

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

Project Information

Project Name: Neighborhood-Sidewalks-Environmental-Review

HEROS Number: 900000010338897

Responsible Entity (RE): GREENVILLE, PO Box 2207 Greenville SC, 29602

RE Preparer: Rachael Anderson

State / Local Identifier:

Certifying Officer: Shannon Lavrin

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable): WK Dickson & Co., Inc.

Point of Contact: Rachael Anderson

Project Location: 112 Rebecca St, Greenville, SC 29607

Additional Location Information:

The projects occur in 6 different locations throughout the City of Greenville in designated Special Emphasis Neighborhoods as shown in Figure 1-II: Aerial Maps. Following a desktop review, a site visit was conducted on June 29, 2023, by the City of Greenville and W.K. Dickson staff to document existing conditions and any potentially

occurring resources, including wetlands and streams, threatened and endangered species, and historic and cultural resources within or in proximity of the project areas.

Direct Comments to:

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

The proposed action includes the construction of approximately 12,045 linear feet of new sidewalk along 14 streets in six (6) designated Special Emphasis Neighborhoods throughout the City of Greenville, Greenville County, South Carolina, as shown in Figure 1-I: Location Map and detailed in Table 1-I: City of Greenville Sidewalk Projects. The proposed action is separated into 6 individual projects. Each project includes the following components: *

- Construction of new 5'-wide sidewalks with 18"-curb and gutter of varying lengths among neighborhoods
- Repair and replacement of existing sidewalk to connect the new sidewalks

The proposed action includes two alternatives: the Preferred Alternative and the No-Build Alternative. The following is a brief description of each component:

Construction of 12,045 linear feet of new sidewalk: The proposed action includes the construction of approximately 12,045 linear feet of new 5'-wide sidewalk with 18"-wide curb and gutter amongst 6 Special Emphasis Neighborhoods. It is estimated that approximately 1.8 acres of pavement will be installed throughout the 6 projects. All areas proposed for construction are within existing, regularly maintained road rights-of-way in urbanized and developed areas.

Repair and replacement of existing sidewalk: The repair and replacement of existing sidewalk is required to properly connect the new sidewalk construction with existing sidewalk.

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

The purpose of the project is to improve neighborhood connectivity throughout the City of Greenville's Special Emphasis Neighborhoods to improve accessibility, walkability, and safety within the community. Since 1964, the City of Greenville has received Community Development Block Grant (CDBG) funding to support neighborhood vibrancy throughout 14 designated Special Emphasis Neighborhoods. The Special Emphasis Neighborhoods are predominantly low to moderate income and African American. In addition, many of the houses and infrastructure in these neighborhoods are antiquated, aged, and deteriorated. The City maintains a five (5) year Consolidated Plan and Annual Action Plan in order to continue receiving funding from HUD and to shape housing and community development strategies. In the 2015-2020 Consolidated Plan, emphasis was placed on the continued need for public improvements and revitalization efforts of the Special Emphasis Neighborhoods, including using funds to improve roads, sidewalks, and curbs. In addition to addressing affordable housing issues, a high priority goal of the plan includes creating a suitable living environment by providing infrastructure, support, and safety to support those neighborhoods. These needs were mirrored in the 2020-2025 Consolidated Plan, where a suitable living environment was listed as one of three main goals as many residents advocated for continued improvements in infrastructure

and walkability. The proposed action will help the City of Greenville meet the strategic goals of the Consolidated Plan and will continue to improve alternate transportation, safety and mobility, and streetscape aesthetics for the Special Emphasis Neighborhoods.

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

The Special Emphasis Neighborhoods are located throughout the City of Greenville in Greenville County, South Carolina. The City of Greenville is located within the Southern Piedmont range of South Carolina, approximately halfway between Charlotte, North Carolina and Atlanta, Georgia, along the foothills of the Blue Ridge Mountains. The City was incorporated in 1831 and was historically developed as a cotton mill town, becoming the "Textile Center of the South" in the early 1900s. Existing land use throughout the City primarily consists of industrial, commercial, and single and multi-family residential development with no significant natural communities. The project sites mainly traverse through a combination of Office and Institutional, Regional Commercial, Neighborhood Commercial, and Single and Multi-Family Residential zoning districts as shown in Figure 2-I: City of Greenville Zoning Map. The 6 Special Emphasis Neighborhoods have histories dating as far back as the early 1840s, making these areas some of the oldest neighborhoods in the City of Greenville. The City designated the neighborhoods to allow those communities to be eligible for federal community development grants to support their revitalization and vibrancy. According to the 2020 U.S. Census Bureau data, the City of Greenville is home to a population of 75,720 people. The median household income is approximately \$57,253. The poverty rate is 16% compared to 14.6% in the State of South Carolina. There is a concentration of poverty within the City's Special Emphasis Neighborhoods, with a majority of the Block Groups surrounding the project areas ranging from 23-30% households reporting income below poverty levels and one Block Group reporting as 50% households in the area with income below poverty levels. Over the years, the City has engaged with residents and collaborated with various consultants and universities to develop master plans for each of the special emphasis neighborhoods. The master plans describe the history, existing conditions, and future planning concepts for revitalization of the neighborhoods. One of the main topics brought up by residents and targeted by the master plans was the improvement of safe, pedestrian-friendly streetscapes to provide connectivity, walkability, and community aesthetics. The proposed action will support the revitalization goals of the City's Consolidated Plan and Action Plan and will address residents' needs in each of the Special Emphasis Neighborhoods. As the proposed action only involves the construction of sidewalk within existing road rights-of-way, there will be no change to existing or future land uses. Without the construction of the sidewalks, the residents within the Special Emphasis Neighborhoods will not have the infrastructure to safely walk throughout their communities, will continue to be

disconnected from recreational and cultural resources, and will not have the infrastructure in place to support revitalization goals.

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

[Table 1-I City of Greenville Sidewalk Projects.pdf](#)

[Fig 2-I City of Greenville Zoning Map.pdf](#)

[Fig 1-II Aerial Map West Greenville.pdf](#)

[Fig 1-II Aerial Map Southernside.pdf](#)

[Fig 1-II Aerial Map Pleasant Valley.pdf](#)

[Fig 1-II Aerial Map Nicholtown.pdf](#)

[Fig 1-II Aerial Map Greenline Spartanburg.pdf](#)

[Fig 1-II Aerial Map Arcadia Hills.pdf](#)

[Fig 1-I Location Map.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:

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name
B-21-MC-45-0003	Community Planning and Development (CPD)	Community Development Block Grants (Section 108 Loan Guarantee)
NSTEP	Other	City of Greenville Neighborhood Sidewalk Targeted Expansion Program (NSTEP)

Estimated Total HUD Funded, Assisted or Insured Amount: \$3,615,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$5,492,520.00

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	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The purpose of considering airport hazards is to promote compatible land uses around civil and military airports and airfields, specifically for Runway Clear Zones (RCZ) at civil airports and Accidental Potential Zones at military airfields. To ensure compatible land use development, the proposed action must be a minimum of 15,000 feet from a military airport or a minimum of 2,500 feet from a civilian airport. There are three (3) civilian airports within proximity to the project sites as shown in Figure 3-1: Airports in Proximity to the Project Sites. There are no military airports within proximity to the project sites. One (1) sidewalk project, Arcadia Hills, is located within 2,500 feet of the Greenville Downtown Airport (GMU). However, the project is located outside of airport property, and therefore, is not located within a RCZ or Runway Protection Zone (RPZ). Coordination with Greenville Downtown Airport confirmed the Arcadia Hills project location is outside of the airport's approach and departure corridor and is not within the runway protection zone (Appendix C). Additionally, it is important to note that there is no vertical construction occurring as part of the proposed action. All projects involve the construction of sidewalks in existing

		<p>road rights-of-way in urbanized areas. The sidewalks will connect into existing sidewalks at each terminus. As the Arcadia Hills project is not within a RPZ, the project will have no impact to airport hazards and is in compliance with airport hazard requirements.</p>
<p>Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Coastal Barrier Resources Act (CBRA) of 1982 protects coastal areas that serve as barriers against wind and tidal forces caused by coastal storms and serve as habitat for aquatic species. The CBRA has 584 designated Coastal Barrier Resource System (CBRS) units, totaling approximately 1.3 million acres of land and aquatic habitat. The proposed projects are not located within any CBRS units, as delineated by the U.S. Fish and Wildlife Service (USFWS). A map of the CBRA resources in South Carolina in relation to the proposed action is shown in Figure 3-II: SC CBRA Map. As the project areas are not located within any CBRS units and are approximately 200 miles west of the coastal areas of South Carolina, the proposed action has no potential to affect a CBRS unit or any coastal resources, and is in compliance with the CBRA.</p>
<p>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Flood Disaster Protection Act of 1973 requires that projects receiving federal assistance and located within a Special Flood Hazard Area (SFHA) identified by the Federal Emergency Management Agency (FEMA) are covered by flood insurance under the National Flood Insurance Program (NFIP). Figure 3-III: FEMA Map shows the locations of the project locations with respect to FEMA special flood hazard zones. A review of the FEMA Map Service Center website indicated the Greenline-Spartanburg and Nicholtown sidewalk projects have portions of sidewalk located within 0.2%</p>

		<p>Annual Chance Flood Hazard areas. The Greenline-Spartanburg project is located in FEMA Flood Insurance Rate Map (FIRM) panel #45045C0382E (effective August 18, 2014). The project extends approximately 80 feet into the area along Stag Street (Figure 3-IV: FEMA and FIRMette Maps- Greenline-Spartanburg). The Nicholtown project is located in FEMA FIRM panel #45045C0384E (effective August 18, 2014). The project extends approximately 60 feet into the area along Alameda Street. Along Alameda Street, there is an existing paved trail system, the Swamp Rabbit Trail, which has a street crossing over the creek. The trail shifts from the east side to the west side of the street at the crossing. The proposed action will connect to the existing sidewalk on either sides of the street crossing (Figure 3-V: FEMA and FIRMette Maps- Nicholtown). The 0.2% Annual Chance Flood Hazard subtype is defined as the 500-year flood and is designated as Zone X. Zone X is considered an area outside of the SFHA. As the structures are not located in a FEMA-designated SFHA, flood insurance is not mandatory. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the NFIP. The proposed action will have no impact on regulatory floodway and is in compliance with flood insurance requirements.</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5</p>		
<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Under the Clean Air Act administered by the Environmental Protection Agency (EPA), National Ambient Air Quality Standards (NAAQS) have been established and states have been delegated to develop and regulate air quality under State Implementation</p>

