

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

Project Information

Project Name: Craycroft-Towers-and-Lee-Street-Duplexes

HEROS Number: 900000010528814

Start Date: 04/14/2026

Responsible Entity (RE): TUCSON, PO Box 27210 Tucson AZ, 85726

State / Local Identifier:

RE Preparer: Emilie Fisher

Certifying Office Ann Chanecka
r:

Grant Recipient (if different than Responsible Entity): City of Tucson Public Housing Authority

Point of Contact: Regina Romero

Point of Contact: Erika Balderson

Consultant (if applicable): BEC ENVIRONMENTAL INC.

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

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

Project Location: 1635 N Craycroft Rd, Tucson, AZ 85712

Additional Location Information:

The proposed Craycroft Towers and Lee Street Duplexes preservation and rehabilitation project is on Pima County Accessor's Parcel Number (APN) 121-12-404E (project area) at 1635 North Craycroft Road (Craycroft Tower) and 5411 East Lee Street (Lee Street Duplexes), Tucson, Arizona 85712. The project area is in Section 02, Township 14 South, Range 14 East within the Gila-Salt River Principal Median. The surrounding area was mixed developments including residential properties and commercial buildings within the Avondale neighborhood of Tucson, Arizona. The project area is on a 3.1-acre parcel containing an occupied 74-unit apartment complex, clubhouse, and four duplexes. The City of Tucson Housing and Community Development Department (HCD) purchased the property in 1972. Three years later, Craycroft Towers and the clubhouse were constructed. The Lee Street Duplexes were constructed in 1984. Craycroft Towers and Lee Street Duplexes currently operate as general occupancy, with HCD operating the development as public housing.

Direct Comments to: E-mail: emilie.fisher@tucsonaz.gov, OR Mail: City of Tucson Housing & Community Development Department, PO Box 27210, Tucson, Arizona 85726

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

Craycroft Towers, constructed in 1976, consists of a detached clubhouse and 74 one- and two-bedroom units in a three-story, multi-family apartment building. Lee Street Duplexes consist of eight one-bedroom units in four buildings. The selected property was identified for transfer from the City of Tucson Public Housing Authority to HCD's non-profit development arm, El Pueblo Housing Development. The project is a Rental Assistance Demonstration (RAD)/Section 18 conversion requiring the completion of both 24 Code of Federal Regulations (CFR) Part 50 and Part 58 environmental reviews. Section 18 of the U.S. Housing Act of 1937 allows Public Housing Agencies (PHAs) to sell (dispose of) public housing that is obsolete, distressed, or not cost-effective to maintain. Nine of the units would be RAD and 65 would be Section 18 under a single blended Housing Assistance Payments (HAP) contract. The project has been allocated 82 Project-Based Vouchers over 15 years and will have four HOME units. Site improvements will include a new clubhouse building constructed north of the existing clubhouse building with an open lounge room, kitchenette, case management office, and support spaces. Other improvements include an upgraded perimeter security fence and trash enclosure gates. The property's landscaping will be enhanced, particularly around the new clubhouse and street frontages. The parking areas will be upgraded, including ensuring the accessible parking spaces meet all standards; photo-voltaic parking canopies may be considered based on availability of

funds. Improvements to Craycroft Towers include upgrading the heating, ventilation, and air conditioning (HVAC) system, electrical system replacement, and water/sewer pipe upgrades. Flooring and cabinetry will be replaced, along with all fixtures, appliances, lighting, exhaust fans, windows, and doors throughout the units and common areas. Painting will also be completed on the interior and exterior. The elevators will be replaced. Fire safety and security systems will be replaced, including upgrading the fire sprinkler system. Interior and exterior walls will be repaired, as needed, including providing additional sound isolation. The exterior roof and interior ceilings will be repaired or replaced, as necessary, to ensure adequate insulation. Modifications will be made to ensure full accessibility compliance, including reconfiguring the existing American with Disabilities Act (ADA) units and adding railings as needed. The unit currently serving as an office will be converted back into a residential unit. Improvements to the Lee Street Duplex buildings will include replacement of the electrical systems, water heaters, doors, flooring and cabinetry, appliances, electrical outlets and switches, and light fixtures. The exteriors and entry paths will be repaired and upgraded, and the interior and exterior spaces will be repainted.

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

[Figure 1 Project Area Map.pdf](#)

[Craycroft Photo Log.pdf](#)

Level of Environmental Review Determination:

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

58.35(a)(5)

58.35(a)(3)(ii)

Determination:

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

Approval Documents:

[2026-7-20 Signature Page.pdf](#)

**7015.15 certified by Certifying Officer
on:**

**7015.16 certified by Authorizing Officer
on:**

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
AZ004600113	Public Housing	Project-Based Voucher Program	\$13,916,340.00
AZ20P00450124	Public Housing	Public Housing Capital Fund (including CFFP and other grants)	\$1,000,000.00
B24PH040002	Community Planning and Development (CPD)	Pathways to Removing Obstacles to Housing (PRO Housing)	\$2,000,000.00
B25MC040505	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$500,000.00
M24DC040229	Community Planning and Development (CPD)	HOME Program	\$1,000,000.00
pending	Rental Assistance Demonstration (RAD)		\$1,401,840.00

**Estimated Total HUD Funded, \$19,818,180.00
Assisted or Insured Amount:**

Estimated Total Project Cost: \$33,894,857.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		

Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	☐ Yes ☒ No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. The nearest civilian airport to the proposed project is the Tucson International Airport (TUS) which is nine miles southwest of the project area. The nearest air force base is Davis-Monthan Air Force Base (DM-AFB) which is four miles south of the project area. The project is not within the Airport Environ Zones (AEZ) for TUS nor the Accident Potential Zones (APZs) or Clear Zones (CZs) for DM-AFB.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	☐ Yes ☒ No	This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	☐ Yes ☒ No	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. The project is not within a Federal Emergency Management Agency (FEMA) identified special Flood Hazard Area (SFHA). The project area is within Zone X, Area of Minimal Flood Hazard, as depicted on the National Flood Hazard Layer, FIRM Panel Number 04019C2282L, effective June 16, 2011.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	☐ Yes ☒ No	The project area is in attainment for all criteria pollutants. Pima County is nonattainment of PM-10 in the Rillito planning area which does not include the project area. The proposed project would include the construction of a new clubhouse on less than an acre of

		disturbed land. The construction would have a temporary effect on air quality due to construction activities, but once completed, it would not generate new air emissions. PM10 is the pollutant primarily associated with construction activities and Pima County Department Environmental Quality (PDEQ) Air Program regulates air quality of proposed construction within the County. PDEQ regulates fugitive dust; PDEQ requires a permit be obtained prior to soil disturbance or construction which disturbs greater than one acre. The project would not be disturbing more than an acre and therefore a permit would not be required. The project is in compliance with the Clean Air Act.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	☐ Yes ☒ No	This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	☒ Yes ☐ No	Site contamination was evaluated as follows: ASTM Phase I ESA, Radon Testing, and ACM and LBP Surveys. The Phase I ESA by Terracon Consultants, Inc. (Terracon) dated September 2, 2025, revealed no evidence of RECs, CRECs, or significant data gaps in connection with the Subject Property. Radon testing was also conducted by Terracon, report dated August 25, 2025. Laboratory analytical results indicated that radon concentrations were not detected above 4.0 pCi/L in any of the samples collected. Radon was detected in each of the samples analyzed, and the concentrations ranged from 0.1 to 3.0 pCi/L. Additionally, ACM and LBP surveys have been conducted for the project site. ACM and LBP were identified on-site. Remediation of ACM and LBP will be conducted in conjunction with the rehabilitation

