



U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

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

Project Information

Project Name: Tucson-Pima-County-PRICE-Rehab-Program

**HEROS
Number:** 900000010535658

Start Date: 05/27/2026

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

**State / Local
Identifier:**

RE Preparer: Emilie Fisher

**Certifying
Officer:** Ann Chanecka

**Grant Recipient (if different than Responsible
Entity):**

Point of Contact:

**Consultant (if
applicable):**

Point of Contact:

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

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

Additional Location Information:

N/A

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

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

The Tucson-Pima County Regional Preservation and Reinvestment Initiative for Community Enhancement (PRICE) Rehab Program includes the preservation/revitalization of to up to 150 units of pre-1976 manufactured housing via manufactured housing rehabilitation, energy efficiency upgrades, advanced weatherization, and accessibility improvements. The work may include, but is not limited to, window and door replacement, roof repair and replacement, HVAC repair and replacement, water heater replacement, repair and replacement of plumbing and electrical systems, interior surface and fixture repairs and replacement, and structural repairs. Accessibility projects may include installation, repair or upgrades to fixtures, ramps, handrails, structural upgrades and other work to increase accessibility in the home. For each project site, a Rehabilitation Project Coordinator will complete a comprehensive assessment identifying existing hazards, the condition of major systems within the home, the condition of exterior surfaces of the home, and a plan including a cost estimate to mitigate the identified issues. The project term is 60 months. This review is valid for five years. Total Estimated Program Cost: \$13,551,520. Project funding includes \$11,519,567.21 of PRICE funds, grant number B23PR040001, through the City of Tucson; \$454,437 in Community Development Block Grant (CDBG) funds, grant number B25MC040505, through the City of Tucson; \$450,000 in CDBG funds, grant numbers B25UC040502 and B26UC040502, through Pima County; and leveraged local and state funding.

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

[Tucson Map.pdf](#)

[Pima County Map.pdf](#)

Approximate size of the project area: more than 1 square mile

Length of time covered by this review: 5 Years

Maximum number of dwelling units or lots addressed by this tiered review:
150

Level of Environmental Review Determination:

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

58.35(a)(2)

58.35(a)(3)

Determination:

	Extraordinary circumstances exist and this project may result in significant environmental impact. This project requires preparation of an Environmental Assessment (EA); OR
✓	There are no extraordinary circumstances which would require completion of an EA, and this project may remain CEST.

Approval Documents:

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

**7015.15 certified by Certifying Officer
on:**

**7015.16 certified by Authorizing Officer
on:**

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
B23PR040001	Community Planning and Development (CPD)	Preservation and Reinvestment Initiative for Community Enhancement (PRICE)	\$11,519,567.21
B25MC040505	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$463,188.00
B25UC040502	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$225,000.00
B26UC040502	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$225,000.00

Estimated Total HUD Funded Amount: \$12,432,755.21

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$13,551,520.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Was compliance achieved at the broad level of review?	Describe here compliance determinations made at the broad level and source documentation.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards	☒ Yes ☐ No	The project does not involve new construction, substantial rehabilitation, acquisition of undeveloped land, activities that would significantly prolong the physical or economic life of existing facilities or change the use of the facility to a use that is not consistent with the recommendations of the Department of Defense (DOD)'s Land Use Compatibility Guidelines, activities that would significantly increase the density or number of people at the site, or activities that would introduce explosive, flammable, or toxic materials to the area. The project involves rehabilitation of existing residential properties. The project is in compliance with Airport Hazards requirements.
Coastal Barrier Resources Act	☒ Yes ☐ No	There are no CBRS units in Arizona. This project is compliance with the Coastal Barrier Resources Act.
Flood Insurance	☐ Yes ☒ No	
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality	☒ Yes ☐ No	The project does not include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units. The project involves rehabilitation of existing residential properties, with no new construction or increase in building footprints. The project is in compliance with the Clean Air Act.
Coastal Zone Management Act	☒ Yes ☐ No	This project is located in a state that does not participate in the Coastal Zone Management Program. There are no

