="checkbox"/> LED		3.D. Mast Mounted Flashing Lights (count of masts) 4 <input type="checkbox"/> Incandescent <input checked="" type="checkbox"/> LED <input checked="" type="checkbox"/> Back Lights Included <input type="checkbox"/> Side Lights Included	3.E. Total Count of Flashing Light Pairs 6
3.F. Installation Date of Current Active Warning Devices: (MM/YYYY) _____/_____/_____ <input checked="" type="checkbox"/> Not Required		3.G. Wayside Horn <input type="checkbox"/> Yes Installed on (MM/YYYY) ____/____/_____ <input checked="" type="checkbox"/> No		3.H. Highway Traffic Signals Controlling Crossing <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	3.I. Bells (count) 4
3.J. Non-Train Active Warning <input type="checkbox"/> Flagging/Flagman <input type="checkbox"/> Manually Operated Signals <input type="checkbox"/> Watchman <input type="checkbox"/> Floodlighting <input type="checkbox"/> None				3.K. Other Flashing Lights or Warning Devices Count 0 Specify type _____	
4.A. Does nearby Hwy Intersection have Traffic Signals? <input type="checkbox"/> Yes <input type="checkbox"/> No	4.B. Hwy Traffic Signal Interconnection <input type="checkbox"/> Not Interconnected <input type="checkbox"/> For Traffic Signals <input type="checkbox"/> For Warning Signs	4.C. Hwy Traffic Signal Preemption <input type="checkbox"/> Simultaneous <input type="checkbox"/> Advance	5. Highway Traffic Pre-Signals <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Storage Distance * _____ Stop Line Distance * _____	6. Highway Monitoring Devices (Check all that apply) <input type="checkbox"/> Yes - Photo/Video Recording <input type="checkbox"/> Yes - Vehicle Presence Detection <input type="checkbox"/> None	
Part IV: Physical Characteristics					
1. Traffic Lanes Crossing Railroad Number of Lanes 4 <input type="checkbox"/> One-way Traffic <input checked="" type="checkbox"/> Two-way Traffic <input type="checkbox"/> Divided Traffic		2. Is Roadway/Pathway Paved? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	3. Does Track Run Down a Street? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	4. Is Crossing Illuminated? (Street lights within approx. 50 feet from nearest rail) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
5. Crossing Surface (on Main Track, multiple types allowed) Installation Date * (MM/YYYY) ____/____/_____ <input type="checkbox"/> 1 Timber <input type="checkbox"/> 2 Asphalt <input type="checkbox"/> 3 Asphalt and Timber <input checked="" type="checkbox"/> 4 Concrete <input type="checkbox"/> 5 Concrete and Rubber <input type="checkbox"/> 6 Rubber <input type="checkbox"/> 7 Metal <input type="checkbox"/> 8 Unconsolidated <input type="checkbox"/> 9 Composite <input type="checkbox"/> 10 Other (specify) _____					
6. Intersecting Roadway within 500 feet? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Approximate Distance (feet) _____		7. Smallest Crossing Angle <input type="checkbox"/> 0° - 29° <input type="checkbox"/> 30° - 59° <input checked="" type="checkbox"/> 60° - 90°		8. Is Commercial Power Available? * <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
Part V: Public Highway Information					
1. Highway System <input type="checkbox"/> (01) Interstate Highway System <input type="checkbox"/> (02) Other Nat Hwy System (NHS) <input type="checkbox"/> (03) Federal AID, Not NHS <input checked="" type="checkbox"/> (08) Non-Federal AID		2. Functional Classification of Road at Crossing <input type="checkbox"/> (0) Rural <input checked="" type="checkbox"/> (1) Urban <input type="checkbox"/> (1) Interstate <input checked="" type="checkbox"/> (5) Major Collector <input type="checkbox"/> (2) Other Freeways and Expressways <input type="checkbox"/> (3) Other Principal Arterial <input type="checkbox"/> (6) Minor Collector <input type="checkbox"/> (4) Minor Arterial <input type="checkbox"/> (7) Local		3. Is Crossing on State Highway System? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
				4. Highway Speed Limit _____ MPH <input type="checkbox"/> Posted <input type="checkbox"/> Statutory	
				5. Linear Referencing System (LRS Route ID) *	
				6. LRS Milepost *	
7. Annual Average Daily Traffic (AADT) Year 1994 AADT 6500		8. Estimated Percent Trucks 05 %	9. Regularly Used by School Buses? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Average Number per Day 0		10. Emergency Services Route <input type="checkbox"/> Yes <input type="checkbox"/> No
Submission Information - This information is used for administrative purposes and is not available on the public website.					
Submitted by _____ Organization _____ Phone _____ Date _____					
Public reporting burden for this information collection is estimated to average 30 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. According to the Paperwork Reduction Act of 1995, a federal agency may not conduct or sponsor, and a person is not required to, nor shall a person be subject to a penalty for failure to comply with, a collection of information unless it displays a currently valid OMB control number. The valid OMB control number for information collection is 2130-0017. Send comments regarding this burden estimate or any other aspect of this collection, including for reducing this burden to: Information Collection Officer, Federal Railroad Administration, 1200 New Jersey Ave. SE, MS-25 Washington, DC 20590.					



HUD Noise Calculation - Breakout of Average Daily Traffic (ADT) by Vehicle Type

Roadway Data Projection for: E. Drake Rd.

Growth rate:		0.4%	(annualized growth rate projected for 10 yrs)		
ADT 2018		25,773	(most recent year in which ADT data is available)		
	2019	25,876			
1	2020	25,980			
2	2021	26,084			
3	2022	26,188			
4	2023	26,293			
5	2024	26,398			
6	2025	26,503			
7	2026	26,609	ADT Breakout		
8	2027	26,716	Autos	92.0%	24,875
9	2028	26,823	Medium Trucks	4.0%	1,082
10	2029	26,930	Heavy Trucks	4.0%	1,082
11	2030	27,038		100%	27,038

Green-highlighted cells are where data is entered.
Yellow-highlighted cells are the results that must be entered into the HUD noise calculator.

Include a printout of this page and attach to the final noise calculation(s).



HUD Noise Calculation - Breakout of Average Daily Traffic (ADT) by Vehicle Type

Roadway Data Projection for: S. Timberline Rd.

Growth rate:		0.6%	(annualized growth rate projected for 10 yrs)		
ADT 2018		30,444	(most recent year in which ADT data is available)		
	2019	30,627			
1	2020	30,810			
2	2021	30,995			
3	2022	31,181			
4	2023	31,368			
5	2024	31,557			
6	2025	31,746			
7	2026	31,936	ADT Breakout		
8	2027	32,128	Autos	92.0%	30,093
9	2028	32,321	Medium Trucks	4.0%	1,308
10	2029	32,515	Heavy Trucks	4.0%	1,308
11	2030	32,710		100%	32,710

Green-highlighted cells are where data is entered.
Yellow-highlighted cells are the results that must be entered into the HUD noise calculator.

Include a printout of this page and attach to the final noise calculation(s).

Noise Assessment Location #1

VOA Sr. Residences



DNL Calculator

The Day/Night Noise Level Calculator is an electronic assessment tool that calculates the Day/Night Noise Level (DNL) from roadway and railway traffic. For more information on using the DNL calculator, view the [Day/Night Noise Level Calculator Electronic Assessment Tool Overview \(/programs/environmental-review/daynight-noise-level-electronic-assessment-tool/\)](#).

