

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

**Project Information**

**Project Name:** LIHTC-West-Point-Apts-II-PBVs

**HEROS Number:** 900000010361235

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

**RE Preparer:** Rolanda Mazeika

**State / Local Identifier:**

**Certifying Officer:** Anna Rosenberry

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

**Point of Contact:** Regina Romero

**Consultant (if applicable):**

**Point of Contact:**

**Project Location:** 20 E Ochoa St, Tucson, AZ 85701

**Additional Location Information:**

The West Point Apartments II project is located at 18 and 20 East Ochoa Street, Tucson, Pima County, Arizona 85701, Pima County Assessor Parcel Number 117-13-0410. The site is located in Downtown Tucson, south of East Broadway Boulevard between South Scott and Stone Avenues on the north side of East Ochoa Street in the

Armory Park Historic Residential District. The property description is: TUCSON LOT 2 & ELY PTN LOT 3 BLK 217. The property is located within the City of Tucson's Infill Incentive District.

**Direct Comments to:** E-mail: [rolanda.mazeika@tucsonaz.gov](mailto:rolanda.mazeika@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]:**

The West Point Apartments II project provides for the development of affordable supportive housing by La Frontera Partners, Inc. on an approximate 0.34-acre site currently used as a parking lot in the Armory Park Historic Residential District in Downtown Tucson, Arizona. The project consists of property acquisition, demolition of the current parking lot, new construction of a 7-story, 85-unit affordable supportive housing complex, and allocation of 26 project-based vouchers (PBVs). The housing complex is designed with community space on the ground floor and 85, one-bedroom, one-bathroom units on the 2nd through 7th floors. The ground floor community space includes offices for supportive services and property management staff and resident amenities including gathering spaces, a warming kitchen, food pantry, fitness room, laundry rooms, and restrooms. The project also includes one resident manager's unit. The project will be allocated 26 PBVs through the City of Tucson Public Housing Authority. The project will also receive \$500,000 in Coronavirus State and Local Fiscal Recovery Funds (SLFRF) authorized by the American Rescue Plan Act through the City of Tucson Housing & Community Development Department. Eighty percent (80%) of the units will be set aside for adults, ages 55 and over. The project will have the following household income targeting: 28 units at 40% of Area Median Income (AMI); 28 units at 50% of AMI; and 28 units at 60% of AMI. Supportive services, including a residential services coordinator, will be available to residents through La Frontera Center, Inc., a sister agency to La Frontera Partners, Inc., a state-certified Community Housing Development Organization and the project developer, both under La Frontera Arizona, Inc., a nonprofit corporation. West Point Apartments II will be designed in compliance with the 2023 State of Arizona Qualified Allocation Plan Mandatory Design Guidelines and will meet Leadership in Energy and Environmental Design (LEED) Silver energy standards, which include energy efficient building elements such as Energy Star qualified fixtures and appliances, water efficient plumbing fixtures, green label materials, efficient HVAC systems, and Home Energy Rating System (HERS) index standards. The West Point Apartments II project represents phase two of West Point Apartments, previously developed by La Frontera Partners in 2017, located at 20 East Broadway Boulevard and consisting of 50 affordable units for residents 55 years of age and older. The total estimated project cost is \$29,348,920 with an estimated \$6,683,040 of funding for 26 PBVs over 20 years, entitlement number AZ004, through the City of Tucson Public Housing Authority. The West Point Apartments II project is located at 18 and 20 East Ochoa Street, Tucson, Pima County, Arizona 85701, Pima County Assessor Parcel Number 117-13-0410. The site is located in Downtown Tucson, south of East Broadway Boulevard between South Scott and Stone Avenues on the north side of East Ochoa Street in

the Armory Park Historic Residential District. The property description is: TUCSON LOT 2 & ELY PTN LOT 3 BLK 217. The property is located within the City of Tucson's Infill Incentive District.

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

This project supports the Administrative Plan for the Housing Choice Voucher Program Public Housing Authority's standards including: providing decent, safe, and sanitary housing for very low-income families while ensuring family rents are fair, reasonable, and affordable; encouraging self sufficiency of participant families and assist in the expansion of family opportunities which address educational, socio-economic, recreational and other human services needs; promoting fair housing and the opportunity for very low-income families of all ethnic backgrounds to experience freedom of housing choice; promoting a housing program which maintains quality service and integrity while providing an incentive to private property owners to rent to very low-income families; promoting a market-driven housing program that will help qualified low-income families be successful in obtaining affordable housing and increase the supply of housing choices for such families. The project serves the program purpose of increasing the supply of much needed affordable housing in the City of Tucson. This project is also expected to receive funding through the Arizona Department of Housing. The project also supports the goals of Plan Tucson, the 2013 City of Tucson General & Sustainability Plan, to provide housing, human services, public facilities, and economic development programs to address the housing needs of the most vulnerable populations ([www.tucsonaz.gov/Departments/Planning-Development-Services/Development-Tools-Resources/Plans#section-1](http://www.tucsonaz.gov/Departments/Planning-Development-Services/Development-Tools-Resources/Plans#section-1)).

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

The site is located in Downtown Tucson, south of East Broadway Boulevard between South Scott and Stone Avenues on the north side of East Ochoa Street in the Armory Park Historic Residential District. The site is approximately one-half mile east of Interstate 10. Tucson's regional transit system including Sun Tran, Sun Express, and Sun Van provide service to nearby arterial streets, Congress Street/Broadway Boulevard, Stone and Church Avenues, and Scott Avenue, and bus stops are within walking distance of the site. Multiple bus lines travel along East Congress Street/Broadway Boulevard, and four bus lines accessible within two blocks east and west of the site provide travel north/south along South 6th and Church Avenues. Amenities within walking distance or directly available via the transit system include: medical providers and pharmacies; markets and grocery; restaurants; retail shopping; and senior/recreation centers. The site is located within 1,000 feet of five major roadways, Stone, 6th, and Church Avenues, Broadway Boulevard, and Congress Street. The site is surrounded by residential and commercial development, including buildings and parking lots, to the north, east, south, and west. The adjoining sites consist of the following: North, East Jackson Street followed by a four-story mixed

residential/commercial building (44 E Broadway Blvd); South, East Ochoa Street followed by commercial building (Scottish Rite Cathedral, 160 S Scott Ave); East, commercial building and associated parking lot (formerly Udall Foundation, 130 S Scott Ave); and West, commercial building and apartment complex (123 S Stone Ave and 119 S Stone Ave). The site is a good choice for housing development based on the current affordable housing crisis as well as its proximity to transit and services. Low- to high-density commercial, residential, public, and government development/improvements are likely to continue within Downtown Tucson.

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

- [2023-6-8 Ochoa Google Map.pdf](#)
- [2023-8-4 Ochoa Aerial Map.pdf](#)
- [West Point Apts II - Design Floor Plans.pdf](#)
- [2023-6-14 Ochoa Updated Phase I WTI Photos.pdf](#)
- [2023-1-9 Ochoa Phase I WTI Photos.pdf](#)

**Determination:**

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

**Approval Documents:**

[2023-12-7 Ochoa 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
AZ004	Public Housing	Project-Based Voucher Program

**Estimated Total HUD Funded, Assisted or Insured Amount:** \$6,683,040.00

**This project anticipates the use of funds or assistance from another federal agency in addition to HUD in the form of:**

**Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** \$29,348,920.00

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

<b>Compliance Factors:</b> 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)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.
<b>Coastal Barrier Resources Act</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not contain CBRS units. There are no CBRS units in Arizona. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
<b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. FEMA Zone X, 04019C 2276L, 6/16/2011. 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.
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b>		
<b>Air Quality</b> Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project's county or air quality management district is in nonattainment status for the following: Particulate Matter, <10 microns (Rillito planning area, Pima County, AZ). The

		<p>project's county or air quality management district is in maintenance status for the following: Carbon monoxide (Tucson, Pima County, AZ) and Particulate Matter, &lt;10 microns (Ajo planning area, Pima County, AZ). This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The Arizona Department of Environmental Quality (ADEQ) and the Pima County Department of Environmental Quality (PDEQ) have reviewed air quality monitoring data and do not believe the development of single-family residences, multi-family housing, or small apartment complexes (under 100 units) in existing residential areas will adversely impact air quality. Memo from Richard Grimaldi, PDEQ, dated 12/18/2019. The project is in compliance with the Clean Air Act.</p>
<p><b>Coastal Zone Management Act</b> Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is located in a state that does not participate in the Coastal Zone Management Program. There are no coastal zones in Arizona. Therefore, this project is in compliance with the Coastal Zone Management Act.</p>
<p><b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) &amp; 58.5(i)(2)]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA, Western Technologies Inc., 1/13/2023 &amp; 6/15/2023, and ASTM Vapor Encroachment Screening, Western Technologies Inc., 7/26/2023. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.</p>
<p><b>Endangered Species Act</b> Endangered Species Act of 1973,</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project will have No Effect on listed species because there are no listed</p>

<p>particularly section 7; 50 CFR Part 402</p>		<p>species or designated critical habitats in the action area. E-mail from US Fish &amp; Wildlife Service, 10/20/2023. This project is in compliance with the Endangered Species Act.</p>
<p><b>Explosive and Flammable Hazards</b> Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. Two propane ASTs were evaluated. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements.</p>
<p><b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The site does not meet the definition of farmland per 7 CFR Part 658.2(a), "...Farmland" does not include land already in or committed to urban development or water storage..." The site is in a fully developed, urban environment per the US Census Urban Area Map printed 7/5/2022. The project is in compliance with the Farmland Protection Policy Act.</p>
<p><b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not occur in a floodplain. FEMA Zone X, 04019C 2276L, 6/16/2011. The project is in compliance with Executive Order 11988.</p>
<p><b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Based on Section 106 consultation the project will have No Adverse Effect on historic properties. No adverse effect determination, City of Tucson, Historic Preservation Office, 11/9/2023. Conditions: Consistent with the SHPO Survey Report Summary Form dated September 7, 2023, archaeological monitoring for potential subsurface historic remains during construction should be implemented. Contact the Historic Preservation Office to arrange for an archaeological monitor. In accordance with the Programmatic Agreement (Section IV.A &amp; B),</p>

		<p>properties located in designated local historic districts are required to go through the City of Tucson Planning Department design review process prior to a building permit being issued. Projects located in designated and potential National Register districts shall have proposed work approved by the Plans Review Subcommittee of the Tucson-Pima County Historical Commission (project reviewed on 9/28/2023 and recommended for approval as presented). Application of the Secretary of Interior's Standards shall include interpretation for affordability and shall allow for the use of substitute materials when appropriate. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.</p>
<p><b>Noise Abatement and Control</b> Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>A Noise Assessment was conducted. The noise level was acceptable: 65.0 db (northwest and northeast corners of proposed buildings) and 63.0 db (southeast). See noise analysis, Spendiarian &amp; Willis Acoustics &amp; Noise Control LLC, 8/22/2023. The project is in compliance with HUD's Noise regulation.</p>
<p><b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project is located on a 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 II.B.1, "Construction of residential, commercial or industrial projects, or public facilities, or land developments, which will be served by an existing and publicly owned and operated sewerage system and treatment plant which is not subject to a locally or EPA imposed moratorium, except for any development covered in A above."). The project will utilize</p>



		existing municipal water and wastewater facilities. The project is in compliance with Sole Source Aquifer requirements.
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.
<b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. There are no NWSRS in Tucson. The project is in compliance with the Wild and Scenic Rivers Act.
<b>HUD HOUSING ENVIRONMENTAL STANDARDS</b>		
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

