

**NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND  
NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS**

January 8, 2025  
City of Corpus Christi  
1201 Leopard St.  
Corpus Christi, Texas, 78401  
(361) 826-3010

These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the City of Corpus Christi.

**REQUEST FOR RELEASE OF FUNDS**

On or about **January 24, 2025**, the City of Corpus Christi will submit a request to the Office of Community Planning & Development, US Department of Housing & Urban Development (HUD) for the release of 2024 HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME) funds under Title 24 Section 92 of the Cranston-Gonzalez National Affordable Housing Act (NAHA) of 1990, as amended to undertake the following project located within City limits known as:

**FY25-PY24-TG-110-Inc.-Palms-at-Morris-(CHDO)**, at 2212 Morris Street, Corpus Christi, TX. 78405, for the purpose of developing affordable living apartments in an upcoming elderly community with 72 units for residents aged 55 and above whose incomes are at or below 60% of the Area Median Income. The community will be at 2212 Morris Street in northwest Corpus Christi, Texas. The property's location is ideal for affordable housing as it is within two miles of a grocery store, pharmacy, medical facilities, a recreation center, public transportation routes, and three senior centers. The community will offer a range of amenities and tailored services to meet residents' needs. The buildings will all be three stories high, and there will be an outdoor activity area with tables and grills, a community room, a food pantry, laundry facilities, a computer center, and a fitness center. The development will be financed primarily through the Texas Department of Housing and Community Affairs' Low Income Housing Tax Credits, private debt, and HOME funds through the City of Corpus Christi. Total HOME funding amount \$587,531. Other funding amount \$17,247,893. Total project Cost \$17,835,424. Environmental Assessment.

**FINDING OF NO SIGNIFICANT IMPACT**

The City of Corpus Christi has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR) on file at the Planning and Community Development Department at 1201 Leopard St. Corpus Christi, Texas 78401, La Retama Central Library at 805 Comanche St, Corpus Christi, TX 78401 and may be examined or copied weekdays 8:00 A.M. to 5:00 P.M.

## **PUBLIC COMMENTS**

Any individual, group, or agency may submit written comments on the ERR to the Planning and Community Development Department at 1201 Leopard St. Corpus Christi, Texas; if mailed: P.O. Box 9277 Corpus Christi, Texas 78469 or call (361) 826-3034. All comments received by **January 23, 2025**, will be considered by the City of Corpus Christi prior to authorizing submission of a request for release of funds. Comments should specify which Notice they are addressing.

## **ENVIRONMENTAL CERTIFICATION**

The City of Corpus Christi certifies to U.S. Department of Housing and Urban Development (HUD) that Daniel McGinn in his capacity as Director of the Planning and Community Development Department consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the City of Corpus Christi to use Program funds.

## **OBJECTIONS TO RELEASE OF FUNDS**

HUD will accept objections to its release of fund and the City of Corpus Christi's certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the City of Corpus Christi; (b) the City of Corpus Christi has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted via email in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to the HUD San Antonio Field Office at [CPDRROFSAN@hud.gov](mailto:CPDRROFSAN@hud.gov). Potential objectors should contact the HUD San Antonio Field Office via email to verify the actual last day of the objection period.

Daniel McGinn, Director  
Planning and Community Development Department  
City of Corpus Christi  
Certifying Officer

## **AVISO DE DETERMINACIÓN DE NO IMPACTO SIGNIFICATIVO Y AVISO DE INTENCIÓN DE SOLICITAR LIBERACIÓN DE FONDOS**

8 de enero de 2025  
Ciudad de Corpus Christi  
1201 Leopard St.  
Corpus Christi, Texas, 78401  
(361) 826-3010

Estos avisos satisfacen dos requisitos procesales distintos pero relacionados para actividades que llevará a cabo a la Ciudad de Corpus Christi.

### **SOLICITUD PARA LIBERACIÓN DE FONDOS**

En o cerca del 24 de enero de 2025, la ciudad de Corpus Christi, procederá a someter una solicitud a Oficina de Planificación y Desarrollo Comunitario, Departamento de Vivienda y Desarrollo Urbano de EE. UU.(HUD) para la liberación de fondos del programa 2024 PROGRAMA DE ASOCIACIONES DE INVERSIÓN EN EL HOGAR (HOME) bajo Título 24 Sección 92 de la Ley Nacional de Vivienda Asequible Cranston-González (NAHA) de 1990, *según enmendada*, para llevar a cabo el proyecto en los límites de la ciudad conocido como;

**FY25-PY24-TG-110-Inc.-Palms-at-Morris-(CHDO)**, en 2212 Morris Street, Corpus Christi, TX. 78405, con el propósito de desarrollar apartamentos de vida asequible en una próxima comunidad de ancianos con 72 unidades para residentes de 55 años o más cuyos ingresos sean iguales o inferiores al 60% del ingreso medio del área. La comunidad estará en 2212 Morris Street en el noroeste de Corpus Christi, Texas. La ubicación de la propiedad es ideal para viviendas asequibles, ya que se encuentra a dos millas de una tienda de comestibles, farmacia, instalaciones médicas, un centro recreativo, rutas de transporte público y tres centros para personas mayores. La comunidad ofrecerá una variedad de comodidades y servicios personalizados para satisfacer las necesidades de los residentes. Todos los edificios tendrán tres pisos de altura, y habrá un área de actividades al aire libre con mesas y parrillas, un salón comunitario, una despensa de alimentos, instalaciones de lavandería, un centro de computación y un gimnasio. El desarrollo se financiará principalmente a través de la e Los créditos fiscales para viviendas de bajos ingresos del Departamento de Vivienda y Asuntos Comunitarios de Texas, deuda privada y fondos HOME a través de la Ciudad de Corpus Christi. Monto total de financiamiento de HOME \$587,531. Otras financiaciones \$17,247,893. Costo total del proyecto \$17,835,424. Evaluación Ambiental.

### **DETERMINACIÓN DE NO IMPACTO SIGNIFICATIVO**

La ciudad de Corpus Christi ha determinado que el proyecto no tendrá impacto significativo en el ambiente humano. Por lo tanto, no es necesaria una Declaración de Impacto Ambiental bajo la Ley de Política Ambiental Nacional del 1969 (NEPA, por sus siglas en inglés). Un Expediente de Revisión Ambiental (ERR, por sus siglas en inglés) que contiene información adicional del proyecto está disponible en Departamento de Planificación y Desarrollo Comunitario en 1201 Leopard St. Corpus Christi, Texas 78401, Biblioteca Central La Retama en 805 Comanche St., Corpus Christi, TX 78401 y puede ser examinado o reproducido de lunes a viernes de 8:00 a.m. a 5:00 p.m.