Guidelines

- To display the Road and/or Rail DNL calculator(s), click on the "Add Road Source" and/or "Add Rail Source" button(s) below.
- All Road and Rail input values must be positive non-decimal numbers.
- All Road and/or Rail DNL value(s) must be calculated separately before calculating the Site DNL.
- All checkboxes that apply must be checked for vehicles and trains in the tables' headers.
- Note #1:** Tooltips, containing field specific information, have been added in this tool and may be accessed by hovering over all the respective data fields (site identification, roadway and railway assessment, DNL calculation results, roadway and railway input variables) with the mouse.
- Note #2:** DNL Calculator assumes roadway data is always entered.

DNL Calculator

Site ID	VOA Sr. Residences - NAL #1
Record Date	06/29/2020
User's Name	Miniello Consulting

Road # 1 Name:	E. Drake Rd.
----------------	--------------

Road #1			
Vehicle Type	Cars <input checked="" type="checkbox"/>	Medium Trucks <input checked="" type="checkbox"/>	Heavy Trucks <input checked="" type="checkbox"/>
Effective Distance	95	95	95
Distance to Stop Sign			
Average Speed	40	40	40
Average Daily Trips (ADT)	24875	1082	1082
Night Fraction of ADT	15	15	15
Road Gradient (%)			0
Vehicle DNL	65	61	69
Calculate Road #1 DNL	71	Reset	

Road # 2 Name:	S. Timberline Rd.
----------------	-------------------

Road #2			
Vehicle Type	Cars <input checked="" type="checkbox"/>	Medium Trucks <input checked="" type="checkbox"/>	Heavy Trucks <input checked="" type="checkbox"/>
Effective Distance	818	818	818

Tools and Guidance

[Day/Night Noise Level Assessment Tool User Guide \(/resource/3822/day-night-noise-level-assessment-tool-user-guide/\)](#)

[Day/Night Noise Level Assessment Tool Flowcharts \(/resource/3823/day-night-noise-level-assessment-tool-flowcharts/\)](#)

Distance to Stop Sign			
Average Speed	45	45	45
Average Daily Trips (ADT)	30093	1308	1308
Night Fraction of ADT	15	15	15
Road Gradient (%)			0
Vehicle DNL	53	49	56
Calculate Road #2 DNL	58	Reset	

Railroad #1 Track Identifier:		Union Pacific - Dent Branch
Rail # 1		
Train Type	Electric <input type="checkbox"/>	Diesel <input checked="" type="checkbox"/>
Effective Distance		364
Average Train Speed		25
Engines per Train		1
Railway cars per Train		50
Average Train Operations (ATO)		2
Night Fraction of ATO		50
Railway whistles or horns?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Bolted Tracks?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
Train DNL	0	60
Calculate Rail #1 DNL	60	Reset

Add Road SourceAdd Rail Source

Airport Noise Level	
Loud Impulse Sounds?	<input type="radio"/> Yes <input checked="" type="radio"/> No
Combined DNL for all Road and Rail sources	71
Combined DNL including Airport	N/A
Site DNL with Loud Impulse Sound	
Calculate	Reset

Mitigation Options

Noise Assessment Location #2

VOA Sr. Residences



DNL Calculator

The Day/Night Noise Level Calculator is an electronic assessment tool that calculates the Day/Night Noise Level (DNL) from roadway and railway traffic. For more information on using the DNL calculator, view the [Day/Night Noise Level Calculator Electronic Assessment Tool Overview \(/programs/environmental-review/daynight-noise-level-electronic-assessment-tool/\)](#).

Guidelines

- To display the Road and/or Rail DNL calculator(s), click on the "Add Road Source" and/or "Add Rail Source" button(s) below.
- All Road and Rail input values must be positive non-decimal numbers.
- All Road and/or Rail DNL value(s) must be calculated separately before calculating the Site DNL.
- All checkboxes that apply must be checked for vehicles and trains in the tables' headers.
- Note #1:** Tooltips, containing field specific information, have been added in this tool and may be accessed by hovering over all the respective data fields (site identification, roadway and railway assessment, DNL calculation results, roadway and railway input variables) with the mouse.
- Note #2:** DNL Calculator assumes roadway data is always entered.

DNL Calculator

Site ID	VOA Sr. Residences - NAL #2
Record Date	06/29/2020
User's Name	Miniello Consulting

Road # 1 Name:	E. Drake Rd.
----------------	--------------

Road #1			
Vehicle Type	Cars <input checked="" type="checkbox"/>	Medium Trucks <input checked="" type="checkbox"/>	Heavy Trucks <input checked="" type="checkbox"/>
Effective Distance	68	68	68
Distance to Stop Sign			
Average Speed	40	40	40
Average Daily Trips (ADT)	24875	1082	1082
Night Fraction of ADT	15	15	15
Road Gradient (%)			0
Vehicle DNL	67	63	71
Calculate Road #1 DNL	73	Reset	

Railroad #1 Track Identifier:	Union Pacific - Dent Branch
-------------------------------	-----------------------------

Rail # 1	
Train Type	Electric <input type="checkbox"/> Diesel <input checked="" type="checkbox"/>
Effective Distance	106

Tools and Guidance

[Day/Night Noise Level Assessment Tool User Guide \(/resource/3822/day-night-noise-level-assessment-tool-user-guide/\)](#)

[Day/Night Noise Level Assessment Tool Flowcharts \(/resource/3823/day-night-noise-level-assessment-tool-flowcharts/\)](#)

Average Train Speed	<input type="text"/>	<input type="text" value="25"/>
Engines per Train	<input type="text"/>	<input type="text" value="1"/>
Railway cars per Train	<input type="text"/>	<input type="text" value="50"/>
Average Train Operations (ATO)	<input type="text"/>	<input type="text" value="2"/>
Night Fraction of ATO	<input type="text"/>	<input type="text" value="50"/>
Railway whistles or horns? Yes: <input type="checkbox"/> No: <input type="checkbox"/> Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>		
Bolted Tracks? Yes: <input type="checkbox"/> No: <input type="checkbox"/> Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>		
Train DNL	<input type="text" value="0"/>	<input type="text" value="68"/>
Calculate Rail #1 DNL	<input type="text" value="68"/>	<input type="button" value="Reset"/>

Add Road Source

Add Rail Source

Airport Noise Level	<input type="text"/>
Loud Impulse Sounds?	<input type="radio"/> Yes <input checked="" type="radio"/> No
Combined DNL for all Road and Rail sources	<input type="text" value="74"/>
Combined DNL including Airport	<input type="text" value="N/A"/>
Site DNL with Loud Impulse Sound	<input type="text"/>
Calculate	Reset

Mitigation Options

If your site DNL is in Excess of 65 decibels, your options are:

- **No Action Alternative:** Cancel the project at this location
- **Other Reasonable Alternatives:** Choose an alternate site
- **Mitigation**
 - Contact your Field or Regional Environmental Officer (/programs/environmental-review/hud-environmental-staff-contacts/)
 - Increase mitigation in the building walls (only effective if no outdoor, noise sensitive areas)
 - Reconfigure the site plan to increase the distance between the noise source and noise-sensitive uses
 - Incorporate natural or man-made barriers. See *The Noise Guidebook* (/resource/313/hud-noise-guidebook/)
 - Construct noise barrier. See the **Barrier Performance Module** (/programs/environmental-review/bpm-calculator/)

Noise Assessment Location #3

VOA Sr. Residences



DNL Calculator

The Day/Night Noise Level Calculator is an electronic assessment tool that calculates the Day/Night Noise Level (DNL) from roadway and railway traffic. For more information on using the DNL calculator, view the [Day/Night Noise Level Calculator Electronic Assessment Tool Overview \(/programs/environmental-review/daynight-noise-level-electronic-assessment-tool/\)](#).