		work, and in accordance with EPA and Pima County requirements. The adverse environmental impacts will be mitigated via the rehabilitation. With mitigation, the project is in compliance with contamination and toxic substances requirements.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	☐ Yes ☒ No	This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area. This project is in compliance with the Endangered Species Act. The project area is within a developed, residential/urban area and project activities would occur within an urban landscape. The USFWS identified nine species under the Endangered Species Act in the general vicinity of the project areas: one endangered mammal, the ocelot [<i>Leopardus (Felis) pardalis</i>]; two threatened and one endangered bird species, cactus ferruginous pygmy-owl (<i>Glaucidium brasilianum cactorum</i>), yellow-billed cuckoo (<i>Coccyzus americanus</i>), and California least tern (<i>Sternula antillarum browni</i>); three endangered fish species, desert pupfish (<i>Cyprinodon macularius</i>), Gila chub (<i>Gila intermedia</i>), and the Gila topminnow (<i>Poeciliopsis occidentalis</i>); one proposed threatened insect species, the monarch butterfly (<i>Danaus plexippus</i>); and one endangered flowering plant species, Arizona eryngo (<i>Eryngium sparganophyllum</i>). The USFWS identified no critical habitat within the project, as depicted in the USFWS Species Report. The project is not expected to have an impact on the federally protected species as no supporting habitat was observed at the site, the property is fully developed/landscaped, and proposed ground disturbance would convert a concrete outdoor recreation area to a new clubhouse.

Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	☐ Yes ☒ No	Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements. No above-ground storage tanks or other evidence of explosive or flammable hazards were observed on the project area during the site survey on February 18, 2026.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	☐ Yes ☒ No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	☐ Yes ☒ No	This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. The project area was not within a FEMA identified SFHA. The project area is within Zone X, Area of Minimal Flood Hazard, as depicted on the National Flood Hazard Layer, FIRM Panel Number 04019C2282L, effective June 16, 2011.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	☐ Yes ☒ No	Based on Section 106 consultation, there is No Adverse Effect. A Cultural Resources Survey and Historic Property Inventory Forms were prepared for the project site by WestLand Resources Inc. Westland Resources Inc. documented Craycroft Towers and recommended that it is individually, and as a contributor to a potential historic district, Eligible for the NRHP under Criteria A for the property's association with the development of public housing in Tucson. Westland Resources Inc. also documented the Clubhouse and recommended that, as a contributor to a potential historic district, the property is Eligible for the NRHP under Criteria A for the property's association with the development of public housing in Tucson. The City of Tucson reviewed the

		Criteria of Adverse Effect and determined that none apply to the activities that will be carried out in this project. The integrity of the Craycroft Towers and Clubhouse structures will not be impacted by the proposed improvements. In addition, no archaeological sites were identified by Westland Resources during the 2025 pedestrian survey of the APE. On April 22, 2026, the City of Tucson initiated Section 106 consultation with SHPO and tribes. No concerns or adverse comments were received from consulting parties. The project is in compliance with Section 106.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	☐ Yes ☒ No	Terracon preformed a Noise Assessment (Section 7.2 of Terracon's Phase I ESA) and found that the DNLs are 65 dB and below, falling within the "acceptable" range. Therefore, no mitigation is required. However, the rehabilitation and site improvements will include standardized noise attenuation measures. The project is in compliance with HUD's Noise regulation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	☐ Yes ☒ No	The project is located on a sole source aquifer. Tucson is within the Upper Santa Cruz & Avra Basin sole source aquifer. The region has an MOU or other working agreement with EPA for HUD projects impacting a sole source aquifer, and the MOU or working agreement excludes the project from further review (Section B.2.). The project is served by municipal water and sewer systems and will have no impact on the aquifer. The project includes rehabilitation and site improvements with no change in land use. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	☐ Yes ☒ No	The project will not impact wetlands. The USFWS National Wetlands Inventory Mapper web application

		identified no features within or adjacent to the project area. The closest feature is a concrete lined canal 0.74 miles east of the project. Therefore, the project would not have an impact on aquatic features within the area. The project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	☐ Yes ☒ No	This project is not within proximity of a NWSRS river. There are two water features classified by the NWSRS in Arizona. Portions of Fossil Creek are designated as wild and recreational, and portions of the Verde River are classified as scenic and wild. Neither are in the vicinity of the project area. There are no Study Rivers in Arizona. Arizona does contain Nationwide Rivers Inventory identified river segments which potentially qualify as national wild, scenic, or recreational river areas. Canada del Oro, Romero Canyon, and Sabino Creek are identified in the Santa Catalina Mountains near Tucson but are not near the project site. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Contamination and Toxic Substances	Remediation of Asbestos Containing Material (ACM) and Lead Based Paint (LBP) will be conducted in accordance with	N/A	Prior to renovation activities, a licensed abatement	

	EPA and Pima County requirements.		consultant(s) will be required to remove ACM and ensure the removed building materials are properly disposed of per local regulations.	
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Project Mitigation Plan

Materials confirmed as ACM (greater than 1% asbestos) should be properly abated and disposed of by a qualified and licensed asbestos abatement contractor. Although not considered ACM by NESHAP, materials containing less than 1% asbestos were identified. The U.S. Occupation Safety and Health Administration (OSHA) considers any amount of detectable asbestos to be a potential hazard for workers and requires proper handling of these materials during disturbance (i.e., during demolition or renovation), such as using adequate amounts of amended water to control dust. Control of dust and minimizing the release of asbestos-containing material during construction is required under the PDEQ Fugitive Dust Permit and the PDEQ Asbestos National Emissions Standards for Hazardous Air Pollutants (NESHAP) permit. Removal of components with LBP must be conducted by personnel that are appropriately trained in accordance with OSHA 29 CFR 1926.62 "Lead in Construction" regulations. Removal of components with lead-containing paint (below the LBP threshold) must be conducted by personnel with lead awareness training. An operations, maintenance, and monitoring (OM&M) plan will be developed and maintained for the site for any asbestos and/or lead paint containing materials left in place.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

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

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

✓ No

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

Yes

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. The nearest civilian airport to the proposed project is the Tucson International Airport (TUS) which is nine miles southwest of the project area. The nearest air force base is Davis-Monthan Air Force Base (DM-AFB) which is four miles south of the project area. The project is not within the Airport Environ Zones (AEZ) for TUS nor the Accident Potential Zones (APZs) or Clear Zones (CZs) for DM-AFB.

Supporting documentation

[Figure 2 Airport Hazards Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Craycroft-Towers-and-Lee-
Street-Duplexes

Tucson, AZ

900000010528814

Coastal Barrier Resources

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

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

Screen Summary

Compliance Determination

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

Supporting documentation

[Figure 3 Coastal barrier resources.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

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

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

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

✓ Yes

2. Upload a FEMA/FIRM map showing the site here:

[Figure 4 National Flood Hazard Layer FIRMette Map.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

✓ No

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

Yes

4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance

Program (NFIP). Will flood insurance be required as a mitigation measure or condition?

Yes

✓ No

Screen Summary

Compliance Determination

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. The project is not within a Federal Emergency Management Agency (FEMA) identified special Flood Hazard Area (SFHA). The project area is within Zone X, Area of Minimal Flood Hazard, as depicted on the National Flood Hazard Layer, FIRM Panel Number 04019C2282L, effective June 16, 2011.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

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

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

☒ Yes

☐ No

Air Quality Attainment Status of Project's County or Air Quality Management District

2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

☒ No, project's county or air quality management district is in attainment status for all criteria pollutants.