		coastal zones in Arizona. This project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances	☐ Yes ☒ No	
Endangered Species Act	☒ Yes ☐ No	The project involves rehabilitation of existing residential properties in developed, urban neighborhoods, with no new construction or increase in building footprints. The project will have no effect on threatened or endangered species. The project is compliance with the Endangered Species Act.
Explosive and Flammable Hazards	☒ Yes ☐ No	The project involves rehabilitation of existing residential properties, with no increase in residential densities or conversion. This project does not include development, construction, or rehabilitation that will increase residential densities, or conversion of land use. The project is in compliance with explosive and flammable hazard requirements.
Farmlands Protection	☒ Yes ☐ No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project involves rehabilitation of existing residential properties in developed, urban neighborhoods, with no new construction or increase in building footprints. The project area 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..." Project activities will take place in a fully developed, urban environment. The project is in compliance with the Farmland Protection Policy Act.
Floodplain Management	☐ Yes ☒ No	
Historic Preservation	☒ Yes ☐ No	According to the Arizona State Historic Preservation Office (SHPO), the Arizona SHPO, with input from HUD, has determined that certain undertakings may proceed with a finding of No Historic Properties Affected without

		formal consultation when there is little to no potential to affect historic properties, including undertakings on mobile/manufactured homes of any age. Project activities will occur solely on manufactured homes; therefore, no further review will be required for historic preservation compliance.
Noise Abatement and Control	☒ Yes ☐ No	The project does not involve the development of new noise sensitive uses, new construction, increase in residential density, or change in land use. The project involves rehabilitation of existing residential properties in developed, urban neighborhoods. Standardized noise attenuation measures are incorporated into rehabilitation activities, where applicable (installation of improved building envelope components). The project is in compliance with HUD's Noise regulations.
Sole Source Aquifers	☒ Yes ☐ No	The project area is within 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.2, "Acquisition, disposition, rehabilitation, reconstruction or modernization of existing projects, buildings, and public facilities."). The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection	☒ Yes ☐ No	The project involves rehabilitation of existing residential properties in developed, urban neighborhoods, with no new construction or increase in building footprints. Potential ground disturbance would be limited in nature and would not modify stormwater flow, release pollutants, or otherwise change conditions that contribute to wetlands viability. The project is in compliance with EO 11990 and Wetlands Protection requirements in 24 CFR Part 55.

Wild and Scenic Rivers Act	☒ Yes ☐ No	There are no NWSRS rivers in Pima County. The project is in compliance with the Wild and Scenic Rivers Act.
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Supporting documentation

[Critical Habitat Map.pdf](#)

[Urban Areas Map.pdf](#)

[2026-7-15 Arizona SHPO Memo for HUD Undertakings.pdf](#)

[1990-4-30 Sole Source Aquifer MOU.pdf](#)

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

Written Strategies

The following strategies provide the policy, standard, or process to be followed in the site-specific review for each law, authority, and factor that will require completion of a site-specific review.

1	Flood Insurance
	A flood map with FEMA flood zones will be created for each site-specific review. All projects in FEMA-designated Special Flood Hazard Areas (SFHAs) will be required to obtain and maintain flood insurance for the economic life of the activity to cover the total activity cost. A copy of the flood insurance declaration will be kept in the project file and uploaded to HEROS.
2	Contamination and Toxic Substances
	A site-specific review will be conducted to determine if the site is free from hazardous materials, contamination, toxic chemicals and gases, and radioactive substances. The review will evaluate site conditions through field observations and by researching Federal, state, and local databases (e.g., NEPAassist, ADEQ eMaps). Radon will be evaluated at sites that are not exempt from review through a review of scientific data (e.g., CDC National Environmental Public Health Tracking Network) or through radon testing (DIY or ANSI/AARST) in accordance with HUD's radon policy, CPD-23-103. If toxic or hazardous conditions are identified, mitigation measures will be identified. If toxic or hazardous conditions cannot be mitigated, the site-specific project will be rejected.
3	Floodplain Management
	A site-specific review will be conducted to determine if the site is located in the FFRMS Floodplain. If the project is located in the FFRMS Floodplain, the 8-Step or 5-Step process will be conducted to evaluate practicable mitigation measures.