		<p>Plans (SIP). National Ambient Air Quality Standards: Under the Clean Air Act, NAAQS were developed for six (6) common pollutants. These criteria air pollutants are carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM), and sulfur dioxide (SO₂), and may harm human health and the environment and cause property damage. The EPA regulates these pollutants to permissible levels through human health-based (primary standards) and environmental-based (secondary standards) criteria as shown in Table 3-I: NAAQS. Attainment/Non-attainment Areas: Ambient pollutant concentrations include areas of the country where air pollution levels persistently exceed the NAAQS and are designated as "non-attainment". Each non-attainment area is required to implement mitigation measures to bring ambient concentrations below the NAAQS. When a non-attainment area attains the NAAQS, the EPA designates the area as "maintenance". The EPA's Green Book was reviewed to determine if the project area is in a non-attainment or maintenance area for any of the criteria air pollutants that have NAAQS. According to the Green Book, Greenville County nor the State of South Carolina has non-attainment or maintenance status, current as of June 30, 2023. A map of all non-attainment areas within the United States are shown below (Figure 3-VI: Counties Designated "Nonattainment"). Greenville County and the State of South Carolina are in attainment status for all criteria pollutants. The proposed action will have no impact on air quality and is in compliance with the Clean Air Act.</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Coastal Zone Management Act (CZMA) of 1972 preserves, protects, develops, and restores the nation's</p>

		<p>coastal zone resources. Greenville County is not designated as a "coastal zone" under the South Carolina Coastal Tidelands and Wetlands Act. Figure 3-VII: SC Coastal Counties shows the location of Greenville County and the project locations with respect to the coastal counties of South Carolina. As the project areas are not located within a "coastal zone" as defined by the state coastal management plan and are approximately 200 miles west of the coastal areas of South Carolina, the proposed action has no potential to affect any coastal resources, and is in compliance with the Coastal Zone Management Act.</p>
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>EPA Superfund National Priorities List Sites: None of the project areas are currently listed on the National Priorities List (NPL). The closest sites are located approximately 1.6 miles north/northwest of the northernmost extent of the proposed action (US Finishing/Cone Mills) and over 7 miles southeast of the southernmost extent of the proposed action (Golden Strip Septic Tank Service) as shown in Figure 3-VIII: NPL Sites in Region. Toxic and Solid Waste Landfill Sites: A review of the South Carolina Department of Environmental Quality (SCDHEC)'s Solid Waste Facilities revealed two (2) solid waste sites and no landfills within a 5-mile radius of the project locations as shown in Figure 3-IX: CDRs and Landfills in Greenville, SC. Both facilities are construction and demolition (C&D) facilities. The Blue Sky Recycling CDR is the closest solid waste facility to any of the project locations and is located approximately 0.5 miles west of Southernside (Figure 3-X: CDR Site in Proximity to Southernside). Construction and Demolition debris is considered non-hazardous solid waste.</p>

		<p>There are no toxic or solid waste landfill sites within a 5-mile radius of the proposed projects. Underground Storage Tanks: USTs were documented in proximity to the Arcadia Hills and Nicholtown sites (Figure 3-XI: USTs in Greenville). Two (2) USTs were documented along Lowndes Hill Road in Arcadia Hills as shown in Figure 3-XII: USTs in Proximity to Arcadia Hills. Norris Supply Co is a closed UST located on the opposite side of the street from the proposed sidewalk construction and is outside of the limits of development. The Corner Mart 12 UST is currently active; however it is not located within the limits of development. One (1) UST was documented along Ackley Road in Nicholtown (Figure 3-XIII: USTs in Proximity to Nicholtown at Ackley Road). The UST is closed and is located approximately 90 feet south of the roadway and is not within the proposed limits of development. None of the USTs are located within the limits of development and will not be impacted by the proposed action. All projects involve the construction of sidewalks in existing road rights-of-way in the City of Greenville's Special Emphasis Neighborhoods. There are no real property acquisitions associated with the proposed action. These neighborhoods are some of the oldest in the area, with most dating back to the mid-to-late 90s and some being established as early as the 1870s. These areas have been historically zoned as single and multi-family residential with interspersed commercial and office districts. There have been no significant changes in previous land use. Radioactive Substances: Regulated radioactive waste is categorized into low-level waste (LLW), which is contaminated clothing, tools, filters,</p>
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		<p>medical tools, etc., high-level waste (HLW), which includes nuclear reactor fuel, and Waste Incidental to Reprocessing (WIR) disposal facilities. There are four (4) licensed LLW disposal facilities located throughout the U.S. in the Agreement States. The EnergySolutions Barnwell Operations facility is the closest, located in Barnwell, South Carolina as shown in Figure 3-XIV: LLW and WIR Facilities. The City of Greenville is approximately 146 miles north of Barnwell, therefore the proposed action will have no impact to this facility. There is only one (1) WIR disposal facility in Aiken, South Carolina, approximately 115 miles south of Greenville. There are seven (7) currently operating nuclear power reactors and one (1) fuel cycle facility in South Carolina. Oconee Nuclear Station located in Seneca, which is 30 miles west of Greenville, is the closest facility with three reactor units. The remaining facilities are located in Barnwell, Columbia, Hartsville, Jenkinsville, and York. As none of these facilities are in close proximity to any of the project sites, there will be no impact to or contamination associated with radioactive substances due to the proposed action.</p>
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Federally Protected Species: The Endangered Species Act of 1973 requires all federal agencies to ensure that any action federally authorized or funded is not likely to jeopardize the continued existence of any federally listed threatened or endangered species. The Official Species List, generated from the U.S. Fish and Wildlife Services (USFWS) Information for Planning and Consultation (IPaC) database was reviewed to determine whether suitable habitat was present within the project area and is listed</p>

		<p>under Table 3-II: List of Federal Threatened and Endangered Species. All projects involve the construction of sidewalks in existing road rights-of-way in urbanized areas. The sidewalks will connect into existing sidewalks at each terminus. No critical habitat or suitable habitat for any of the listed species currently exists within the project areas (Appendix D). Coordination with the USFWS was initiated in June 2023 to comply with Section 7 of the Endangered Species Act, which requires all federal agencies to ensure that any action. On August 2, 2023, in response to the information sent during the initial coordination, the USFWS provided a concurrence letter. The concurrence letter lists types of HUD projects in South Carolina that the USFWS has determined will have no effect or no impact to federally protected species or their critical habitat. The proposed action meets the criteria listed under project type 5- "Implement streetscape beautification projects. Examples of these projects include the removal and replacement of existing sidewalks, curbing, or gutters; demolishing and disposing of existing curbing; installing irrigation systems for plants; installing or replacing streetlights, benches, or trashcans; and installing handicap sidewalk ramps or new sidewalks within city limits in right of ways" (Appendix X). As the sidewalk construction projects are proposed in existing road rights-of-way, the proposed action will have no effect or impact on federally protected species or their designated critical habitat (Appendix A). State Protected Species: GIS data of elements of occurrence was obtained from the South Carolina National Heritage Program (SCNHP) on May 17, 2023. No records of rare species, important</p>
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		<p>natural communities, natural areas, or conservation/managed areas were documented within the project areas. There was one (1) insect and two (2) fish species documented within 1 mile of the project footprints (Appendix D). If any elements are identified during the proposed action, the SCNHP will be notified. The SCNHP report recommended best management practices for the project: * Any tree-clearing activities should be conducted during the inactive season (November 15th through March 31st) to avoid negative impacts to Northern long-eared bats, Rafinesque's big-eared bats, and tricolored bats. * All necessary measures should be taken to prevent oil, tar, trash, and other pollutants from entering adjacent offsite areas. * Appropriate erosion and siltation control measures (e.g., silt fences or barriers) must be in place and maintained until the area is permanently stabilized. Erosion control measures must be inspected daily in areas of active construction, weekly in areas with no active construction, and within 24 hours of each 0.5" rainfall. Repair of any ineffective measures must be done within 24 hours. * Materials used for erosion control, such as hay bales or straw mulch, must be certified as weed-free. * If clearing of riparian vegetation must occur, it must be done manually. Construction activities must avoid and minimize, to the greatest extent possible, disturbance of woody shoreline vegetation to maintain bank stability and reduce erosion.</p>
<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>HUD-assisted projects are required to meet an Acceptable Separation Distance (ASD) between the project site and hazardous facilities which store, handle, or process flammable or explosive substances. The proposed action</p>

		<p>includes the construction of new sidewalk along existing road rights-of way and does not include the construction of a hazardous facility. There were no NPLs or hazardous waste facilities documented within a mile of any of the project sites (Refer to Contamination and Toxic Substances section). Neither the State Environmental Clearinghouse or the EPA had comments for the project (Appendix A). As there are no known ASTs or hazardous waste facilities within a mile of the project sites, the proposed action will not expose users to explosive or flammable hazards.</p>
<p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The proposed action is subject to the Farmland Protection Policy Act (FPPA) requirements if irreversible conversion of farmland (directly or indirectly) to non-agricultural use is completed by a federal agency. It should be noted that the FPPA is not a regulatory program but a reporting program to assist in the avoidance of converting farmland into non-agricultural land uses by federal funding. Farmland includes prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forested, pastureland, cropland, or other land, but not water or urban built-up land. Farmland, however, does not include land already in or committed to urban development or water storage. Based on correspondence from the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS), the proposed action may include areas of prime farmland, however the USDA considers these locations to be "land committed to urban development" due to the locations within the city limits of</p>

		<p>Greenville. In addition, the projects are located within areas that have a density of 30 structures per 40-acres. Due to these factors, the USDA considers the proposed action exempt from the provisions of the FPPA (Appendix A). Although the project includes activities (new construction) which could potentially convert agricultural land to non-agricultural use, the proposed action is exempt from the provisions of the FPPA, therefore the project is in compliance with the FPPA.</p>
<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Executive Order (EO) 11988 - Floodplain Management requires federal activities to avoid unnecessary impacts to floodplain and to avoid direct and indirect support of floodplain development to the maximum extent possible. As previously discussed in the Flood Insurance section, the Greenline-Spartanburg and Nicholtown sidewalk projects have small portions of the proposed sidewalk located within 0.2% annual chance or 500-year floodplains. Critical actions, including hospitals, nursing homes, police stations, fire stations, and roadways serving as sole egress from floodprone areas must comply with 24 CFR Part 55. Although the sidewalk projects are located within a 500-year floodplain, they are outside the 100-year floodplain and based on the project description, are considered noncritical actions and therefore, are not required to undergo the decision-making processes. As the project sites are located in a 500-year floodplain and sidewalk construction is not a critical action, the decision-making process is not required, and the proposed action is in compliance with EO 11988.</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>A review of the South Carolina State Historic Preservation Office's (SHPO) ArchSite revealed there were no cultural or historic resources within the Arcadia</p>