Yes, project's management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

4. Determine the estimated emissions levels of your project. Will your project exceed any of the de minimis or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

Yes, the project exceeds *de minimis* emissions levels or screening levels.

Screen Summary

Compliance Determination

The project area is in attainment for all criteria pollutants. Pima County is nonattainment of PM-10 in the Rillito planning area which does not include the project area. The proposed project would include the construction of a new clubhouse on less than an acre of disturbed land. The construction would have a temporary effect on air quality due to construction activities, but once completed, it would not generate new air emissions. PM10 is the pollutant primarily associated with construction activities and Pima County Department Environmental Quality (PDEQ) Air Program regulates air quality of proposed construction within the County. PDEQ regulates fugitive dust; PDEQ requires a permit be obtained prior to soil disturbance or construction which disturbs greater than one acre. The project would not be disturbing more than an acre and therefore a permit would not be required. The project is in compliance with the Clean Air Act.

Supporting documentation

[Current Nonattainment Counties for All Criteria Pollutants__Green Book__US EPA.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

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

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

Screen Summary

Compliance Determination

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

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

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

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

☒ ASTM Phase I ESA

☐ ASTM Phase II ESA

☐ Remediation or clean-up plan

☐ ASTM Vapor Encroachment Screening.

☐ None of the above

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

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

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

No

Explain:

✓ Yes

3. Mitigation

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental impacts cannot be mitigated, then HUD assistance may not be used for the project at this site.

Can adverse environmental impacts be mitigated?

No, adverse environmental impacts cannot feasibly be mitigated. Project cannot proceed at this location.

✓ Yes, adverse environmental impacts can be eliminated through mitigation.

4. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls*, or use of institutional controls**.

Remediation of Asbestos Containing Material (ACM) and Lead Based Paint (LBP) will be conducted in accordance with EPA and Pima County requirements.

If a remediation plan or clean-up program was necessary, which standard does it follow?

Complete removal

Risk-based corrective action (RBCA)

* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

** Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

8. Mitigation

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental impacts cannot be mitigated, then HUD assistance may not be used for the project at this site.

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan*.

Can all adverse environmental impacts be mitigated?

No, all adverse environmental impacts cannot feasibly be mitigated.
Project cannot proceed at this location.

- ✓ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.
Provide all mitigation requirements** and documents in the Screen Summary at the bottom of this screen.

* Refer to CPD Notice [CPD-23-103](#) for additional information on radon mitigation plans.

** Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

9. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls*, or use of institutional controls**.

Remediation of Asbestos Containing Material (ACM) and Lead Based Paint (LBP) will be conducted in accordance with EPA and Pima County requirements.

If a remediation plan or clean-up program was necessary, which standard does it follow?

Complete removal

Risk-based corrective action (RBCA)

Other

* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

** Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, Radon Testing, and ACM and LBP Surveys. The Phase I ESA by Terracon Consultants, Inc. (Terracon) dated September 2, 2025, revealed no evidence of RECs, CRECs, or significant data gaps in connection with the Subject Property. Radon testing was also conducted by Terracon, report dated August 25, 2025. Laboratory analytical results indicated that radon concentrations were not detected above 4.0 pCi/L in any of the samples collected. Radon was detected in each of the samples analyzed, and the concentrations ranged from 0.1 to 3.0 pCi/L. Additionally, ACM and LBP surveys have been conducted for the project site. ACM and LBP were identified on-site. Remediation of ACM and LBP will be conducted in conjunction with the rehabilitation work, and in accordance with EPA and Pima County requirements. The adverse environmental impacts will be mitigated via the rehabilitation. With mitigation, the project is in compliance with contamination and toxic substances requirements.

Supporting documentation

[Radon Testing Craycroft.pdf](#)
[ACM LBP Survey Craycroft.pdf](#)
[Phase I ESA Craycroft.pdf](#)
[Figure 6 Cleanups Community.pdf](#)

Are formal compliance steps or mitigation required?

Craycroft-Towers-and-Lee-
Street-Duplexes

Tucson, AZ

900000010528814

- ✓ Yes
- No

Endangered Species

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

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

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

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

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

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

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

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below. Documentation may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.

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

Screen Summary

Compliance Determination

This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area. This project is in compliance with the Endangered Species Act. The project area is within a developed, residential/urban area and project activities would occur within an urban landscape. The USFWS identified nine species under the Endangered Species Act in the general vicinity of the project areas: one endangered mammal, the ocelot [*Leopardus (Felis) pardalis*]; two threatened and one endangered bird species, cactus ferruginous pygmy-owl (*Glaucidium brasilianum cactorum*), yellow-billed cuckoo (*Coccyzus americanus*), and California least tern (*Sternula antillarum browni*); three endangered fish species, desert pupfish (*Cyprinodon macularius*), Gila chub (*Gila intermedia*), and the Gila topminnow (*Poeciliopsis occidentalis*); one proposed threatened insect species, the monarch butterfly (*Danaus plexippus*); and one endangered flowering plant species, Arizona eryngo (*Eryngium sparganophyllum*). The USFWS identified no critical habitat within the project, as depicted in the USFWS Species Report. The project is not expected to have an impact on the federally protected species as no supporting habitat was observed at the site, the property is fully developed/landscaped, and proposed ground disturbance would convert a concrete outdoor recreation area to a new clubhouse.

Supporting documentation

[USFWS Species Report.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

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

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

✓ No

Yes

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

✓ No

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

Yes

Screen Summary

Compliance Determination

Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements. No above-ground storage tanks or other evidence of explosive or flammable hazards were observed on the project area during the site survey on February 18, 2026.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Craycroft-Towers-and-Lee-
Street-Duplexes

Tucson, AZ

900000010528814

Farmlands Protection

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

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

Yes

✓ No

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

The US Department of Agriculture, Natural Resources Conservation Service, has designated the project area as "not prime farmland".

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

Screen Summary

Compliance Determination

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

Supporting documentation

[Farmland Classification.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

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

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

Yes

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Describe:

✓ No

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

Yes

Describe:

✓ No

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

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

Select one of the following three options:

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

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

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

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

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

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

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary

Compliance Determination

This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. The project area was not within a FEMA identified SFHA. The project area is within Zone X, Area of Minimal Flood Hazard, as depicted on the National Flood Hazard Layer, FIRM Panel Number 04019C2282L, effective June 16, 2011.

Supporting documentation

[Figure 4 National Flood Hazard Layer FIRMette Map\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

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

Threshold

Is Section 106 review required for your project?

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

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

Research and evaluation of the project site by the City of Tucson and Westland Resources; Cultural Resources Survey and Historic Property Inventory Forms prepared for the project site by Westland Resources; determination of No Adverse Effect; and SHPO and THPO consultation. Tribes selected for consultation were determined by utilizing the TDAT and the Arizona Government to Government Consultation Toolkit.