Supporting documentation

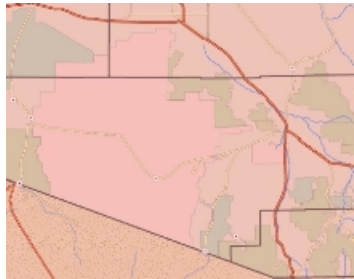
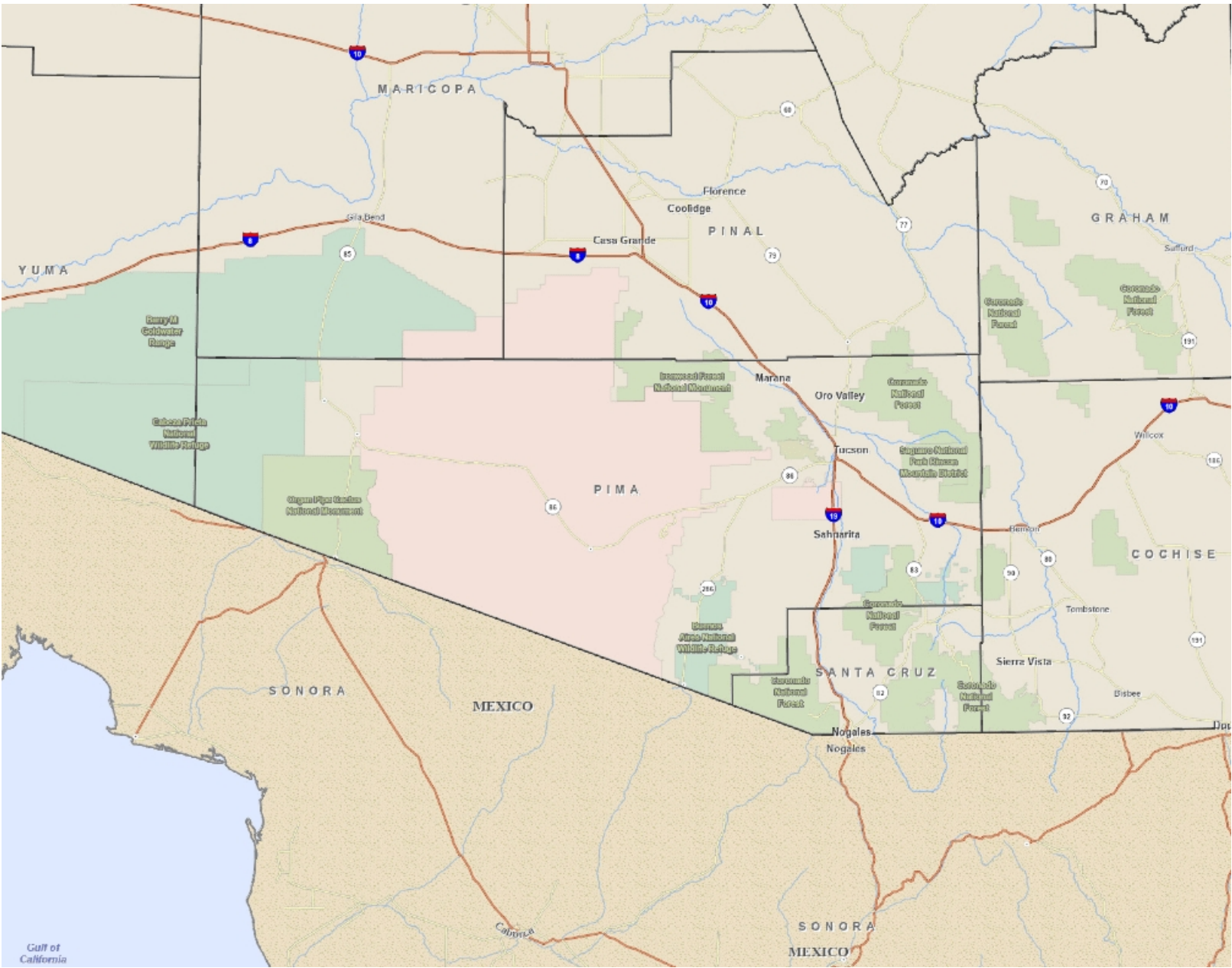
[RER Form.pdf](#)

[Tier 2 Review Form.pdf](#)