	<p>Hills, Greenline-Spartanburg, Nicholstown, Pleasant Valley, or Southernside project sites (Appendix E). Approximately 100 linear feet of sidewalk at the West Greenville project site is proposed to be constructed within and connected to existing sidewalk in the Pendleton Street Commercial Historic District, a district eligible for the National Register as shown in Figure 3-XV: Historic and Cultural Resources in West Greenville. A Section 106 Project Review Form was submitted to the South Carolina Department of Archives and History to determine if the proposed action would have any potential impacts to the historic district. In a letter dated August 8, 2023, SHPO determined that no properties listed in or eligible for listing in the National Register of Historic Places would be impacted by the project (Appendix A). Tribal Nations were consulted to determine if there were any unique, special, ethnographic, or archaeological resources or areas in or near the project areas. The Catawba Indian Nation, Cherokee Nation, and Eastern Band of Cherokee Indians all have interests in Greenville County, South Carolina, and were consulted with. The Catawba Indian Nation had no concerns but requested notification if Native American artifacts and/or human remains were located during ground disturbance. As of August 29, 2023, no comments have been received from the other Tribal Nations (Appendix B). If any additional comments are received, the project will comply with any requirements or BMPs. If archaeological materials are encountered during construction activities, the procedures codified in 36 CFR 800.13(b) will apply. At that time, immediate contact would be made to</p>
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		<p>the South Carolina State Historic Preservation Officer at 803-896-6129.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The locations of major roadways, railroads, and airports in proximity to the project sites were determined from GIS data obtained from the City of Greenville's GIS Division as shown in Figure 3-XVI: Noise Generators in Proximity to Project Sites and detailed in Table 3-III: Proximity of Noise Generators to Project Sites. All sites with noise exposure levels which exceed the day night average sound level (DNL) of 65 decibels (dB) are considered noise-impacted areas with "normally unacceptable" noise levels between 65-75 dB and "unacceptable" noise levels above 75 dB. To determine whether the current noise levels at each project site were at acceptable levels, the Day/Night Noise Level Calculator tool was used to assess noise from nearby road, railroad, and airport traffic. The effective distance, distance to stop sign, and average speed were determined using the City of Greenville GIS data. When distances between major roadways and project sites varied due to the location and orientation of the streets, the average distance between the project site and major roadway was estimated. Average Daily Trips (ADT) were determined based on South Carolina Department of Transportation (SCDOT) Average Daily Traffic reports for Greenville County (Appendix F). Railroad track data was determined using the Federal Railroad Administration (FRA) Safety Map to identify the nearest railroad crossings and generating a Crossing Inventory Form, which provided information on daily train activity and the use of whistles or horns (Appendix F). There were three (3) airports within a 15-mile radius of the proposed action. However, based on</p>

		<p>noise contour maps reviewed in the Greenville-Spartanburg Master Plan and the South Carolina Aeronautics Commission airport data, Arcadia Hills is the only project site located within noise contours at the Greenville Downtown airport. Airport noise levels for Greenville Downtown airport were estimated using HUD's Noise Assessment Guidelines. The daily number of flights was plotted against the average distance of the Arcadia Hills project to each runway and the estimated DNLs were averaged. In instances where data was unknown or could not be determined, the default value was inputted. The estimated DNL values findings are shown in Table 3-IV: Estimated DNL Values and in Appendix F. The Pleasant Valley project site was not evaluated as there were no noise generators found in proximity to the site. Based on the best available data, noise exposure levels for most of the project sites were found to be Acceptable. The noise exposure level for the Arcadia Hills project was found to be Normally Unacceptable due to the close proximity to the Greenville Downtown airport and portions of the project site located in a highly developed, commercialized area. The proposed action is not located in an undeveloped area nor will it change existing land use or advance future, incompatible land use. It is important to note that the new sidewalks will connect into existing sidewalks at the terminus on Lowndes Hill Road and Keith Drive. Additionally, there are existing barriers between the project site and the airport, including an approximate 10-acre forested parcel, roadways, and commercial buildings. As the Arcadia Hills project is located in an already highly developed area with existing sidewalks and there will be no</p>
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		<p>permanent increase in noise level due to the proposed action, no mitigation is proposed for this project site. Because the proposed action consists of 6 sites, the DNLs for each site were averaged at 53 dB. The DNL value for the proposed action falls within the Acceptable noise level range and is therefore not considered a noise-impacted area. As the average noise level for all project sites within the proposed action is Acceptable, the project is in compliance with HUD's noise regulation and no mitigation is required.</p>
<p>Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The 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. The Environmental Protection Agency's (EPA) Sole Source Aquifer (SSA) program designates an aquifer as a sole source of drinking water and establishes a review area overlaying the SSA. According to the EPA's Sole Source Aquifer online GIS map, there are no SSAs in South Carolina (Figure 3-XVII: EPA Sole Source Aquifers). The proposed action is not located on a sole source aquifer area, therefore the project will have no effect on sole source aquifers and is in compliance with Sole Source Aquifer requirements.</p>
<p>Wetlands Protection Executive Order 11990, particularly sections 2 and 5</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Executive Order 11990: Protection of Wetlands requires federal activities to avoid adverse impacts to wetlands. National Wetlands Inventory (NWI) mapping indicates there are no wetlands or streams within the Arcadia Hills, Greenline-Spartanburg, Pleasant Valley, Southernside, and West Greenville project sites. There were riverine wetlands present within the Nicholtown project site (Figures 3-XVIII: USFWS NWI Maps). Alameda Street runs</p>

	<p>parallel along a stretch of the Reedy River, approximately 200 feet to the west, and crosses a tributary of the river. The tributary is aligned with an existing street crossing of the Swamp Rabbit Trail. The Swamp Rabbit Trail is a paved, multi-use trail system that traverses the Reedy River throughout the City of Greenville. The Swamp Rabbit Trail connects to Alameda Street approximately 40 feet north and south of the existing street crossing. The new sidewalk is proposed to connect to either side of the existing Swamp Rabbit Trail street crossing and therefore, would not encroach on the existing stream. The limits of development are proposed no further than the Swamp Rabbit Trail in order to maintain the 40-foot distance between the new sidewalk and existing crossing and to avoid any potential impacts to the stream. WK Dickson staff conducted site visits of all project sites between June 29 and July 12, 2023. No wetlands or streams were observed on-site as the limits of development for all project sites were in existing road rights-of-way. The only stream observed on-site was the Swamp Rabbit Trail crossing at Alameda Street in the Nicholtown project. In coordination with the U.S. Army Corps of Engineers (USACE), it was noted that any discharge of dredged or fill material into jurisdictional streams or wetlands would require a Department of the Army (DA) permit authorization (Appendix A). The limits of development for each project site are within existing, impervious road rights-of-way. No work is proposed in any streams or wetlands. The sidewalk proposed along Alameda Street at the Nicholtown site will connect into existing sidewalk approximately 40 feet on either side of a crossing to avoid the existing stream.</p>
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		<p>The project will comply with Best Management Practices (BMPs) recommended by the SCNHP report to minimize any potential impacts from stormwater runoff and will implement sediment and erosion control measures.</p>
<p>Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Wild and Scenic Rivers Act provides federal protection for rivers defined as having remarkable scenic, recreational, geologic, fish, wildlife, historic, or cultural values. According to the National Wild and Scenic Rivers System website, there are approximately 41.9 miles of river in South Carolina designated as wild and scenic. The closest designated river is approximately 40 miles east/northeast of the City of Greenville as shown in Figure 3-XIX: Wild and Scenic Rivers in South Carolina. The proposed action is not within proximity to a designated Wild and Scenic River, a study river, or a Nationwide Rivers Inventory (NRI) river. Additionally, during agency coordination, the National Park Service (NPS) had no comments for the proposed action (Appendix A). The proposed action will have no effect on wild and scenic rivers and is in compliance with the Wild and Scenic Rivers Act.</p>
<p>HUD HOUSING ENVIRONMENTAL STANDARDS</p>		
<p>ENVIRONMENTAL JUSTICE</p>		
<p>Environmental Justice Executive Order 12898</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to U.S. Census Bureau data, the population of Greenville County was reported as 525,534 in 2020. The median income per household varied by project and is shown in Table 3-V: Median Income per Household in 2021. The median income per household varied per project site from \$14,548 to \$60,524. To determine if low-income households are present within the project sites, the 2023 Poverty</p>

		<p>Guidelines issued by the U.S. Department of Health and Human Services (HSS) were compared to the median incomes for each of the Census Tracts. Table 3-VI: 2023 Poverty Guidelines for the 48 Contiguous States and the District of Columbia lists the poverty guidelines for 1 to 8 person households. Population, race, ethnicity, gender, age, and housing data were collected and evaluated to assess potential socioeconomic impacts and are listed in Table 3-VII: 2020 U.S. Census Data for Census Tracts in Each Project Site. According to the data, a minority population is reported in Arcadia Hills Census Tract 12.04, Block Group 1. Minority populations were determined by subtracting the population of all Non-Hispanic whites from the total population of the study area for each Block Group. Persons per household was determined by dividing the Block Group populations by total housing. Based on this calculation, residents living in the project sites have an estimated 2.03-person household. According to the 2023 Poverty Guidelines, the median income reported for a 2-person household is \$19,720. Census Tract 43 Block Group 3 reported a median income of \$14,548, indicating the presence of low-income populations in the Nicholtown project site. Although a minority population and low-income population were documented, there will be no negative impacts due to the proposed action. The proposed action includes the construction of new sidewalks in existing road rights-of-way. No real property acquisition or displacement of residential properties is proposed. Acquisition of road rights-of-way is proposed along a few streets where the existing roadway cannot be narrowed to</p>
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		<p>accommodate the sidewalks. If acquisition cannot be achieved, the sidewalk will not be constructed in those areas. There will be no eminent domain associated with the proposed action. In collaboration with various partners throughout the years, the City of Greenville has developed Neighborhood Master Plans for many of the Special Emphasis Neighborhoods. Master plans have been developed for the Greenline-Spartanburg, Nicholtown, Pleasant Valley, Southernside, and West Greenville neighborhoods. Each master plan incorporated numerous opportunities for community and residential engagement through robust and comprehensive interviews, surveys, public presentations, and community meetings to gather input from residents on issues impacting their communities, their interests, and future improvements. In each of these master plans, community residents identified the following: * Disrepair and lack of curb and gutter of existing sidewalks * Pedestrian-unfriendly and unsafe streetscapes * Isolation due to lack of connection to community facilities and services In each master plan, there was a strong consensus among residents for future development to incorporate safe, pedestrian-friendly streetscapes to improve safety, connectability, walkability, and community perception. This consensus was mirrored in the City of Greenville's 2015-2020 Consolidated Plan. As part of the consolidated plan, public workshops were held to provide citizens the opportunity to share needs within their communities and to identify safety issues and opportunities within their neighborhoods. Creating a suitable living environment, including improving streetscape, infrastructure, and</p>
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		walkability, was one of the main discussion items emphasized for future community development efforts. No adverse environmental impacts have been identified in the proposed action's total environmental review.
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Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