Guidelines

- To display the Road and/or Rail DNL calculator(s), click on the "Add Road Source" and/or "Add Rail Source" button(s) below.
- All Road and Rail input values must be positive non-decimal numbers.
- All Road and/or Rail DNL value(s) must be calculated separately before calculating the Site DNL.
- All checkboxes that apply must be checked for vehicles and trains in the tables' headers.
- Note #1:** Tooltips, containing field specific information, have been added in this tool and may be accessed by hovering over all the respective data fields (site identification, roadway and railway assessment, DNL calculation results, roadway and railway input variables) with the mouse.
- Note #2:** DNL Calculator assumes roadway data is always entered.

DNL Calculator

Site ID	VOA Sr. Residences - NAL #3
Record Date	06/29/2020
User's Name	Miniello Consulting

Road # 1 Name:	E. Drake Rd.
----------------	--------------

Road #1			
Vehicle Type	Cars <input checked="" type="checkbox"/>	Medium Trucks <input checked="" type="checkbox"/>	Heavy Trucks <input checked="" type="checkbox"/>
Effective Distance	206	206	206
Distance to Stop Sign			
Average Speed	40	40	40
Average Daily Trips (ADT)	24875	1082	1082
Night Fraction of ADT	15	15	15
Road Gradient (%)			0
Vehicle DNL	60	56	64
Calculate Road #1 DNL	66	Reset	

Railroad #1 Track Identifier:	Union Pacific - Dent Branch
-------------------------------	-----------------------------

Rail # 1	
Train Type	Electric <input type="checkbox"/> Diesel <input checked="" type="checkbox"/>
Effective Distance	110

Tools and Guidance

[Day/Night Noise Level Assessment Tool User Guide \(/resource/3822/day-night-noise-level-assessment-tool-user-guide/\)](#)

[Day/Night Noise Level Assessment Tool Flowcharts \(/resource/3823/day-night-noise-level-assessment-tool-flowcharts/\)](#)

Average Train Speed	<input type="text"/>	<input type="text" value="25"/>
Engines per Train	<input type="text"/>	<input type="text" value="1"/>
Railway cars per Train	<input type="text"/>	<input type="text" value="50"/>
Average Train Operations (ATO)	<input type="text"/>	<input type="text" value="2"/>
Night Fraction of ATO	<input type="text"/>	<input type="text" value="50"/>
Railway whistles or horns? Yes: <input type="checkbox"/> No: <input type="checkbox"/> Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>		
Bolted Tracks? Yes: <input type="checkbox"/> No: <input type="checkbox"/> Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>		
Train DNL	<input type="text" value="0"/>	<input type="text" value="68"/>
Calculate Rail #1 DNL	<input type="text" value="68"/>	<input type="button" value="Reset"/>

Add Road Source

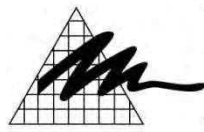
Add Rail Source

Airport Noise Level	<input type="text"/>
Loud Impulse Sounds?	<input type="radio"/> Yes <input checked="" type="radio"/> No
Combined DNL for all Road and Rail sources	<input type="text" value="70"/>
Combined DNL including Airport	<input type="text" value="N/A"/>
Site DNL with Loud Impulse Sound	<input type="text"/>
Calculate	Reset

Mitigation Options

If your site DNL is in Excess of 65 decibels, your options are:

- **No Action Alternative:** Cancel the project at this location
- **Other Reasonable Alternatives:** Choose an alternate site
- **Mitigation**
 - Contact your Field or Regional Environmental Officer (/programs/environmental-review/hud-environmental-staff-contacts/)
 - Increase mitigation in the building walls (only effective if no outdoor, noise sensitive areas)
 - Reconfigure the site plan to increase the distance between the noise source and noise-sensitive uses
 - Incorporate natural or man-made barriers. See *The Noise Guidebook* (/resource/313/hud-noise-guidebook/)
 - Construct noise barrier. See the **Barrier Performance Module** (/programs/environmental-review/bpm-calculator/)



**D. L. ADAMS
ASSOCIATES**

acoustics | performing arts | technology

1536 Ogden Street
Denver, CO 80218
www.dlaa.com
303.455.1900

September 8, 2020

Ms. Aleka Pappas
Shopworks Architecture
301 West 45th Avenue
Denver, CO 80216

Subject: VOA Senior Residences – HUD Site Noise Analysis (DLAA #20-156)

Dear Aleka,

We have completed our analysis of the VOA Senior Residences in Fort Collins, Colorado with respect to the sound isolation performance of the exterior wall and window assemblies. Our analysis and recommendations are based on meeting the Fort Collins Municipal Code building façade requirements and industry standards for exterior sound transmission to residential units.

Note that our recommendations are based on meeting acoustical objectives only and should be reviewed by qualified personnel prior to implementation.

Design Criteria

HUD Criteria

Our noise assessment evaluates the site based on the Site Acceptability Standards of the U.S. Department of House and Urban Development (HUD). The Site Acceptability Standards are given in the Code of Federal Regulations 24 CFR Part 51B. The standards regulate the acceptability of sites for residential buildings with HUD funding. The noise levels are expressed in terms of the Day-Night Average Sound Level (DNL). The DNL is the average sound level over a 24-hour period to which a 10-decibel penalty has been applied to sound levels occurring during the nighttime hours (10:00 PM to 7:00 AM). DNL level in decibels are A-weighted. The HUD Site Acceptability Standards for exterior sound levels are summarized in Table 1 below.

Table 1: HUD Site Acceptability Standards

Category	DNL	Comments
Acceptable	Less than or equal to 65 dBA	No special acoustical design consideration necessary
Normally Unacceptable	Greater than 65 dBA, but less than or equal to 70 dBA	5 dB additional attenuation required through the use of barriers or in design to ensure interior noise levels are acceptable

Ms. Aleka Pappas
 September 8, 2020
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	Greater than 70 dBA, but less or equal to 75 dBA	10 dB additional attenuation required through the use of barriers or in design to ensure interior noise levels are acceptable
Unacceptable	Greater than 75 dBA	Attenuation measures must be submitted and approved on a case-by-case basis

The intent of the 65 DNL outside criteria is to achieve DNL 45 dBA indoors. HUD typically allows upgrades to the building shell to meet an interior DNL of 45 dBA in Normally Unacceptable or Unacceptable areas. This can be accomplished by specifying building facades, windows, and doors with higher sound transmission class (STC) ratings than normal construction. Addressing windows is particularly important, as they are often the weak link in the building facade with respect to noise intrusion.

Fort Collins Municipal Code

Chapter 5, Article II, Division 2, Section 5-27.3603.3.1.1 titled Exterior Sound Transmission of the Fort Collins Municipal Code states that the wall assemblies making up the building thermal envelope shall have a composite sound transmission class (STC_C) rating of 39 or greater if the building is in any of the following locations:

1. Within 500 feet (152 m) of a multi-lane highway designed for high-speed travel by large numbers of vehicles, and having no traffic lights, stop signs, or other regulations requiring vehicles to stop; fire stations; heavy industrial or manufacturing areas or facilities; commercial storage facilities with back-up alarms; outdoor music amphitheaters; or sports arena or stadium;
2. Within 250 feet (76 m) of a roadway containing 4 or more traffic lanes; or
3. Within 1,000 feet (305 m) of an active railway.

The VOA Senior Residences site falls under the above-listed categories and is subject to compliance with the Exterior Sound Transmission criteria.