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

Screen Summary

Compliance Determination

Based on Section 106 consultation, there is No Adverse Effect. A Cultural Resources Survey and Historic Property Inventory Forms were prepared for the project site by

WestLand Resources Inc. Westland Resources Inc. documented Craycroft Towers and recommended that it is individually, and as a contributor to a potential historic district, Eligible for the NRHP under Criteria A for the property's association with the development of public housing in Tucson. Westland Resources Inc. also documented the Clubhouse and recommended that, as a contributor to a potential historic district, the property is Eligible for the NRHP under Criteria A for the property's association with the development of public housing in Tucson. The City of Tucson reviewed the Criteria of Adverse Effect and determined that none apply to the activities that will be carried out in this project. The integrity of the Craycroft Towers and Clubhouse structures will not be impacted by the proposed improvements. In addition, no archaeological sites were identified by Westland Resources during the 2025 pedestrian survey of the APE. On April 22, 2026, the City of Tucson initiated Section 106 consultation with SHPO and tribes. No concerns or adverse comments were received from consulting parties. The project is in compliance with Section 106.

Supporting documentation

[2026-5-19 SCAT concur.pdf](#)
[2026-5-19 PYT concur and comments.pdf](#)
[2026-5-6 WMAT NAE Concur.pdf](#)
[2026-4-23 SRPMIC defer to TON.pdf](#)
[2026-4-22 Craycroft Tower NAE Zuni.pdf](#)
[2026-4-22 Craycroft Tower NAE Yavapai.pdf](#)
[2026-4-22 Craycroft Tower NAE White Mountain.pdf](#)
[2026-4-22 Craycroft Tower NAE Tonto.pdf](#)
[2026-4-22 Craycroft Tower NAE TON.pdf](#)
[2026-4-22 Craycroft Tower NAE SRPMIC.pdf](#)
[2026-4-22 Craycroft Tower NAE San Carlos.pdf](#)
[2026-4-22 Craycroft Tower NAE PYT.pdf](#)
[2026-4-22 Craycroft Tower NAE Mescalero.pdf](#)
[2026-4-22 Craycroft Tower NAE Hopi.pdf](#)
[2026-4-22 Craycroft Tower NAE GRIC.pdf](#)
[2026-4-22 Craycroft Tower NAE Ak-Chin.pdf](#)
[Attachment E - CRS.pdf](#)
[Attachment D HPIF_clubhouse.pdf](#)
[Attachment D HPIF_apts.pdf](#)
[Attachment C - Scope of Work.docx](#)
[Attachment B- APE Map.pdf](#)
[Attachment A - Site Maps.pdf](#)
[2026-5-19 Craycroft Tower NAE SHPO concur.pdf](#)
[Figure 7 Historical Districts Map.pdf](#)

Are formal compliance steps or mitigation required?

Craycroft-Towers-and-Lee-
Street-Duplexes

Tucson, AZ

900000010528814

Yes

✓ No

Noise Abatement and Control

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

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

New construction for residential use

☒ Rehabilitation of an existing residential property

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

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

An interstate land sales registration

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

None of the above

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

☒ Yes

Indicate the type of measures that will apply (check all that apply):

- ✓ Improved building envelope components (better windows and doors, strengthened sheathing, insulation, sealed gaps, etc.)
- Redesigned building envelope (more durable or substantial materials, increased air gap, resilient channels, staggered wall studs, etc.)
- Other

Explain:

Standardized noise attenuation measures such as the installation of double paned windows, sealing gaps, and improving weatherization will be included in the rehabilitation work, and will be installed in the new clubhouse.

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

No

Screen Summary

Compliance Determination

Terracon preformed a Noise Assessment (Section 7.2 of Terracon's Phase I ESA) and found that the DNLs are 65 dB and below, falling within the "acceptable" range. Therefore, no mitigation is required. However, the rehabilitation and site improvements will include standardized noise attenuation measures. The project is in compliance with HUD's Noise regulation.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

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

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

- Yes
- ✓ No

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

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

- < No
- ✓ Yes

3. Does your region have a memorandum of understanding (MOU) or other working agreement with Environmental Protection Agency (EPA) for HUD projects impacting a sole source aquifer?

- ✓ Yes

Document and upload MOU or Agreement below.

No

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

☒ Yes

Document and upload where your project fits within the MOU or working agreement below. Based on the response, the review is in compliance with this section.

No

Screen Summary

Compliance Determination

The project is located on a sole source aquifer. Tucson is within the Upper Santa Cruz & Avra Basin sole source aquifer. The region has an MOU or other working agreement with EPA for HUD projects impacting a sole source aquifer, and the MOU or working agreement excludes the project from further review (Section B.2.). The project is served by municipal water and sewer systems and will have no impact on the aquifer. The project includes rehabilitation and site improvements with no change in land use. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[MOU and map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

☒ No

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 requires avoiding to the extent possible the long and short term adverse impacts associated with the destruction or modification of wetlands, and avoiding actions that directly or indirectly support new construction in wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory must be used as a primary screening tool, but observed or known wetlands not delineated on NWI maps must also be evaluated.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

1. Does this project involve new construction as defined in 24 CFR 55.10 and referenced in Executive Order 11990? The term "new construction" shall include grading, clearing, draining, dredging, channelizing, filling, diking, impounding, and related activities for any structure or facilities, including the siting of new manufactured housing units.

No

✓ Yes

2. Will the new construction activities directly impact an onsite wetland?

The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, prairie potholes, wet meadows, river overflows, mud flats, and natural ponds. This definition includes those wetland areas separated from their natural supply of water as a result of activities such as the construction of structural flood protection methods or solid fill roadbeds and activities such as mineral extraction and navigation improvements. This definition includes both wetlands subject to and those not subject to Section 404 of the Clean Water Act as well as constructed wetlands.

✓ No, an onsite wetland will not be directly impacted by new construction activities, as defined in 24 CFR 55.10.

Yes, there is an onsite wetland that will be directly impacted by new construction activities, as defined 24 CFR 55.10.

3. Will the proposed project indirectly affect wetlands by modifying the flow of stormwater, releasing pollutants, or otherwise changing conditions that contribute to wetlands viability?

Yes, wetlands may be indirectly affected by changing conditions that contribute to wetlands viability.

- ✓ No, wetlands will not be indirectly affected by changing conditions that contribute to wetlands viability.

4. Will the proposed project indirectly affect off-site wetlands?

Yes, off-site wetlands may be indirectly affected.

- ✓ No, off-site wetlands will not be indirectly affected by changing conditions that contribute to wetlands viability.

Screen Summary

Compliance Determination

The project will not impact wetlands. The USFWS National Wetlands Inventory Mapper web application identified no features within or adjacent to the project area. The closest feature is a concrete lined canal 0.74 miles east of the project. Therefore, the project would not have an impact on aquatic features within the area. The project is in compliance with Executive Order 11990.