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

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

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The proposed action is consistent with the City of Greenville's 5-year Consolidated Plan and Annual Action Plan. The projects will achieve the current and future revitalization goals of each of the City's completed Special Emphasis Neighborhood Master Plans by providing pedestrian-safe streetscapes that residents of these communities have expressed over the years. All projects conform to the existing land use and zoning and will not change the current or future land use. The projects will improve the infrastructure and streetscape of some of the oldest neighborhoods in the City of Greenville, providing	As the proposed action is consistent with the City of Greenville's comprehensive plans, conforms to the existing and future land use and zoning, and will improve the safety and aesthetics of the existing streetscape, the projects provide a beneficial impact, and no mitigation is proposed.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>safe walkways, access to recreational and cultural facilities, an improving the aesthetic to support the revitalization of the Special Emphasis Neighborhoods. In addition to the new sidewalk, the proposed action will repair and replace existing sidewalk in disrepair, to connect to the new sidewalk.</p>	
<p>Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff</p>	<p>2</p>	<p>The soils throughout the project areas are mostly characterized by Cecil-Urban land complex and urban land soils with 2-10 and 10-25% slopes. Correspondence with the USDA NRCS confirmed that the project sites are "land committed to urban development". All sidewalk construction projects are proposed within existing, paved road rights-of-way in highly developed and urbanized areas. Each project includes the construction of 18" curb and gutters with all sidewalks to effectively collect and drain stormwater runoff from the road, which will improve existing impervious runoff. There were no underground hazards documented within the limits of development of any of the project sites. Each individual project will be constructed and completed as separate projects and due to the size of each individual project, Stormwater Pollution</p>	<p>The proposed action will not alter existing soils, slopes, or increase erosion and sedimentation as the project sites are all proposed within existing road rights-of-way in urbanized areas. Although no SWPPP permits will be required, each project will implement BMPs for erosion and sediment control during construction. No impacts are anticipated; therefore no mitigation is proposed.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Prevention Plan (SWPPP) permits will not be required.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	None of the project sites are located within a regulatory floodway. Neither South Carolina nor the City of Greenville has non-attainment or maintenance status. None of the project areas are listed on the NPL and there are no toxic or solid hazardous waste facilities or radioactive facilities in proximity. None of the USTs documented in proximity to the Arcadia Hills or Nicholtown project are within the limits of development and will be impacted. The project sites are located in proximity to noise generators, including major roadways, railroads, and airports, however the average DNL estimated for the proposed action fell within the acceptable range, indicating the project sites are not noise-impacted areas.	The proposed action is not located within or in proximity to any hazards that would negatively impact the construction or future use of the projects. Installation of the sidewalks may temporarily increase ambient noise levels due to construction operations, however there would be no permanent impact on noise levels. The City of Greenville regulates noise to protect residents and surrounding areas from disruptive noises. As no impacts are anticipated and the project will adhere to all noise regulations related to construction and heavy machinery operation, no mitigation is proposed.
SOCIOECONOMIC			
Employment and Income Patterns	2	Construction jobs account for approximately 4.1% of employment in Greenville County with approximately 12,044 employees and a median income of \$51,010. There may be an increase in temporary construction jobs related to the proposed action. Once the project has been completed, the temporary construction jobs	The proposed action may temporarily increase construction jobs but would not significantly alter employment opportunities. No impacts are anticipated and no mitigation is proposed.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>may cease to exist. However, the construction of the sidewalks will provide pedestrian-safe streetscapes for residents of the Special Emphasis Neighborhoods to use and will connect them to other recreational and cultural resources as well as to transit stops.</p>	
<p>Demographic Character Changes / Displacement</p>	<p>1</p>	<p>The communities living within the Special Emphasis Neighborhoods consist of low-income and minority populations compared to the rest of Greenville County. These neighborhoods are some of the oldest in Greenville and have documented disrepair, unsafe streetscapes, and isolation due to lack of connection to other communities and services. The proposed action would not result in a change in demographics or displacement of residents or negative impact to low-income or minority populations, but would improve the infrastructure and accessibility of the communities living within the neighborhoods. The sidewalk construction projects will create aesthetic, pedestrian-safe streetscapes that will connect the residents to existing services and recreational and cultural facilities.</p>	<p>The proposed action will improve the infrastructure and accessibility of the Special Emphasis Neighborhoods, resulting in a benefit to the project sites. No mitigation is proposed.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Environmental Justice EA Factor	1	There were no adverse environmental impacts identified in the proposed action's total environmental review. The project sites are located throughout the City of Greenville in Special Emphasis Neighborhoods, which are characterized by low-income and minority communities compared to Greenville County. With collaboration and input of the residents of these communities, the City of Greenville has developed Neighborhood Master Plans. These plans effectively engaged and gathered input from local residents on the issues impacting their communities and their needs. Residents across neighborhoods expressed a strong need for safe, pedestrian-friendly streetscapes to improve safety, walkability, and community perception. The proposed action will improve the existing infrastructure and provide safe walkways throughout the communities.	The proposed action is consistent with the goals of the Special Emphasis Neighborhood master plans and will improve the infrastructure and accessibility to the communities within these neighborhoods. As no adverse environmental impacts were identified and the projects will provide pedestrian-safe walkways throughout the neighborhoods, the proposed action will have a beneficial impact to residents. No mitigation is proposed.
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	No educational or cultural facilities are proposed as part of or would be impacted by the proposed action.	As there are no educational or cultural facilities that would be impacted by the proposed action, no mitigation is proposed.
Commercial Facilities (Access and Proximity)	1	There are commercial facilities and businesses, such as miscellaneous stores and	As the proposed action will improve connectivity and walkability throughout the

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>restaurant establishments, in proximity to several of the project sites, including the Arcadia Hills, Greenline-Spartanburg, and Pleasant Valley sites. The proposed action will not adversely impact or displace any existing retail or commercial services. The installation of new sidewalk would improve safety and existing access to these facilities. Other areas, such as the Nicholtown project site, do not have nearby commercial areas. In areas where commercial facilities may not be within walking distance, the addition of sidewalk connecting different communities throughout the neighborhoods has the potential to improve access to existing public transit.</p>	<p>project sites, access to commercial facilities and businesses will be improved, providing a beneficial impact. Therefore, no mitigation is proposed.</p>
<p>Health Care / Social Services (Access and Capacity)</p>	<p>2</p>	<p>The proposed action would not increase the population or change the current capacity or demand of any nearby health care services. There would be no impact to the accessibility or demand of social services.</p>	<p>As there are no health care or social services that would be impacted by the proposed action, no mitigation is proposed.</p>
<p>Solid Waste Disposal and Recycling (Feasibility and Capacity)</p>	<p>2</p>	<p>At this time, solid waste potentially generated by the proposed action has not been determined. It is important to note that the proposed action is separated and will be constructed as 6 individual projects at each site. There are two (2) C&D solid waste</p>	<p>Any transport and disposal of solid waste generated from the project will be coordinated with the closest facility having capacity and will comply with the City's Solid Waste Management regulations. No hazardous waste is anticipated as part</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>disposal and recycling facilities within a 5-mile radius of the project locations. The closest facility is Blue Sky Recycling CDR, approximately 0.5 miles west of the Southernside project site. All non-hazardous construction debris generated from the project will likely be transported to Blue Sky. Coordination will occur prior to construction to confirm the facility has the capacity for any waste generated. No hazardous waste is anticipated as part of the sidewalk construction. All transport and handling of solid waste will comply with the City of Greenville's Solid Waste Management ordinance.</p>	<p>of the proposed action. No impact is anticipated and no mitigation is proposed.</p>
<p>Waste Water and Sanitary Sewers (Feasibility and Capacity)</p>	<p>2</p>	<p>Although the proposed action involves new construction, all sidewalks are proposed within existing, maintained road rights-of-way. There are no wastewater or sewer systems associated with the proposed projects.</p>	<p>As no wastewater or sewer systems will be impacted by the proposed action, no mitigation is proposed.</p>
<p>Water Supply (Feasibility and Capacity)</p>	<p>2</p>	<p>The proposed project only includes the construction of sidewalk with curb and gutter and does not include any facilities or building units. The projects will not impact existing or future water supply and does not require an adequate water supply determination. There are no</p>	<p>Water supply will not be impacted by the proposed projects; therefore, mitigation is not proposed.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		sole source aquifers in South Carolina.	
Public Safety - Police, Fire and Emergency Medical	2	The proposed action would not impact the demand for or access to emergency services or personnel. The sidewalks are proposed within existing, maintained road rights-of-way, therefore access routes for emergency personnel is not burdened. The projects do not involve the construction of any buildings or facilities.	As the proposed action will not impact the demand for or access to emergency services, no mitigation is proposed.
Parks, Open Space and Recreation (Access and Capacity)	1	The proposed action does not involve the construction or creation of any parks, open space, or cultural resources. There are a number of greenspaces, parks, and religious institutions located throughout each of the project sites. Some of the facilities include Timmons Park and Railroad Mini Park in Greenline-Spartanburg, the Phillis Wheatley Center and Nicholtown Community Center in Nicholtown, Kiwanis Park in Pleasant Valley, and the Southernside Community Center and four (4) parks in the Southernside project site. During the development of the Special Emphasis Neighborhood master plans, residents stressed the lack of connection to community facilities and services and there was a strong consensus for future development to	The proposed action will provide safe and walkable streetscape and infrastructure to connect the residents to their community and to recreational and cultural resources, resulting in a beneficial impact to the project sites. No mitigation is proposed.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		focus on safe, pedestrian-friendly streetscapes.	
Transportation and Accessibility (Access and Capacity)	1	The proposed action will not require a traffic study, does not involve any public transportation services, and would not impact the local transportation system. The construction of the sidewalks has the potential to improve access to public transit by connecting the neighborhood to existing facilities and services within the community. For example, the Nicholtown sidewalk project will connect into the existing Swamp Rabbit Trail System, a 22-mile paved, multi-use trail system that traverses throughout the City of Greenville. With the exception of the Pleasant Valley site, all project sites are within existing bus routes. The proposed action will increase the accessibility of residents within the neighborhoods to public transit.	The proposed action will provide pedestrian-friendly access to the City of Greenville's public transit and will connect residents to existing recreational and cultural facilities within their communities. The proposed projects will result in a beneficial impact and therefore, no mitigation is proposed.
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	Each project site of the proposed action occurs within a Special Emphasis Neighborhood on existing, maintained road rights-of-way. There are no natural communities within these areas as they have been historically urbanized. There are no natural features within or in close proximity to the	As the proposed action will not impact any natural features or water resources, no mitigation is required.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>project sites. There will be no impacts to surface or groundwater recharge due to the proposed action and the project will not increase the amount of impervious surface as the sidewalks will be constructed within roadways. There are no wetlands or streams within the limits of development for any of the projects. There is a tributary of the Reedy River which runs underneath Alameda Street at the Nicholtown project site. The tributary is aligned with an existing street crossing of the Swamp Rabbit Trail. The sidewalks will connect to either side of the Swamp Rabbit Trail street crossing to avoid the stream. BMPs will be implemented to prevent any potential erosion and sedimentation.</p>	
<p>Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)</p>	<p>2</p>	<p>The proposed action will have no impact on vegetation and natural communities as the sidewalk projects are proposed within existing, maintained road rights-of-way in urbanized areas. The projects will not introduce any nuisance or invasive species or disrupt any agricultural or silvicultural activities. No existing communities will be impacted by the proposed project. A review of the IPaC and SCNHP Elements of Occurrence determined there were no</p>	<p>As there are no natural communities or federally protected species or their critical habitats in or near the project sites, the proposed action will have no impact on these resources and no mitigation is proposed.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		records of rare species or natural communities within any of the project sites and coordination with USFWS confirmed the projects will have no impact to federally protected species or their critical habitats.	
Other Factors 1	2		
Other Factors 2	2		
CLIMATE AND ENERGY			
Climate Change	2	Due to the City of Greenville's location, natural disasters, such as those from hurricanes, sea level rise, and wildfire, are not likely to severely impact the project sites. Small portions of the Greenline-Spartanburg and Nicholtown project sites are located within 0.2% Annual Chance Flood Hazard or 500-year floodplain areas associated with tributaries of Richland Creek and the Reedy River. The 500-year floodplain has a 0.2% chance of flooding in a given year, indicating a low probability of severe impacts occurring to the project sites. Construction of the sidewalks will be confined to one project at a time and would not increase emissions throughout the entire proposed action areas at once. The construction of the sidewalks will not increase the amount of vehicular traffic occurring in these areas. The construction	As the proposed action is located within existing, paved road rights-of-way, the project areas would not have increased susceptibility to climate change risks. The construction activities are temporary and will not impact vehicular traffic, therefore, the proposed action is not likely to result in increased emissions and no mitigation is required.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		activities are temporary and would be confined to the construction site and roadways. Based on this information, it is unlikely that the proposed action would create a reasonably foreseeable increase in emissions during and after project implementation.	
Energy Efficiency	2	The location of the sidewalk projects are in close proximity to existing public transportation, such as major roadways and bus routes. The proposed action includes construction of sidewalks along existing, maintained road rights-of-way. There are no energy-consuming systems or use of energy resources proposed as part of the projects. Construction activities will be confined to one project at a time and would not increase emissions throughout the entire area at once.	The location of the sidewalk projects are in close proximity to existing public transportation, such as major roadways and bus routes. The proposed action includes construction of sidewalks along existing, maintained road rights-of-way. There are no energy-consuming systems or use of energy resources proposed as part of the projects. Construction activities will be confined to one project at a time and would not increase emissions throughout the entire area at once.