Provided HUD Calculations

For our analysis we did not conduct HUD noise assessment calculations, but they were provided to us by Shopworks Architecture. The HUD DNL Calculations were conducted on June 29, 2020 at three locations on the VOA site: two on the west facade and one on the south facade. The noise assessment locations (NALs), input data, and results are shown in the attached NAL Base Map and DNL Calculator sheets.

The DNLs at the west façade were calculated to be 74 dBA and 70 dBA. The DNL at the south facade was calculated to be 71 dBA. Both facades fall under the “Normally Unacceptable” category and require noise mitigation techniques to reach acceptable interior noise levels by HUD standards.

Ms. Aleka Pappas
 September 8, 2020
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Exterior Shell Review

As stated under the Design Criteria section of this report, the Fort Collins Municipal Code requires an STC_C 39 rating for all building facades when the building is within a certain proximity to significant noise sources. The STC_C rating is a weighted average of the building facade assemblies and their corresponding individual STC ratings. From the provided building elevations, we see the facades are primarily constructed of assemblies X26 and X56 with doors and amenity and residential windows placed throughout. We calculated the STC_C ratings for each building facade, which are summarized below in Table 2.

Table 2: Calculated STC_C Ratings of Building Facades

Assembly/ Component	North		East		West		South	
	STC	% of Facade	STC	% of Facade	STC	% of Facade	STC	% of Facade
X26	56	43	56	44	56	29	56	47
X56	35	28	35	33	35	37	35	34
Amen. Windows	30	1	30	2	30	9	30	6
Res. Windows	30	26	30	20	30	24	30	12
Doors	31	2	31	1	31	1	31	1
Resulting STC_C	34		35		33		35	

In calculating the STC_C ratings, we had to make assumptions about various components which are summarized below.

1. Windows at Amenities spaces are a minimum STC 30 rating.
2. Windows at Residential Units are a minimum STC 30 rating.
3. All hollow metal doors at the building exterior will be insulated with mineral wool, or similar, for a minimum STC 31 rating.
4. Wood studs are spaced 16" on-center.

If any of our assumptions are incorrect, please advise and we will adjust our calculations accordingly.

From the results shown in Table 2, we see that none of the facades meet the STC_C 39 design criteria under the current design including our listed calculation assumptions. However, Fort Collins municipal code requires that the building envelope be analyzed as a whole. Table 3 below summarizes the composition and calculated STC_C rating for the entire building envelope.

Table 3: Calculated STC_C Rating of Entire Building Envelope

Assembly/ Component	Whole Building Envelope	
	STC	% of Facade
X26	56	42
X56	35	32
Amen. Windows	30	4
Res. Windows	30	20
Doors	31	1
Resulting STC_C	35	

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September 8, 2020
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The entire building envelope also does not achieve the STC_C 39 design criteria, so upgrades to the exterior building shell elements must be made. We recommend upgrading the residential windows to a minimum STC 35 rating. This can be achieved with a standard 1" IGU such as ¼" glass, ½" air space, and ¼" glass. Additionally, we recommend adding a resilient channel or resilient isolation clip to the interior side of Wall Type X56 to increase its individual STC rating from 35 to 55. These two recommendations, if used in conjunction, will increase the STC_C of the entire building envelope to meet the STC_C 39 design criteria.

These recommendations will also ensure the HUD maximum interior noise level of 45 L_{DN} is achieved. We analyzed the STC_C of exterior walls at three different unit bedrooms: Unit 2.1 – 116, Unit 1.3 – 101, and Unit 1.4 – 207. These three units are at approximately the same location as the NALs provided by Shopworks. If the recommended building exterior upgrades are included at each of these unit bedrooms, the interior noise levels are as follows:

- 30 dBA in Unit 2.1 – 116.
- 29 dBA in Unit 1.3 – 101.
- 33 dBA in Unit 1.4 – 207.

The provided calculated DNLs were used to calculate the expected interior noise levels at each unit. All units analyzed achieve the HUD maximum interior noise level design criteria.

Barrier Analysis

There is an outdoor seating area along the southwest corner of the project site. At outdoor amenity areas, HUD prescribes a maximum DNL of 65 dBA from external noise sources. We see there is currently a brick barrier wall planned that surrounds the outdoor seating area that is approximately 4' above grade. The seating area is depressed by approximately 1'-4" below the foot of the barrier, making the actual barrier height 5'-4" above the outdoor seating area. The provided DNL at this location is 74 dBA, which exceeds the HUD design criteria.

To achieve the design criteria, the barrier height must be increased enough to result in at least a 9 dB reduction. We recommend extending the height of the barrier up an additional 3', which results in an exterior DNL of 65 dBA. Constructing the barrier with brick is recommended because it will reduce the potential for air gaps in the barrier that would compromise the sound mitigation performance. We've attached the HUD Barrier Performance Module (BPM) calculation sheets of the as-shown condition and with the taller barrier for your reference.

If a new construction material or detail is created for the barrier, we can review the design and update our calculations accordingly.

Ms. Aleka Pappas
September 8, 2020
Page 5 of 5

Please let us know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Michelle Huey". The signature is fluid and cursive, with the first name "Michelle" written in a larger, more prominent script than the last name "Huey".

Michelle Huey
Staff Consultant

Encl.: NAL Base Maps
DNL Calculator Sheets
BPM Calculator Sheets

Barrier Performance Module

This module provides to the user a measure on the barrier's effectiveness on noise reduction. A list of the input/output variables and their definitions, as well as illustrations of different scenarios are provided.

Calculator

[View Day/Night Noise Level Calculator \(/programs/environmental-review/dnl-calculator/\)](/programs/environmental-review/dnl-calculator/)

[View Descriptions of the Input/Output variables.](#)

Note: Tool tips, containing field specific information, have been added in this tool and may be accessed by hovering over the Input and Output variables with the mouse.

WARNING: If there is direct line-of-sight between the Source and the Observer, the module will report erroneous attenuation. "Direct line-of-sight" means if the 5' tall Observer can see the noise Source (cars, trucks, trains, etc.) over the Barrier (wall, hill/excavation, building, etc.), the current version of Barrier Performance Module will not accurately calculate the attenuation provided. In this instance, there is unlikely to be any appreciable attenuation.

Road/Rail Site DNL:

Note: Barrier height must block the line of sight

Input Data

H	<input type="text" value="5"/>	R ¹	<input type="text" value="106"/>
S	<input type="text" value="8"/>	D ¹	<input type="text" value="15"/>
O	<input type="text" value="5"/>	α	<input type="text" value="180"/>

Calculate Output

Output Data

h	<input type="text" value="0"/>	R	<input type="text" value="106"/>
D	<input type="text" value="15"/>	FS	<input type="text" value="-0.0077"/>

New Site DNL:

0.0077

Refresh

Note: If you have separate Road and Rail DNL values, please enter the values below to calculate the new site DNL:

Road DNL:

Rail DNL:

68

Calculate

Combined New Site DNL:

74.2

Input/Output Variables

Input Variables

The following variables and definitions from the barrier being assessed are the input required for the web-based barrier performance module:

- H = Barrier Height
- S = Noise Source Height
- O = Observer Height (known as the receiver)
- R^1 = Distance from Noise Source to Barrier
- D^1 = Distance from the Observer to the Barrier
- α = Line of sight angle between the Observer and the Noise Source, subtended by the barrier at observer's location

Output Variables

Definitions of the output variables from the mitigation module of the Day/Night Noise Level Assessment Tools as part of the Assessment Tools for Environmental Compliance:

- h = The shortest distance from the barrier top to the line of sight from the Noise source to the Observer.
- R = Slant distance along the line of sight from the Barrier to the Noise Source
- D = Slant distance along the line of sight from the Barrier to the Observer

The “actual barrier performance for barriers of finite length” is noted on the worksheets(in the Guidebook) as **FS**.