Supporting documentation

[Figure 9 Wetlands Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

- ✓ No

Wild and Scenic Rivers Act

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

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

✓ No

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

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

Screen Summary

Compliance Determination

This project is not within proximity of a NWSRS river. There are two water features classified by the NWSRS in Arizona. Portions of Fossil Creek are designated as wild and recreational, and portions of the Verde River are classified as scenic and wild. Neither are in the vicinity of the project area. There are no Study Rivers in Arizona. Arizona does contain Nationwide Rivers Inventory identified river segments which potentially qualify as national wild, scenic, or recreational river areas. Canada del Oro, Romero Canyon, and Sabino Creek are identified in the Santa Catalina Mountains near Tucson but are not near the project site. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Figure 10 Wild and Scenic Rivers Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No



Figure 1. Project Area Map

Craycroft Towers & Lee Street Duplexes
1635 N Craycroft Rd & 5411 E Lee St
Tucson, Arizona

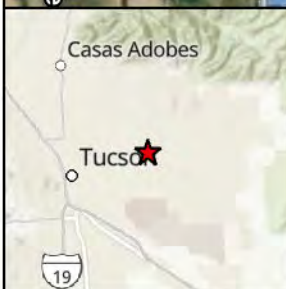
Legend

Project Area

Data Source: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, CGIAR, USGS, J. Microsoft, Vantor

bec environmental, inc.
Environmental Services

0 100 200 300
Feet



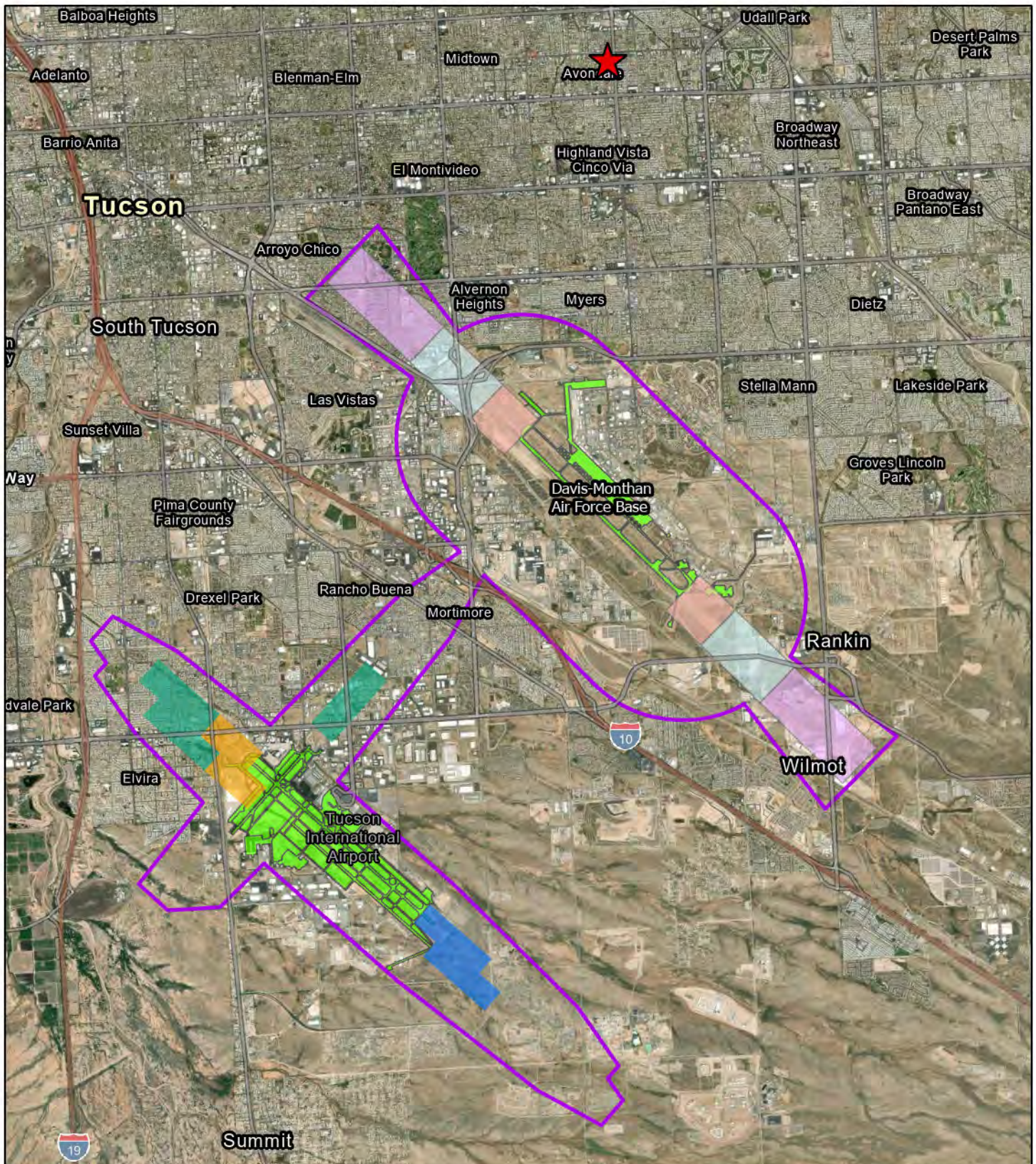
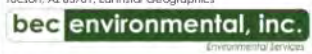


Figure 2. Airport Hazards Map
 Craycroft Towers and Lee Street Duplexes
 1635 N Craycroft Rd & 5411 E Lee St
 Tucson, Arizona

Data Source: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, CGIAR, USGS. Published by City of Tucson Information Technology Department, GIS Services, GIS.IT@tucsonaz.gov. Published by City of Tucson Information Technology Department, GIS Services, GIS.IT@tucsonaz.gov. Pima County Information Technology Department - Geographic Information Systems, 33 N Stone Av, 15th Floor, Tucson, AZ 85701, Earthstar Geographics



Legend

★ Project Area	CZ
■ Airport Runways	■ CUZ-1
▭ Height Restriction Zone	■ CUZ-2
▭ APZ 1	■ CUZ-3
▭ APZ 2	