Supporting documentation

Additional Studies Performed:

[Table 5-I Summary of Environmental Findings.pdf](#)

Field Inspection [Optional]: Date and completed by:

Rachael M Anderson

6/29/2023 12:00:00 AM

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

A list of references used throughout this environmental review are provided in Appendix H. Agency and Tribal Nation coordination is included in the attached Appendices.

[Appendix I.pdf](#)

[Appendix H.pdf](#)

[Appendix G.pdf](#)

[Appendix F.pdf](#)

[Appendix E.pdf](#)

[Appendix D.pdf](#)

[Appendix C.pdf](#)

[Appendix B.pdf](#)

[Appendix A.pdf](#)

[List of References.pdf](#)

List of Permits Obtained:

Clean Water Act, Sections 404 and 401 Permits: Since the proposed action will not have impacts to streams or wetlands, a United States Army Corps of Engineers (USACE) Section 404 permit will not be required. BMPs will be implemented to avoid erosion and sedimentation. Erosion and Sedimentation Control Permit: The proposed action consists of six (6) separate, individual construction projects throughout the City of Greenville. Each project will result in less than an acre of land disturbance and therefore, will not require a state or city National Pollutant Discharge Elimination System (NPDES) or soil erosion and sediment control plan. Solid Waste Permit: All non-hazardous waste generated from the project will be transported to the closest C&D solid waste disposal facility. Coordination will occur prior to construction to confirm the facility has the capacity for any waste generated. All transport and handling of solid waste will comply with the City of Greenville's Solid Waste Management ordinance. Special Flood Hazard Area (SFHA) Permit: Since the proposed action will not occur within a regulated floodway or a SFHA, no flood development permit will be required. Stormwater Permit: As each project site encompasses less than an acre of development and will be constructed as separate, individual projects within existing, maintained road rights-of-way, a stormwater permit will not be required.

Public Outreach [24 CFR 58.43]:

If a Finding of No Significant Impact (FONSI) is determined, a combined notice of FONSI and Request for Release of Funds (RROF) will be published in a newspaper of general circulation. All public comments received during the comment period and formulated responses from the City of Greenville will be included in Appendix G.

Cumulative Impact Analysis [24 CFR 58.32]:

A cumulative impact is one that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. Since the inception of the City of Greenville's Neighbor Sidewalk Targeted Expansion Program (NSTEP) in 1999, approximately 8 miles of sidewalk have been constructed throughout the city. The program was established in response to resident surveys and community outreach regarding pedestrian safety and mobility. Based off the Special Emphasis Neighborhood master plans and the City of Greenville's Consolidated and Annual Action Plans, future sidewalks may be proposed to continue to improve pedestrian safety, urban infrastructure, and connectivity to revitalize the neighborhoods. Specific details of timing, location, and proposed design for future projects are currently unknown.

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

Three alternatives were considered, including the preferred alternative, the rejected alternative, and the No-Build alternative. The rejected alternative initially reviewed all 12 of the designated Special Emphasis Neighborhoods. Based on the capacity of the neighborhood to improve connectivity between communities and the areas that had the minimal rights-of-way issue, the rejected alternative was revised to consider only Arcadia Hills, Greenline-Spartanburg, Nicholtown, Pleasant Valley, Southernside, and West Greenville. This alternative was further revised as proposed sidewalk locations within each of the neighborhoods were removed due to potential right-of-way issues, resulting in the preferred alternative discussed throughout this environmental review. The proposed action only includes a single alternative for construction (preferred alternative). This alternative has no environmental impacts and is therefore, the preferred alternative. The preferred alternative includes the construction of approximately 12,045 linear feet of new 5'-wide sidewalks with 18"-curb and gutter. The repair and replacement of existing sidewalk will be required to properly connect the new sidewalk.

No Action Alternative [24 CFR 58.40(e)]

The No-Build alternative represents the status quo to provide a basis of comparison among alternatives. The status quo represents the existing capabilities baseline where no action is taken before comparing alternatives. With the No-Build alternative, the sidewalks will not be constructed, and residents of the Special Emphasis Neighborhoods will not have pedestrian-safe, walkable streetscapes to connect and revitalize their communities.

Summary of Findings and Conclusions:

A summary of the environmental findings discussed throughout this environmental review are summarized in Table 5-I: Summary of Environmental Findings. The proposed action only includes a single alternative for construction (Preferred Alternative) and has no environmental impacts. The proposed action will have several beneficial Environmental Justice impacts by providing pedestrian-safe streetscapes, improving urban infrastructure, and connecting residents to existing community and recreational facilities and services. BMPs will be implemented to minimize any potential stormwater runoff and for erosion and sedimentation control during construction. Solid waste disposal and noise levels will comply with local and state regulations. There are no adverse environmental impacts associated with the proposed action. The projects will result in several beneficial impacts, including providing pedestrian-safe streetscapes and improved urban infrastructure, and improving access to community and recreational facilities and services. As there are no adverse impacts, no mitigation measures will be required.

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	As the proposed action is consistent with the City of Greenville's comprehensive plans, conforms to the existing and future land use and zoning, and will improve the safety and aesthetics of the existing streetscape, the projects provide a beneficial impact, and no mitigation is proposed.	N/A		
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	The proposed action will not alter existing soils, slopes, or increase erosion and sedimentation as the project sites are all proposed within existing road rights-of-way in	N/A		

	urbanized areas. Although no SWPPP permits will be required, each project will implement BMPs for erosion and sediment control during construction. No impacts are anticipated; therefore no mitigation is proposed.			
Hazards and Nuisances including Site Safety and Site-Generated Noise	The proposed action is not located within or in proximity to any hazards that would negatively impact the construction or future use of the projects. Installation of the sidewalks may temporarily increase ambient noise levels due to construction operations, however there would be no permanent impact on noise levels. The City of Greenville regulates noise to protect residents and surrounding areas from disruptive noises. As no impacts are anticipated and the project will adhere to all noise regulations related to construction and heavy machinery operation, no mitigation is proposed.	N/A		
Employment and Income Patterns	The proposed action may temporarily increase construction jobs but would not significantly alter employment opportunities. No impacts are anticipated and no mitigation is proposed.	N/A		
Demographic Character Changes / Displacement	The proposed action will improve the infrastructure and accessibility of the Special Emphasis Neighborhoods, resulting in a benefit to the project sites. No mitigation is proposed.	N/A		

<p>Environmental Justice EA Factor</p>	<p>The proposed action is consistent with the goals of the Special Emphasis Neighborhood master plans and will improve the infrastructure and accessibility to the communities within these neighborhoods. As no adverse environmental impacts were identified and the projects will provide pedestrian-safe walkways throughout the neighborhoods, the proposed action will have a beneficial impact to residents. No mitigation is proposed.</p>	<p>N/A</p>		
<p>Educational and Cultural Facilities (Access and Capacity)</p>	<p>As there are no educational or cultural facilities that would be impacted by the proposed action, no mitigation is proposed.</p>	<p>N/A</p>		
<p>Commercial Facilities (Access and Proximity)</p>	<p>As the proposed action will improve connectivity and walkability throughout the project sites, access to commercial facilities and businesses will be improved, providing a beneficial impact. Therefore, no mitigation is proposed.</p>	<p>N/A</p>		
<p>Health Care / Social Services (Access and Capacity)</p>	<p>As there are no health care or social services that would be impacted by the proposed action, no mitigation is proposed.</p>	<p>N/A</p>		
<p>Solid Waste Disposal and Recycling (Feasibility and Capacity)</p>	<p>Any transport and disposal of solid waste generated from the project will be coordinated with the closest facility having capacity and will comply with the City's Solid Waste Management regulations. No hazardous waste is anticipated as part of the proposed action. No impact is anticipated and no mitigation is proposed.</p>	<p>N/A</p>		