## COMENTARIOS PÚBLICOS

Cualquier individuo, grupo o agencia puede proveer comentarios por escrito acerca del ERR a Departamento de Planificación y Desarrollo Comunitario en 1201 Leopard St. Corpus Christi, Texas; si se envía por correo: P.O. Box 9277 Corpus Christi, Texas 78469 o llame al (361) 826-3034. Todo comentario recibido hasta 23 de enero de 2025, será considerado por Ciudad de Corpus Christi antes de autorizar que se someta la solicitud de liberación de fondos. Los comentarios deben indicar a cuál aviso en específico responden.

## CERTIFICACIÓN AMBIENTAL

The City of Corpus Christi certifica a HUD que Daniel McGinn, en su capacidad como Director de Planificación y Desarrollo Comunitario da su consentimiento a aceptar la jurisdicción de las cortes federales si una acción legal fuera iniciada para hacer cumplir responsabilidades relacionadas al proceso de revisión ambiental y que estas responsabilidades se satisfagan. La aprobación de la certificación por parte de HUD satisface sus responsabilidades bajo NEPA, y las leyes y autoridades relacionadas, y permite que la Ciudad de Corpus Christi utilice fondos del programa.

## OBJECIONES A LA LIBERACIÓN DE FONDOS

HUD aceptará objeciones a su liberación de fondos y la certificación por parte de la Ciudad de Corpus Christi por un período de quince días a partir de la fecha anticipada de recibo o la fecha en que en efecto se reciba la solicitud de liberación de fondos (lo que ocurra más tarde) solamente si estas se basan en una de las siguientes posibles razones: (a) la certificación no fue firmada por el Oficial Certificador de de la Ciudad de Corpus Christi (b) de la Ciudad de Corpus Christi omitió un paso o no tomó una decisión o determinación que es requisito de la reglamentación de HUD en 24 CFR Parte 58; (c) el beneficiario de la subvención u otros participantes en el proceso de desarrollo comprometieron fondos, incurrieron en gastos o llevaron a cabo actividades no autorizadas por 24 CFR Parte 58 antes de que HUD apruebe la liberación de fondos; o (d) otra agencia federal actuando de acuerdo con 40 CFR Parte 1504 sometió una determinación de que el proyecto no es satisfactorio desde el punto de vista de calidad ambiental. Las objeciones deben prepararse y someterse de acuerdo con los requisitos procesales (24 CFR Parte 58, Sección 58.76) y dirigirse a the HUD San Antonio Field Office at a [CPDRROFSAN@hud.gov](mailto:CPDRROFSAN@hud.gov). Objetores potenciales deben contactar a HUD para verificar la fecha en que en efecto finaliza el período para objeciones.

Daniel McGinn, Director  
Departamento de Planificación y Desarrollo Comunitario  
Ciudad de Corpus Christi  
Oficial Certificador

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

**Project Information**

**Project Name:** FY25-PY24-TG-110-Inc.-Palms-at-Morris-(CHDO)

**HEROS Number:** 900000010434613

**Start Date:** 10/28/2024

**Responsible Entity (RE):** CORPUS CHRISTI, PO Box 9277 Corpus Christi TX, 78469

**RE Preparer:** Alvin Witcher

**State / Local Identifier:** TX

**Certifying Officer:** Daniel McGinn

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

**Point of Contact:**

**Consultant (if applicable):** ASTEX ENVIRONMENTAL SERVICES

**Point of Contact:** Elizabeth Combs

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

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

**Project Location:** 2212 Morris St, Corpus Christi, TX 78405

**Additional Location Information:**

ECKERD BLK 1 LOT 1 Property ID: 228353 2.07 Acres ECKERD LTS 1 AND 2 BK 2  
Property ID: 228354 .17 Acres ECKERD LTS 3 & 4 BK 2 Property ID: 228356 .17 Acres  
ECKERD LT 5 BK 2 Property ID: 228357 .08 Acres ECKERD LTS 6 & 7 BK 2 Property ID:  
228358 .17 Acres ECKERD LT 8A BLK 2 Property ID: 228359 .16 Acres ECKERD LT 10  
BLK 2 Property ID: 228360 .08 Acres ECKERD LT 11 BLK 2 Property ID: 228361 .08  
Acres ECKERD LT 12 BK 2 Property ID: 228362 .08 Acres

**Direct Comments to:** Planning and Community Development Department at 1201  
Leopard St. Corpus Christi, Texas; if mailed: P.O. Box 9277  
Corpus Christi, Texas 78469  
if emailed: cpdrrofsan@hud.gov

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

Palms at Morris Apartments is an upcoming elderly community with 72 units for residents aged 55 and above whose incomes are at or below 60% of the Area Median Income. The community will be at 2212 Morris Street in northwest Corpus Christi, Texas. The property's location is ideal for affordable housing as it is within two miles of a grocery store, pharmacy, medical facilities, a recreation center, public transportation routes, and three senior centers. The community will offer a range of amenities and tailored services to meet residents' needs. The buildings will all be three stories high, and there will be an outdoor activity area with tables and grills, a community room, a food pantry, laundry facilities, a computer center, and a fitness center.

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

The need for more affordable housing for seniors in Corpus Christi, TX, is significant. There are currently 26 low-income affordable senior housing options in the area. However, the demand often exceeds the available supply, leading to waitlists and limited availability. Several programs, such as Section 202 housing and the Low-Income Housing Tax Credit (LIHTC), aim to provide affordable housing for low-income seniors. Despite these efforts, the growing senior population and rising housing costs continue to create a pressing need for more affordable options. The need for more affordable housing for seniors in Corpus Christi, TX, is significant. There are currently 26 low-income affordable senior housing options in the area. However, the demand often exceeds the available supply, leading to waitlists and limited availability. Several programs, such as Section 202 housing and the Low-Income Housing Tax Credit

(LIHTC), aim to provide affordable housing for low-income seniors. Despite these efforts, the growing senior population and rising housing costs continue to create a pressing need for more affordable options.