Barrier Performance Module

This module provides to the user a measure on the barrier's effectiveness on noise reduction. A list of the input/output variables and their definitions, as well as illustrations of different scenarios are provided.

Calculator

[View Day/Night Noise Level Calculator \(/programs/environmental-review/dnl-calculator/\)](/programs/environmental-review/dnl-calculator/)

[View Descriptions of the Input/Output variables.](#)

Note: Tool tips, containing field specific information, have been added in this tool and may be accessed by hovering over the Input and Output variables with the mouse.

WARNING: If there is direct line-of-sight between the Source and the Observer, the module will report erroneous attenuation. "Direct line-of-sight" means if the 5' tall Observer can see the noise Source (cars, trucks, trains, etc.) over the Barrier (wall, hill/excavation, building, etc.), the current version of Barrier Performance Module will not accurately calculate the attenuation provided. In this instance, there is unlikely to be any appreciable attenuation.

Road/Rail Site DNL:

Note: Barrier height must block the line of sight

Input Data

H	<input type="text" value="8"/>	R ¹	<input type="text" value="106"/>
S	<input type="text" value="8"/>	D ¹	<input type="text" value="15"/>
O	<input type="text" value="5"/>	α	<input type="text" value="180"/>

Calculate Output

Output Data

h	<input type="text" value="3"/>	R	<input type="text" value="106"/>
D	<input type="text" value="15"/>	FS	<input type="text" value="9.6068"/>

New Site DNL:

-9.6068

Refresh

Note: If you have separate Road and Rail DNL values, please enter the values below to calculate the new site DNL:

Road DNL:

Rail DNL:

68

Calculate

Combined New Site DNL:

64.6

Input/Output Variables

Input Variables

The following variables and definitions from the barrier being assessed are the input required for the web-based barrier performance module:

- H = Barrier Height
- S = Noise Source Height
- O = Observer Height (known as the receiver)
- R^1 = Distance from Noise Source to Barrier
- D^1 = Distance from the Observer to the Barrier
- α = Line of sight angle between the Observer and the Noise Source, subtended by the barrier at observer's location

Output Variables

Definitions of the output variables from the mitigation module of the Day/Night Noise Level Assessment Tools as part of the Assessment Tools for Environmental Compliance:

- h = The shortest distance from the barrier top to the line of sight from the Noise source to the Observer.
- R = Slant distance along the line of sight from the Barrier to the Noise Source
- D = Slant distance along the line of sight from the Barrier to the Observer

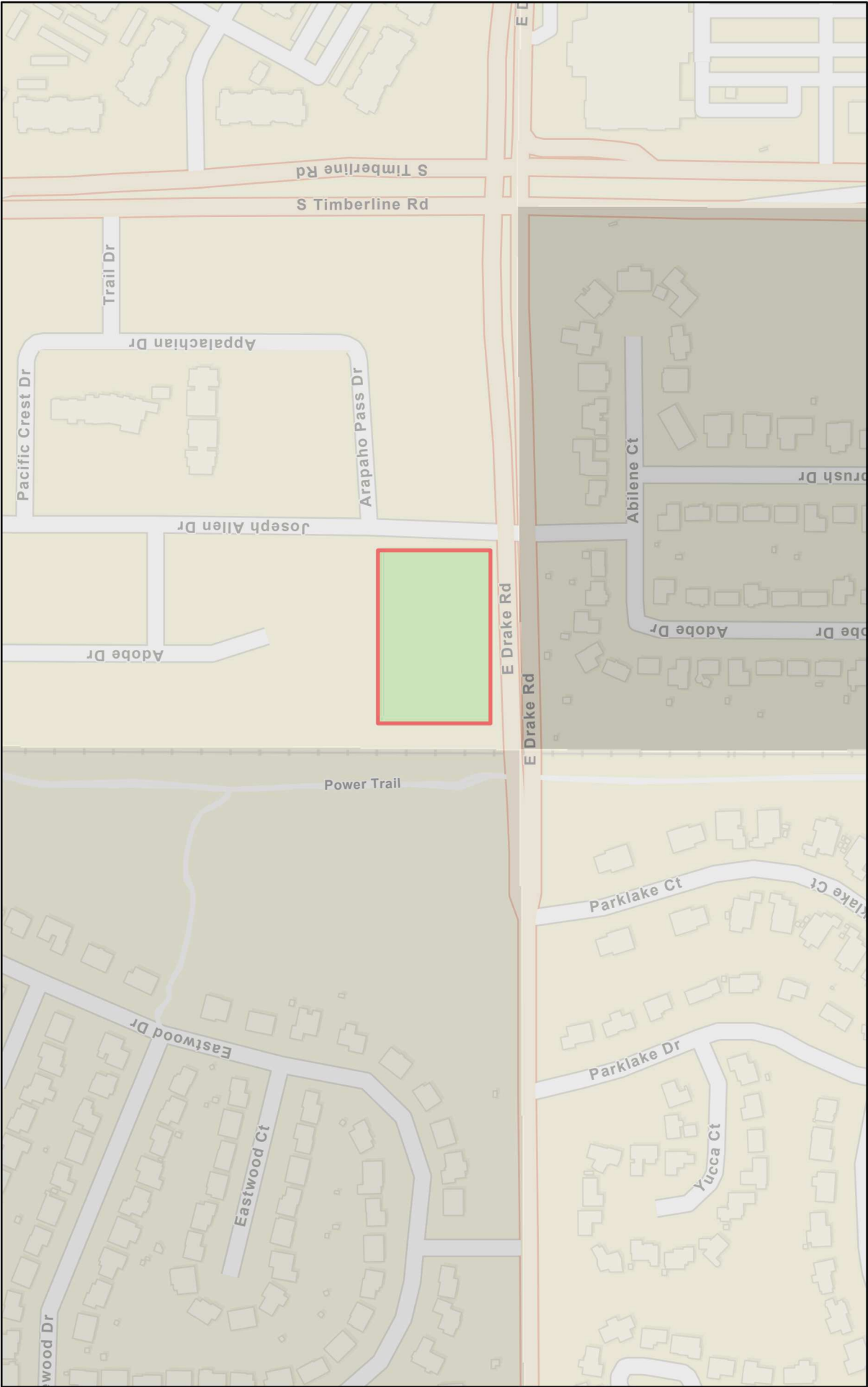
The “actual barrier performance for barriers of finite length” is noted on the worksheets(in the Guidebook) as **FS**.