Waste Water and Sanitary Sewers (Feasibility and Capacity)	As no wastewater or sewer systems will be impacted by the proposed action, no mitigation is proposed.	N/A		
Water Supply (Feasibility and Capacity)	Water supply will not be impacted by the proposed projects; therefore, mitigation is not proposed.	N/A		
Public Safety - Police, Fire and Emergency Medical	As the proposed action will not impact the demand for or access to emergency services, no mitigation is proposed.	N/A		
Parks, Open Space and Recreation (Access and Capacity)	The proposed action will provide safe and walkable streetscape and infrastructure to connect the residents to their community and to recreational and cultural resources, resulting in a beneficial impact to the project sites. No mitigation is proposed.	N/A		
Transportation and Accessibility (Access and Capacity)	The proposed action will provide pedestrian-friendly access to the City of Greenville's public transit and will connect residents to existing recreational and cultural facilities within their communities. The proposed projects will result in a beneficial impact and therefore, no mitigation is proposed.	N/A		
Unique Natural Features /Water Resources	As the proposed action will not impact any natural features or water resources, no mitigation is required.	N/A		
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	As there are no natural communities or federally protected species or their critical habitats in or near the project sites, the proposed action will have no impact on these resources and no mitigation is proposed.	N/A		

Climate Change	As the proposed action is located within existing, paved road rights-of-way, the project areas would not have increased susceptibility to climate change risks. The construction activities are temporary and will not impact vehicular traffic, therefore, the proposed action is not likely to result in increased emissions and no mitigation is required.	N/A		
Energy Efficiency	The location of the sidewalk projects are in close proximity to existing public transportation, such as major roadways and bus routes. The proposed action includes construction of sidewalks along existing, maintained road rights-of-way. There are no energy-consuming systems or use of energy resources proposed as part of the projects. Construction activities will be confined to one project at a time and would not increase emissions throughout the entire area at once.	N/A		

Project Mitigation Plan

There are no adverse environmental impacts associated with the proposed action. The projects will result in several beneficial impacts, including providing pedestrian-safe streetscapes and improved urban infrastructure, and improving access to community and recreational facilities and services. As there are no adverse impacts, no mitigation measures will be required.

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

✓ Yes

2. Is your project located within a Runway Projection Zone/Clear Zone (RPZ/CZ) or Accident Potential Zone (APZ) ?

Yes, project is in an APZ

Yes, project is an RPZ/CZ

✓ No, project is not within an APZ or RPZ/CZ

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within either zone below.

Screen Summary

Compliance Determination

The purpose of considering airport hazards is to promote compatible land uses around civil and military airports and airfields, specifically for Runway Clear Zones (RCZ) at civil airports and Accidental Potential Zones at military airfields. To ensure compatible land use development, the proposed action must be a minimum of 15,000 feet from a military airport or a minimum of 2,500 feet from a civilian airport. There

are three (3) civilian airports within proximity to the project sites as shown in Figure 3-I: Airports in Proximity to the Project Sites. There are no military airports within proximity to the project sites. One (1) sidewalk project, Arcadia Hills, is located within 2,500 feet of the Greenville Downtown Airport (GMU). However, the project is located outside of airport property, and therefore, is not located within a RCZ or Runway Protection Zone (RPZ). Coordination with Greenville Downtown Airport confirmed the Arcadia Hills project location is outside of the airport's approach and departure corridor and is not within the runway protection zone (Appendix C). Additionally, it is important to note that there is no vertical construction occurring as part of the proposed action. All projects involve the construction of sidewalks in existing road rights-of-way in urbanized areas. The sidewalks will connect into existing sidewalks at each terminus. As the Arcadia Hills project is not within a RPZ, the project will have no impact to airport hazards and is in compliance with airport hazard requirements.

Supporting documentation

[Fig 3-I Airports in Proximity to the Project Sites.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)	

1. Is the project located in a CBRS Unit?

No

Document and upload map and documentation below.

Yes

Compliance Determination

The Coastal Barrier Resources Act (CBRA) of 1982 protects coastal areas that serve as barriers against wind and tidal forces caused by coastal storms and serve as habitat for aquatic species. The CBRA has 584 designated Coastal Barrier Resource System (CBRS) units, totaling approximately 1.3 million acres of land and aquatic habitat. The proposed projects are not located within any CBRS units, as delineated by the U.S. Fish and Wildlife Service (USFWS). A map of the CBRA resources in South Carolina in relation to the proposed action is shown in Figure 3-II: SC CBRA Map. As the project areas are not located within any CBRS units and are approximately 200 miles west of the coastal areas of South Carolina, the proposed action has no potential to affect a CBRS unit or any coastal resources, and is in compliance with the CBRA.

Supporting documentation

[Fig 3-II SC CBRA Map.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:

[Fig 3-V FIRMette Map Nicholtown.pdf](#)

[Fig 3-V FEMA Map Nicholtown.pdf](#)

[Fig 3-IV FIRMette Map Greenline Spartanburg.pdf](#)

[Fig 3-IV FEMA Map Greenline Spartanburg.pdf](#)

[Fig 3-III FEMA 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 Flood Disaster Protection Act of 1973 requires that projects receiving federal assistance and located within a Special Flood Hazard Area (SFHA) identified by the Federal Emergency Management Agency (FEMA) are covered by flood insurance under the National Flood Insurance Program (NFIP). Figure 3-III: FEMA Map shows the locations of the project locations with respect to FEMA special flood hazard zones. A review of the FEMA Map Service Center website indicated the Greenline-Spartanburg and Nicholtown sidewalk projects have portions of sidewalk located within 0.2% Annual Chance Flood Hazard areas. The Greenline-Spartanburg project is located in FEMA Flood Insurance Rate Map (FIRM) panel #45045C0382E (effective August 18, 2014). The project extends approximately 80 feet into the area along Stag Street (Figure 3-IV: FEMA and FIRMette Maps- Greenline-Spartanburg). The Nicholtown project is located in FEMA FIRM panel #45045C0384E (effective August 18, 2014). The project extends approximately 60 feet into the area along Alameda Street. Along Alameda Street, there is an existing paved trail system, the Swamp Rabbit Trail, which has a street crossing over the creek. The trail shifts from the east side to the west side of the street at the crossing. The proposed action will connect to the existing sidewalk on either sides of the street crossing (Figure 3-V: FEMA and FIRMette Maps- Nicholtown). The 0.2% Annual Chance Flood Hazard subtype is defined as the 500-year flood and is designated as Zone X. Zone X is considered an area outside of the SFHA. As the structures are not located in a FEMA-designated SFHA, flood insurance is not mandatory. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the NFIP. The proposed action will have no impact on regulatory floodway and 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):

Screen Summary

Compliance Determination

Under the Clean Air Act administered by the Environmental Protection Agency (EPA), National Ambient Air Quality Standards (NAAQS) have been established and states have been delegated to develop and regulate air quality under State Implementation Plans (SIP). National Ambient Air Quality Standards: Under the Clean Air Act, NAAQS were developed for six (6) common pollutants. These criteria air pollutants are carbon

monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (PM), and sulfur dioxide (SO₂), and may harm human health and the environment and cause property damage. The EPA regulates these pollutants to permissible levels through human health-based (primary standards) and environmental-based (secondary standards) criteria as shown in Table 3-I: NAAQS. Attainment/Non-attainment Areas: Ambient pollutant concentrations include areas of the country where air pollution levels persistently exceed the NAAQS and are designated as "non-attainment". Each non-attainment area is required to implement mitigation measures to bring ambient concentrations below the NAAQS. When a non-attainment area attains the NAAQS, the EPA designates the area as "maintenance". The EPA's Green Book was reviewed to determine if the project area is in a non-attainment or maintenance area for any of the criteria air pollutants that have NAAQS. According to the Green Book, Greenville County nor the State of South Carolina has non-attainment or maintenance status, current as of June 30, 2023. A map of all non-attainment areas within the United States are shown below (Figure 3-VI: Counties Designated "Nonattainment"). Greenville County and the State of South Carolina are in attainment status for all criteria pollutants. The proposed action will have no impact on air quality and is in compliance with the Clean Air Act.

Supporting documentation

[Table 3-I NAAQS.pdf](#)

[Fig 3-VI Counties Designated Nonattainment.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

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

Yes

✓ No

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

Screen Summary

Compliance Determination

The Coastal Zone Management Act (CZMA) of 1972 preserves, protects, develops, and restores the nation's coastal zone resources. Greenville County is not designated as a "coastal zone" under the South Carolina Coastal Tidelands and Wetlands Act. Figure 3-VII: SC Coastal Counties shows the location of Greenville County and the project locations with respect to the coastal counties of South Carolina. As the project areas are not located within a "coastal zone" as defined by the state coastal management plan and are approximately 200 miles west of the coastal areas of South Carolina, the proposed action has no potential to affect any coastal resources, and is in compliance with the Coastal Zone Management Act.

Supporting documentation

[Fig 3-VII SC Coastal Counties.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:

In accordance with 24 CFR 58.5(i)(2), all property proposed for use in HUD programs must be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where the health and safety of users could be impacted. In addition, all non-residential property must be evaluated for previous uses or evidence of contamination on or near the site. The National Priorities List, EPA Superfund List, and CERCLA List were reviewed to determine the presence of any hazardous materials, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of users. No comments were provided by EPA and the State Environmental Clearinghouse Review during agency coordination (Appendix A).