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

The U.S. Census Bureau reports a 0.7% population growth in the subject property's Primary Market Area (PMA) over the last eight years. The senior population in this area has been growing at an average rate of 2% annually. Palms at Morris is strategically located to meet the increasing demand for affordable senior housing in this area. Additionally, the Corpus Christi metropolitan area (PMA) has experienced a 5.7% population growth from approximately 336,000 in 2016 to around 355,000 in 2024.

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

[Palms at Morris Aerial Overview.pdf](#)  
[4 - Photo Plate Palms at Morris fall 2024.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:**

[FY25-PY24 TG-110 Inc Palms at Morris-CHDO EA-Signed.pdf](#)

**7015.15 certified by Certifying Officer**

on:

**7015.16 certified by Authorizing Officer**

on:

**Funding Information**

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
M-24-MC-480502	Community Planning and Development (CPD)	HOME Program	\$1,119,386.00

**Estimated Total HUD Funded,  
Assisted or Insured Amount:** \$587,531.00

**Estimated Total Project Cost [24 CFR 58.2 (a)  
(5)]:** \$17,835,424.00

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

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. There are no military airports within 15,000 feet or civilian airports within 2,500 feet of the subject property. Three military installations are between approximately 28,353 feet and 60,931 feet of the subject property (NALF Cabaniss, NALF Waldron and Corpus Christi Naval Air Station). One civilian airport (Corpus Christi International Airport) is approximately 27,878 feet. No impact from airport hazards is expected. Attachment 19.
<b>Coastal Barrier Resources Act</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The Federal Government does not subsidize development along coastal barriers as development in these areas may lead to the loss of natural resources as well as threaten human life, health, and property. Coastal Barriers along the Gulf coast are part of the John H. Chafee Coastal Barrier Resources System (CBRS). The subject property is not located in a CBRS unit. The nearest CBRS unit is approximately 13 miles away. Attachment 20
<b>Flood Insurance</b> Flood Disaster Protection Act of	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on Flood Plain information provided by the Federal Emergency



<p>1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>		<p>Management Agency, the property is part of Flood Insurance Rate Map Number 48355C0320G Effective Date of October 13, 2022. The property is located in Zone X, an area of minimal flooding. Attachment 22.</p>
<p><b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b></p>		
<p><b>Air Quality</b> Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>No activities were observed on the subject property at the time of the site inspection that would generate regulated air emissions. A review of Corpus Christi: Current Attainment Status on the Texas Commission on Environmental Quality (TCEQ) website confirms that the Corpus Christi area is currently unclassified or in general attainment of the National Air Quality Standards for all six criteria air pollutants, general conformity rules do not apply. Attachment 23.</p>
<p><b>Coastal Zone Management Act</b> Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to the Texas Coastal Management Zone Map provided by the Texas General Land Office, the subject property is located within a coastal zone boundary. The scope of work for the project is the construction of new apartment buildings on land that has been previously developed. The nearest water is 1.3 miles away. The project will likely not have adverse impacts on coastal natural resource areas. Attachment 21.</p>
<p><b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) &amp; 58.5(i)(2)]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. Radon analysis indicated elevated levels of radon or consideration of radon will occur following construction. Adverse radon impacts can be mitigated. With</p>

		mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.
<p><b>Endangered Species Act</b> 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>Thirteen(13) total threatened, endangered, or candidate species are on the species list for this area of Nueces County, TX. Four of the thirteen species listed are marine reptiles (sea turtles) which live in the water; since there are no bodies of water on the property and the nearest water is over one mile away from the property, these species would not be impacted by this project. There are 9 remaining species to be investigated. Habitat information for each species was gathered from various sources. As the property is currently undeveloped with none of the specified habitats present, none of these species should be encountered on the property and should not be impacted by planned activities.</p>
<p><b>Explosive and Flammable Hazards</b> Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements. During the preparation of this ESA, aerial surveillance of the area revealed a CITGO Refinery, a Flint Hills Resources Refinery, and the Magellan Terminal Holdings Refinery within two miles of the border of the Palms at Morris property. In accordance with 24 CFR Part 51 Subpart C, "Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive Nature," Acceptable Separation Distances (ASDs) were calculated for the nearest above ground storage tank from each refinery. Attachment 10. The Palms at Morris property is calculated to be beyond the Acceptable Separation Distance from</p>

		<p>the four (4) identified refinery tanks located within two miles of the property as calculated using the Acceptable Separation Distance Electronic Assessment algorithm. As a result, no further actions nor mitigation appears required.</p>
<p><b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project includes activities that could potentially convert agricultural land to a non-agricultural use, but an exemption applies. The project is in compliance with the Farmland Protection Policy Act. According to the Soil Survey, the type of soil on the property is listed as not prime farmland. The property, however, can be considered to be land committed to urban development since it has been occupied by the schools and residential housing since the late 1950s. The subject property is in a shaded area on the 2020 Census-Urbanized Area Reference Map which indicates it is an incorporated place and is exempt from the provisions of the Farmland Protection Policy Act. Attachment 24.</p>
<p><b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. Based on Flood Plain information provided by the Federal Emergency Management Agency, the property is part of Flood Insurance Rate Map Number 48355C0320G Effective Date of October 13, 2022. The property is located in Zone X, an area of minimal flooding. Attachment 22.</p>
<p><b>Historic Preservation</b> 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>Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106. There were 17 properties listed on the historical listings for Corpus Christi. The closest was 0.29</p>

		miles away and the farthest was 35.85 miles away.
<b>Noise Abatement and Control</b> Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	A Noise Assessment was conducted. The noise level was acceptable: 64.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation.
<b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements. According to the United States Environmental Protection Agency, Sole Source Aquifer Protection Program, National Summary of Sole Source Aquifer Designations, the only designated sole source aquifer in Texas is the Edwards Aquifer in the San Antonio/ South Texas area. The subject property is not located over the Edwards Aquifer. The closest intersection with the Edwards Aquifer is 144 miles from the subject property. Attachment 28.
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990. A National Wetlands inventory map from the United States Department of Interior for this specific area was reviewed at the time of the field investigation and it was determined that the subject property has no designated wetlands. No water features, streams, tanks, ponds, or other areas of water were observed or identified on the subject property. There are no wetlands nearby. Attachment 29.
<b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. The subject property will not impact wild and scenic rivers as there are none in the City of Corpus and Nueces County. The only designated Wild and Scenic Rivers in Texas are in