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

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

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

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
<b>LAND DEVELOPMENT</b>			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The project consists of property acquisition, demolition of the current parking lot, new construction of a 7-story, 85-unit affordable supportive housing complex, and allocation of 26 PBVs on a property currently used as a parking lot in the Armory Park Historic Residential District in Downtown Tucson, Arizona that conforms within the surrounding neighborhoods in terms of overall scale, density, size, and massing. The new construction activities will be permitted through the City of Tucson and Pima County. The site is	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>consistent with local and regional planning efforts and must receive planning and zoning verification from the City of Tucson. The project was reviewed by the Tucson-Pima County Historical Commission on 9/28/2023 (Item 3c) and was recommended for approval as presented. The project site is zoned C-3. The project supports the goals of Plan Tucson, the City of Tucson General &amp; Sustainability Plan to provide housing, human services, public facilities, and economic development programs to address the housing needs of the most vulnerable populations.</p> <p><a href="http://www.tucsonaz.gov/Departments/PlanningDevelopment-Services/DevelopmentToolsResources/Plans#section-1">www.tucsonaz.gov/Departments/PlanningDevelopment-Services/DevelopmentToolsResources/Plans#section-1</a>. The project also supports the Administrative Plan for the Housing Choice Voucher Program Public Housing Authority's standards. Planning and Zoning verification by City of Tucson Planning &amp; Development Services Department, 2/10/2023.</p>	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	<p>The ground surface was relatively flat and contained no vegetation. Site drainage trended to the west as sheet surface flow, although shallow depressions existed. Geotechnical Evaluation Report, Western Technologies, Inc., 8/14/2023. Indications of existing or former wastewater or stormwater discharge indicators were not observed on the Subject Property. Phase I ESAs, Western Technologies, Inc., 1/13/2023 &amp; 6/15/2023.</p>	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	<p>No recognized environmental conditions were identified in the Phase I ESAs or VES conducted by the project developer. No other evidence of onsite hazards or nuisances including soil contamination; proximity to high pressure pipe lines or other volatile and explosive products; high-voltage transmission lines; radio/TV transmission towers; excessive smoke, fumes, odors, subsidence, ground water, inadequate surface drainage, flood, etc. Tucson Electric Power owned transformers on or near the sites were all in good condition with no evidence of spills or leakage. There are no visible poisonous plants or animals on the site. No known</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		natural hazards exist. The sites have access to intersections with crosswalks for residents to cross nearby arterial streets, nearby street lighting, sidewalks, bike lanes and other safety features. Other than a brief period of construction, there should be no increase in noise levels. Phase I ESAs, Western Technologies, Inc., 1/13/2023 & 6/15/2023; VES, Western Technologies, Inc., 7/26/2023.	
<b>SOCIOECONOMIC</b>			
Employment and Income Patterns	2	The City of Tucson anticipates sustaining jobs in the environmental, engineering, and construction industries as part of this project. Employment opportunities will be created for construction trades as part of this project. The project consists of acquisition and redevelopment of the current parking lot with newly constructed affordable supportive housing. The project will follow Section 3 and Davis Bacon requirements in all employment, construction, and subcontracting activities. The site is within walking distance or a short commute on public transit to numerous retail, restaurant, and service businesses.	
Demographic Character Changes / Displacement	2	The project site is in an area where 53% of the community is identified as low income. There is a mix of downtown mid-rise development of general commercial uses that serve the community and region with other uses that provide reasonable compatibility with adjoining residential uses, low-intensity commercial and other uses that are compatible with adjacent residential uses, high-rise development located in major activity zones that serve the community and region, medium-density, single-family and multifamily residential development along with other uses necessary for an urban residential environment, mid-rise, office, medical, civic, and select other uses in a historic district, and the Tucson Community Center Planned Area Development. The area has a 49% minority population with approximately 76% of housing units being renter-occupied. The project consists of acquisition and redevelopment of the current	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		parking lot with newly constructed affordable supportive housing. Displacement of residents or businesses is not projected. Multiple public parking facilities are available in the area.	
Environmental Justice EA Factor	1	<p>The project site is in an area where 53% of the community is identified as low income. There is a mix of downtown mid-rise development of general commercial uses that serve the community and region with other uses that provide reasonable compatibility with adjoining residential uses, low-intensity commercial and other uses that are compatible with adjacent residential uses, high-rise development located in major activity zones that serve the community and region, medium-density, single-family and multifamily residential development along with other uses necessary for an urban residential environment, mid-rise, office, medical, civic, and select other uses in a historic district, and the Tucson Community Center Planned Area Development. The area has a 49% minority population with approximately 76% of housing units being renter-occupied. Elevated EJ Indexes are observed within one mile of the site related to air quality. The project consists of acquisition and redevelopment of the current parking lot with newly constructed supportive affordable housing. Phase I Environmental Site Assessments and a Tier I Vapor Encroachment Screening were conducted. No recognized environmental conditions and no vapor encroachment conditions were identified. This project supports the Administrative Plan for the Housing Choice Voucher Program PHA standards to provide decent, safe, and sanitary affordable housing. The project will directly benefit underserved, low-income populations. The project will have minimal impact to neighboring residents/occupants while providing much needed affordable housing.</p>	
<b>COMMUNITY FACILITIES AND SERVICES</b>			
Educational and Cultural Facilities	2	The project consists of acquisition and redevelopment of the current parking lot with newly constructed affordable supportive housing	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
(Access and Capacity)		with 80% of the units set aside for adults, ages 55 and over. Little to no impact is anticipated to area primary, middle, and high schools, daycares, and pre-schools. Neighborhood residents are served by 7 elementary, middle, and high schools within walking distance and/or a 6-minute driving distance. Educational and cultural enrichment opportunities are available at nearby community centers, cultural attractions and museums, libraries, recreation centers, and parks. The Armory Park Center features a senior meal program Mondays-Fridays and the Santa Rosa Center features senior activities on Wednesdays. Multi-modal access to educational and cultural facilities is readily available and is not anticipated to be impacted by foreseeable climate changes.	
Commercial Facilities (Access and Proximity)	2	The project consists of acquisition and redevelopment of the current parking lot with newly constructed affordable supportive housing with 80% of the units set aside for adults, ages 55 and over. The project will not adversely impact or displace commercial facilities. The project site is within 2.2 miles of major grocery stores, discount stores, pharmacies, medical providers, and thrift stores. Multi-modal access to these facilities is readily available.	
Health Care / Social Services (Access and Capacity)	2	The project site is within 3.4 miles of major medical centers and emergency rooms. Numerous emergency facilities, clinics, and physician services are within an easy commute on public transit. Supportive services, including a residential services coordinator, will be available to residents through La Frontera Center, Inc. Nearby support services include Resilient Health, Intermountain Centers for Human Development, and La Frontera.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	Waste disposal and recycling services are available through the City of Tucson Environmental & General Services Department. The City of Tucson provides extensive recycling options, including construction debris handling and recycling, landfill disposal, green waste recycling, and household hazardous waste disposal services.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The project consists of acquisition and redevelopment of the current parking lot with newly constructed affordable supportive housing. Pima County Wastewater has confirmed capacity is available for this project in the public sewer system. Wastewater and sewer service is not anticipated to be impacted by foreseeable climate changes. Sewerage capacity letter from Pima County Wastewater Reclamation, 1/17/2023.	
Water Supply (Feasibility and Capacity)	2	The project consists of acquisition and redevelopment of the current parking lot with newly constructed affordable supportive housing. Tucson Water will provide water service to the project. Will serve letter from Tucson Water, 2/9/2023.	
Public Safety - Police, Fire and Emergency Medical	2	The project site is less than 1 mile from Tucson Fire Headquarters. The site is within one-half mile of Tucson Police Department. Response times vary depending on the type of call, but the average time for emergency response is five minutes or less. The project site is within 3.4 miles of major medical centers with emergency medical care, including St. Mary's and Banner Hospitals and urgent care facilities.	
Parks, Open Space and Recreation (Access and Capacity)	2	The site is within two blocks (0.11 miles) of Armory Park and Armory Park Center, which provide greenspace, senior programs, services, and activities. The Armory Park Center also provides a senior meal program.	
Transportation and Accessibility (Access and Capacity)	2	The project is located within 0.11 miles of three arterial roads with excellent bus access, crosswalks, sidewalks, and bicycle lanes. Tucson's regional transit system including Sun Tran, Sun Express, and Sun Van provide service to nearby arterial streets, Congress Street/Broadway Boulevard, Stone and Church Avenues, and Scott Avenue, and bus stops are within walking distance of the site. Multiple bus lines travel along East Congress Street/Broadway Boulevard, and four bus lines accessible within two blocks east and west of the site provide travel north/south along South 6th and Church Avenues.	
<b>NATURAL FEATURES</b>			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Unique Natural Features /Water Resources	2	There are no unique natural or water features on or nearby the site.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The site is currently a fenced, paved parking lot with no vegetation. There are no visible signs of wildlife at this property.	
Other Factors 1			
Other Factors 2			
<b>CLIMATE AND ENERGY</b>			
Climate Change	2	The project consists of acquisition and redevelopment of the current parking lot with newly constructed affordable supportive housing designed in compliance with the 2023 State of Arizona Qualified Allocation Plan Mandatory Design Guidelines and will meet Leadership in Energy and Environmental Design (LEED) Silver energy standards, which include energy efficient building elements such as Energy Star qualified fixtures and appliances, water efficient plumbing fixtures, green label materials, efficient HVAC systems, and Home Energy Rating System (HERS) index standards. Climate predictions forecast increased average daily temperatures and decreased annual precipitation for the area.	
Energy Efficiency	2	The project consists of acquisition and redevelopment of the current parking lot with newly constructed affordable supportive housing designed in compliance with the 2023 State of Arizona Qualified Allocation Plan Mandatory Design Guidelines and will meet Leadership in Energy and Environmental Design (LEED) Silver energy standards, which include energy efficient building elements such as Energy Star qualified fixtures and appliances, water efficient plumbing fixtures, green label materials, efficient HVAC systems, and Home Energy Rating System (HERS) index standards.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Minimal water use anticipated for dust control during construction.	

**Supporting documentation**

- [2023-3-21 PC Av Total Precipitation.pdf](#)
- [2023-3-21 PC Av Daily Max Temp.pdf](#)
- [2023-8-14 Ochoa Geotech Eval Report WTI.pdf](#)
- [2023-11-29 Ochoa Santa Rosa Center.pdf](#)
- [2023-11-29 Ochoa Google Maps Thrift Store.pdf](#)
- [2023-11-29 Ochoa Google Maps Schools.pdf](#)
- [2023-11-29 Ochoa Google Maps Police.pdf](#)
- [2023-11-29 Ochoa Google Maps Parks.pdf](#)
- [2023-11-29 Ochoa Google Maps Parking.pdf](#)
- [2023-11-29 Ochoa Google Maps Museums.pdf](#)
- [2023-11-29 Ochoa Google Maps Libraries.pdf](#)
- [2023-11-29 Ochoa Google Maps Hospitals.pdf](#)
- [2023-11-29 Ochoa Google Maps Grocery.pdf](#)
- [2023-11-29 Ochoa Google Maps Fire.pdf](#)
- [2023-11-29 Ochoa Google Maps Discount Store.pdf](#)
- [2023-11-29 Ochoa Google Maps Comm Ctr.pdf](#)
- [2023-11-29 Ochoa Google Maps Clinic.pdf](#)
- [2023-11-29 Ochoa Google Maps Behavioral Health.pdf](#)
- [2023-11-29 Ochoa Armory Park Center.pdf](#)
- [2023-8-4 Ochoa Zoning Map.pdf](#)
- [2023-2-10 Ochoa Zoning Verification.pdf](#)
- [2023-2-9 Ochoa TW Will Serve Letter.pdf](#)
- [2023-1-17 Ochoa PCWW Sewer Capacity Letter.pdf](#)

**Additional Studies Performed:**

**Field Inspection [Optional]:** Date and completed

by:

Kage Anderson

6/14/2023 12:00:00 AM

- [West Point Apts II - Design Floor Plans.pdf](#)
- [2023-6-14 Ochoa Updated Phase I WTI Photos.pdf](#)
- [2023-1-9 Ochoa Phase I WTI Photos.pdf](#)

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



City of Tucson, Office of the Mayor-Mayor Regina Romero; City of Tucson, Housing and Community Development Department-Ann Chanecka, Jason Thorpe, Terry Galligan, Ben Carpenter, Cyndy Nunez; City of Tucson Planning and Development Services; City of Tucson, Department of Transportation and Mobility; Tucson Fire Department; Tucson Police Department; City of Tucson, Tucson Water Department; City of Tucson, Environmental & General Services Department; Pima County Wastewater Management; City of Tucson Administrative Plan for the Housing Choice Voucher Program Public Housing Authority ([www.tucsonaz.gov/files/sharedassets/public/v/1/living-and-working/housing-community-development/documents/fy-2024\\_hcv-admin-plan-final-eff-07012023.pdf](http://www.tucsonaz.gov/files/sharedassets/public/v/1/living-and-working/housing-community-development/documents/fy-2024_hcv-admin-plan-final-eff-07012023.pdf)); City of Tucson, Plan Tucson ([www.tucsonaz.gov/Departments/Planning-DevelopmentServices/Development-Tools-Resources/Plans#section-1](http://www.tucsonaz.gov/Departments/Planning-DevelopmentServices/Development-Tools-Resources/Plans#section-1))

**List of Permits Obtained:**

The reviews that go into each project include but are not limited to: Planning, Zoning, Engineering, Landscape, Fire, ADA, Plumbing, Solid Waste, Right of Way Improvements, Structural, Mechanical and Plumbing, Electrical, Fire, Zoning Engineering, Wastewater, Water, Transportation. The City of Tucson Planning and Development Services Department reviews, approves and issues all permits for: zoning, site plans, grading, storm water, demolition, parking, landscape and construction trades; issues all permits; performs inspections and issues certificate of occupancy. The Department enforces building and zoning codes.

**Public Outreach [24 CFR 58.43]:**

Publication of a combined Notice of Intent to Request Release of Funds/Finding of No Significant Impacts (RROF/FONSI) in the Arizona Daily Star 12/11/2023. Interested parties contacted by e-mail. The Environmental Review Record (ERR) that documents the environmental determinations for this project is available at [www.tucsonaz.gov/Departments/HousingandCommunityDevelopment/Documents/Environmental-Review](http://www.tucsonaz.gov/Departments/HousingandCommunityDevelopment/Documents/Environmental-Review) and in-person at 310 North Commerce Park Loop, Tucson, Arizona 85745. The ERR will also be available and distributed on the HUD HEROS system.

[2023-12-4 Ochoa contact list.pdf](#)

**Cumulative Impact Analysis [24 CFR 58.32]:**

The project consists of acquisition and redevelopment of the current parking lot with newly constructed affordable supportive housing in Downtown Tucson in the Armory Park Historic Residential District, in an area where 53% of the community is identified

as low income. There is a mix of downtown mid-rise development of general commercial uses that serve the community and region with other uses that provide reasonable compatibility with adjoining residential uses, low-intensity commercial and other uses that are compatible with adjacent residential uses, high-rise development located in major activity zones that serve the community and region, medium-density, single-family and multifamily residential development along with other uses necessary for an urban residential environment, mid-rise, office, medical, civic, and select other uses in a historic district, and the Tucson Community Center Planned Area Development. The project will be a minor contributor to the increase in population, traffic, and energy usage already anticipated in the area. The project will redevelop a site in an urban neighborhood that will use existing roadways, sewer systems, municipal water, and other utilities. No significant cumulative impacts on the environment are anticipated from the Proposed Action in conjunction with other activities.

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

No alternatives other than the No Action Alternative were considered.

**No Action Alternative [24 CFR 58.40(e)]**

Acquisition and redevelopment of the current parking lot with newly constructed affordable supportive housing would not occur. Goals of the City of Tucson and Plan Tucson would not be fulfilled. Much needed affordable housing would not be developed and be available to the community.