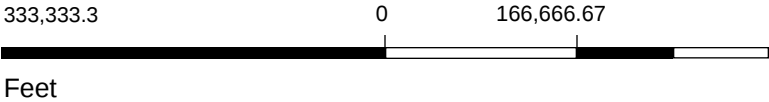
APPENDIX A: Site Specific Reviews

Pima County, AZ

Legend

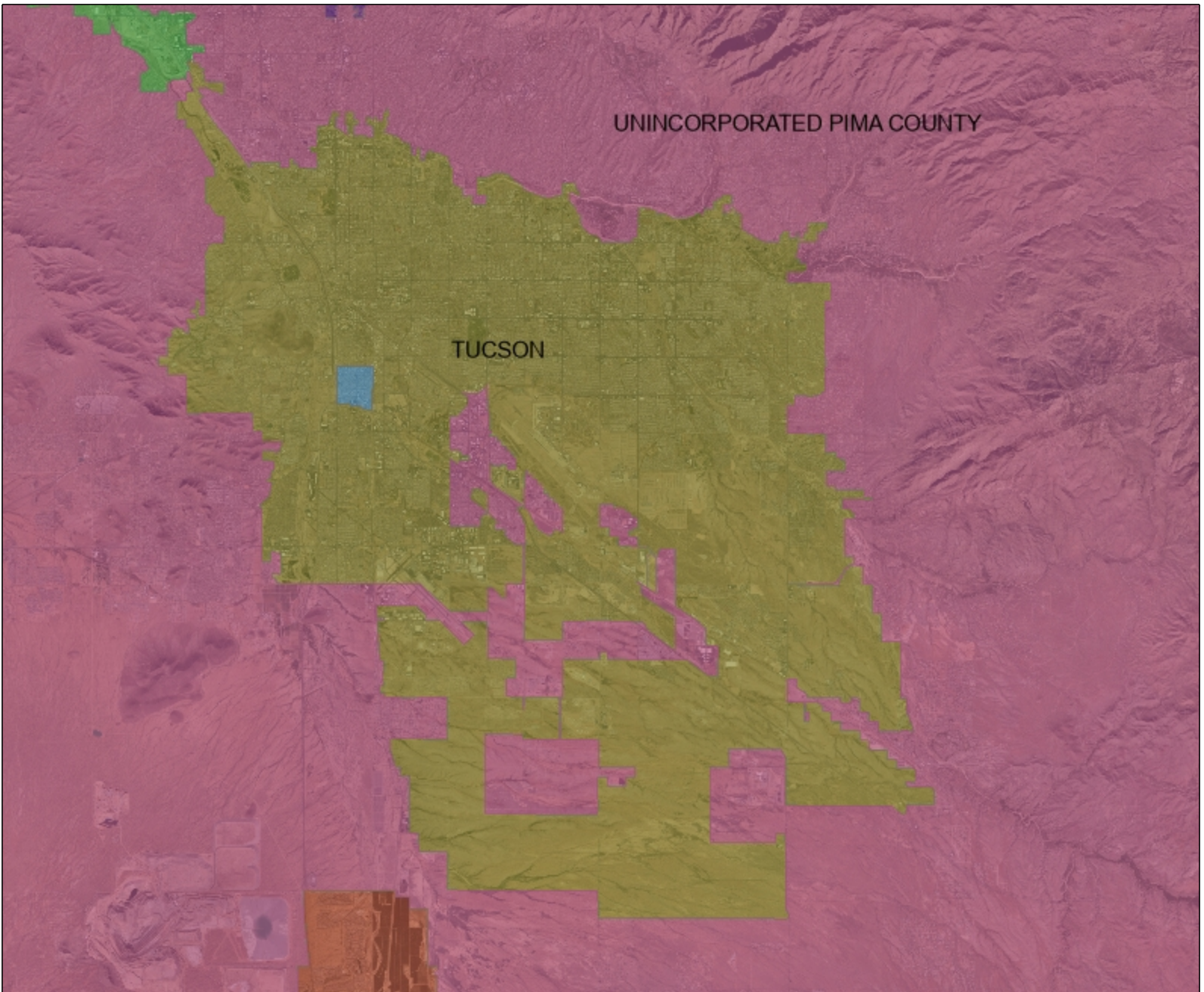


Project Limits



This map is static output from an internet mapping site and no warranty is expressed or implied as to the accuracy, reliability, currency or completeness of the data, and is for reference only

6/1/2026



Notes

Legend

Jurisdictions
 MARANA
 ORO VALLEY
 SAHUARITA
 SOUTH TUCSON
 TUCSON
 UNINCORPORATED

Citations
 75m Resolution
 Metadata

World Imagery
 Low Resolution 15m
 Imagery
 High Resolution
 60cm Imagery
 High Resolution
 30cm Imagery