		<p>the Rio Grande in Big Bend National Park. The closest intersection with Rio Grande is over 290 miles away. Attachment 30. There are 19 segments of rivers in Texas that are listed on the Nationwide Rivers Inventory (NRI). These are segments that potentially qualify as national wild, scenic, or recreational river areas. The closest of these segments is the Guadalupe River or the Medina River which are approximately 160 miles away from the subject property. Attachment 31. The project will not have a direct or adverse effect within wild and scenic river boundaries or river segments listed in the NRI.</p>
<b>HUD HOUSING ENVIRONMENTAL STANDARDS</b>		
<b>ENVIRONMENTAL JUSTICE</b>		
<p><b>Environmental Justice</b> Executive Order 12898</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. As the land for this project is currently undeveloped, there would be no displacement of low income or minority populations. The area of the proposed apartment complex and a three mile radius around the complex include critical service gaps relating to broadband internet availability, housing burden, and transportation access burden. The apartment complex site also exists within a food desert. An EJ Screen was performed on October 18, 2024. Attachment 32.</p>

**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
<b>LAND DEVELOPMENT</b>			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	Generally, the community's zoning land use controls, which carry out its Master Plan, are sufficient to ensure land use compatibility. This assessment did not identify surrounding land uses that would be a nuisance or hazard to the subject property. According to the Corpus Christi zoning map, the subject property is listed as RS-6 for the property north of Mary Street and CI for the property south of Mary Street. RS zoning districts provide for orderly suburban residential development and redevelopment "RS- 6" equals a minimum lot size of 6,000 square feet. The "CI" zoning district is intended to provide for intense commercial service activities, as well as a few light manufacturing uses. Attachment 5.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	The Nueces County District Conservationist stated that the soil in this area consists of 100 percent urban land which is not prime farmland. This type of soil is in the Class D Hydrologic Group which consists of soils with very slow infiltration rates. Soils are clayey, have a high water table, or are shallow to an impervious layer. A visual inspection of the subject property revealed no dirt, soil, sand, or other earth, which was obtained off-site that was used to fill holes or depressions, create mounds, or otherwise artificially change the grade or	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>elevation of the subject property were identified. This does not include material that is used in limited quantities for normal landscaping activities. The subject site appears to be adequately drained and no indication of the significant accumulation of water was observed during the site inspection.</p>	
<p>Hazards and Nuisances including Site Safety and Site-Generated Noise</p>	<p>2</p>	<p>No hazardous materials were at the site on the day of the inspection. The inspector noted no spills, obvious discoloration, or unexplained sunken areas. No odors were detected and no areas where used motor oil or other discharges occurred were noted. No 55-gallon drums were observed on the subject property. Based on information gathered from the EDR Radius Map Report, it is known that Lamar Elementary School had asbestos present prior to demolition. No debris piles from the demolition were found at the subject property. No structures remain so asbestos should not be an issue for the subject property. Astex conducted an evaluation to identify hazardous operations/facilities with stationery, above ground storage tanks in a one-mile radius of the proposed project. During a detailed search of available aerial photographs, no above ground storage tanks were found within one mile of the subject property. Attachment 10. During the preparation of this ESA, aerial surveillance of the area revealed a CITGO Refinery, a Flint Hills Resources Refinery, and the Magellan Terminal Holdings Refinery within two miles of the border of the Palms at Morris property. In accordance with 24 CFR Part 51 Subpart C, "Siting of HUDAssisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive Nature," Acceptable Separation Distances (ASDs) were calculated for the nearest above</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		ground storage tank from each refinery. Attachment 11. Refinery properties to the northwest of the subject property were marked based on ownership information for individual parcels taken from the Nueces County Appraisal District website. The closest tanks from each refinery were identified and distances were measured from the center of each of the four storage tanks to the closest point on the perimeter of the Palms at Morris property. All tanks are diked.	
<b>SOCIOECONOMIC</b>			
Employment and Income Patterns	2	Corpus Christi's median household income is \$60,958 (2022) as compared to the USA which has a median household income of \$74,580 (2022). Corpus Christi's unemployment rate is 5% and the rating for the US is 3.5% (2022). Income per capita in Corpus Christi is \$50,681 vs. \$65,423 for the USA. In 2022, the federal poverty threshold for a family of four was \$29,678. The overall poverty rate in Corpus Christi in 2022 was 17.1 %. Attachment 33.	
Demographic Character Changes / Displacement	2	The population density of people in Corpus Christi is 1794.2 people per square mile, as compared to the USA which has a population density of 98 people per square mile. Cost of living index in Corpus Christi is 86.7% of the U.S. and the biggest factor in the cost-of-living difference is housing. Corpus Christi has 60.7% of housing units occupied by the owner (2022) as compared to the national average of 65.2%. The average one-way commute time in Corpus Christi is 20.5 minutes compared to 26.7 minutes for the national average. Attachment 33.	
Environmental Justice EA Factor	2	As the land for this project is currently undeveloped, there would be no displacement of low income or minority populations. The area of the proposed apartment complex and a three mile radius	



Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		around the complex include critical service gaps relating to broadband internet availability, housing burden, and transportation access burden. The apartment complex site also exists within a food desert. An EJ Screen was performed on October 18, 2024. Attachment 32.	
<b>COMMUNITY FACILITIES AND SERVICES</b>			
Educational and Cultural Facilities (Access and Capacity)	2	The Corpus Christi Independent School District is made up of thirty-three elementary schools, eleven middle schools, and eight high schools serving students in pre-kindergarten through twelfth grade. There are also three special campus schools. The following schools will serve the students living at the Palms at Morris: Zavala Elementary School - 3125 Ruth Street Driscoll Middle School - 3501 Kenwood Drive Roy Miller High School - 1 Battlin Buc Blvd Corpus Christi has many cultural facilities. The USS Lexington, Asian Cultures Museum & Educational Center, the Texas Surf Museum, Padre Island National Seashore, Texas State Aquarium, the South Texas Botanical Gardens and Nature Center, and the Corpus Christi Museum of Science and History are just a few of the cultural facilities to visit in Corpus Christi.	
Commercial Facilities (Access and Proximity)	2	The area immediately around the subject property is largely residential in nature with single family houses and multifamily apartments. There are some industrial facilities to the north of the subject property, especially north of Agnes Street. To the east, there are many non-chain restaurants grouped around Highway 286. The subject property is within 2 miles of the following shopping destinations: * HEB * Home Depot * Walgreens * Dollar Tree * Taco Bell * Walmart * Texas Roadhouse	
Health Care / Social Services (Access and Capacity)	2	In addition to the local hospitals, a variety of health care and social services are located within close traveling distance. Christus	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>Health Bayside Medical Center, Physicians Premier Staples Emergency Room, The Doctors Center Urgent Care, Angel Bright Home Health Care, South Texas Family Planning and Health Corporation, Nueces County Head Start Program, Blind Services, Crime Victims Services, Texas Family and Protective Services, Ronald McDonald House of Charities of Corpus Christi, Spaulding for Children Adoption Agency. The amount and variety of social services seems sufficient for the project.</p>	
<p>Solid Waste Disposal and Recycling (Feasibility and Capacity)</p>	<p>2</p>	<p>Solid waste disposal is handled by independent operators, such as Waste Management, which can provide solid waste dumpsters of various sizes and schedule pickups according to the client's needs. The subject property is currently undeveloped and there were no solid waste dumpsters observed on or near the property.</p>	
<p>Waste Water and Sanitary Sewers (Feasibility and Capacity)</p>	<p>2</p>	<p>Wastewater is handled by the City of Corpus Christi. Water used to remove waste comes from residential, commercial establishments and industries. The wastewater is collected and transported to a treatment center through a system of pipes and pump stations, then treated to standards imposed by state and federal regulations. The resulting effluent is discharged to a receiving watercourse or reused for landscape irrigation. Daily, 28 Million gallons of water are treated at 6 wastewater treatment plants.</p>	
<p>Water Supply (Feasibility and Capacity)</p>	<p>2</p>	<p>The City of Corpus water supply is from surface water sources. The water is supplied through a network of three reservoirs, including Choke Canyon and Lake Corpus Christi that reside in the Nueces River Basin. The Atascosa River and the Nueces River transports water from the two reservoirs where it is pumped to the O.N. Stevens Water Treatment Plant. Water pumped</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>from Lake Texana through the Mary Rhodes Pipeline is blended at the treatment plant. According to the 2023 Water Quality Report, the water quality meets or exceeds State and Federal minimum standards for drinking water quality. Attachment 7.</p>	
<p>Public Safety - Police, Fire and Emergency Medical</p>	<p>2</p>	<p>The nearest hospital to the subject property is CHRISTUS Spohn Hospital - Memorial located at 2606 Hospital Blvd is approximately one half miles away with a response time of 8 to 12 minutes. CHRISTUS Spohn Hospital Corpus Christi - Shoreline(600 Elizabeth) is located approximately two miles to the east and has a similar response time. The Driscoll Children's Hospital located at 3533 S. Alameda St. #302 is approximately 4 miles away with a response time of 12 to 16 minutes. AES estimates a response time of between seven and ten minutes from the City of Corpus Christi Fire Department Station #3 which is located at 1401 Morgan Ave, approximately one mile southwest of the subject property. The main Corpus Christi Police Department is located at 321 John Sartain St and has a response time of between 14 to 19 minutes.</p>	
<p>Parks, Open Space and Recreation (Access and Capacity)</p>	<p>2</p>	<p>There are nearly 200 parks and recreation areas listed for the Corpus Christi area which would suggest that there are plenty of open spaces for recreation nearby. The following is a list of parks near the subject property and some of the amenities they provide. Antonio E Garcia Park - playground Austin Park - playground, baseball field, softball field, basketball court, backstop, and grill Ben Garza Park - basketball courts (outdoor and indoor), gym, baseball field, softball field, backstop Blucher Park - recognized birding site and nature walking trails Dr. H.C. Dilworth Park - shaded playground, backstop, baseball field, basketball court, softball field, picnic table</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Dr. H.J. Williams Park - playground, grill, backstop, baseball field, basketball court, softball field, restroom, shelter, and picnic table Joe Garza Park - picnic table and shelter South Bluff Park - playground, grill, basketball court, and shelter Wilmot Park - play unit, picnic unit, shelter	
Transportation and Accessibility (Access and Capacity)	2	Corpus Christi Regional Transportation Authority (CCRTA) has thirty three bus routes in Corpus Christi with 1,309 bus stops covering 846 square miles of Nueces and San Patricio counties. There is a CCRTA bus stop located near the intersection of Mary Street and South 19th Street opposite the eastern border of the subject property.	
<b>NATURAL FEATURES</b>			
Unique Natural Features /Water Resources	2	There are areas that need special attention such as unique geological features. The geological features may vary from one place to another and may include cliffs, waterfalls, or unusual rock formations and colors. Natural areas may include heavily wooded areas that might pose a fire hazard to some projects in the event of a forest fire. No unique natural features or areas were identified on the proposed project property.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	Vegetation consists of scattered trees and well-kept lawns. No wildlife activity was observed on the property during the on-site investigation.	
Other Factors 1			
Other Factors 2			
<b>CLIMATE AND ENERGY</b>			
Climate Change	2	According to the ClimateCheck, Corpus Christi has an extreme risk of heat, and a high risk for flood and storm. A day that reaches 95 degrees Fahrenheit is considered hot for Corpus Christi. Historically, Corpus Christi had about seven hot days per year. The projection for 2050 is about 46 hot days per year. The storm risk is calculated as high	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>but overall yearly rainfall will decrease slightly from 28.7 inches per year to 28.4 inches. There is about a 30% chance of a flood over one foot deep before 2050. According to Surging Seas Risk Finder, there are 339 high and medium social vulnerability people located in land that is 2 feet elevation or less and \$224 million dollars' worth of property that could be impacted by a flood over one foot. The elevation of the subject property is 38 feet above sea level and the closest water is 1.3 miles away so the potential for the subject property to flood is minimal. A Coastal Flood Exposure Mapper from NOAA confirms this by showing that the subject property has had no coastal flood hazard. A NOAA storm surge map illustrates that the storm surge from a Category 5 Hurricane would not reach the subject property. An urban heat index map shows the census tract that includes the subject property has one of the highest heat indices when compared to other tracts in the metro area.</p>	
Energy Efficiency	2	<p>The Palms at Morris Multi-Family Development will provide residents with high-quality, energy-efficient appliances that help reduce energy consumption and lower utility bills. The units will be equipped with ENERGY STAR certified appliances, including refrigerators, dishwashers, heating and cooling systems. These appliances will meet strict energy efficiency guidelines set by the U.S. Environmental Protection Agency and help conserve natural resources while providing reliable performance.</p>	