**Summary of Findings and Conclusions:**

The proposed property acquisition, demolition of the current parking lot, new construction of a 7-story, 85-unit affordable supportive housing complex, and allocation of 26 project-based vouchers (PBVs) in the Armory Park Historic Residential District in Downtown Tucson will not adversely affect the environment or the neighborhood. The activity is compatible with the existing mix of downtown mid-rise development of general commercial uses that serve the community and region with other uses that provide reasonable compatibility with adjoining residential uses, low-intensity commercial and other uses that are compatible with adjacent residential uses, high-rise development located in major activity zones that serve the community and region, medium-density, single-family and multifamily residential development along with other uses necessary for an urban residential environment, mid-rise, office, medical, civic, and select other uses in a historic district, and the Tucson Community Center Planned Area Development. There will be little to no impact on existing resources or services in the area. The project is a positive step in meeting City of Tucson goals for encouraging appropriate growth and development in the area. The project is a positive step in meeting City of Tucson goals for addressing the housing shortage and housing affordability needs in the community.

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

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

<b>Law, Authority, or Factor</b>	<b>Mitigation Measure or Condition</b>	<b>Comments on Completed Measures</b>	<b>Mitigation Plan</b>	<b>Complete</b>
Historic Preservation	Consistent with the SHPO Survey Report Summary Form dated September 7, 2023, archaeological monitoring for potential subsurface historic remains during construction should be implemented. Contact the Historic Preservation Office to arrange for an archaeological monitor.	N/A	Consistent with the SHPO Survey Report Summary Form dated September 7, 2023, archaeological monitoring for potential subsurface historic remains during construction should be implemented. Developer will contact the Historic Preservation Office to arrange for an archaeological monitor.	

**Project Mitigation Plan**

Consistent with the SHPO Survey Report Summary Form dated September 7, 2023, archaeological monitoring for potential subsurface historic remains during construction should be implemented. Developer will contact the Historic Preservation Office to arrange for an archaeological monitor.

**Supporting documentation on completed measures**

## APPENDIX A: Related Federal Laws and Authorities

### Airport Hazards

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

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

No

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

Yes

### Screen Summary

#### Compliance Determination

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

#### Supporting documentation

[2023-8-4 Ochoa Airport Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

### Coastal Barrier Resources

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

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

#### Compliance Determination

This project is located in a state that does not contain CBRS units. There are no CBRS units in Arizona. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

#### Supporting documentation

[Coastal Barriers Template 2022-9-14.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:**

[2023-8-4 Ochoa Flood 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. FEMA Zone X, 04019C 2276L, 6/16/2011. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

✓ No



## Air Quality

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

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

Yes

No

**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):

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

Ozone

Particulate Matter, <2.5 microns

✓ Particulate Matter, <10 microns

**3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above**

Carbon monoxide ppm (parts per million)  
Particulate Matter, <10 microns µg/m3 (micrograms per cubic meter of air)

**Provide your source used to determine levels here:**  
Pima County Department of Environmental Quality (PDEQ)

**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.

**Enter the estimate emission levels:**

Carbon monoxide ppm (parts per million)  
Particulate Matter, <10 microns µg/m3 (micrograms per cubic meter of air)

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

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

**Screen Summary**

**Compliance Determination**

The project's county or air quality management district is in nonattainment status for the following: Particulate Matter, <10 microns (Rillito planning area, Pima County, AZ). The project's county or air quality management district is in maintenance status for the following: Carbon monoxide (Tucson, Pima County, AZ) and Particulate Matter,

<10 microns (Ajo planning area, Pima County, AZ). This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The Arizona Department of Environmental Quality (ADEQ) and the Pima County Department of Environmental Quality (PDEQ) have reviewed air quality monitoring data and do not believe the development of single-family residences, multi-family housing, or small apartment complexes (under 100 units) in existing residential areas will adversely impact air quality. Memo from Richard Grimaldi, PDEQ, dated 12/18/2019. The project is in compliance with the Clean Air Act.

**Supporting documentation**

[Air quality memo 12-18-19.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. There are no coastal zones in Arizona. Therefore, this project is in compliance with the Coastal Zone Management Act.

##### **Supporting documentation**

[Coastal zones template 11-1-19.pdf](#)

**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)

**1. How was site contamination evaluated? Select all that apply. Document and upload documentation and reports and evaluation explanation of site contamination below.**

- American Society for Testing and Materials (ASTM) Phase I Environmental Site Assessment (ESA)  
ASTM Phase II ESA  
Remediation or clean-up plan
- ASTM Vapor Encroachment Screening  
None of the Above

**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:**

Phase I ESA, Western Technologies Inc., 1/13/2023 & 6/15/2023, no RECs; VES, Western Technologies Inc., 7/26/2023, no VEC

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

Yes

### Screen Summary

#### **Compliance Determination**

Site contamination was evaluated as follows: ASTM Phase I ESA, Western Technologies Inc., 1/13/2023 & 6/15/2023, and ASTM Vapor Encroachment Screening, Western

Technologies Inc., 7/26/2023. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.

**Supporting documentation**

[2023-7-26 Ochoa Tier I VES WTI.pdf](#)

[2023-6-15 Ochoa Updated Phase I WTI.pdf](#)

[2023-1-13 Ochoa Phase I WTI.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Endangered Species**

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

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

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

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

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

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

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

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. E-mail from US Fish & Wildlife Service, 10/20/2023. This project is in compliance with the Endangered Species Act.

**Supporting documentation**

[2023-10-6 Ochoa IPaC TE.pdf](#)

[2023-10-20 Ochoa FWS No Effect.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

Yes

3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR

- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer "No." For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer "Yes."

No

Yes

4. Based on the analysis, is the proposed HUD-assisted project located at or beyond the required separation distance from all covered tanks?

Yes

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

No

#### **Screen Summary**

##### **Compliance Determination**

There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. Two propane ASTs were evaluated. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements.

##### **Supporting documentation**

[2023-12-4 Ochoa AST Summary.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

### Farmlands Protection

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

**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 site does not meet the definition of farmland per 7 CFR Part 658.2(a), "...Farmland" does not include land already in or committed to urban development or water storage..." The site is in a fully developed, urban environment per the US Census Urban Area Map printed 7/5/2022.

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 site does not meet the definition of farmland per 7 CFR Part 658.2(a), "...Farmland" does not include land already in or committed to urban development or water storage..." The site is in a fully developed, urban environment per the US Census Urban Area Map printed 7/5/2022. The project is in compliance with the Farmland Protection Policy Act.

##### **Supporting documentation**

[US Census Urban Area Map 2022-7-5.pdf](#)

**Are formal compliance steps or mitigation required?**

LIHTC-West-Point-Apts-II-  
PBVs

Tucson, AZ

900000010361235

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	24 CFR 55

**1. Do any of the following exemptions apply? Select the applicable citation? [only one selection possible]**

- 55.12(c)(3)
- 55.12(c)(4)
- 55.12(c)(5)
- 55.12(c)(6)
- 55.12(c)(7)
- 55.12(c)(8)
- 55.12(c)(9)
- 55.12(c)(10)
- 55.12(c)(11)

None of the above

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

[2023-8-4 Ochoa Flood 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.

**Does your project occur in a floodplain?**

No

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

Yes

**Screen Summary**

**Compliance Determination**

This project does not occur in a floodplain. FEMA Zone X, 04019C 2276L, 6/16/2011.

The project is in compliance with Executive Order 11988.

**Supporting documentation**

**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” <a href="https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf">https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf</a>

**Threshold**

**Is Section 106 review required for your project?**

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA ). (See the PA Database to find applicable PAs.)

No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

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

**Step 1 – Initiate Consultation**

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

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

- ✓ Other Consulting Parties

✓ City of Tucson, Historic Preservation Office

Completed

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

Project was referred to Tucson Historic Preservation Office in accordance with the 1/25/2002 Programmatic Agreement (Sections IV.B & C, V.A-C)

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

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

Yes

No

**Step 2 – Identify and Evaluate Historic Properties**

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

18 & 20 E Ochoa St, Tucson, AZ 85701

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

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

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
----------------------------------	-----------------------------	------------------	--------------------------

**Additional Notes:**

Property is currently used as a parking lot and is located in the Armory Park Historic Residential District and Downtown Archaeological Sensitivity Zone

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

✓ Yes



Document and upload surveys and report(s) below.  
For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

Additional Notes:

Cultural Resources Survey Comments: No sites, historic buildings, or isolated occurrences were observed in the project area during the survey. Tierra recommends that COT should be allowed to proceed with the proposed project. Archaeological monitoring for potential subsurface historic remains during construction is also recommended.

No

***Step 3 –Assess Effects of the Project on Historic Properties***

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

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

No Historic Properties Affected

✓ No Adverse Effect

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

**Document reason for finding:**

No adverse effect determination, City of Tucson, Historic Preservation Office,  
11/9/2023

**Does the No Adverse Effect finding contain conditions?**

✓ Yes (check all that apply)

Avoidance

Modification of project

✓ Other

Describe conditions here:

Consistent with the SHPO Survey Report Summary Form dated September 7, 2023, archaeological monitoring for potential subsurface historic remains during construction should be implemented. Contact the Historic Preservation Office to arrange for an archaeological monitor.

No

Adverse Effect

### **Screen Summary**

#### **Compliance Determination**

Based on Section 106 consultation the project will have No Adverse Effect on historic properties. No adverse effect determination, City of Tucson, Historic Preservation Office, 11/9/2023. Conditions: Consistent with the SHPO Survey Report Summary Form dated September 7, 2023, archaeological monitoring for potential subsurface historic remains during construction should be implemented. Contact the Historic Preservation Office to arrange for an archaeological monitor. In accordance with the Programmatic Agreement (Section IV.A & B), properties located in designated local historic districts are required to go through the City of Tucson Planning Department design review process prior to a building permit being issued. Projects located in designated and potential National Register districts shall have proposed work approved by the Plans Review Subcommittee of the Tucson-Pima County Historical Commission (project reviewed on 9/28/2023 and recommended for approval as presented). Application of the Secretary of Interior's Standards shall include interpretation for affordability and shall allow for the use of substitute materials when

appropriate. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.

**Supporting documentation**

[2023-9-28 TPCHC PRS Agenda.pdf](#)

[2023-8-4 Ochoa HPO Map\(1\).pdf](#)

[2023-8-4 Ochoa HPO Map 2.pdf](#)

[2023-11-9 20 E Ochoa HPO Review ltr No Adv Eff Determination.pdf](#)

[2023-9-27 Ochoa CRS TROW.pdf](#)

[HPO Programmatic agreement.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

### Noise Abatement and Control

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

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

- New construction for residential use

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

Rehabilitation of an existing residential property

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

An interstate land sales registration

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

None of the above

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

**Indicate the findings of the Preliminary Screening below:**

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

- ✓ Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

- ✓ Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Indicate noise level here: 65

Based on the response, the review is in compliance with this section. Document and upload noise analysis, including noise level and data used to complete the analysis below.

Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

Indicate noise level here: 65

Document and upload noise analysis, including noise level and data used to complete the analysis below.

**Screen Summary**

**Compliance Determination**

A Noise Assessment was conducted. The noise level was acceptable: 65.0 db (northwest and northeast corners of proposed buildings) and 63.0 db (southeast). See noise analysis, Spendiarian & Willis Acoustics & Noise Control LLC, 8/22/2023. The project is in compliance with HUD's Noise regulation.

**Supporting documentation**

[2023-8-22 Ochoa WestPointApt HUD Noise Study Spendiarian Willis.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

### Sole Source Aquifers

General requirements	Legislation	Regulation
<b>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.</b>	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. 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 II.B.1, "Construction of residential, commercial or industrial projects, or public facilities, or land developments, which will be served by an existing and publicly owned and operated sewerage system and treatment plant which is not subject to a locally or EPA imposed moratorium, except for any development covered in A above."). The project will utilize existing municipal water and wastewater facilities. The project is in compliance with Sole Source Aquifer requirements.

##### **Supporting documentation**

[Sole Source Aquifer Template 5-11-18.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No



### Wetlands Protection

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

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

No

Yes

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

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

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

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

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

### Screen Summary

**Compliance Determination**

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

**Supporting documentation**

[2023-8-4 Ochoa 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 no NWSRS in Tucson. The project is in compliance with the Wild and Scenic Rivers Act.