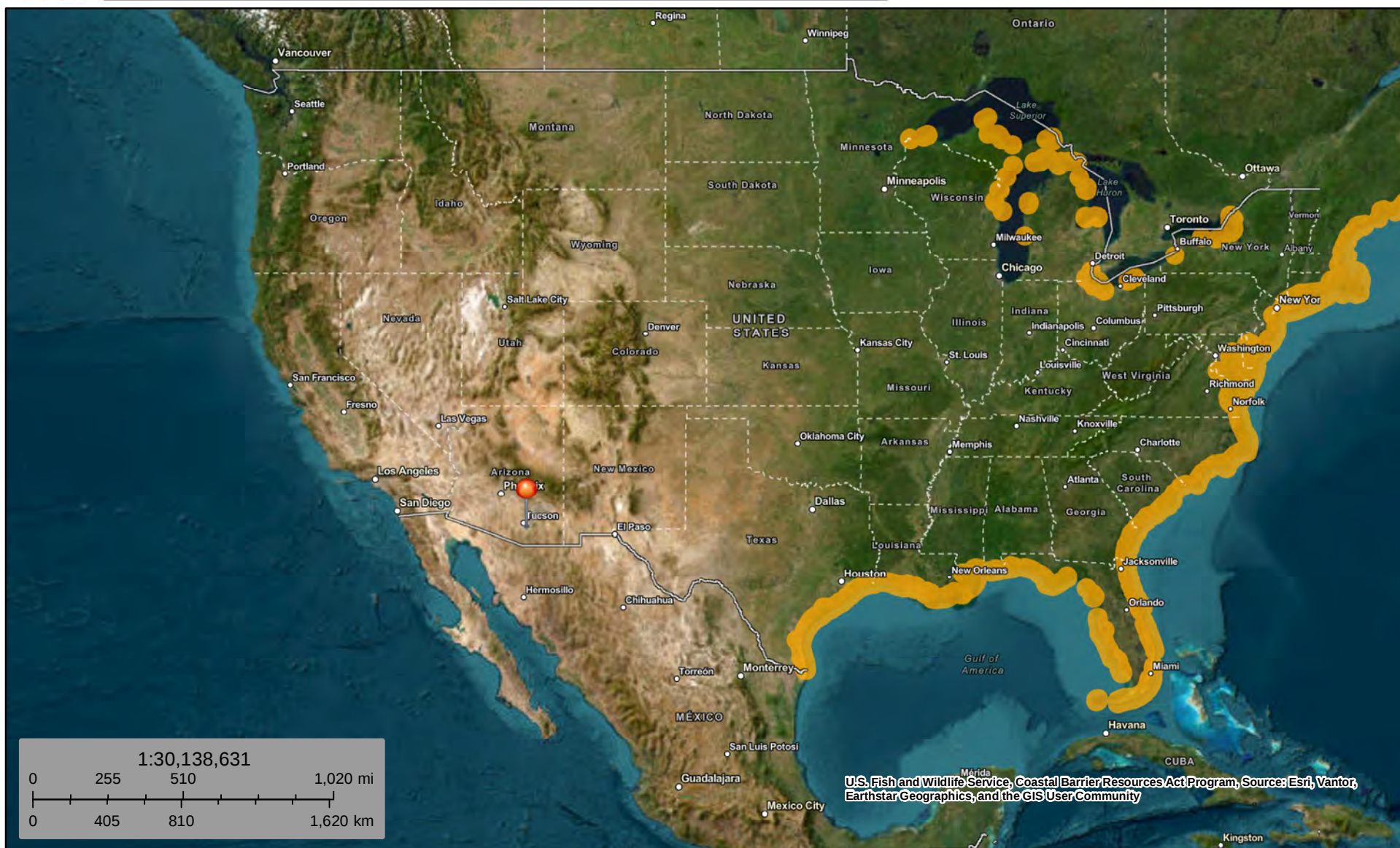
0 1 2 3
 Miles

N



U.S. Fish and Wildlife Service Coastal Barrier Resources System

Figure 3. Craycroft Towers & Lee Street Duplexes



February 16, 2026

Generalized Units

This map is for general reference only. The Coastal Barrier Resources System (CBRS) boundaries depicted on this map are representations of the controlling CBRS boundaries, which are shown on the official maps, accessible at <https://www.fws.gov/library/collections/official-coastal-barrier-resources-system-maps>. All CBRS related data should be used in accordance with the layer metadata found on the CBRS Mapper website.

The CBRS Buffer Zone represents the area immediately adjacent to the CBRS boundary where users are advised to contact the Service for an official determination (<https://www.fws.gov/service/coastal-barrier-resources-system-property-documentation>) as to whether the property or project site is located "in" or "out" of the CBRS.

CBRS Units normally extend seaward out to the 20- or 30-foot bathymetric contour (depending on the location of the unit). The true seaward

This page was produced by the CBRS Mapper

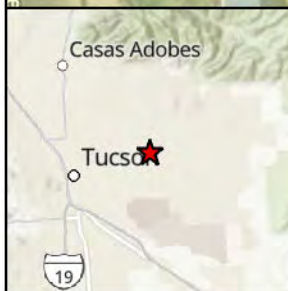


Figure 4. National Flood Hazard Layer FIRMette Map

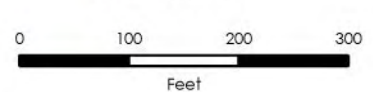
Craycroft Towers and Lee Street Duplexes
1635 N Craycroft Rd & 5411 E Lee St
Tucson, Arizona

Data Source: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, CGIAR, USGS, J. Microsoft, Vantor

bec environmental, inc.
Environmental Services

Legend

- Project Area
- Flood Zone X - Area of Minimal Flood Hazard



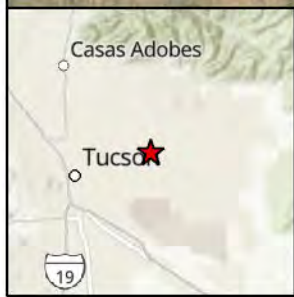
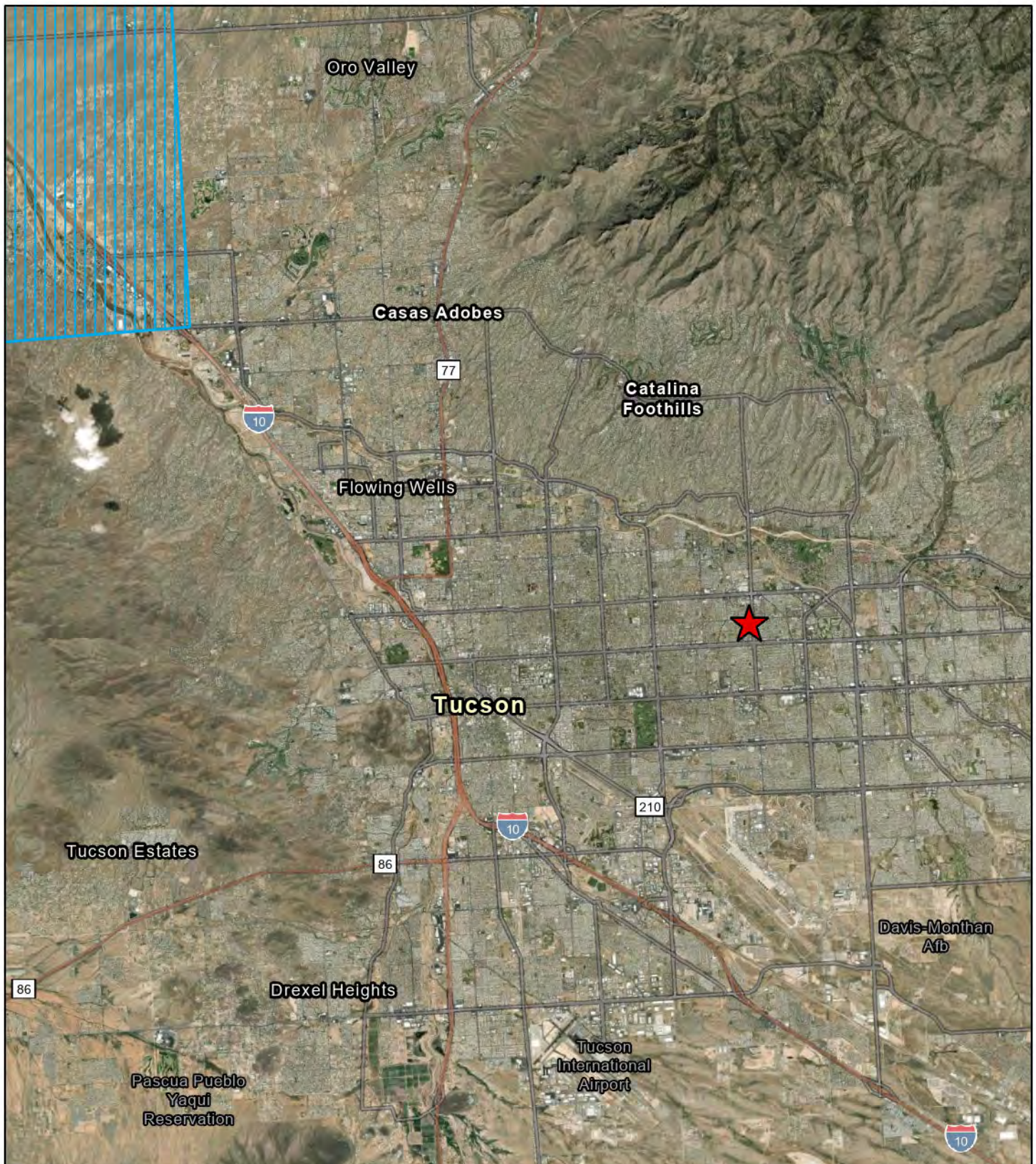