**Supporting documentation**

[Climate response visuals Corpus Christi.pdf](#)

[33 - Corpus Christi TX Data USA.pdf](#)

[32- EJ Screen Palms at Morris.pdf](#)

[7 - 2023-water-quality-report-en.pdf](#)

[10 - Palms at Morris Acceptable Separation Distance Response.pdf](#)

[6- Palms at Morris Soil\\_Report.pdf](#)  
[5 -Palms at Morris zoning map.pdf](#)

**Additional Studies Performed:**

Prior Phase I ESA performed by Astex Environmental Services dated February 28, 2024  
Limited Review of the 2-mile Refinery Rule prepared by Astex Environmental Services  
dated February 16, 2024 Phase II prepared by EnviroPhase dated September 9, 2024

[Palms at Morris Spring 2024 Bookmarked.pdf](#)  
[12 - Phase II ESA - 2212 Morris Street Corpus Christi TX.pdf](#)  
[10 - Palms at Morris Acceptable Separation Distance Response\(1\).pdf](#)

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

by:

Arthur Vallejo

8/5/2024 12:00:00 AM

[4 - Photo Plate Palms at Morris fall 2024.pdf](#)

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

<https://ejscreen.epa.gov/mapper> <https://edrnet.com> <https://msc.fema.gov/portal#>  
<https://www.fws.gov/ecological-services/habitat-conservation/cbra/maps/Locator/TX.pdf>  
<http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx>  
<https://nepassisttool.epa.gov/nepassist/nepamap.aspx>  
<http://www.bestplaces.net/city/texas/CorpusChristiTexas>  
<http://www.dshs.state.tx.us./radiation/radon.shtm>  
[http://www.txdot.gov/apps/statewide\\_mapping/StatewidePlanningMap.html](http://www.txdot.gov/apps/statewide_mapping/StatewidePlanningMap.html)  
<http://www.glo.texas.gov/coast/coastal-management/forms/files/CoastalBoundaryMap.pdf>  
<https://ecos.fws.gov/ipac/gettingStarted/index>  
<https://www.fws.gov/wetlands/data/mapper.html> Texas Commission on  
Environmental Quality (TCEQ) Texas Department of Transportation Texas Historical  
Commission United States Department of Agriculture U.S. Fish & Wildlife Service

**List of Permits Obtained:**

None

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

City website to provide detailed information about the project, its goals, and progress updates. Public meetings to discuss the project and answer questions from the public.

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

The proposed activities for the Palms at Morris development will provide additional affordable housing for low-income seniors. According to the market study report, projected increases in the senior population are significant across the nation as well as demand for more age-restricted housing. The existing senior low-income properties in Corpus Christi have high occupancy rates and maintain long waiting lists. New, affordable housing has been found to provide low-income seniors with a more vibrant community, reduction in health problems, decrease in psychological stress, and enhance overall quality of life. The new complex may have a moderate impact on traffic in the immediate area and may encourage the development of commercial and retail facilities. The total environmental impact of the development will be limited due to the small footprint of the facility and historical disturbances on the property. As a result, to the extent reasonable and practical, the action as proposed will improve the future human environment.

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

The site at 2212 Morris Street in northwest Corpus Christi, Texas, was being considered for a Single-Family Housing Development. This housing option provides a sense of ownership and stability. However, the proposed development was rejected because it did not comply with the area's existing zoning regulations or comprehensive plans. Palms AT Williams Apartments is an alternative multi-family development at 7031 Williams Dr., Corpus Christi, TX. Although 78412 was considered, this option was not selected because the project was not awarded tax credits. This would significantly increase the project's financial burden, making it less feasible and potentially leading to higher rental costs for residents. The lack of tax credits would also reduce the project's attractiveness to investors and developers.

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

Without implementing the proposed multi-family apartment project, the site may remain underutilized or vacant, leading to neglect and potential deterioration. Implementing the project could meet growing housing demand, stabilize rental prices, create jobs, and improve environmental conditions. It would also enhance community development, infrastructure, and transportation, reducing congestion and improving public transportation options.

**Summary of Findings and Conclusions:**

exceptions to, or deletions from, this practice are described in Section 2.3.1 of this report. This assessment has revealed no recognized environmental conditions, controlled recognized environmental conditions, or significant data gaps in connection with the subject property. The prior Phase ESA, dated February 28, 2024, included a recommendation for a Phase II to determine if potential contamination from two

nearby facilities had impacted the subject property. According to the Phase II report, dated September 9, 2024, the results of the Limited Subsurface Investigation at the subject property concluded that there was no evidence of a chemical impact detected in the soil and groundwater samples collected. A search of available environmental records was conducted by Environmental Data Resources, Inc. (EDR) to produce a Vapor Encroachment Screen. The report was designed to meet the search requirements of the ASTM Standard E2600. None of the properties identified on the database searches were found to have contributed to a vapor encroachment condition. There are no issues with the property in regard to airport hazards, coastal barrier resources, flood management, clean air, contamination, farmland protection, historic preservation, endangered species, sole source aquifers, wetlands, wild and scenic or inventory rivers, environmental justice, or noise.

**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
Contamination and Toxic Substances	Post construction radon testing will be conducted to determine if mitigation is required.	N/A		

**Project Mitigation Plan**

The need for radon mitigation will be determined through post construction radon testing.

**Supporting documentation on completed measures**



## APPENDIX A: Related Federal Laws and Authorities

### Airport Hazards

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

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

✓ No

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

Yes

### Screen Summary

#### Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. There are no military airports within 15,000 feet or civilian airports within 2,500 feet of the subject property. Three military installations are between approximately 28,353 feet and 60,931 feet of the subject property (NALF Cabaniss, NALF Waldron and Corpus Christi Naval Air Station). One civilian airport (Corpus Christi International Airport) is approximately 27,878 feet. No impact from airport hazards is expected. Attachment 19.