**Supporting documentation**

[NWSRS Wild-Scenic Rivers 2023-10-9.pdf](#)

[NWSRS Wild-Scenic Rivers 2022-7-7.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

### Environmental Justice

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

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

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

Yes

No

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

#### Screen Summary

##### **Compliance Determination**

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

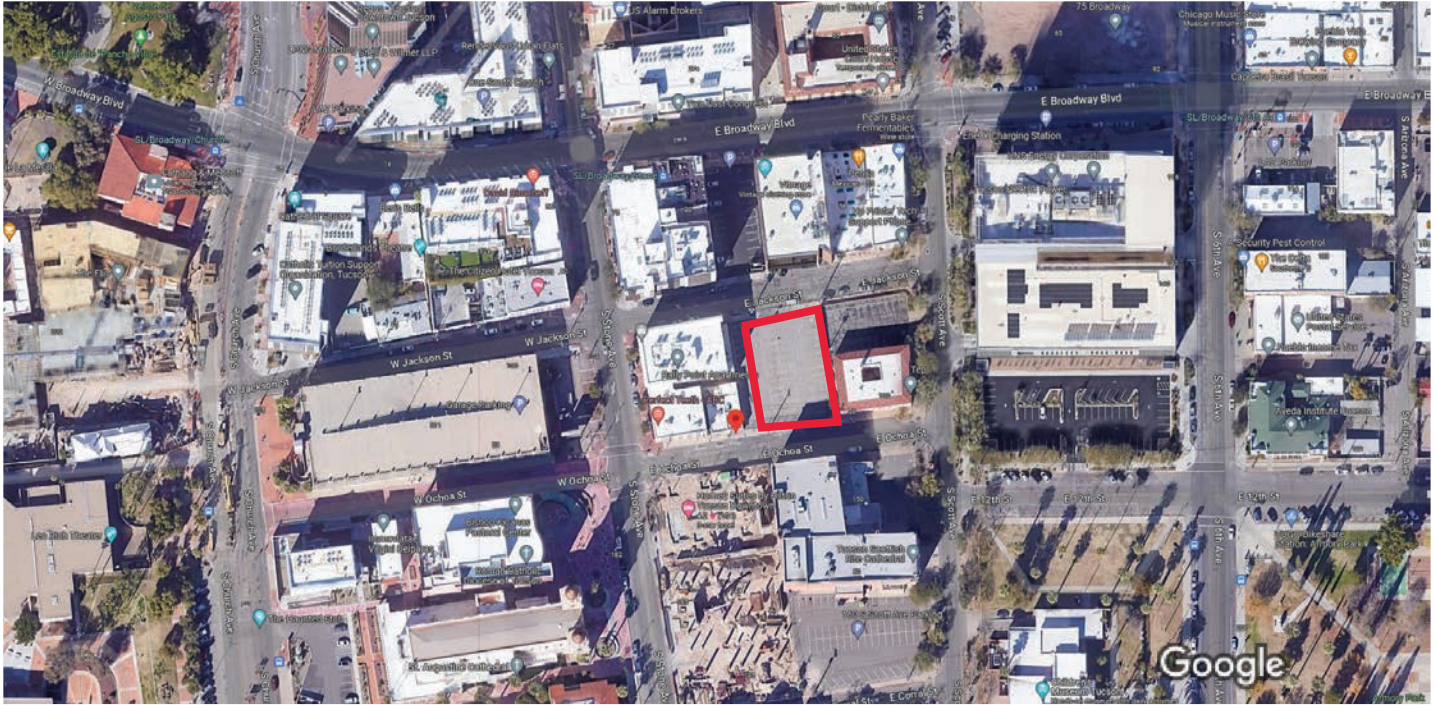
##### **Supporting documentation**

[2023-11-29 Ochoa EJScreen.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No



Imagery ©2023 Airbus, CNES / Airbus, Maxar Technologies, U.S. Geological Survey, USDA/FPAC/GEO, Map data ©2023 Google 50 ft



Project location

## 20 E Ochoa St



Directions



Save



Nearby



Send to  
phone



Share



20 E Ochoa St, Tucson, AZ 85701

62CH+2Q Tucson, Arizona

WEST POINT APARTMENTS II

GROUND FLOOR RETAIL: 1,170 SF

ZONE: C-3

(85) 1-BEDROOMS (585 NSF) = 49,725 NSF

0.33 ACRES / 14,517 SF

7 STORY BUILDING

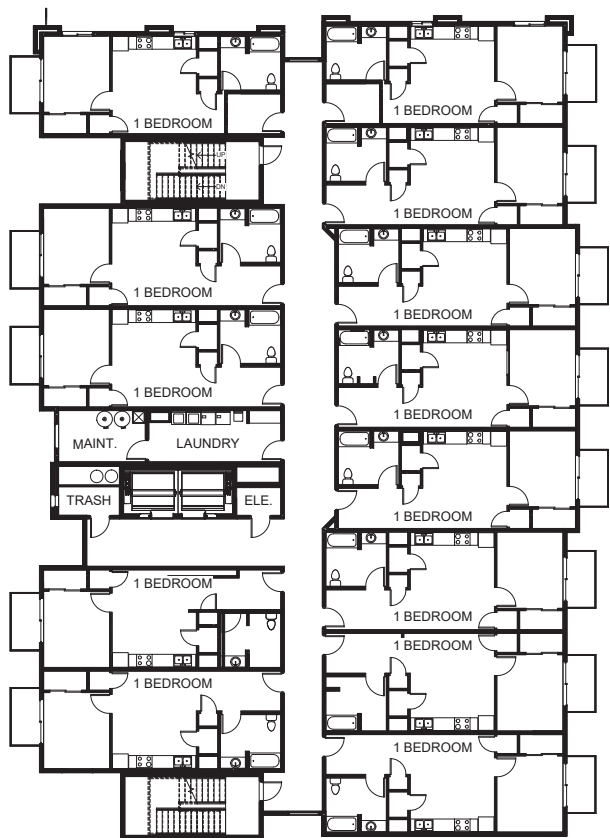
79'-0" TALL W/ 65'-0" TOP FLOOR

10,501 GSF PER FLOOR x 73,507 GSF

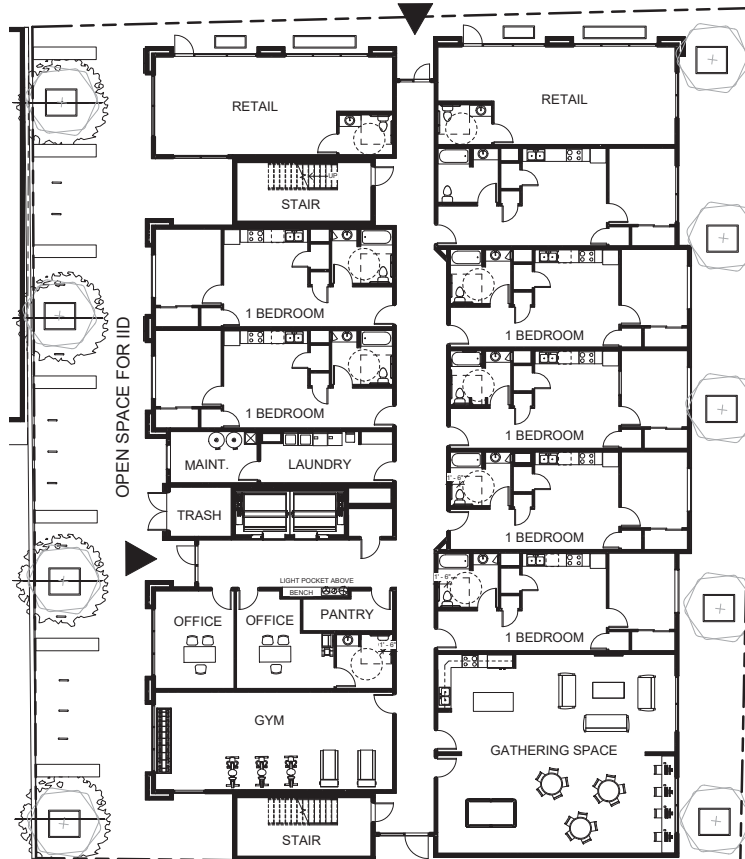
43 SF BALCONY PER FLOOR x 78 BALCONIES = 3,354 GSF

73,507 GSF + 3,354 GSF = 76,861 TOTAL PROJECT SF

JACKSON STREET



2 LEVELS 2 - 7  
1/8" = 1'-0"



1 OVERALL PLAN LEVEL 1  
1/8" = 1'-0"

OCHOA STREET

WEST POINT  
APTS. II



PRELIMINARY  
NOT FOR  
CONSTRUCTION



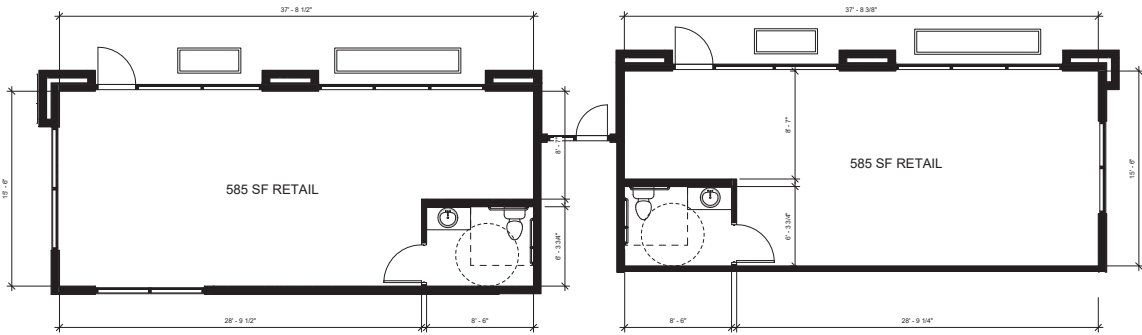
carhuff+cueva  
architects, llc  
2930 n swan rd #210  
tucson, arizona 85712  
phone 520.577.4560  
www.cca-az.com

NEW APARTMENT BUILDING  
FOR:  
LA FRONTERA ARIZONA  
20 E. OCHOA ST.  
TUCSON ARIZONA

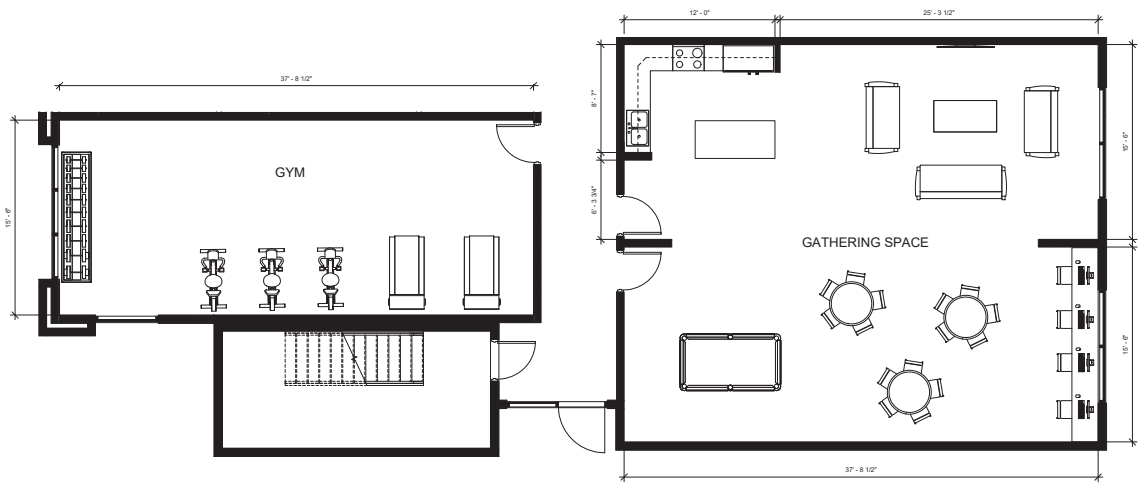
CONCEPT DESIGN

DATE	DESCRIPTION	BY

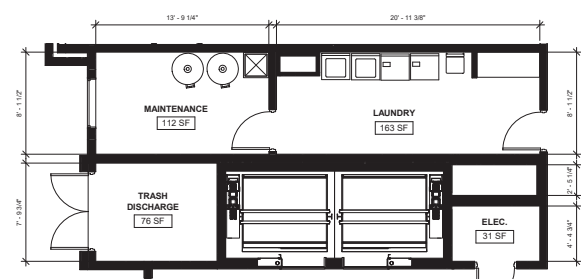
PROJECT NO.	T22-20
DATE	1.6.23
SCALE	1/8" = 1'-0"
DRAWN BY	VHG
DRAWING TITLE	OVERALL FLOOR PLANS
DRAWING NUMBER	SD-1



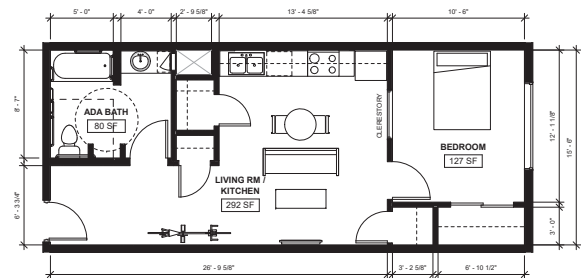
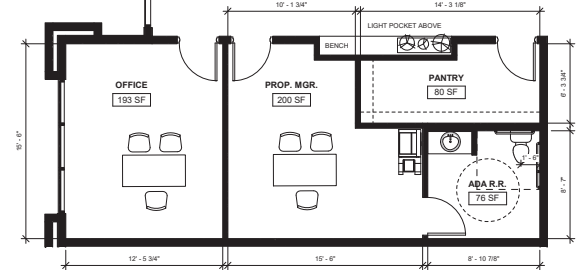
**3 1ST LEVEL RETAIL PLANS**  
1/4" = 1'-0"



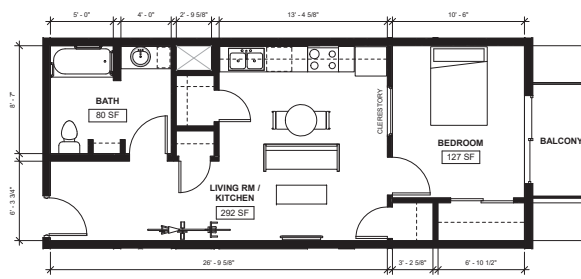
**4 GATHERING SPACES PLAN**  
1/4" = 1'-0"



**5 OFFICE / LAUNDRY PLAN**  
1/4" = 1'-0"



**1 TYP. 1ST LEVEL 1-BEDROOM PLAN**  
1/4" = 1'-0"



**2 TYP. 2ND LEVEL 1-BEDROOM PLAN**  
1/4" = 1'-0"

PRELIMINARY  
NOT FOR  
CONSTRUCTION



**carhuff+cueva  
architects, llc**  
2930 n swan rd #210  
tucson, arizona 85712  
phone 520.577.4560  
www.cca-az.com

NEW APARTMENT BUILDING  
FOR:

LA FRONTERA ARIZONA  
20 E. OCHOA ST.  
TUCSON ARIZONA

CONCEPT DESIGN

DATE	DESCRIPTION	BY

PROJECT NO. T22-20

DATE 1.6.23

SCALE 1/4" = 1'-0" DRAWN BY VHG

DRAWING TITLE ENLARGED FLOOR PLANS

DRAWING NUMBER **SD-2**

**WEST POINT  
APTS. II**

LA FRONTERA  
ARIZONA



PRELIMINARY  
NOT FOR  
CONSTRUCTION



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2930 n swan rd #210  
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phone 520.577.4560  
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NEW APARTMENT BUILDING  
FOR:

LA FRONTERA ARIZONA  
20 E. OCHOA ST.  
TUCSON ARIZONA

CONCEPT DESIGN

NO.	DATE	DESCRIPTION	BY

PROJECT NO. T22-20

DATE 1.6.23

SCALE DRAWN BY VHG

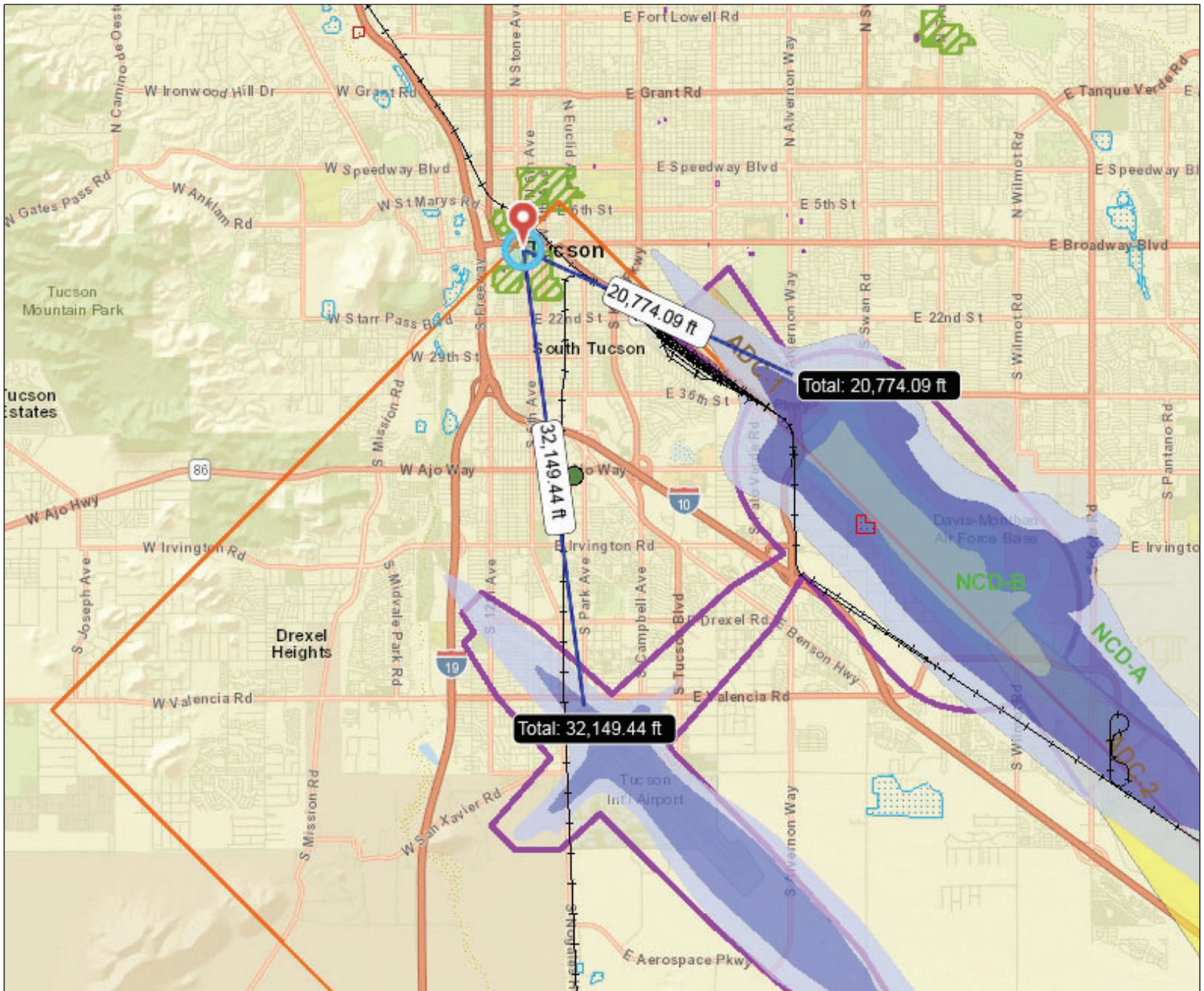
DRAWING TITLE 3D VIEW

DRAWING NUMBER SD-3



3D View 1





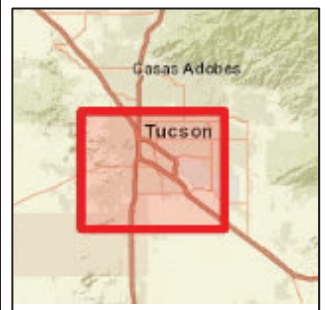
**Notes**

Airport Map

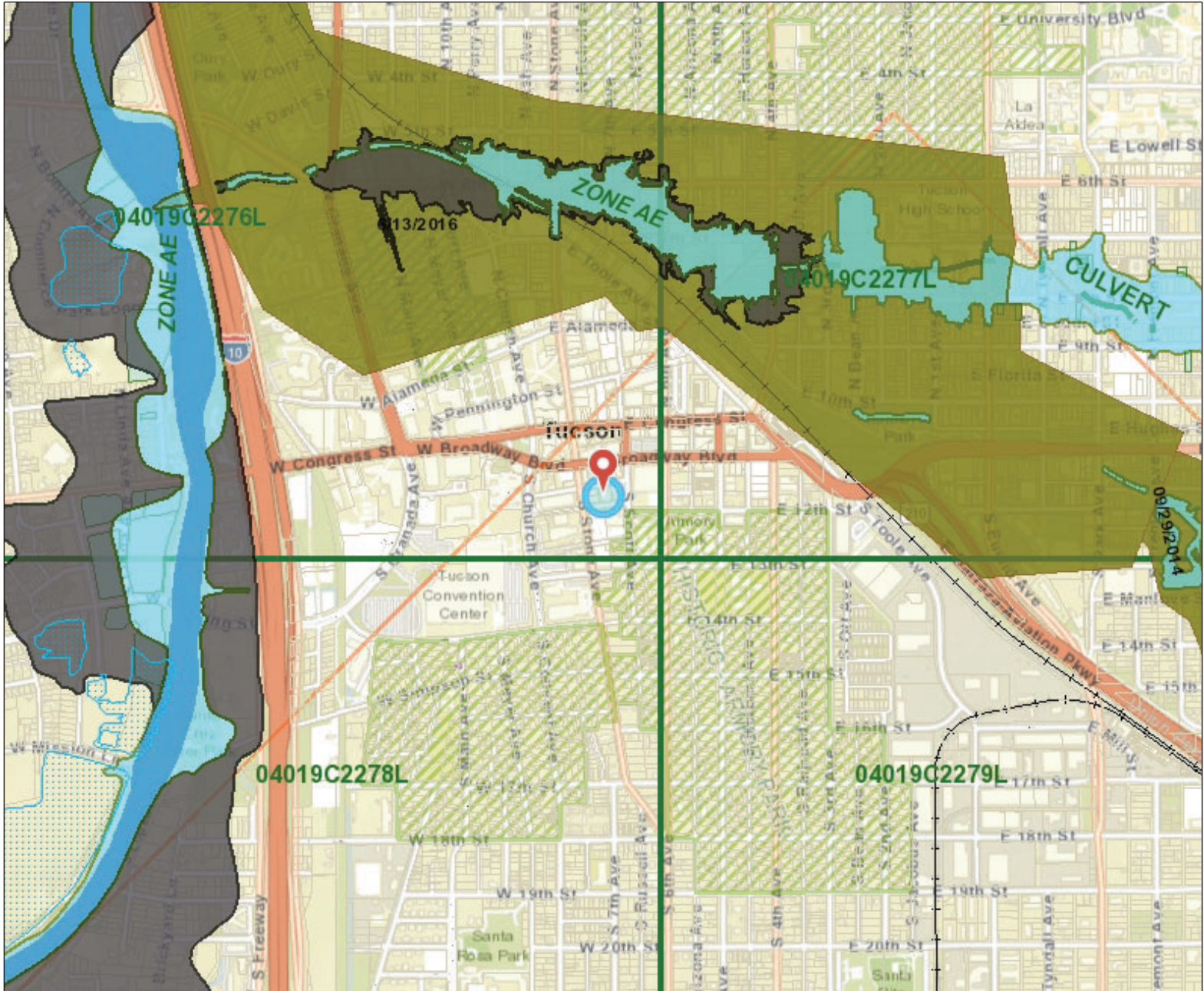
**Legend**

- Land Fills - City/County
  - Land Fills - State/Federal
  - Leaking Underground Storage Tanks - COT Owned
  - Parcels
  - Railroads
  - AEZ Noise 65-70 LDN
  - AEZ Noise 70-75 LDN
  - AEZ Noise 70-PLUS LDN
  - Avigation Easement & Disclosure Areas
  - DM AFB Approach-Departure Corridors
  - ADC-1
  - ADC-2
  - ADC-3
  - DM AFB Noise Control Districts
  - NCD-A
  - NCD-B
  - Airport Hazard Districts
- World Street Map

1: 144,448



23,322.3      0      11,661.14      23,322.3 Feet



Notes

Flood Map

Legend

- |   |  |                                       |                             |
|---|--|---------------------------------------|-----------------------------|
| Land Fills - City/County                      | LOMR   | 70-PLUS LDN                           | Airport Hazard Districts    |
| Land Fills - State/Federal                    | Excluded Structures/Parcels                  | 75-80 LDN                             | Historic Landmark Zones     |
| Leaking Underground Storage Tanks - COT Owned | Other  | 80-PLUS LDN                           | Historic Preservation Zones |
| A Zones                                       | Floodway                                     | Avigation Easement & Disclosure Areas | World Street Map            |
| ZONE A  | 1% Chance Flood Contained in Culvert/Channel | DM AFB Approach-Departure Corridors   |                             |
| ZONE AE                                       | FIRM   | ADC-1                                 |                             |
| ZONE AH                                       | Parcels                                      | ADC-2                                 |                             |
| ZONE AO                                       | Railroads                                    | ADC-3                                 |                             |
| X Zones                                       | AEZ Noise                                    | DM AFB Noise Control Districts        |                             |
|   | 65-70 LDN                                    | NCD-A                                 |                             |
|   | 70-75 LDN                                    |                                       |                             |

1: 18,056



2,915.3 0 1,457.64 2,915.3 Feet

## PHASE I ENVIRONMENTAL SITE ASSESSMENT

**PARKING LOT:**

20 East Ochoa Street  
Tucson, Arizona 85701  
WT Reference No. 2983JP005

**PREPARED FOR:**

Carhuff + Cueva Architects, LLC  
2930 North Swan Road, Number 210  
Tucson, Arizona 85712

Attn: Vance Goodman

**ASTM DATES:**

Reconnaissance:	January 9, 2023
Records Review:	January 9, 2023
Interview:	January 9, 2023
Lien Search:	January 6, 2023
Report Issuance:	January 13, 2023
ASTM Viability:	July 8, 2023



Kage Anderson  
Environmental Scientist



Karl D. Peterson, RG  
Environmental Project Manager





**Western  
Technologies Inc.**  
The Quality People  
Since 1955

3480 South Dodge Boulevard  
Tucson, Arizona 85713-5435  
(520) 748-2262 • fax 748-0435

January 13, 2023

Carhuff + Cueva Architects, LLC  
2930 North Swan Road, Number 210  
Tucson, Arizona 85712

Attn: Vance Goodman

Re: Phase I Environmental Site Assessment  
Vacant Land  
20 East Ochoa Street  
Tucson, Arizona

WT Job No. 2983JP005

The enclosed report summarizes the significant findings about Recognized Environmental Conditions in connection with the Subject Property referenced above. The presumed viability of the enclosed report, pursuant to ASTM E1527-21, Section 4.6.1, is July 8, 2023. This report completes the agreed scope of services. If you have any questions or if we may be of further assistance to you, please do not hesitate to contact us. Thank you for allowing us to provide these services.

Sincerely,  
**WESTERN TECHNOLOGIES INC.**

A handwritten signature in blue ink, appearing to read 'Karl D. Peterson', is written over a horizontal line.

Karl D. Peterson, RG  
Environmental Project Manager



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## EXECUTIVE SUMMARY

Western Technologies Inc. (WT) completed a Phase I Environmental Site Assessment (ESA) of the parking lot at 20 East Ochoa Street, Tucson, Arizona (the "Subject Property"). The purpose of this ESA was to identify to the extent feasible pursuant to the processes described herein, *Recognized Environmental Conditions* (RECs) and *Controlled RECs* (CRECs), and to evaluate other environmental conditions for consideration as *Historical RECs* (HRECs), *Vapor Encroachment Conditions* (VEC) and *de minimis conditions* in connection with the Subject Property.

The Subject Property was developed in 1953 as an asphalt-paved parking lot. WT did not identify any RECs associated with the current use of the Subject Property.

The Subject Property was within a commercial portion of Tucson, Arizona. The adjoining sites uses consisted of retail, multi-family housing, and offices. WT did not identify any RECs to the Subject Property in connection with the current uses of the adjoining sites.

Based on the review of available historical information, the Subject Property was developed as a parking lot. The adjoining sites and surrounding areas were developed as commercial and multi-family living buildings before 1950. WT did not identify a REC in connection with the historical uses of the Subject Property or surrounding area.

WT obtained and reviewed a commercially available report of standard lists and database kept by the United States Environmental Protection Agency (USEPA) and the Arizona Department of Environmental Quality (ADEQ). The Subject Property was not listed in the standard Federal USEPA or State ADEQ databases. The database listings identified six Comprehensive Environmental Response, Compensation and Liability Information Systems (CERCLIS), 5 CERCLIS no further remedial action planned (NFRAP), one Superfund Enterprise Management System (SEMS), five SEMS ARCHIVE, eight Resource Conservation and Recovery Act non-generator (RCRA NON GEN), 20 federal brownfields, 14 CERCLIS Information Data System (SHWS ACIDS), two Water Quality Assurance Revolving Fund (WQARF), 13 underground storage tanks (USTs), 18 leaking USTs (LUSTs), one aboveground storage tank (AST), and three voluntary remediation program (VRP) sites within the ASTM minimum search distance. An additional 28 drycleaners were also listed within ¼ mile of the Subject Property. However, based on the regulatory classification of these sites, physical distance, and the down- or cross-gradient locations with respect to the direction of groundwater flow, these facilities do not represent a REC in connection with the Subject Property.