APPENDIX J

ENVIRONMENTAL JUSTICE

VOA Sr. Residences - Low Income Population



June 15, 2020

Low Income Population
(National Percentiles)

Data not available

Less than 50 percentile

50 -60 percentile

60 -70 percentile

70 -80 percentile

80 - 90 percentile

90 - 95 percentile

95 - 100 percentile

Subject Property

1:4,514

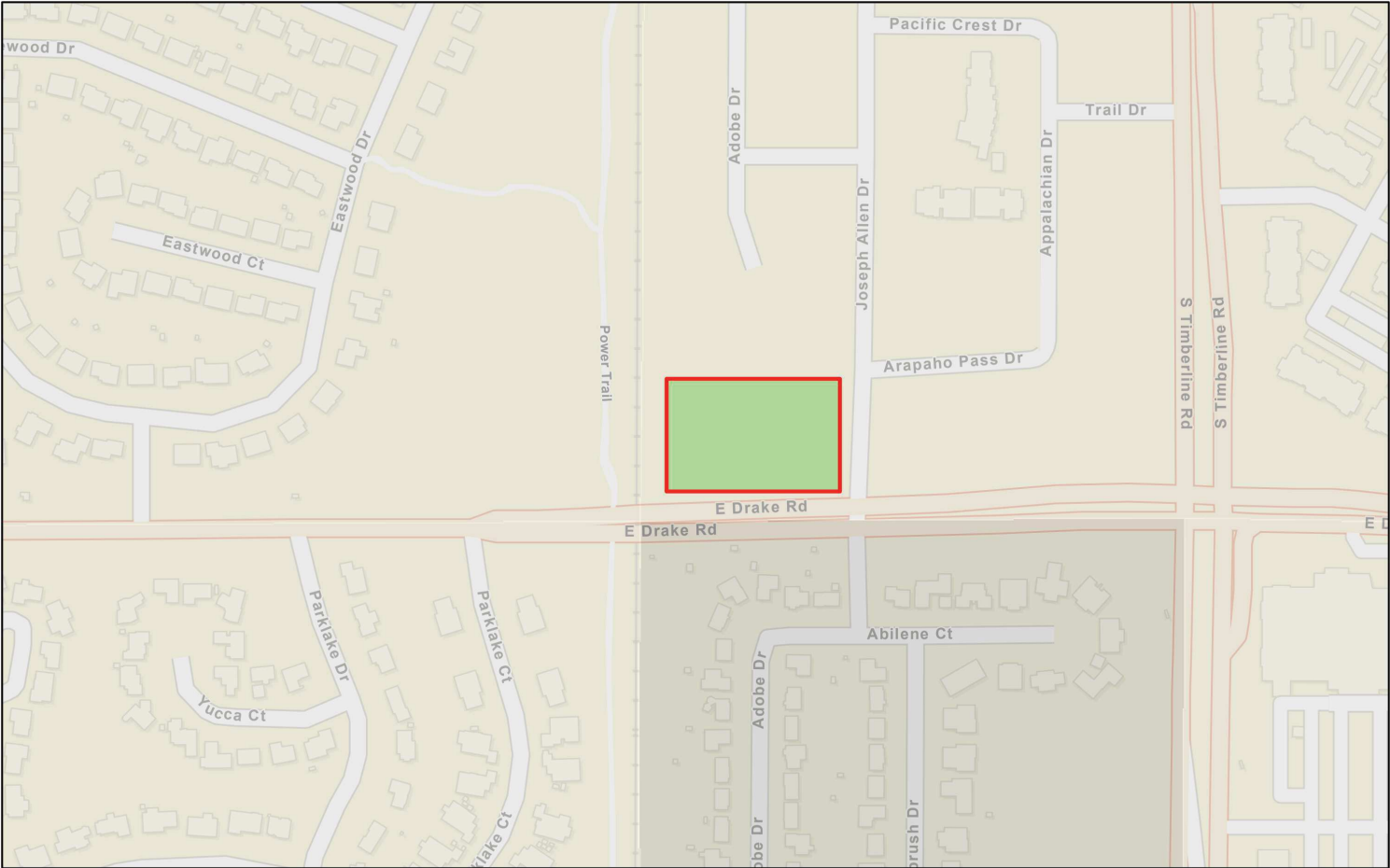
0 0.03 0.06 0.11 mi

0 0.04 0.09 0.18 km

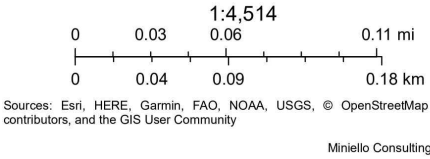
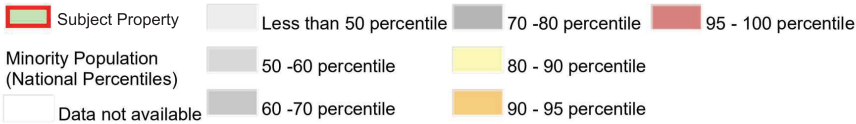
Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community