#### Supporting documentation

[19 - Palms at Morris airport hazard circle.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 Federal Government does not subsidize development along coastal barriers as development in these areas may lead to the loss of natural resources as well as threaten human life, health, and property. Coastal Barriers along the Gulf coast are part of the John H. Chafee Coastal Barrier Resources System (CBRS). The subject property is not located in a CBRS unit. The nearest CBRS unit is approximately 13 miles away. Attachment 20

#### Supporting documentation

[20 - Palms at Morris CBRS Units.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:**

[22 - Palms at Morris Flood Map.pdf](#)

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

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

No

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

Yes

**4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?**

Yes

✓ No

**Screen Summary**

**Compliance Determination**

Based on Flood Plain information provided by the Federal Emergency Management Agency, the property is part of Flood Insurance Rate Map Number 48355C0320G Effective Date of October 13, 2022. The property is located in Zone X, an area of minimal flooding. Attachment 22.

**Supporting documentation**

[22 - Palms at Morris Flood Map\(1\).pdf](#)

**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**

No activities were observed on the subject property at the time of the site inspection that would generate regulated air emissions. A review of Corpus Christi: Current Attainment Status on the Texas Commission on Environmental Quality (TCEQ) website confirms that the Corpus Christi area is currently unclassified or in general attainment

of the National Air Quality Standards for all six criteria air pollutants, general conformity rules do not apply. Attachment 23.

**Supporting documentation**

[23 - Corpus Christi Current Attainment Status - Texas Commission on Environmental Quality.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

**2. Does this project include new construction, conversion, major rehabilitation, or substantial improvement activities?**

Yes

No

**3. Has this project been determined to be consistent with the State Coastal Management Program?**

Yes, without mitigation

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

Yes, with mitigation

No, project must be canceled.



**Screen Summary**

**Compliance Determination**

According to the Texas Coastal Management Zone Map provided by the Texas General Land Office, the subject property is located within a coastal zone boundary. The scope of work for the project is the construction of new apartment buildings on land that has been previously developed. The nearest water is 1.3 miles away. The project will likely not have adverse impacts on coastal natural resource areas. Attachment 21.

**Supporting documentation**

[21 - coastal-zone boundary-map.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)
<b>Reference</b>		
<a href="https://www.onecpd.info/environmental-review/site-contamination">https://www.onecpd.info/environmental-review/site-contamination</a>		

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

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

None of the above

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

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

**2. Were any on-site or nearby toxic, hazardous, or radioactive substances\* (excluding radon) 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?)**

Provide a map or other documentation of absence or presence of contamination\*\* and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.

✓ No

Explain:

A Phase II was conducted to establish if contamination was impacting the subject property. Attachment 12. Both soil and water samples were collected during the Phase II. Results for Volatile Organic Compounds (VOCs) and Total Petroleum Hydrocarbons (TPH) were below laboratory method detection limits (MDLs) and Texas Risk Reduction Program (TRRP) Action Levels. Therefore, the Phase II determined there is no evidence of chemical impact on the subject property.

Yes

\* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.

\*\* Utilize EPA's Enviromapper, NEPAAssist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

**3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions\* from having to consider radon in the contamination analysis listed in CPD Notice [CPD-23-103](#)?**

Yes

Explain:

✓ No

\* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the

environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.

- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

**4. Is the proposed project new construction or substantial rehabilitation where testing will be conducted but cannot yet occur because building construction has not been completed?**

✓ Yes

Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be uploaded to the mitigation section within this screen.

No

**8. Mitigation**

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

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

**Can all adverse environmental impacts be mitigated?**

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

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

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

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

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

Post construction radon testing will be conducted to determine if mitigation is required.

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

Complete removal

Risk-based corrective action (RBCA)

Other

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

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

### **Screen Summary**

#### **Compliance Determination**

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. Radon analysis indicated elevated levels of radon or consideration of radon will occur following construction. Adverse radon impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.

**Supporting documentation**

[8 - Corpus Christi radon map and Nueces county radon levels.pdf](#)

[13 - Palms at Morris Vapor Encroachment.pdf](#)

[12 - Phase II ESA - 2212 Morris Street Corpus Christi TX\(1\).pdf](#)

[Palms at Morris ESA 10 18 2024 bookmarked.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

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

**3. What effects, if any, will your project have on federally listed species or designated critical habitat?**

- ✓ No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat. in the action area.

Document and upload all documents used to make your determination below. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate

May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

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

Mitigation as follows will be implemented:

- ✓ No mitigation is necessary.

Explain why mitigation will not be made here:

All species that might have been in the area have been eliminated based on lack of appropriate habitats.

**Screen Summary**  
**Compliance Determination**



Thirteen(13) total threatened, endangered, or candidate species are on the species list for this area of Nueces County, TX. Four of the thirteen species listed are marine reptiles (sea turtles) which live in the water; since there are no bodies of water on the property and the nearest water is over one mile away from the property, these species would not be impacted by this project. There are 9 remaining species to be investigated. Habitat information for each species was gathered from various sources. As the property is currently undeveloped with none of the specified habitats present, none of these species should be encountered on the property and should not be impacted by planned activities.

**Supporting documentation**

[27 - Corpus Christi Species for Palms at Morris\(1\).pdf](#)  
[27 - Corpus Christi Species for Palms at Morris.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**

There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements. During the preparation of this ESA, aerial surveillance of the area revealed a CITGO Refinery, a Flint Hills Resources Refinery, and the Magellan Terminal Holdings Refinery within two miles of the border of the Palms at Morris property. In accordance with 24 CFR Part 51 Subpart C, "Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive Nature," Acceptable Separation Distances (ASDs) were calculated for the nearest above ground storage tank from each refinery. Attachment 10. The Palms at Morris property is calculated to be beyond the Acceptable Separation Distance from the four (4) identified refinery tanks located within two miles of the property as calculated using the Acceptable Separation Distance Electronic Assessment algorithm. As a result, no further actions nor mitigation appears required.

**Supporting documentation**

[10 - Palms at Morris Acceptable Separation Distance Response\(2\).pdf](#)  
[9 - Explosives and flammables Palms at Morris.pdf](#)

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

Yes

✓ No

### Farmlands Protection

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

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

Yes

No

**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

This project includes activities that could potentially convert agricultural land to a non-agricultural use, but an exemption applies. The project is in compliance with the Farmland Protection Policy Act. According to the Soil Survey, the type of soil on the property is listed as not prime farmland. The property, however, can be considered to be land committed to urban development since it has been occupied by the schools and residential housing since the late 1950s. The subject property is in a shaded area on the 2020 Census-Urbanized Area Reference Map which indicates it is an

incorporated place and is exempt from the provisions of the Farmland Protection Policy Act. Attachment 24.