WT considered the potential for a VEC to exist at the Subject Property by comparing the relative locations of the facilities identified in the regulatory agency database report to the Subject Property using the geographical and hydrogeological gradients described in the physical setting data. six historical drycleaners were identified within 500 feet of the Subject Property, however, none of these three drycleaners were within the 100-foot critical distance, therefore, a VEC is not likely to exist on the Subject Property.

WT performed this ESA in general agreement with the scope and limitations of ASTM E1527-21 of the parking lot at 20 East Ochoa Street, Tucson, Arizona. Any exceptions to, or deletions from, this practice are described in Section 9 of this report.

This assessment has revealed no recognized environmental conditions, controlled recognized environmental conditions, or significant data gaps in connection with the Subject Property.

WT recommends no further assessment to address the environmental condition of the Subject Property at this time.

If additional information becomes available or known that may suggest the presence of recognized environmental conditions currently in connection with the Subject Property, contact this firm for potential recommendations.





**Western Technologies**  
An **RMA** Company

## PHASE I ENVIRONMENTAL SITE ASSESSMENT

### PARKING LOT

20 East Ochoa Street  
Tucson, Arizona 85701  
WT Job No. 2983JP005-REVISED

### PREPARED FOR:

Carhuff + Cueva Architects, LLC  
2930 North Swan Road, Number 210  
Tucson, Arizona 85712

Attn: Vance Goodman

### ASTM DATES:

Reconnaissance: June 14, 2023  
Records Review: June 12, 2023  
Interviews: June 12, 2023  
Report Issuance: June 15, 2023  
ASTM Viability: December 9, 2023

Kage Anderson  
Environmental Scientist

Karl D. Peterson, RG  
Environmental Department Manager



GEOTECHNICAL

ENVIRONMENTAL

INSPECTIONS

NDT

MATERIALS

3480 South Dodge Boulevard, Tucson, Arizona, 85713

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Building **Confidence** from the Ground Up



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• 3480 South Dodge Boulevard • Tucson, Arizona 85713 • [www.wt-us.com](http://www.wt-us.com)

June 15, 2023

Carhuff + Cueva Architects, LLC  
2930 North Swan Road, Number 210  
Tucson, Arizona 85712

Attn: Vance Goodman

Re: Phase I Environmental Site Assessment  
Vacant Land  
20 East Ochoa Street  
Tucson, Arizona

WT Job No. 2983JP005-REVISED

The enclosed report summarizes the significant findings about Recognized Environmental Conditions in connection with the Subject Property referenced above. The presumed viability of the enclosed report, pursuant to ASTM E1527-21, Section 4.6.1, is December 9, 2023. This report completes the agreed scope of services. If you have any questions or if we may be of further assistance to you, please do not hesitate to contact us. Thank you for allowing us to provide these services.

Sincerely,  
**WESTERN TECHNOLOGIES INC.**



Karl D. Peterson, RG  
Environmental Department Manager

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## EXECUTIVE SUMMARY

Western Technologies (WT) completed a Phase I Environmental Site Assessment (ESA) of the parking lot at 20 East Ochoa Street, Tucson, Arizona (the “Subject Property”). The purpose of this ESA was to identify to the extent feasible pursuant to the processes described herein, *Recognized Environmental Conditions* (RECs) and *Controlled RECs* (CRECs), and to evaluate other environmental conditions for consideration as *Historical RECs* (HRECs), *Vapor Encroachment Conditions* (VEC) and *de minimis conditions* in connection with the Subject Property.

The Subject Property was developed in 1953 as an asphalt-paved parking lot. WT did not identify any RECs associated with the current use of the Subject Property.

The Subject Property was within a commercial portion of Tucson, Arizona. The adjoining sites uses consisted of retail, multi-family housing, and offices. WT did not identify any RECs to the Subject Property in connection with the current uses of the adjoining sites.

Based on the review of available historical information, the Subject Property was developed with dwellings and stores from 1901 to 1947. The Subject Property was then used as an asphalt-paved parking lot from 1958 to 2023. The historical uses of the adjoining sites consisted of retail, multi-family living, and office uses. The southwest adjoining site was an auto repair shop from 1930 to 1968. Based on a separation distance exceeding the 100-foot critical distance, no USTs listed, and significant redevelopment of the site, a VEC likely does not exist at the Subject Property due to the historical uses of the Subject Property or adjoining sites.

WT obtained and reviewed a commercially available report of standard lists and database kept by the United States Environmental Protection Agency (USEPA) and the Arizona Department of Environmental Quality (ADEQ). The Subject Property was not listed in the standard Federal USEPA or State ADEQ databases. The database listed 2 WQARF, one SEMS, four SEMS-Archive, 19 SHWS, 19 US Brownfield, 20 LUST, and three VCP sites within the approximate search distances. The database also listed 24 historical auto service stations and 10 historical dry cleaners. However, based on the regulatory classification of these sites, physical distance, and the down- or cross-gradient locations with respect to the direction of groundwater flow, these facilities do not represent a REC in connection with the Subject Property.

WT considered the potential for a VEC to exist at the Subject Property by comparing the relative locations of the facilities identified in the regulatory agency database report to the Subject Property using the geographical and hydrogeological gradients described in the physical setting data. The database identified 2 WQARF, one SEMS, four SEMS-Archive, 19 SHWS, 19 US Brownfield, 20 LUST, and three VCP sites. The southwest adjoining site was listed as a historical auto service station from 1930 to 1968. However, based on a separation distance exceeding the 100-foot critical distance, no USTs listed on the southwest adjoining site, and significant redevelopment of the site, a VEC likely does not exist at the Subject Property due to these listings.

WT performed this ESA in general agreement with the scope and limitations of ASTM E1527-21 of the parking lot at 20 East Ochoa Street, Tucson, Arizona. Any exceptions to, or deletions from, this practice are described in Section 9 of this report.

This assessment has revealed no recognized environmental conditions, controlled recognized environmental conditions, or significant data gaps in connection with the Subject Property.

If additional information becomes available or known that may suggest the presence of recognized environmental conditions currently in connection with the Subject Property, contact this firm for potential recommendations.

## TIER I VAPOR ENCROACHMENT SCREEN

**Residential Property**

20 East Ochoa Street  
Tucson, Arizona 85701  
WT Job No. 2983JP065

**Prepared For:**

Carhuff + Cueva Architects, LLC  
2930 North Swan Road, #210  
Tucson, Arizona 85712

July 26, 2023



Amie L. Town  
Environmental Project Manager



Todd Sayers  
Vice President

GEOTECHNICAL

ENVIRONMENTAL

INSPECTIONS

NDT

MATERIALS

3480 South Dodge Boulevard, Tucson, Arizona 85713 (520) 748-2262 [wt-us.com](http://wt-us.com)

---

Building **Confidence** from the Ground Up



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An **RMA** Company

• 3480 South Dodge Boulevard • Tucson, Arizona 85713 • [www.wt-us.com](http://www.wt-us.com)

July 26, 2023

Carhuff + Cueva Architects, LLC  
2930 North Swan Road, #210  
Tucson, Arizona 85712

Attn: Mr. Vance Goodman

Re: Tier I Vapor Encroachment Screen  
Parking Lot  
20 East Ochoa Street  
Tucson, Arizona 85701

WT Job No. 2983JP065

Western Technologies presents this Tier I Vapor Encroachment Screen of the Residential Property at 20 East Ochoa Street in Tucson, Arizona. The results of our assessment, significant findings and conclusions are presented in the enclosed report.

This report completes the agreed scope of services. Thank you for allowing us to provide these services.

Sincerely,  
**WESTERN TECHNOLOGIES INC.**

Todd Sayers  
Vice President

Copies to: Addressee (1)



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## EXECUTIVE SUMMARY

Western Technologies (WT) completed a Tier I Vapor Encroachment Screen (VES) of the parking lot at 20 East Ochoa Street, Tucson, Arizona (“the Target Property”). The purpose of this VES was to identify to the extent feasible, pursuant to the processes described herein, Vapor Encroachment Conditions (VECs), in connection with Target Property.

This section presents our opinion regarding the probable impact to the Target Property from VECs that were identifiable from the records reviews and soil-gas survey.

- The planned use of Target Property includes demolition of current improvements and features and re-development with residential structures and associated infrastructure.
- No vapor conduits or preferential pathways were noted during this assessment.
- WT reviewed a previous Phase I Environmental Site Assessment of the Target Property (WT Job No. 2983JP005), which “*revealed no recognized environmental conditions, controlled recognized environmental conditions, or significant data gaps in connection with the Subject Property.*” Additionally, the Phase I ESA determined “*a VEC likely does not exist at the Subject Property.*”
- WT reviewed information regarding two Water Quality Assurance Revolving Fund (WQARF) sites within one mile of the Target Property. Due to the remedial action undertaken at these sites as well as current regulatory statuses and physical distances, these sites do not represent a VEC to the Target Property.
- An EDR Database Search was reviewed for the Target Property. The database search identified 32 LUST incidents within ½ mile of the Target Property. All of these incidents occurred greater than 0.1 miles, or 528 feet, from the Target Property. Based on the physical distance, hydrogeological down-to-cross-gradient locations of the sites relative to groundwater flow, and the closure statuses of the incidents, these incidents do not represent a VEC to the Target Property.
- WT requested and reviewed available records from the City of Tucson and Pima County. The reviewed records were not indicative of a VEC to the Subject Property.
- WT reviewed aerial photographs, fire insurance maps, and topographic maps for indications of past uses of the Subject Property. The reviewed records indicated the Subject Property was used as dwellings and stores from 1901 to 1947, and an asphalt paved parking lot from 1949 to current.

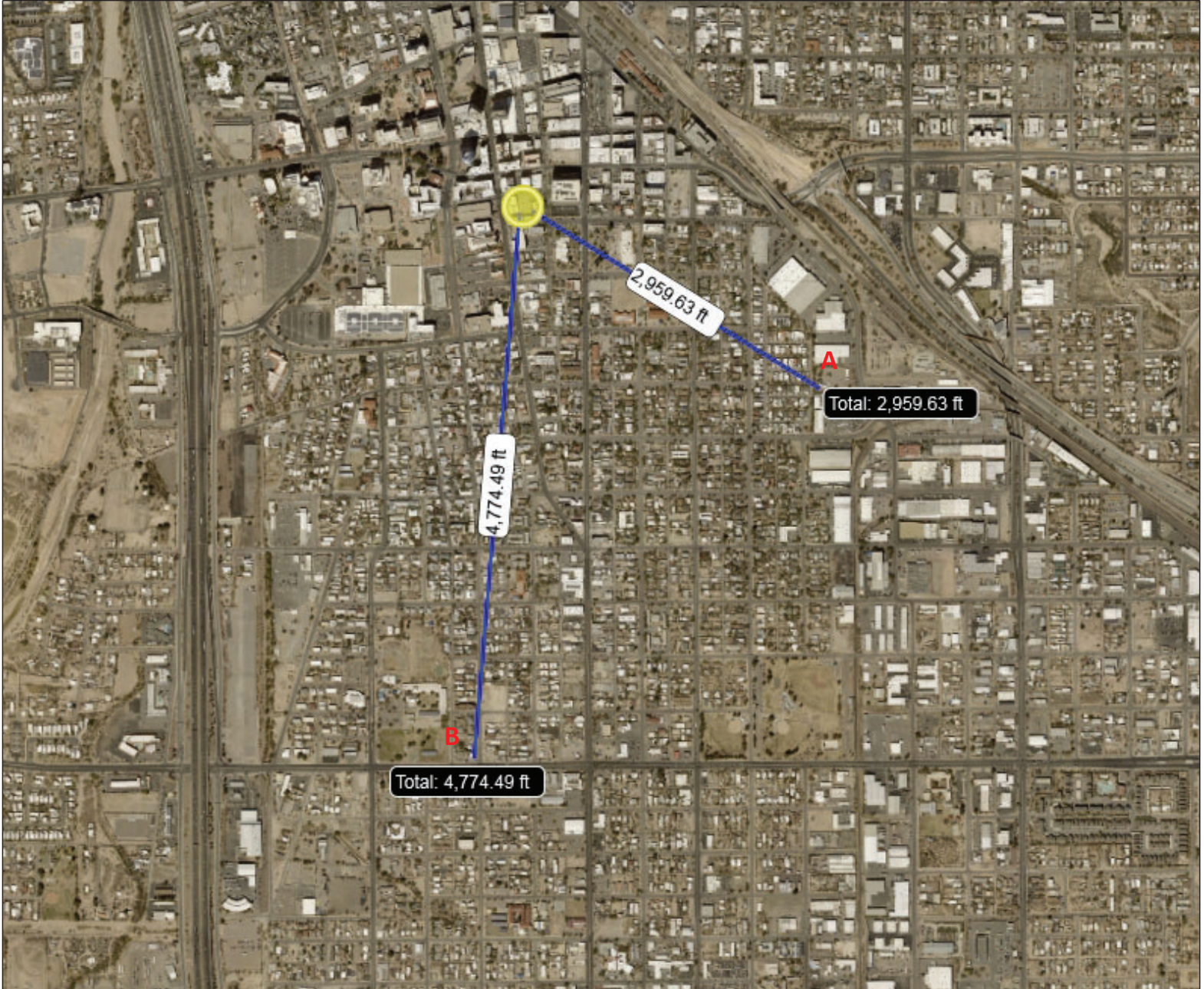
WT has performed a Tier I Vapor Encroachment Screen in conformance with the scope and limitations of ASTM Practice E2600-22 of the parking lot at 20 East Ochoa Street, Tucson, Arizona. Any exceptions to, or deletions from, this practice are described in Section 7 of this report.

This Tier I VES has concluded a VEC does not exist for the Target Property. WT makes no recommendations at this time.