Miniello Consulting

VOA Sr. Residences - Minority Population

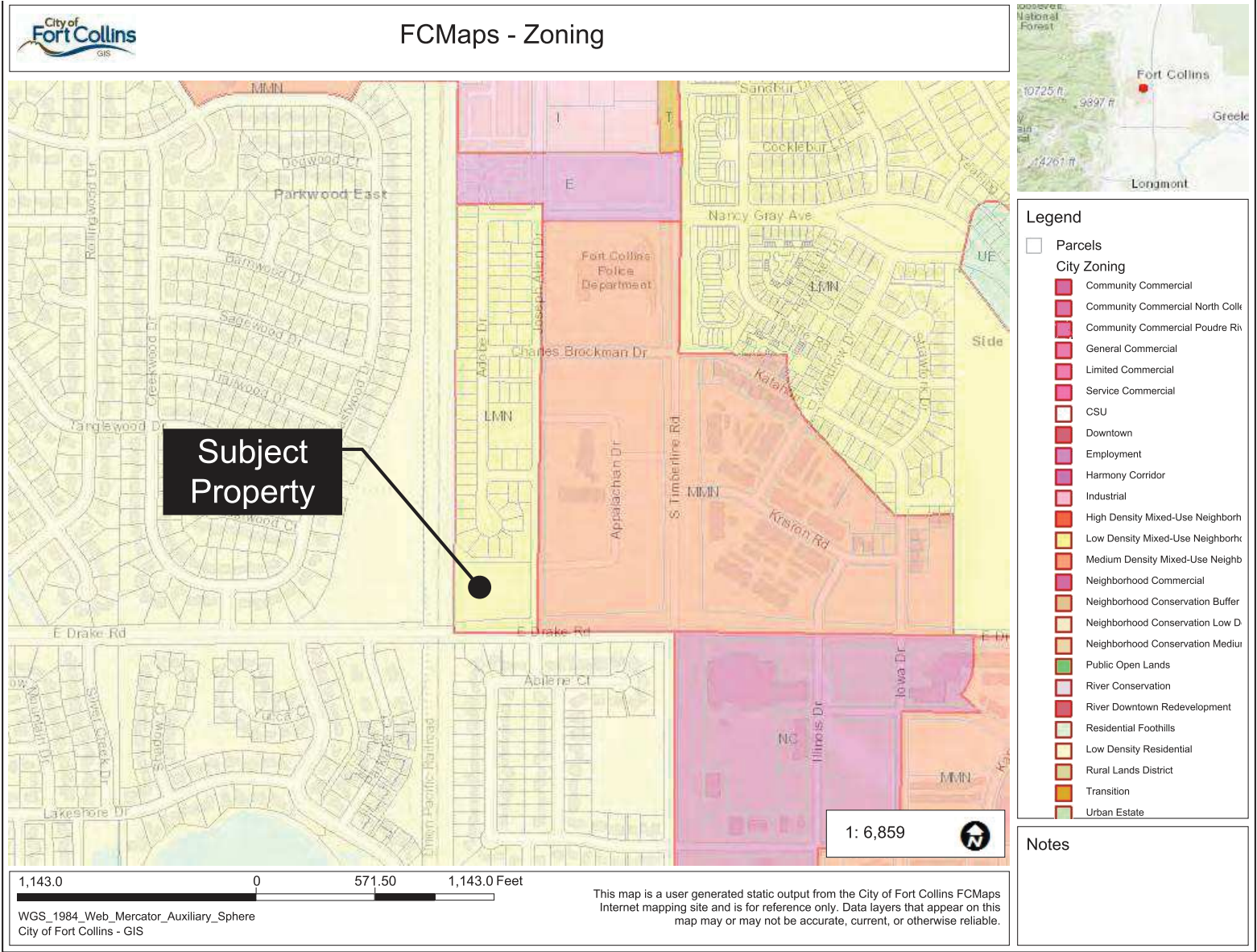


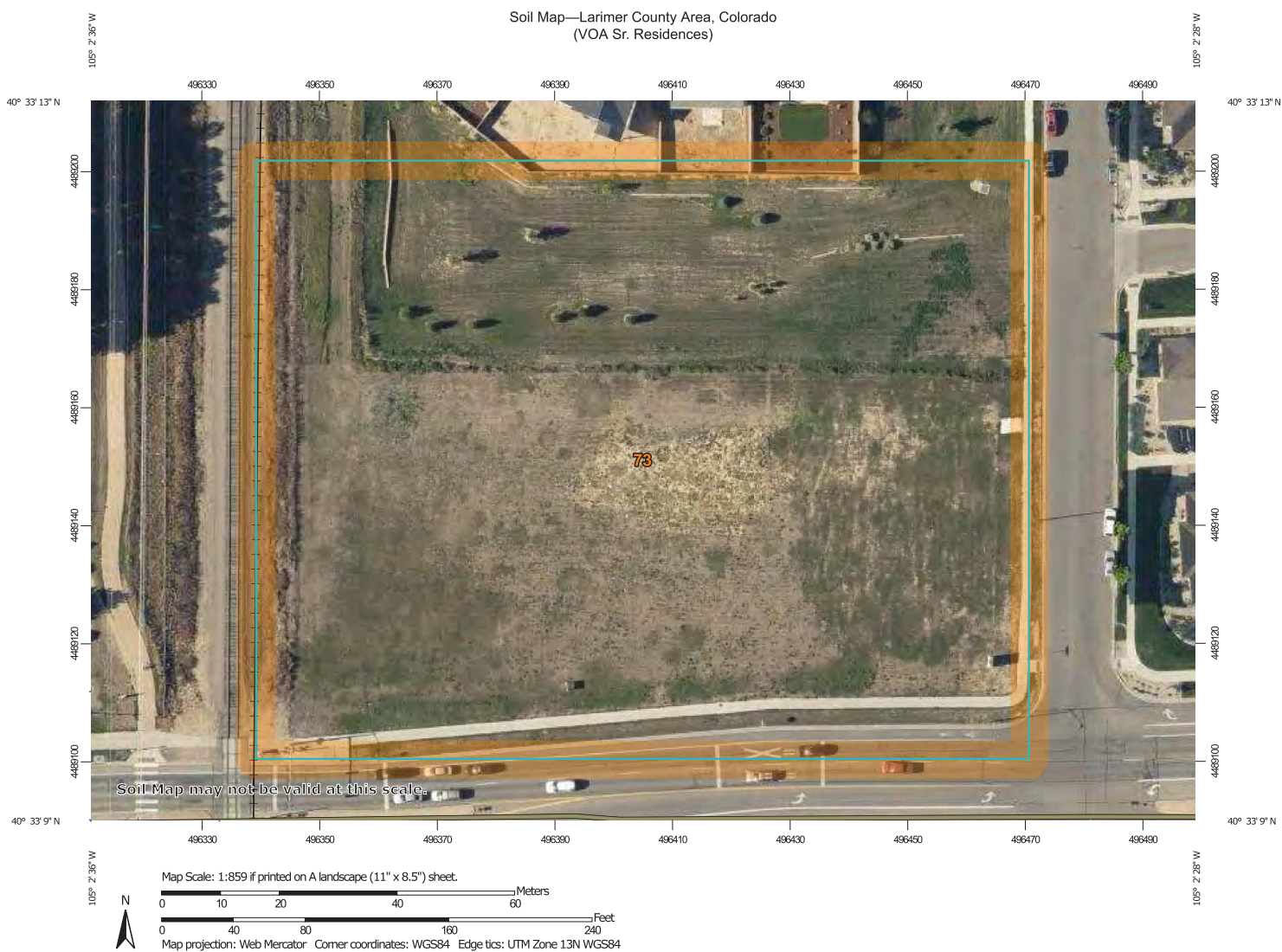
June 15, 2020



APPENDIX K





































ENVIRONMENTAL ASSESSMENT FACTORS





Soil Map—Larimer County Area, Colorado
(VOA Sr. Residences)

MAP LEGEND

Area of Interest (AOI)			Spoil Area
	Area of Interest (AOI)		Stony Spot
Soils			Very Stony Spot
	Soil Map Unit Polygons		Wet Spot
	Soil Map Unit Lines		Other
	Soil Map Unit Points		Special Line Features
Special Point Features		Water Features	
	Blowout		Streams and Canals
	Borrow Pit	Transportation	
	Clay Spot		Rails
	Closed Depression		Interstate Highways
	Gravel Pit		US Routes
	Gravelly Spot		Major Roads
	Landfill		Local Roads
	Lava Flow	Background	
	Marsh or swamp		Aerial Photography
	Mine or Quarry		
	Miscellaneous Water		
	Perennial Water		
	Rock Outcrop		
	Saline Spot		
	Sandy Spot		
	Severely Eroded Spot		
	Sinkhole		
	Slide or Slip		
	Sodic Spot		

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:24,000.

Warning: Soil Map may not be valid at this scale.
Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Larimer County Area, Colorado
Survey Area Data: Version 15, Jun 9, 2020

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Aug 11, 2018—Aug 12, 2018

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

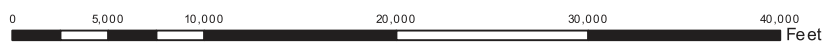
Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
73	Nunn clay loam, 0 to 1 percent slopes	3.3	100.0%
Totals for Area of Interest		3.3	100.0%

jobsBySector_data

Year	Area	NAICS Code	Sector	Jobs	
2018	Larimer County	8090	Warehousing and storage	suppressed	
2018	Larimer County	0	Total Jobs	209,099	
2018	Larimer County	15000	Government	40,022	
2018	Larimer County	7000	Retail Trade	22,186	
2018	Larimer County	15020	State government	21,832	
2018	Larimer County	13015	Accommodation and food services	19,704	
2018	Larimer County	12015	Health Services	18,440	
2018	Larimer County	11000	Professional, scientific and technical services	16,901	
2018	Larimer County	11020	Professional, scientific and technical services	16,901	
2018	Larimer County	13030	Food services and drinking places	16,509	
2018	Larimer County	5000	Manufacturing	14,960	
2018	Larimer County	15030	Local government	14,796	
2018	Larimer County	4000	Construction	14,790	
2018	Larimer County	14000	Other services, except public administration	12,018	
2018	Larimer County	11050	Administrative and support and waste management and remediat	10,962	
2018	Larimer County	4030	Special trade contractors	10,792	
2018	Larimer County	11090	Administrative and support services	10,506	
2018	Larimer County	12020	Ambulatory health care services	9,874	
2018	Larimer County	10150	Real estate	7,881	
2018	Larimer County	10200	Real estate	7,881	
2018	Larimer County	6000	Wholesale trade	5,408	
2018	Larimer County	6010	Wholesale trade	5,408	
2018	Larimer County	13000	Arts, entertainment and recreation	5,028	
2018	Larimer County	13010	Arts, entertainment and recreation	5,028	
2018	Larimer County	10000	Finance activities	4,731	
2018	Larimer County	14020	Personal and laundry services	4,636	
2018	Larimer County	8000	Transportation and warehousing	4,239	
2018	Larimer County	5050	Computer and electrical equipment manufacturing	4,104	
2018	Larimer County	12050	Social assistance	3,989	
2018	Larimer County	12000	Education	3,779	
2018	Larimer County	12010	Private Educational services	3,779	
2018	Larimer County	9000	Information	3,730	
2018	Larimer County	7080	General merchandise stores	3,728	
2018	Larimer County	7030	Food and beverage stores	3,291	
2018	Larimer County	12040	Nursing and residential care facilities	3,207	
2018	Larimer County	13020	Accommodation	3,194	
2018	Larimer County	7020	Furniture, electronics, appliances and home furnishings	3,137	
2018	Larimer County	14030	Religious, civic, professional and similar membership organizati	3,066	