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

Yes

Screen Summary

Compliance Determination

EPA Superfund National Priorities List Sites: None of the project areas are currently listed on the National Priorities List (NPL). The closest sites are located approximately 1.6 miles north/northwest of the northernmost extent of the proposed action (US Finishing/Cone Mills) and over 7 miles southeast of the southernmost extent of the proposed action (Golden Strip Septic Tank Service) as shown in Figure 3-VIII: NPL Sites in Region. Toxic and Solid Waste Landfill Sites: A review of the South Carolina Department of Environmental Quality (SCDHEC)'s Solid Waste Facilities revealed two (2) solid waste sites and no landfills within a 5-mile radius of the project locations as shown in Figure 3-IX: CDRs and Landfills in Greenville, SC. Both facilities are construction and demolition (C&D) facilities. The Blue Sky Recycling CDR is the closest solid waste facility to any of the project locations and is located approximately 0.5 miles west of Southernside (Figure 3-X: CDR Site in Proximity to Southernside). Construction and Demolition debris is considered non-hazardous solid waste. There are no toxic or solid waste landfill sites within a 5-mile radius of the proposed projects. Underground Storage Tanks: USTs were documented in proximity to the Arcadia Hills and Nicholtown sites (Figure 3-XI: USTs in Greenville). Two (2) USTs were documented along Lowndes Hill Road in Arcadia Hills as shown in Figure 3-XII: USTs in Proximity to Arcadia Hills. Norris Supply Co is a closed UST located on the opposite side of the street from the proposed sidewalk construction and is outside of the limits of development. The Corner Mart 12 UST is currently active; however it is not located within the limits of development. One (1) UST was documented along Ackley Road in Nicholtown (Figure 3-XIII: USTs in Proximity to Nicholtown at Ackley Road). The UST is closed and is located approximately 90 feet south of the roadway and is not within the proposed limits of development. None of the USTs are located within the limits of development and will not be impacted by the proposed action. All projects involve the construction of sidewalks in existing road rights-of-way in the City of Greenville's Special Emphasis Neighborhoods. There are no real property acquisitions associated with the proposed action. These neighborhoods are some of the oldest in the area, with most dating back to the mid-to-late 90s and some being established as early as the 1870s. These areas have been historically zoned as single and multi-family residential with interspersed commercial and office districts. There have been no significant changes in previous land use. Radioactive Substances: Regulated radioactive waste is categorized into low-level waste (LLW), which is contaminated clothing, tools, filters, medical tools, etc., high-level waste (HLW), which includes nuclear reactor fuel, and Waste Incidental to

Reprocessing (WIR) disposal facilities. There are four (4) licensed LLW disposal facilities located throughout the U.S. in the Agreement States. The EnergySolutions Barnwell Operations facility is the closest, located in Barnwell, South Carolina as shown in Figure 3-XIV: LLW and WIR Facilities. The City of Greenville is approximately 146 miles north of Barnwell, therefore the proposed action will have no impact to this facility. There is only one (1) WIR disposal facility in Aiken, South Carolina, approximately 115 miles south of Greenville. There are seven (7) currently operating nuclear power reactors and one (1) fuel cycle facility in South Carolina. Oconee Nuclear Station located in Seneca, which is 30 miles west of Greenville, is the closest facility with three reactor units. The remaining facilities are located in Barnwell, Columbia, Hartsville, Jenkinsville, and York. As none of these facilities are in close proximity to any of the project sites, there will be no impact to or contamination associated with radioactive substances due to the proposed action.

Supporting documentation

[Fig 3-XIV LLW and WIR Facilities.pdf](#)

[Fig 3-XIII USTs in Proximity to Nicholtown at Ackley Road.pdf](#)

[Fig 3-XII USTs in Proximity to Arcadia Hills.pdf](#)

[Fig 3-XI USTs in Greenville.pdf](#)

[Fig 3-X CDR Site in Proximity to Southernside.pdf](#)

[Fig 3-VIII NPL Sites in Region.pdf](#)

[Fig 3-IX CDRs and Landfills in Greenville SC.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

Federally Protected Species: The Endangered Species Act of 1973 requires all federal agencies to ensure that any action federally authorized or funded is not likely to jeopardize the continued existence of any federally listed threatened or endangered species. The Official Species List, generated from the U.S. Fish and Wildlife Services (USFWS) Information for Planning and Consultation (IPaC) database was reviewed to determine whether suitable habitat was present within the project area and is listed under Table 3-II: List of Federal Threatened and Endangered Species. All projects involve the construction of sidewalks in existing road rights-of-way in urbanized areas. The sidewalks will connect into existing sidewalks at each terminus. No critical habitat or suitable habitat for any of the listed species currently exists within the project areas (Appendix D). Coordination with the USFWS was initiated in June 2023 to comply with Section 7 of the Endangered Species Act, which requires all federal agencies to ensure that any action. On August 2, 2023, in response to the information sent during the initial coordination, the USFWS provided a concurrence letter. The concurrence letter lists types of HUD projects in South Carolina that the USFWS has determined will have no effect or no impact to federally protected species or their critical habitat. The proposed action meets the criteria listed under project type 5- "Implement streetscape beautification projects. Examples of these projects include the removal and replacement of existing sidewalks, curbing, or gutters; demolishing and disposing of existing curbing; installing irrigation systems for plants; installing or replacing streetlights, benches, or trashcans; and installing handicap sidewalk ramps or new sidewalks within city limits in right of ways" (Appendix X). As the sidewalk construction projects are proposed in existing road rights-of-way, the proposed action will have no effect or impact on federally protected species or their designated critical habitat (Appendix A). State Protected Species: GIS data of elements of occurrence was obtained from the South Carolina National Heritage Program (SCNHP) on May 17, 2023. No records of rare species, important natural communities, natural areas, or conservation/managed areas were documented within the project areas. There was one (1) insect and two (2) fish species documented within 1 mile of the project footprints (Appendix D). If any elements are identified during the proposed action, the SCNHP will be notified. The SCNHP report recommended best management practices for the project: * Any tree-clearing activities should be conducted during the inactive season (November 15th through March 31st) to avoid negative impacts to Northern long-eared bats, Rafinesque's big-eared bats, and tricolored bats. * All necessary measures should be taken to prevent oil, tar, trash, and other pollutants from entering adjacent offsite areas. * Appropriate erosion and siltation control measures (e.g., silt fences or barriers) must be in place and maintained until the area is permanently stabilized. Erosion control measures must be inspected daily in areas

of active construction, weekly in areas with no active construction, and within 24 hours of each 0.5" rainfall. Repair of any ineffective measures must be done within 24 hours. * Materials used for erosion control, such as hay bales or straw mulch, must be certified as weed-free. * If clearing of riparian vegetation must occur, it must be done manually. Construction activities must avoid and minimize, to the greatest extent possible, disturbance of woody shoreline vegetation to maintain bank stability and reduce erosion.

Supporting documentation

[Table 3-II List of Federal Threatened and Endangered Species.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

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

Yes

Screen Summary

Compliance Determination

HUD-assisted projects are required to meet an Acceptable Separation Distance (ASD) between the project site and hazardous facilities which store, handle, or process flammable or explosive substances. The proposed action includes the construction of new sidewalk along existing road rights-of way and does not include the construction of a hazardous facility. There were no NPLs or hazardous waste facilities documented within a mile of any of the project sites (Refer to Contamination and Toxic Substances section). Neither the State Environmental Clearinghouse or the EPA had comments for the project (Appendix A). As there are no known ASTs or hazardous waste facilities within a mile of the project sites, the proposed action will not expose users to explosive or flammable hazards.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

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

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

Yes

No

2. Does your project meet one of the following exemptions?

- Construction limited to on-farm structures needed for farm operations.
- Construction limited to new minor secondary (accessory) structures such as a garage or storage shed
- Project on land already in or committed to urban development or used for water storage. (7 CFR 658.2(a))

Yes

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

No

Screen Summary

Compliance Determination

The proposed action is subject to the Farmland Protection Policy Act (FPPA) requirements if irreversible conversion of farmland (directly or indirectly) to non-agricultural use is completed by a federal agency. It should be noted that the FPPA is not a regulatory program but a reporting program to assist in the avoidance of converting farmland into non-agricultural land uses by federal funding. Farmland includes prime farmland, unique farmland, and land of statewide or local importance. Farmland subject to FPPA requirements does not have to be currently used for cropland. It can be forested, pastureland, cropland, or other land, but not water or

urban built-up land. Farmland, however, does not include land already in or committed to urban development or water storage. Based on correspondence from the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS), the proposed action may include areas of prime farmland, however the USDA considers these locations to be "land committed to urban development" due to the locations within the city limits of Greenville. In addition, the projects are located within areas that have a density of 30 structures per 40-acres. Due to these factors, the USDA considers the proposed action exempt from the provisions of the FPPA (Appendix A). Although the project includes activities (new construction) which could potentially convert agricultural land to non-agricultural use, the proposed action is exempt from the provisions of the FPPA, therefore the project is in compliance with the FPPA.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	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:

- [Fig 3-V FIRMette Map Nicholtown.pdf](#)
- [Fig 3-V FEMA Map Nicholtown.pdf](#)
- [Fig 3-IV FIRMette Map Greenline Spartanburg.pdf](#)
- [Fig 3-IV FEMA Map Greenline Spartanburg.pdf](#)
- [Fig 3-III FEMA 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

✓ Yes

Select the applicable floodplain using the FEMA map or the best available information:

Floodway

Coastal High Hazard Area (V Zone)

100-year floodplain (A Zone)

✓ 500-year floodplain (B Zone or shaded X Zone)

500-year Floodplain

Is this a critical action?

✓ No

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

Yes

Screen Summary

Compliance Determination

Executive Order (EO) 11988 - Floodplain Management requires federal activities to avoid unnecessary impacts to floodplain and to avoid direct and indirect support of floodplain development to the maximum extent possible. As previously discussed in the Flood Insurance section, the Greenline-Spartanburg and Nicholtown sidewalk projects have small portions of the proposed sidewalk located within 0.2% annual chance or 500-year floodplains. Critical actions, including hospitals, nursing homes, police stations, fire stations, and roadways serving as sole egress from floodprone areas must comply with 24 CFR Part 55. Although the sidewalk projects are located within a 500-year floodplain, they are outside the 100-year floodplain and based on the project description, are considered noncritical actions and therefore, are not required to undergo the decision-making processes. As the project sites are located in a 500-year floodplain and sidewalk construction is not a critical action, the decision-

making process is not required, and the proposed action is in compliance with EO 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” https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

Threshold

Is Section 106 review required for your project?

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

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

See Appendix E.

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

Screen Summary

Compliance Determination

A review of the South Carolina State Historic Preservation Office's (SHPO) ArchSite revealed there were no cultural or historic resources within the Arcadia Hills, Greenline-Spartanburg, Nicholtown, Pleasant Valley, or Southernside project sites (Appendix E). Approximately 100 linear feet of sidewalk at the West Greenville project site is proposed to be constructed within and connected to existing sidewalk in the Pendleton Street Commercial Historic District, a district eligible for the National Register as shown in Figure 3-XV: Historic and Cultural Resources in West Greenville. A

Section 106 Project Review Form was submitted to the South Carolina Department of Archives and History to determine if the proposed action would have any potential impacts to the historic district. In a letter dated August 8, 2023, SHPO determined that no properties listed in or eligible for listing in the National Register of Historic Places would be impacted by the project (Appendix A). Tribal Nations were consulted to determine if there were any unique, special, ethnographic, or archaeological resources or areas in or near the project areas. The Catawba Indian Nation, Cherokee Nation, and Eastern Band of Cherokee Indians all have interests in Greenville County, South Carolina, and were consulted with. The Catawba Indian Nation had no concerns but requested notification if Native American artifacts and/or human remains were located during ground disturbance. As of August 29, 2023, no comments have been received from the other Tribal Nations (Appendix B). If any additional comments are received, the project will comply with any requirements or BMPs. If archaeological materials are encountered during construction activities, the procedures codified in 36 CFR 800.13(b) will apply. At that time, immediate contact would be made to the South Carolina State Historic Preservation Officer at 803-896-6129.