**Aboveground Storage Tank (AST) Summary – 20 E Ochoa St, Tucson, AZ, 85701**

<b>AST</b>	<b>Location</b>	<b>Container</b>	<b>ASDBOP (ft)</b>	<b>ASDPPU (ft)</b>	<b>ASDBPU (ft)</b>	<b>Measured Distance (ft)</b>
A	APN 117-06-315E	1160 gallons, propane*	230.04	294.21	53.85	2,959.63
B	246 W 22nd St	1999 gallons, propane	275.39	369.08	69.26	4,774.49

\*Note – Approximate container volume based on aerial maps and site surveys



Notes

AST Map

Legend

1: 18,056



2,915.3                      0                      1,457.64                      2,915.3 Feet

[Home \(/\)](#) > [Programs \(/programs/\)](#) > [Environmental Review \(/programs/environmental-review/\)](#) > ASD Calculator

## 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/ft<sup>2</sup> - hr - people and 10,000 BTU/ft<sup>2</sup> - 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 checked="" type="checkbox"/> No: <input type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="1160"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<input type="button" value="Calculate Acceptable Separation Distance"/>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDR <sub>OP</sub> )	<input type="text" value="230.04"/>

ASD for Blast Over Pressure (ASDBOP)	299.81
ASD for Thermal Radiation for People (ASDPPU)	294.21
ASD for Thermal Radiation for Buildings (ASDBPU)	53.85
ASD for Thermal Radiation for People (ASDPNPD)	
ASD for Thermal Radiation for Buildings (ASDBNPD)	

**For mitigation options, please click on the following link: [Mitigation Options \(/resource/3846/acceptable-separation-distance-asd-hazard-mitigation-options/\)](/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 \(/resource/3839/acceptable-separation-distance-asd-assessment-tool-user-guide/\)](/resource/3839/acceptable-separation-distance-asd-assessment-tool-user-guide/)
- [ASD Flow Chart \(/resource/3840/acceptable-separation-distance-asd-flowchart/\)](/resource/3840/acceptable-separation-distance-asd-flowchart/)

[Home \(/\)](#) > [Programs \(/programs/\)](#) > [Environmental Review \(/programs/environmental-review/\)](#) > ASD Calculator

## Acceptable Separation Distance (ASD) Electronic Assessment Tool

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### 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 checked="" type="checkbox"/> No: <input type="checkbox"/>
Does the container hold a cryogenic liquified gas?	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
Is the container diked?	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
What is the volume (gal) of the container?	<input type="text" value="1999"/>
What is the Diked Area Length (ft)?	<input type="text"/>
What is the Diked Area Width (ft)?	<input type="text"/>
<input type="button" value="Calculate Acceptable Separation Distance"/>	
Diked Area (sqft)	<input type="text"/>
ASD for Blast Over Pressure (ASDR <sub>OP</sub> )	<input type="text" value="275.39"/>

ASD for Blast Over Pressure (ASDBOP)	279.00
ASD for Thermal Radiation for People (ASDPPU)	369.08
ASD for Thermal Radiation for Buildings (ASDBPU)	69.26
ASD for Thermal Radiation for People (ASDPNPD)	
ASD for Thermal Radiation for Buildings (ASDBNPD)	

**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/)



STATE HISTORIC PRESERVATION OFFICE  
SURVEY REPORT SUMMARY FORM

1

**1. REPORT TITLE**

**1a. Report Title:** *Cultural Resources Class III Survey of .37 Acres of a Vacant Lot at 20 E. Ochoa St. between Stone Avenue and Scott Avenue*

**1b. Report Author(s):** Danielle Soza, M.A.

**1c. Date:** September 7, 2023 **1d. Report No.:** Tierra Archaeological Report No. 2023-067

**2. PROJECT REGISTRATION/PERMITS**

**2a. ASM Accession Number:** 2023-pending

**2b. AAA Permit Number:** 2023-053bl

**2c. ASLD Lease Application Number(s):** N/A

**2d. Other Permit Number(s):** N/A

**3. ORGANIZATION/CONSULTING FIRM**

**3a. Name:** Tierra Right of Way Services, Ltd.

**3b. Internal Project Number:** 23TA06-273.01

**3c. Internal Project Name:** COT West Point Apt II

**3d. Contact Name:** Barbara Montgomery

**3e. Contact Address:** 1575 East River Road, Suite 201, Tucson, AZ 85718

**3f. Contact Phone:** 520.319.2106

**3g. Contact Email:** bmontgomery@tierra-row.com

**4. SPONSOR/LEAD AGENCY**

**4a. Sponsor:** City of Tucson (COT)

**4b. Lead Agency:** City of Tucson (COT)

**4c. Agency Project Number(s):** COT 23-021

**4d. Agency Project Name:** N/A

**4e. Funding Source(s):** COT

**4f. Other Involved Agencies:** Arizona State Museum (ASM)

**4g. Applicable Regulations:** City of Tucson Resolution No. 12443, Administrative Directive for the Protection of Archaeological and Historical Resources in City Projects, City of Tucson, May 1999; A.R.S. §41-861 et seq.

**STATE HISTORIC PRESERVATION OFFICE  
SURVEY REPORT SUMMARY FORM**

**5. DESCRIPTION OF PROJECT OR UNDERTAKING:** The proposed project involves the construction of the West Point Apartments II Development in the Armory Park Historic Residential District in Downtown Tucson. The property, at 20 E. Ochoa St., is being considered for acquisition and infill construction of an 85-unit, one-bedroom/one-bath, seven story, mixed use (retail/affordable housing) complex on a vacant lot by City of Tucson (COT) Housing and Community Development. Prior to ground-disturbing activities, a Class III cultural resource survey was required by the COT Historic Preservation Office.

**6. PROJECT AREA/AREA OF POTENTIAL EFFECTS:** The project area is a vacant parking lot at 20 E. Ochoa St. (Photo 1; Figures 1 and 2) between Stone Ave. and Scott Ave. of approximately .37 acres (49 yards N-S x 38 yards E-W).

**7. PROJECT LOCATION**

**7a. Address:** 20 E. Ochoa St.

**7b. Route:** N/A

**7c. Mileposts Limits:** N/A

**7d. Nearest City/Town:** Tucson **7e. County:** Pima County

**7f. Project Locator UTM:** 502792 Easting, 3564873 Northing **7g. NAD 83** **7h. Zone:** 12

**7i. Baseline & Meridian:** G&SR **7j. USGS Quadrangle(s):** Tucson AZ, 7.5-minute

**7k. Legal Description(s):** Portion of the NE ¼ of the NE ¼ of the NW ¼ of Section 13, Township 14 South, Range 13 East.

**8. SURVEY AREA**

**8a. Total Acres:** .37 acres

**8b. Survey Area.**

1. Land Jurisdiction	2. Total Acres Surveyed	3. Total Acres Not Surveyed	4. Justification for Areas Not Surveyed
COT	.37	0	N/A

**9. ENVIRONMENTAL CONTEXTS**

**9a. Landform:** Fan terraces.

**9b. Elevation:** 2,388 amsl.

**9c. Surrounding Topographic Features:** Flat area with minimal topographic variation.

**9d. Nearest Drainage:** Santa Cruz River to the west.

STATE HISTORIC PRESERVATION OFFICE  
SURVEY REPORT SUMMARY FORM

**9e. Local Geology:** Quaternary Surficial Deposits, undivided (0-2 Ma) (Arizona Geological Survey 2023).

**9f. Vegetation:** Very little to no vegetation is present in the project area.

**9g. Soils/Deposition:** Mostly Cave gravelly and sandy loams with cemented material (NRCS 2023).

**9h. Buried Deposits:** Likely

**9i. Justification:** The project area has been mostly paved over with asphalt and concrete; however, it is located in Historic Downtown Tucson, and it is likely there will be subsurface historic materials.

**10. BUILT ENVIRONMENT:** The area consists of businesses, government buildings, and residential neighborhoods. The vacant lot is sandwiched between two buildings between Stone Ave and Scott Ave including a dental office (ABC Perfect Teeth) and a barber shop to the west and a government building (The Udall Foundation) to the east. The current project will have little impact on the built environment.

**11. INVENTORY CLASS COMPLETED**

**11a. Class I Inventory:**

**11b. Researcher(s):**

**11c. Class II Survey:**

**11d Sampling Strategy:**

**11e. Class III Inventory:**

**12. BACKGROUND RESEARCH SOURCES**

**12a. AZSITE:**

**12b. ASM Archaeological Records Office:**

**12c. SHPO Inventories and/or SHPO Library:**

**12d. NRHP Database:**

**12e. ADOT Portal:**

**12f. GLO Maps:** GLO Map Nos. 2048 (T14S, R13E) and 2050 (T14S, R14E), dated 1871 and 1876, shows no historic features within the project area, other than a historical building (Figure 3).

**12g. Land- Managing Agency Files:** N/A

**12h. Tribal Cultural Resources Files:** N/A

**12i. Local Government Websites:** N/A

**12j. Other:** N/A

STATE HISTORIC PRESERVATION OFFICE  
SURVEY REPORT SUMMARY FORM

**17. FIELD SURVEY RESULTS**

**17a. No Cultural Resources Identified:**

**17b. Isolated Occurrences (IOs) Only:**

**17c. Number of IOs Recorded:**

**17d. Table of IOs.**

1. IO Number	2. Description	3. Date Range	4. UTM's
N/A			

**18. COMMENTS:** No sites, historic buildings, or isolated occurrences were observed in the project area during the survey. Tierra recommends that COT should be allowed to proceed with the proposed project. Archaeological monitoring for potential subsurface historic remains during construction is also recommended.

**SECTION 19. ATTACHMENTS**

**19a. Project Location Map:**  Figures 1 and 2

**19b. Land Jurisdiction Map:**  Figure 1


**19c. Background Research Map(s):**  Figures 4 and 5     Figure 5 REDACTED

**19d. GLO Map(s):**  Figure 3

**19e. References:**

**SECTION 20. CONSULTANT CERTIFICATION**

I certify the information provided herein has been reviewed for content and accuracy and all work meets applicable agency standards.



**Signature**

Principal Investigator

**Title**

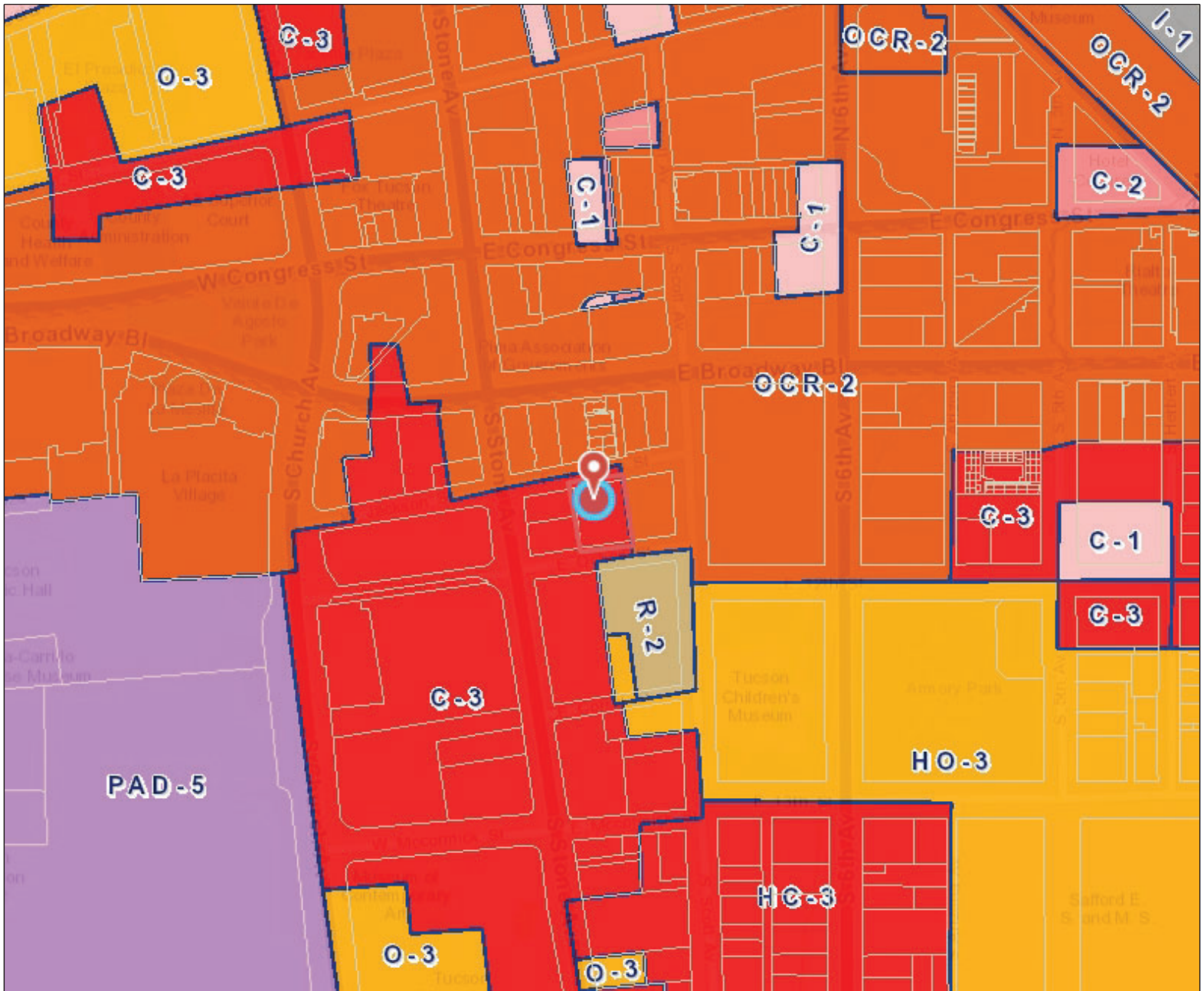
**SECTION 21. DISCOVERY CLAUSE**

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In the event that previously unreported cultural resources are encountered during ground disturbing activities, all work must immediately cease within 30 meters (100 feet) until a qualified archaeologist has documented the discovery and evaluated its eligibility for the Arizona or National Register of Historic Places in consultation with the lead agency, the SHPO, and Tribes, as appropriate. Work must not resume in this area without approval of the lead agency.