1: 288,895



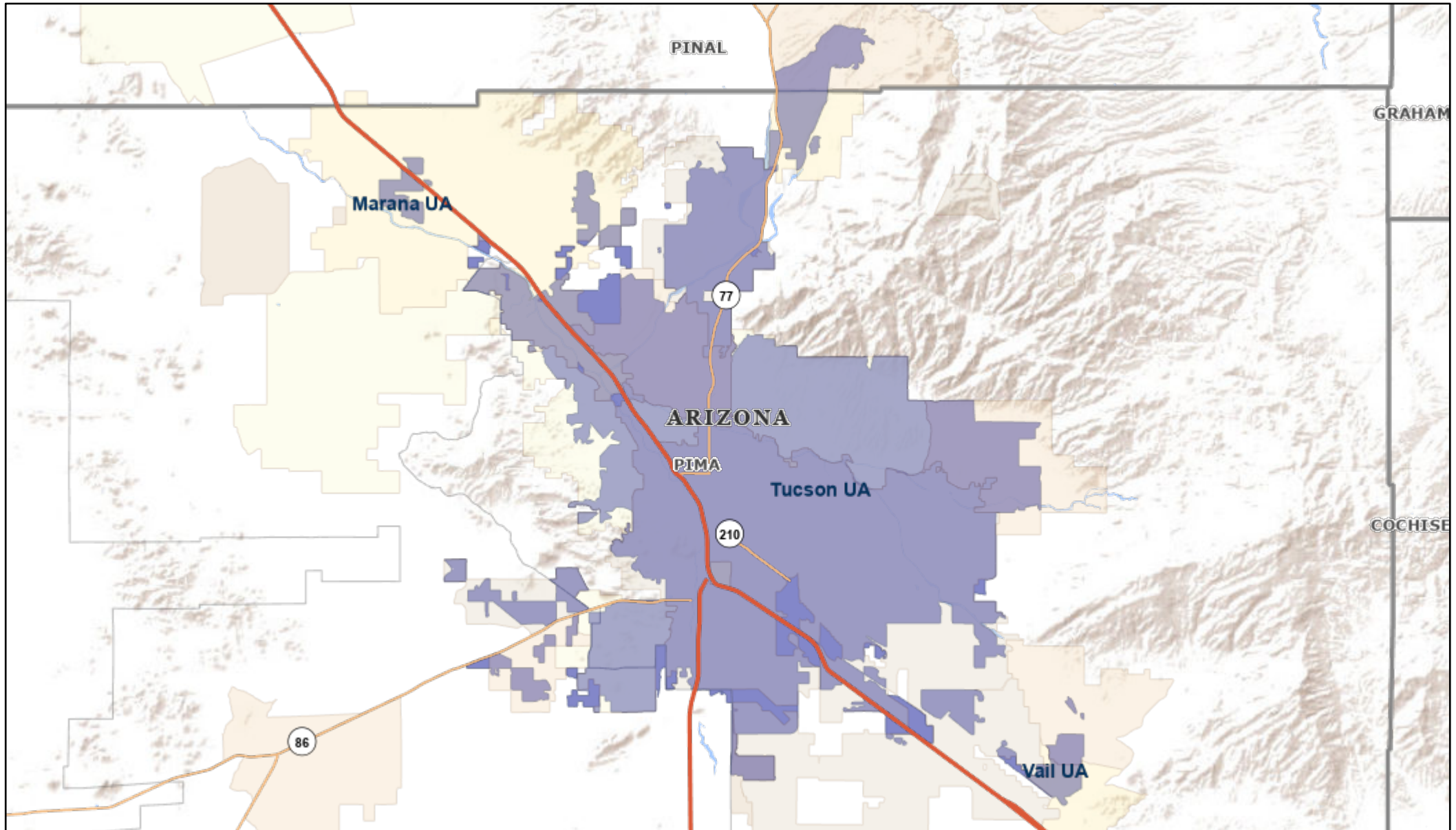
46,644.5 0 23,322.27 46,644.5 Feet

WGS_1984_Web_Mercator_Auxiliary_Sphere
 © City of Tucson

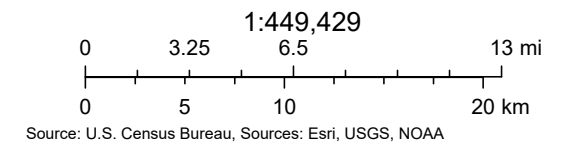
This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