Supporting documentation

[Fig 3-XV Historic and Cultural Resources in West Greenville.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: 53

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: 53

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

Screen Summary

Compliance Determination

The locations of major roadways, railroads, and airports in proximity to the project sites were determined from GIS data obtained from the City of Greenville's GIS Division as shown in Figure 3-XVI: Noise Generators in Proximity to Project Sites and detailed in Table 3-III: Proximity of Noise Generators to Project Sites. All sites with noise exposure levels which exceed the day night average sound level (DNL) of 65

decibels (dB) are considered noise-impacted areas with "normally unacceptable" noise levels between 65-75 dB and "unacceptable" noise levels above 75 dB. To determine whether the current noise levels at each project site were at acceptable levels, the Day/Night Noise Level Calculator tool was used to assess noise from nearby road, railroad, and airport traffic. The effective distance, distance to stop sign, and average speed were determined using the City of Greenville GIS data. When distances between major roadways and project sites varied due to the location and orientation of the streets, the average distance between the project site and major roadway was estimated. Average Daily Trips (ADT) were determined based on South Carolina Department of Transportation (SCDOT) Average Daily Traffic reports for Greenville County (Appendix F). Railroad track data was determined using the Federal Railroad Administration (FRA) Safety Map to identify the nearest railroad crossings and generating a Crossing Inventory Form, which provided information on daily train activity and the use of whistles or horns (Appendix F). There were three (3) airports within a 15-mile radius of the proposed action. However, based on noise contour maps reviewed in the Greenville-Spartanburg Master Plan and the South Carolina Aeronautics Commission airport data, Arcadia Hills is the only project site located within noise contours at the Greenville Downtown airport. Airport noise levels for Greenville Downtown airport were estimated using HUD's Noise Assessment Guidelines. The daily number of flights was plotted against the average distance of the Arcadia Hills project to each runway and the estimated DNLs were averaged. In instances where data was unknown or could not be determined, the default value was inputted. The estimated DNL values findings are shown in Table 3-IV: Estimated DNL Values and in Appendix F. The Pleasant Valley project site was not evaluated as there were no noise generators found in proximity to the site. Based on the best available data, noise exposure levels for most of the project sites were found to be Acceptable. The noise exposure level for the Arcadia Hills project was found to be Normally Unacceptable due to the close proximity to the Greenville Downtown airport and portions of the project site located in a highly developed, commercialized area. The proposed action is not located in an undeveloped area nor will it change existing land use or advance future, incompatible land use. It is important to note that the new sidewalks will connect into existing sidewalks at the terminus on Lowndes Hill Road and Keith Drive. Additionally, there are existing barriers between the project site and the airport, including an approximate 10-acre forested parcel, roadways, and commercial buildings. As the Arcadia Hills project is located in an already highly developed area with existing sidewalks and there will be no permanent increase in noise level due to the proposed action, no mitigation is proposed for this project site. Because the proposed action consists of 6 sites, the DNLs for each site were averaged at 53 dB. The DNL value for the proposed action falls within the Acceptable noise level range and is therefore not considered a noise-impacted area. As the average noise level for all project sites within the proposed action is Acceptable, the project is in compliance with HUD's noise regulation and no mitigation is required.

Supporting documentation

[Table 3-IV Estimated DNL Values.pdf](#)

[Table 3-III Noise Generators in Proximity to Project Sites.pdf](#)

[Fig 3-XVI Noise Generators in Proximity to Project Sites.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

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

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

Yes

✓ No

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

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

✓ No

Based on the response, the review is in compliance with this section. Document and upload documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area, below.

Yes

Screen Summary

Compliance Determination

The 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. The Environmental Protection Agency's

(EPA) Sole Source Aquifer (SSA) program designates an aquifer as a sole source of drinking water and establishes a review area overlaying the SSA. According to the EPA's Sole Source Aquifer online GIS map, there are no SSAs in South Carolina (Figure 3-XVII: EPA Sole Source Aquifers). The proposed action is not located on a sole source aquifer area, therefore the project will have no effect on sole source aquifers and is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[Fig 3-XVII EPA Sole Source Aquifers.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

Executive Order 11990: Protection of Wetlands requires federal activities to avoid adverse impacts to wetlands. National Wetlands Inventory (NWI) mapping indicates there are no wetlands or streams within the Arcadia Hills, Greenline-Spartanburg, Pleasant Valley, Southernside, and West Greenville project sites. There were riverine wetlands present within the Nicholtown project site (Figures 3-XVIII: USFWS NWI Maps). Alameda Street runs parallel along a stretch of the Reedy River, approximately 200 feet to the west, and crosses a tributary of the river. The tributary is aligned with an existing street crossing of the Swamp Rabbit Trail. The Swamp Rabbit Trail is a paved, multi-use trail system that traverses the Reedy River throughout the City of Greenville. The Swamp Rabbit Trail connects to Alameda Street approximately 40 feet north and south of the existing street crossing. The new sidewalk is proposed to connect to either side of the existing Swamp Rabbit Trail street crossing and therefore, would not encroach on the existing stream. The limits of development are proposed no further than the Swamp Rabbit Trail in order to maintain the 40-foot distance between the new sidewalk and existing crossing and to avoid any potential impacts to the stream. WK Dickson staff conducted site visits of all project sites between June 29 and July 12, 2023. No wetlands or streams were observed on-site as the limits of development for all project sites were in existing road rights-of-way. The only stream observed on-site was the Swamp Rabbit Trail crossing at Alameda Street in the Nicholtown project. In coordination with the U.S. Army Corps of Engineers (USACE), it was noted that any discharge of dredged or fill material into jurisdictional streams or wetlands would require a Department of the Army (DA) permit authorization (Appendix A). The limits of development for each project site are within existing, impervious road rights-of-way. No work is proposed in any streams or wetlands. The sidewalk proposed along Alameda Street at the Nicholtown site will connect into existing sidewalk approximately 40 feet on either side of a crossing to avoid the existing stream. The project will comply with Best Management Practices (BMPs) recommended by the SCNHP report to minimize any potential impacts from stormwater runoff and will implement sediment and erosion control measures.

Supporting documentation

[Fig 3-XVIII NWI Map West Greenville.pdf](#)
[Fig 3-XVIII NWI Map Southernside.pdf](#)
[Fig 3-XVIII NWI Map Pleasant Valley.pdf](#)
[Fig 3-XVIII NWI Map Nicholtown.pdf](#)
[Fig 3-XVIII NWI Map Greenline Spartanburg.pdf](#)
[Fig 3-XVIII NWI Map Arcadia Hills.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

The Wild and Scenic Rivers Act provides federal protection for rivers defined as having remarkable scenic, recreational, geologic, fish, wildlife, historic, or cultural values. According to the National Wild and Scenic Rivers System website, there are approximately 41.9 miles of river in South Carolina designated as wild and scenic. The closest designated river is approximately 40 miles east/northeast of the City of Greenville as shown in Figure 3-XIX: Wild and Scenic Rivers in South Carolina. The proposed action is not within proximity to a designated Wild and Scenic River, a study river, or a Nationwide Rivers Inventory (NRI) river. Additionally, during agency coordination, the National Park Service (NPS) had no comments for the proposed action (Appendix A). The proposed action will have no effect on wild and scenic rivers and is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Fig 3-XIX Wild and Scenic Rivers in South Carolina.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

According to U.S. Census Bureau data, the population of Greenville County was reported as 525,534 in 2020. The median income per household varied by project and is shown in Table 3-V: Median Income per Household in 2021. The median income per household varied per project site from \$14,548 to \$60,524. To determine if low-income households are present within the project sites, the 2023 Poverty Guidelines issued by the U.S. Department of Health and Human Services (HSS) were compared to the median incomes for each of the Census Tracts. Table 3-VI: 2023 Poverty Guidelines for the 48 Contiguous States and the District of Columbia lists the poverty guidelines for 1 to 8 person households. Population, race, ethnicity, gender, age, and housing data were collected and evaluated to assess potential socioeconomic impacts and are listed in Table 3-VII: 2020 U.S. Census Data for Census Tracts in Each Project Site. According to the data, a minority population is reported in Arcadia Hills Census Tract 12.04, Block Group 1. Minority populations were determined by subtracting the population of all Non-Hispanic whites from the total population of the study area for each Block Group. Persons per household was determined by dividing

the Block Group populations by total housing. Based on this calculation, residents living in the project sites have an estimated 2.03-person household. According to the 2023 Poverty Guidelines, the median income reported for a 2-person household is \$19,720. Census Tract 43 Block Group 3 reported a median income of \$14,548, indicating the presence of low-income populations in the Nicholtown project site. Although a minority population and low-income population were documented, there will be no negative impacts due to the proposed action. The proposed action includes the construction of new sidewalks in existing road rights-of-way. No real property acquisition or displacement of residential properties is proposed. Acquisition of road rights-of-way is proposed along a few streets where the existing roadway cannot be narrowed to accommodate the sidewalks. If acquisition cannot be achieved, the sidewalk will not be constructed in those areas. There will be no eminent domain associated with the proposed action. In collaboration with various partners throughout the years, the City of Greenville has developed Neighborhood Master Plans for many of the Special Emphasis Neighborhoods. Master plans have been developed for the Greenline-Spartanburg, Nicholtown, Pleasant Valley, Southernside, and West Greenville neighborhoods. Each master plan incorporated numerous opportunities for community and residential engagement through robust and comprehensive interviews, surveys, public presentations, and community meetings to gather input from residents on issues impacting their communities, their interests, and future improvements. In each of these master plans, community residents identified the following: * Disrepair and lack of curb and gutter of existing sidewalks * Pedestrian-unfriendly and unsafe streetscapes * Isolation due to lack of connection to community facilities and services In each master plan, there was a strong consensus among residents for future development to incorporate safe, pedestrian-friendly streetscapes to improve safety, connectability, walkability, and community perception. This consensus was mirrored in the City of Greenville's 2015-2020 Consolidated Plan. As part of the consolidated plan, public workshops were held to provide citizens the opportunity to share needs within their communities and to identify safety issues and opportunities within their neighborhoods. Creating a suitable living environment, including improving streetscape, infrastructure, and walkability, was one of the main discussion items emphasized for future community development efforts. No adverse environmental impacts have been identified in the proposed action's total environmental review.

Supporting documentation

[Table 3-VII 2020 US Census Data for Census Tracts in Each Project Site.pdf](#)

[Table 3-VI 2023 Poverty Guidelines.pdf](#)

[Table 3-V Median Income per Household in 2021.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No