Figure 5. Nonattainment Map
 Craycroft Towers and Lee Street Duplexes
 1635 N Craycroft Rd & 5411 E Lee St
 Tucson, Arizona

Data Source: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, CGIAR, USGS, Arizona Department of Environmental Quality | Air Quality Division, Earthstar Geographics

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Legend

 Project Area

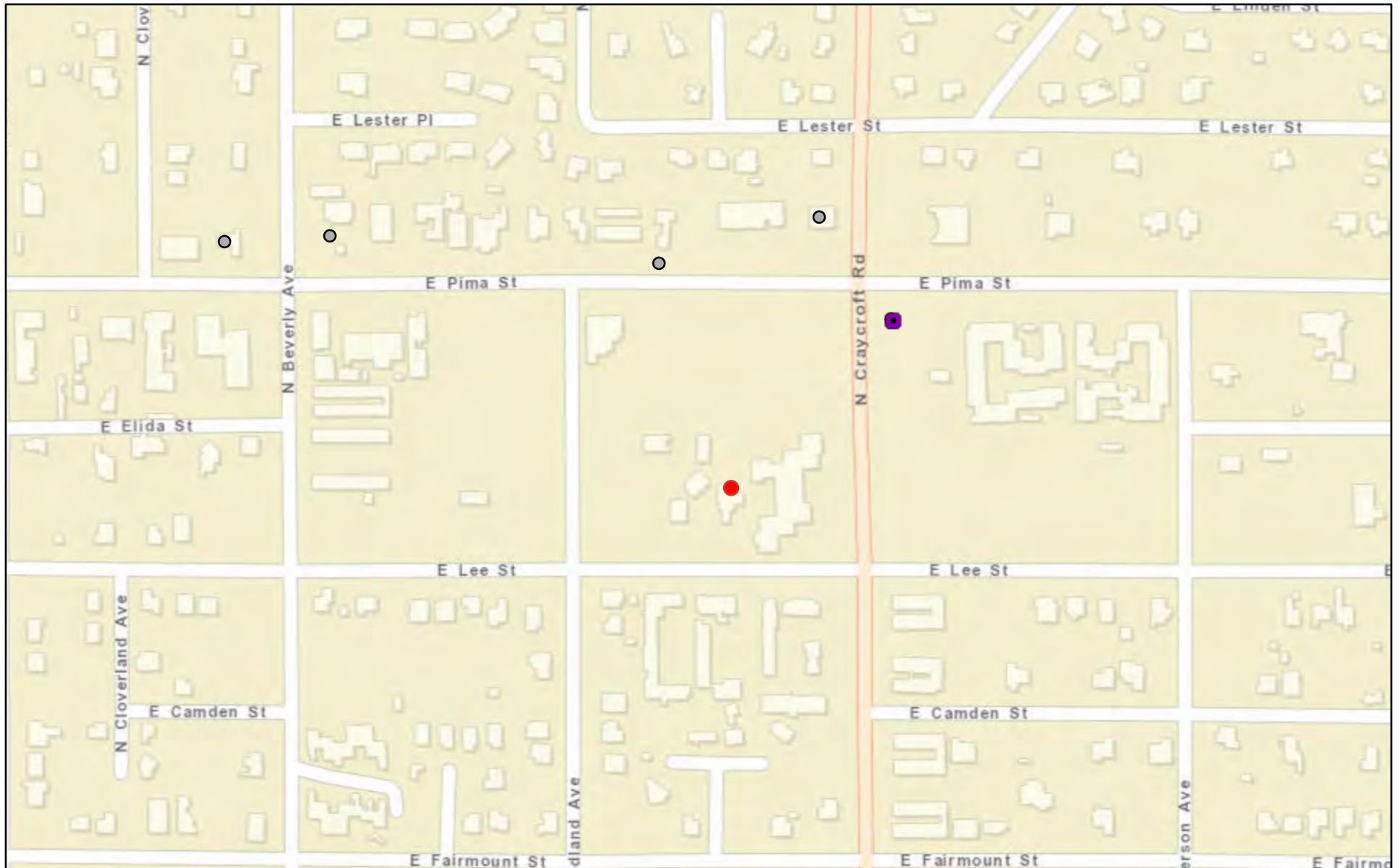
 PM-10 Nonattainment

0 2 4 6
 Miles

N

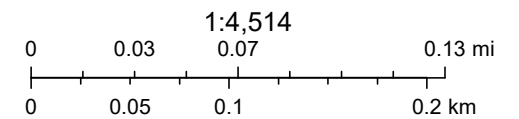


Figure 6B. ADEQ Map



2/16/2026, 11:37:55 AM

- UST - Releases
- Closed
- Counties
- Project



Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, NGA, USGS



Figure 7. Historical Districts Map

Craycroft Towers and Lee Street Duplexes
 1635 N Craycroft Rd & 5411 E Lee St
 Tucson, Arizona

Data Source: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, CGIAR, USGS, Earthstar Geographics

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-  Project Area
-  Current National Register District
-  Eligible National Register District