2018	Larimer County	14010	Automotive and other repair and maintenance	2,792	
2018	Larimer County	4010	Construction of buildings	2,778	
2018	Larimer County	7010	Motor vehicle and parts dealers	2,580	
2018	Larimer County	5040	Machinery manufacturing	2,531	
2018	Larimer County	15010	Federal government, civilian	2,525	
2018	Larimer County	5080	Food and beverage product manufacturing	2,497	
2018	Larimer County	1000	Agriculture	2,399	
2018	Larimer County	10010	Monetary authorities and credit intermediation	2,098	
2018	Larimer County	7070	Sporting goods, hobby, book and music stores	1,939	
2018	Larimer County	7060	Clothing and clothing accessories stores	1,930	
2018	Larimer County	1010	Crops and livestock production	1,904	
2018	Larimer County	7100	Nonstore retailers	1,853	
2018	Larimer County	7090	Miscellaneous store retailers	1,796	
2018	Larimer County	10100	Insurance carriers, funds, trusts and other financial vehicles	1,713	
2018	Larimer County	14040	Private households	1,524	
2018	Larimer County	9010	Publishing industries	1,382	
2018	Larimer County	5120	Plastics and rubber products manufacturing	1,373	
2018	Larimer County	12030	Hospitals	1,370	
2018	Larimer County	4020	Heavy and civil engineering construction	1,221	
2018	Larimer County	7040	Health and personal care stores	1,084	
2018	Larimer County	8030	Truck transportation	1,060	
2018	Larimer County	5030	Primary and fabricated metal manufacturing	955	
2018	Larimer County	5110	Chemical manufacturing	920	
2018	Larimer County	10020	Securities, commodity contracts and other financial investments	920	
2018	Larimer County	11025	Management of companies and enterprises	896	
2018	Larimer County	11030	Management of companies and enterprises	896	
2018	Larimer County	8050	Transit and ground passenger transportation	879	
2018	Larimer County	15014	Military	869	
2018	Larimer County	7050	Gasoline stations	848	
2018	Larimer County	9050	ISPs, search portals and data processing	829	
2018	Larimer County	5010	Wood product and furniture manufacturing	799	
2018	Larimer County	9030	Motion picture and broadcasting, except internet	760	
2018	Larimer County	9040	Telecommunications	759	
2018	Larimer County	2000	Mining	747	
2018	Larimer County	5070	Miscellaneous manufacturing	651	
2018	Larimer County	8080	Couriers and messengers and postal service	631	
2018	Larimer County	1020	Farm services	495	
2018	Larimer County	11100	Waste management and remediation services	456	
2018	Larimer County	5020	Nonmetallic mineral product manufacturing	400	
2018	Larimer County	8040	Support activities for transportation	358	

2018	Larimer County	5100	Paper and printing manufacturing	333	
2018	Larimer County	2030	Support activities for mining	318	
2018	Larimer County	3000	Utilities	280	
2018	Larimer County	3030	Utilities	280	
2018	Larimer County	2020	Mining (except oil and gas)	256	
2018	Larimer County	5090	Textile mills and product, apparel and similar manufacturing	214	
2018	Larimer County	5060	Motor vehicle and transportation manufacturing	184	
2018	Larimer County	2010	Oil and gas extraction	173	
2018	Larimer County	8020	Rail transportation	161	
2018	Larimer County	8010	Air transportation	50	
2018	Larimer County	8070	Scenic, sightseeing and water transportation	31	
2018	Larimer County	8060	Pipeline transportation	7	





June 22, 2020

Jesse Schlam
Environmental Regulatory Specialist
City of Fort Collins
jschlam@fcgov.com

RE: Potential HUD-Funded Project E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO

Dear Jesse,

On behalf of the City of Fort Collins and Volunteers of America (VOA), Miniello Consulting is providing National Environmental Policy Act (NEPA) review services for a proposed federal activity at the northwest corner of East Drake Road and Joseph Allen Drive in Fort Collins.

The proposed federal activity would involve the construction of a new, three-story building with 55 affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant.

We are inquiring about the ability of City's infrastructure to adequately support such a project in terms of water supply/wastewater/stormwater. Your comments regarding this request are appreciated within thirty (30) days of receipt of this letter. If you have any questions, please feel free to email me at kristi@minielloconsulting.com or call (303) 531-1414.

Sincerely,

A handwritten signature in blue ink that reads 'Kristi H. Miniello'.

Kristi H. Miniello
Owner

Attachments: Aerial map, site plan



June 22, 2020

Austin Kreager
City of Fort Collins
akreager@fcgov.com

RE: Potential HUD-Funded Project E. Drake Rd. & Joseph Allen Dr., Fort Collins,
CO

Dear Austin,

On behalf of the City of Fort Collins and Volunteers of America (VOA), Miniello Consulting is providing National Environmental Policy Act (NEPA) review services for a proposed federal activity at the northwest corner of East Drake Road and Joseph Allen Drive in Fort Collins.

The proposed federal activity would involve the construction of a new, three-story building with 55 affordable units for seniors along with a parking lot, detention pond, and associated site/infrastructure improvements. The 2.32-acres parcel, located at the northwest corner of E. Drake Rd. and Joseph Allen Dr., is currently vacant.

We are inquiring about the ability of City's infrastructure to adequately support such a project in terms of light and power usage. Your comments regarding this request are appreciated within thirty (30) days of receipt of this letter. If you have any questions, please feel free to email me at kristi@minielloconsulting.com or call (303) 531-1414.

Sincerely,

A handwritten signature in blue ink that reads 'Kristi H. Miniello'.

Kristi H. Miniello
Owner

Attachments: Aerial site map



Kristi Miniello <kristi@minielloconsulting.com>

NEPA Comment Request - VOA Sr. Residences

Austin Kreager <akreager@fcgov.com>

Mon, Jun 22, 2020 at 11:36 AM

To: Kristi Miniello <kristi@minielloconsulting.com>

Good morning Kristi,

Light and Power has adequate facilities and capacity around the construction site to accommodate the proposed project. This is not to say that the facilities have been installed on site, and there is some work to be done to bring power down the road to the site.

I hope this satisfies your question!

Thank you.

Austin Kreager | Electric Utility Project Manager

700 Wood St./ PO Box 580 | Fort Collins, CO 80522-0580

O: 970.224.6152 |

Email: akreager@fcgov.com



From: Kristi Miniello <kristi@minielloconsulting.com>

Sent: Monday, June 22, 2020 8:16 AM

To: Austin Kreager <akreager@fcgov.com>

Subject: [EXTERNAL] NEPA Comment Request - VOA Sr. Residences

Good morning,

I'm preparing a NEPA review for proposed senior residences at E. Drake Rd. and Joseph Allen Dr. in Fort Collins. Attached you will find project information and a request for comments pertaining to the power infrastructure. Please let me know if you need additional information.