If human remains are encountered during ground-disturbing activities, all work must immediately cease within 30 meters (100 feet) of the discovery and the area must be secured. The Arizona State Museum, lead agency, SHPO, and appropriate Tribes must be notified of the discovery. All discoveries will be treated in accordance with NAGPRA (Public Law 101-601; 25 U.S.C. 3001-3013) or Arizona Revised Statutes (A.R.S. § 41-844 and A.R.S. § 41-865), as appropriate, and work must not resume in this area without authorization from ASM and the lead agency.

---



Notes

Zoning Map

Legend

- |   |                                |                                |                                 |                                  |
|---|--------------------------------|--------------------------------|---------------------------------|----------------------------------|
| <input type="checkbox"/> Parcels            | <input type="checkbox"/> NR-2  | <input type="checkbox"/> HC-2  | <input type="checkbox"/> HO-3   | <input type="checkbox"/> I-1     |
| <b>Tucson Zoning</b>                        | <input type="checkbox"/> R-3   | <input type="checkbox"/> C-3   | <input type="checkbox"/> P      | <input type="checkbox"/> I-2     |
| <input type="checkbox"/> <all other values> | <input type="checkbox"/> HR-3  | <input type="checkbox"/> HC-3  | <input type="checkbox"/> HP     | <input type="checkbox"/> OCR-1   |
| <input type="checkbox"/> PADs               | <input type="checkbox"/> NR-3  | <input type="checkbox"/> HLC-3 | <input type="checkbox"/> HLRX-1 | <input type="checkbox"/> OCR-2   |
| <input type="checkbox"/> R-1                | <input type="checkbox"/> UR-3  | <input type="checkbox"/> UC-3  | <input type="checkbox"/> HLRX-2 | <input type="checkbox"/> HOCCR-2 |
| <input type="checkbox"/> HLR-1              | <input type="checkbox"/> C-1   | <input type="checkbox"/> HNC   | <input type="checkbox"/> SR     | <input type="checkbox"/> MU      |
| <input type="checkbox"/> HR-1               | <input type="checkbox"/> HC-1  | <input type="checkbox"/> O-1   | <input type="checkbox"/> HSR    | <input type="checkbox"/> RH      |
| <input type="checkbox"/> NR-1               | <input type="checkbox"/> HLC-1 | <input type="checkbox"/> HO-1  | <input type="checkbox"/> P-I    | <input type="checkbox"/> SH      |
| <input type="checkbox"/> R-2                | <input type="checkbox"/> UC-1  | <input type="checkbox"/> HO-2  |                                 | <input type="checkbox"/> RV      |
| <input type="checkbox"/> HLR-2              | <input type="checkbox"/> UHC-1 | <input type="checkbox"/> O-2   |                                 | <input type="checkbox"/> MH-1    |
| <input type="checkbox"/> HR-2               | <input type="checkbox"/> C-2   | <input type="checkbox"/> O-3   |                                 | <input type="checkbox"/> MH-2    |

1: 4,514



728.8 0 364.41 728.8 Feet



# EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

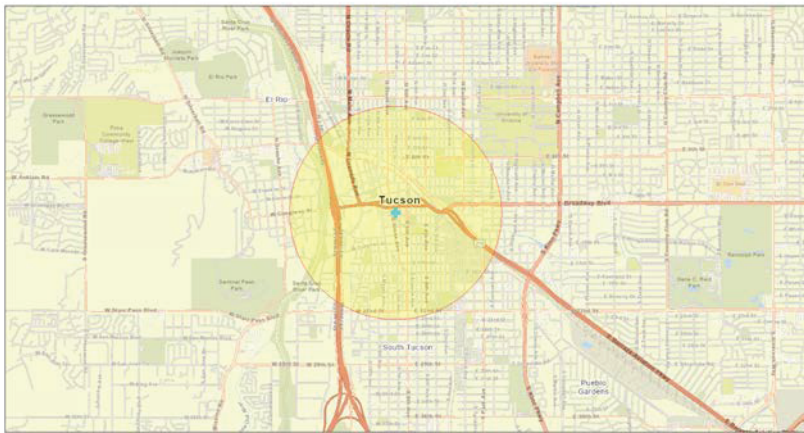
## Tucson, AZ

1 mile Ring Centered at 32.220233,-110.970366

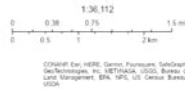
Population: 12,472

Area in square miles: 3.14

A3 Landscape

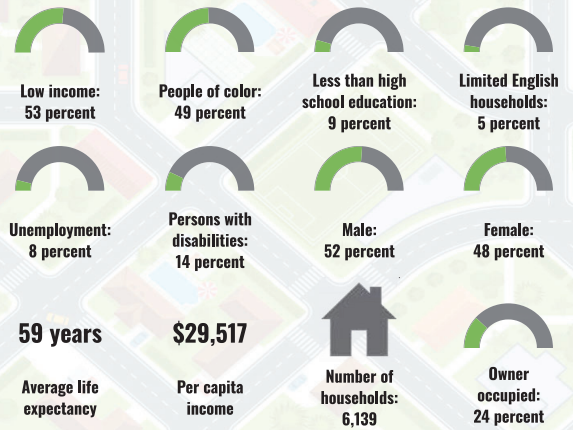


November 29, 2023  
20 E Ochoa St, Tucson, AZ 85701

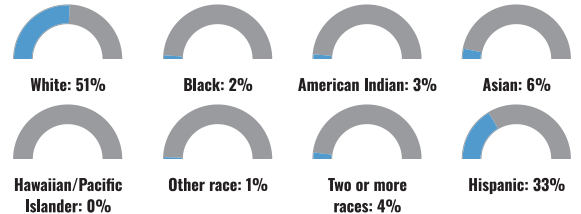


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### COMMUNITY INFORMATION



### BREAKDOWN BY RACE



### BREAKDOWN BY AGE



### LIMITED ENGLISH SPEAKING BREAKDOWN



### LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	70%
Spanish	23%
Other Indo-European	1%
Chinese (including Mandarin, Cantonese)	1%
Other Asian and Pacific Island	1%
Arabic	1%
Other and Unspecified	1%
Total Non-English	30%

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

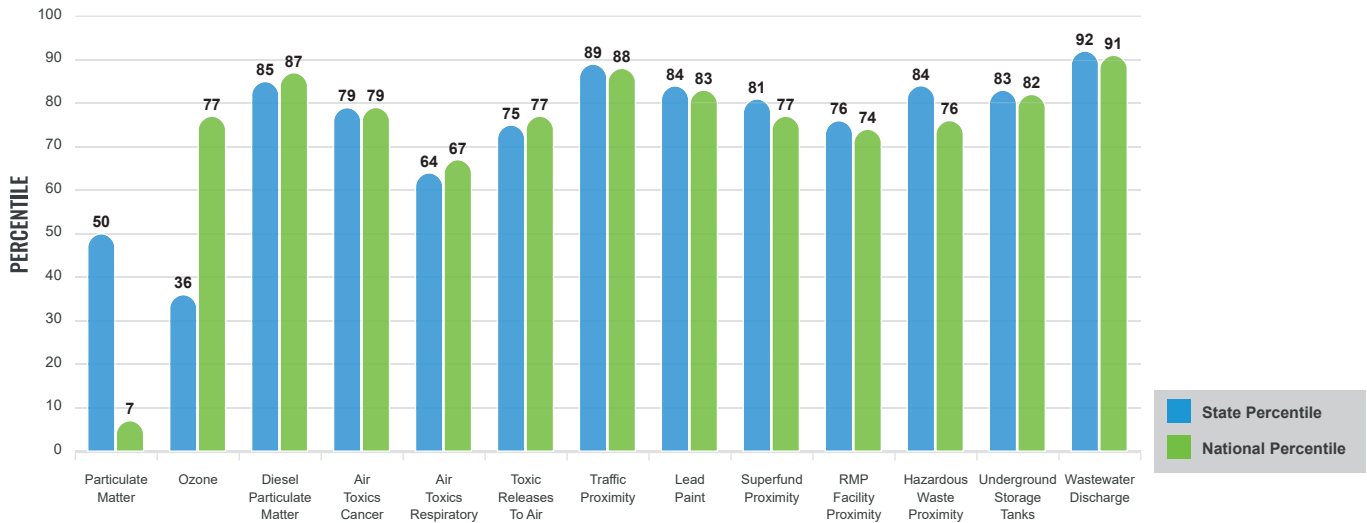
# Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

## EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

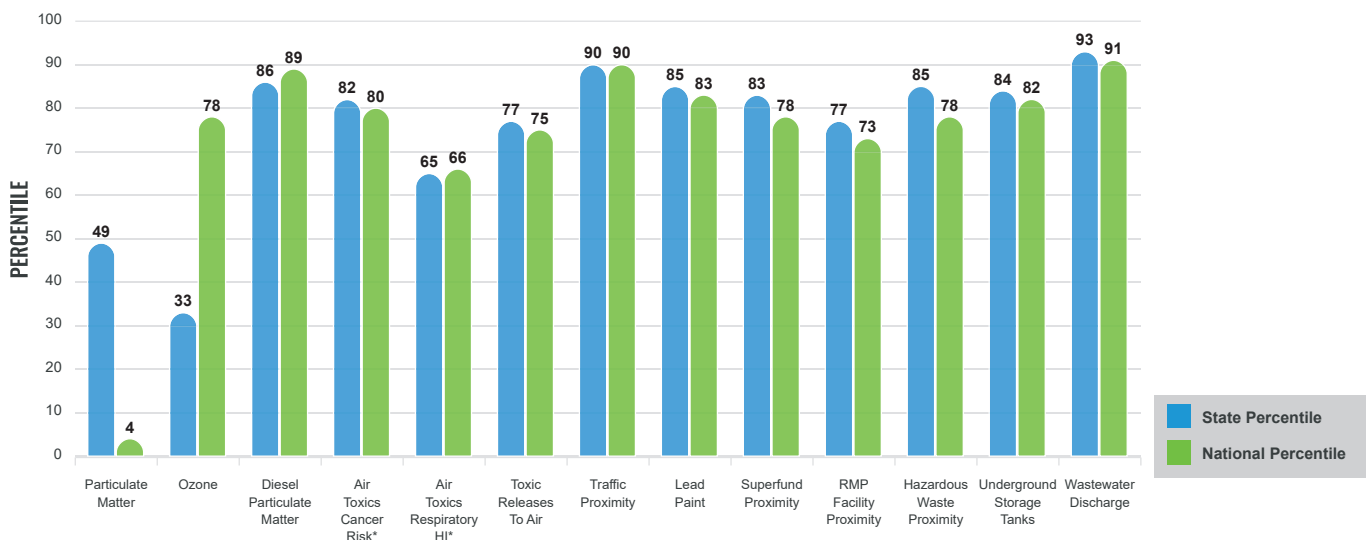
### EJ INDEXES FOR THE SELECTED LOCATION



## SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

### SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

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# EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
<b>POLLUTION AND SOURCES</b>					
Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	4.72	5.87	26	8.08	2
Ozone (ppb)	61.8	66.1	18	61.6	55
Diesel Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	0.439	0.278	84	0.261	87
Air Toxics Cancer Risk* (lifetime risk per million)	29	25	13	25	5
Air Toxics Respiratory HI*	0.3	0.31	30	0.31	31
Toxic Releases to Air	710	2,800	59	4,600	52
Traffic Proximity (daily traffic count/distance to road)	660	190	95	210	93
Lead Paint (% Pre-1960 Housing)	0.51	0.089	95	0.3	74
Superfund Proximity (site count/km distance)	0.075	0.077	70	0.13	57
RMP Facility Proximity (facility count/km distance)	0.2	0.38	63	0.43	57
Hazardous Waste Proximity (facility count/km distance)	1.1	0.71	81	1.9	62
Underground Storage Tanks (count/km <sup>2</sup> )	8.6	1.7	97	3.9	86
Wastewater Discharge (toxicity-weighted concentration/m distance)	110	5.8	98	22	99
<b>SOCIOECONOMIC INDICATORS</b>					
Demographic Index	51%	38%	73	35%	76
Supplemental Demographic Index	19%	14%	74	14%	76
People of Color	49%	44%	61	39%	65
Low Income	53%	32%	80	31%	83
Unemployment Rate	8%	6%	73	6%	74
Limited English Speaking Households	5%	4%	76	5%	76
Less Than High School Education	9%	12%	55	12%	53
Under Age 5	2%	5%	30	6%	27
Over Age 64	11%	20%	38	17%	30
Low Life Expectancy	15%	19%	8	20%	11

\*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

**Sites reporting to EPA within defined area:**

Superfund .....	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities .....	0
Water Dischargers .....	14
Air Pollution .....	1
Brownfields .....	43
Toxic Release Inventory .....	1

**Other community features within defined area:**

Schools .....	16
Hospitals .....	1
Places of Worship .....	14

**Other environmental data:**

Air Non-attainment .....	No
Impaired Waters .....	No

Selected location contains American Indian Reservation Lands* .....	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community .....	Yes
Selected location contains an EPA IRA disadvantaged community .....	Yes

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## EJScreen Environmental and Socioeconomic Indicators Data

### HEALTH INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	15%	19%	8	20%	11
Heart Disease	4.3	6	25	6.1	14
Asthma	12	10.6	90	10	91
Cancer	3.6	6.1	10	6.1	6
Persons with Disabilities	13.8%	13.9%	57	13.4%	58

### CLIMATE INDICATORS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	8%	6%	76	12%	58
Wildfire Risk	67%	48%	53	14%	87

### CRITICAL SERVICE GAPS

INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	17%	13%	72	14%	68
Lack of Health Insurance	11%	10%	64	9%	74
Housing Burden	Yes	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A

Footnotes

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