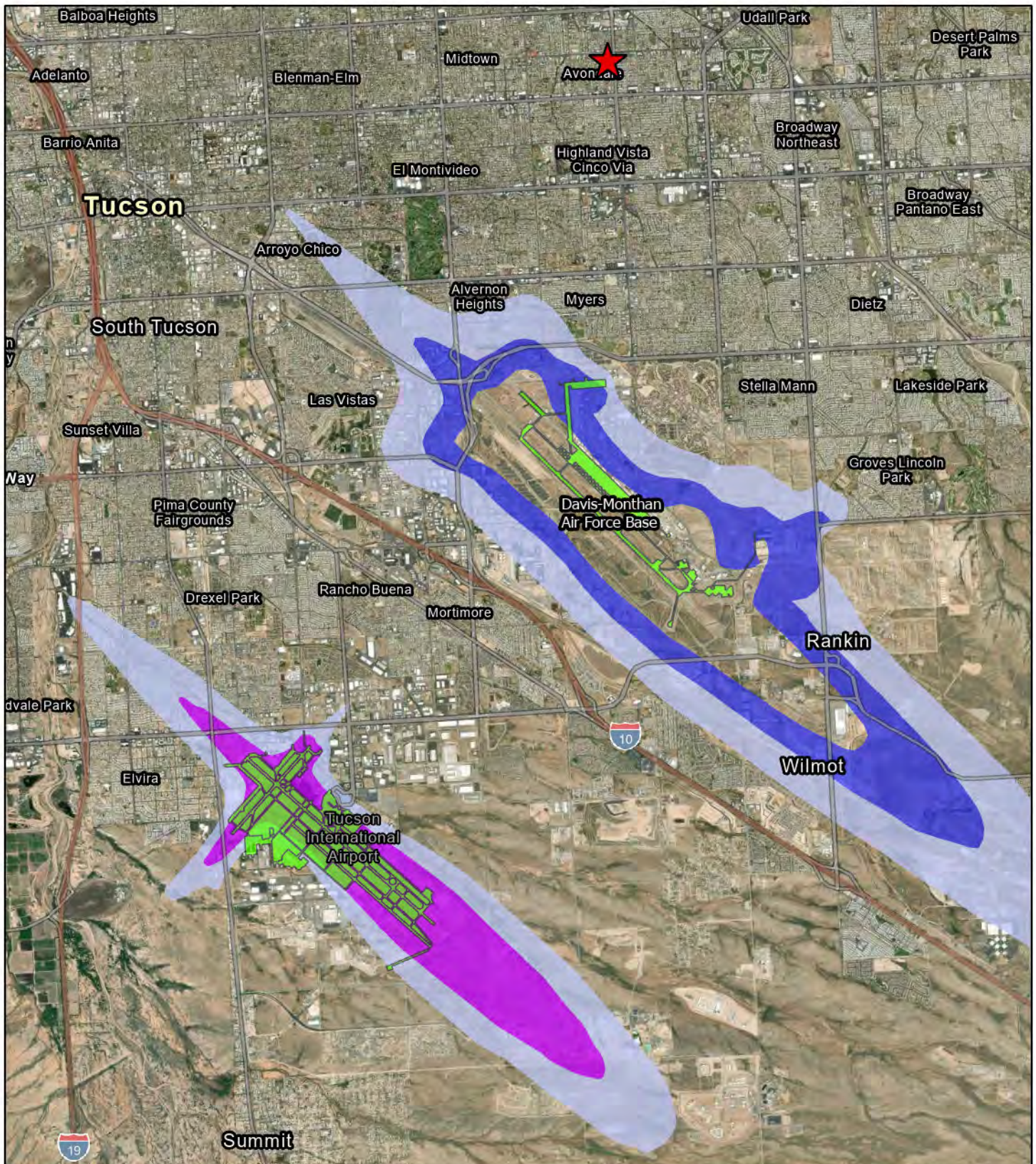


Figure 8. Airport Noise Map
Craycroft Environmental Review
Tucson, Arizona

Data Source: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community. Esri, CGIAR, USGS, Pima County Information Technology Department - Geographic Information Systems, 33 N. Stone Av., 15th Floor, Tucson, AZ 85701, Published by City of Tucson Information Technology Department, GIS Services, Earthstar Geographics

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Legend

- ★ Project Area
- 70-75 LDN
- Airport Runways
- 70-PLUS LDN

Airport Environs Noise

- 65-70 LDN



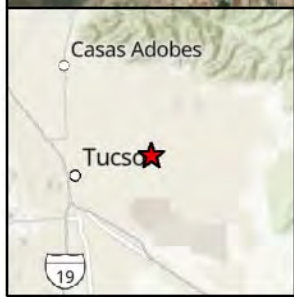
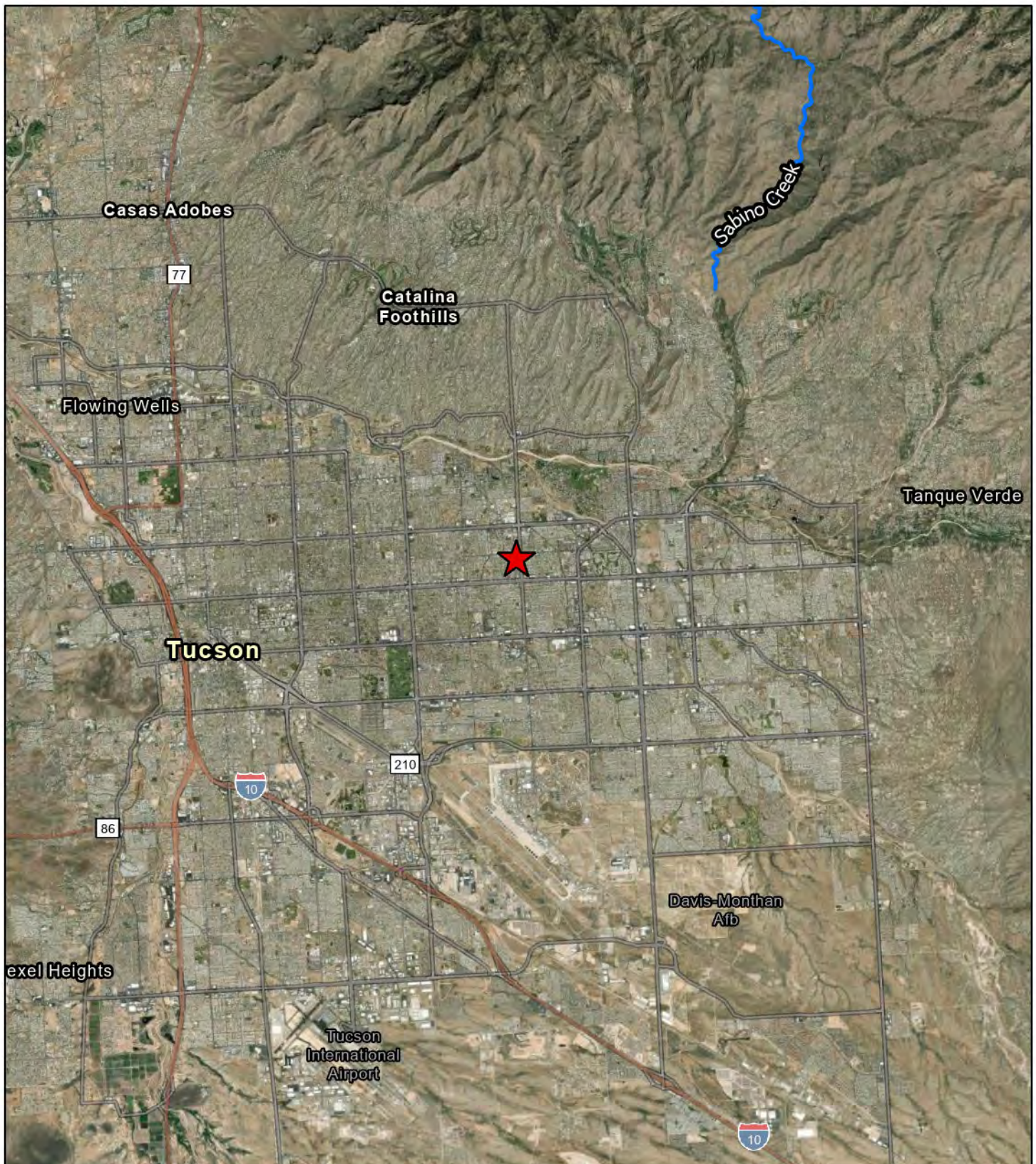


Figure 10. Wild and Scenic Rivers Map
 Craycroft Towers and Lee Street Duplexes
 1635 N Craycroft Rd & 5411 E Lee St
 Tucson, Arizona

Data Source: Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, Esri, CGIAR, USGS, Earthstar Geographics

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Legend

 Project Area

 Nationwide Rivers Inventory



Craycroft Towers & Lee Street Duplexes
Tucson, Arizona
Attachment 2 - Site Photo Log



Photo 1



View of Craycroft Towers (1635 North Craycroft Road).

Photo 2



View north of Craycroft Towers (1635 North Craycroft Road) from East Lee Street.

Photo 3



View northwest of Craycroft Towers (1635 North Craycroft Road).

Photo 4



View of the northeast portion of the Craycroft Towers (1635 North Craycroft Road).

Photo 5



View of Lee Street Duplex (5411 East Lee Street, Building 7 and 8).

Photo 6



View of Lee Street Duplex (5411 East Lee Street, Building 1 and 2).

Craycroft Towers & Lee Street Duplexes
Tucson, Arizona
Attachment 2 - Site Photo Log



Photo 7



View of Lee Street Duplex (5411 East Lee Street, Building 3 and 4).

Photo 8



View of Lee Street Duplex (5411 East Lee Street, Building 5 and 6).



SELECT DATA



RADON | RADON TESTS FROM LABS | MEDIAN PRE-MITIGATION RADON LEVEL IN TESTED BUILDINGS OVER A 10-YEAR PERIOD | ARIZONA

2008-2017