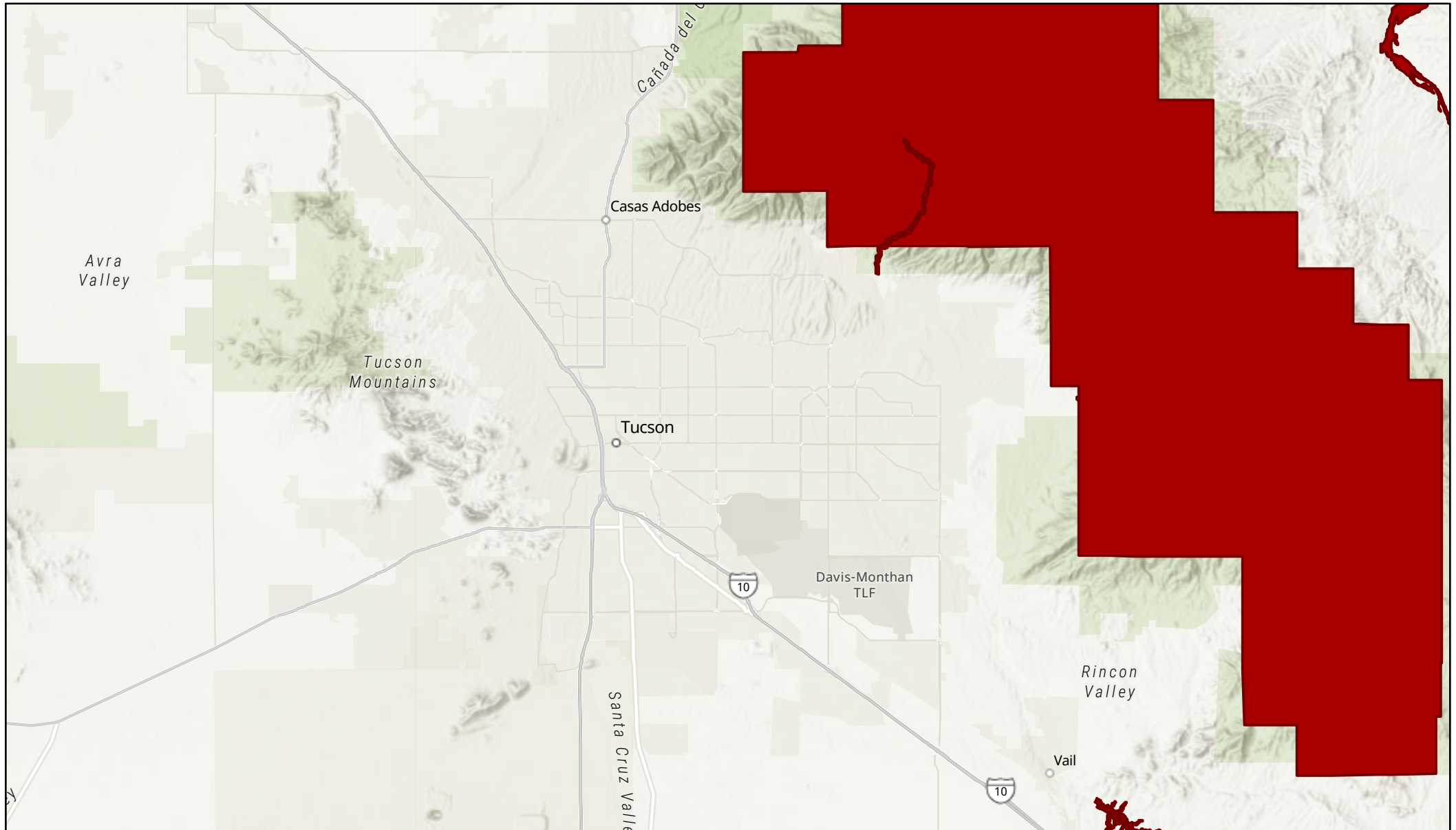
Tucson, AZ Urban Areas Map



July 7, 2026



Tucson, AZ Critical Habitat Map

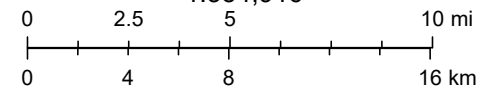


7/7/2026

Final Critical Habitat Features

World_Hillshade

1:354,916



U.S. Fish and Wildlife Service, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Esri, NASA, NGA, USGS

—President Lyndon B. Johnson, 1965