**Supporting documentation**

[24 - Census map overlay for farmland Palms at Morris.pdf](#)

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

Yes

No



## Floodplain Management

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

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

Yes

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

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

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

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

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

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

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

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

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

or other HUD assistance.

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

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

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

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

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

Describe:

No

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

Yes

Describe:

No

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



The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information<sup>1</sup> to determine flood elevation. Include documentation and an explanation of why this is the best available information<sup>2</sup> for the site. Note that newly constructed and substantially improved<sup>3</sup> structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

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

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

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

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

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

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

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

**Screen Summary**

**Compliance Determination**

This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. Based on Flood Plain information provided by the Federal Emergency Management Agency, the property is part of Flood Insurance Rate Map Number 48355C0320G Effective Date of October 13, 2022. The property is located in Zone X, an area of minimal flooding. Attachment 22.

**Supporting documentation**

[22 - Palms at Morris Flood Map\(2\).pdf](#)

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

Yes

✓ No

## Historic Preservation

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

### **Threshold**

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

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

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

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

### **Step 1 – Initiate Consultation**

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

- ✓ State Historic Preservation Offer (SHPO) Completed

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

Other Consulting Parties

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

Current listings of historical locations in Corpus Christi were reviewed. Seventeen locations were included in the current listings. The closest historical location was the Galvan Ballroom which is 0.29 miles away from the subject property. Attachment 25 A letter was sent to the Texas Historical Commission (THC) in Austin, Texas in July 2024 to request a determination on the project.

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

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

Yes  
No

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

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

2212 Morris Street

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

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

<b>Address / Location / District</b>	<b>National Register Status</b>	<b>SHPO Concurrence</b>	<b>Sensitive Information</b>
600 Building	Identified	Yes	✓ Not Sensitive
Britton-Evans House	Identified	Yes	✓ Not Sensitive
Broadway Bluff Improvement	Identified	Yes	✓ Not Sensitive
Galvan Ballroom	Identified	Yes	✓ Not Sensitive
Simon Gugenheim House	Identified	Yes	✓ Not Sensitive

**Additional Notes:**

There were 17 historical listings for Corpus Christi. The closest one was 0.29 miles away.

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

Yes

No

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

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

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

No Historic Properties Affected

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

**Document reason for finding:**

No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Adverse Effect

**Screen Summary**

**Compliance Determination**

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106. There were 17 properties listed on the historical listings for Corpus Christi. The closest was 0.29 miles away and the farthest was 35.85 miles away.

**Supporting documentation**

[Comanche Nation Oklahoma-Palms at Morris Apts Corpus Christi TX FNL.pdf](#)  
[Wichita and Affiliated Tribes-Palms at Morris Apts Corpus Christi TX FNL.pdf](#)  
[Tonkawa Tribe of Indians of Oklahoma-Palms at Morris Apts Corpus Christi TX FNL.pdf](#)  
[Apache Tribe of Oklahoma-Palms at Morris Apts Corpus Christi TX FNL.pdf](#)  
[26 - SHPO response Palms at Morris Apartments.pdf](#)  
[25 - Palms at Morris historical properties.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: 64

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: 64

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

**Screen Summary**

**Compliance Determination**

A Noise Assessment was conducted. The noise level was acceptable: 64.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation.

**Supporting documentation**



- [34 - Palms at Morris Noise support documents.pdf](#)
- [34 - Noise Prediction table Palms at Morris.pdf](#)
- [34 - Future Traffic Palms at Morris.pdf](#)
- [34 - airport circle Palms at Morris.pdf](#)

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

Yes

✓ No

### Sole Source Aquifers

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

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

- Yes
- ✓ No

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

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

- ✓ No

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 project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements. According to the United States Environmental Protection Agency, Sole Source Aquifer Protection Program, National

Summary of Sole Source Aquifer Designations, the only designated sole source aquifer in Texas is the Edwards Aquifer in the San Antonio/ South Texas area. The subject property is not located over the Edwards Aquifer. The closest intersection with the Edwards Aquifer is 144 miles from the subject property. Attachment 28.

**Supporting documentation**

[28 - Palms at Morris Sole source aquifer.pdf](#)

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

Yes

✓ No

**Wetlands Protection**

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

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

No

✓ Yes

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

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

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

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

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

**Screen Summary**

**Compliance Determination**

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990. A National Wetlands inventory map from the United States Department of Interior for this specific area was reviewed at the time of the field investigation and it was determined that the subject property has no designated wetlands. No water features, streams, tanks, ponds, or other areas of water were observed or identified on the subject property. There are no wetlands nearby. Attachment 29.

**Supporting documentation**

[29 - Palms at Morris wetlands map.pdf](#)

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

Yes

✓ No

## Wild and Scenic Rivers Act

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

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

✓ No

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

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

### Screen Summary

#### **Compliance Determination**

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act. The subject property will not impact wild and scenic rivers as there are none in the City of Corpus and Nueces County. The only designated Wild and Scenic Rivers in Texas are in the Rio Grande in Big Bend National Park. The closest intersection with Rio Grande is over 290 miles away. Attachment 30. There are 19 segments of rivers in Texas that are listed on the Nationwide Rivers Inventory (NRI). These are segments that potentially qualify as national wild, scenic, or recreational river areas. The closest of these segments is the Guadalupe River or the Medina River which are approximately 160 miles away from the subject property. Attachment 31. The project will not have a direct or adverse effect within wild and scenic river boundaries or river segments listed in the NRI.

#### **Supporting documentation**

[31 - Inventory Rivers to Corpus Christi Palms at Morris.pdf](#)

[30 - Wild and Scenic Rivers to Corpus Christi Palms at Morris.pdf](#)

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

Yes

✓ No



### Environmental Justice

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

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

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

Yes

✓ No

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

#### **Screen Summary**

##### **Compliance Determination**

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. As the land for this project is currently undeveloped, there would be no displacement of low income or minority populations. The area of the proposed apartment complex and a three mile radius around the complex include critical service gaps relating to broadband internet availability, housing burden, and transportation access burden. The apartment complex site also exists within a food desert. An EJ Screen was performed on October 18, 2024. Attachment 32.

##### **Supporting documentation**

[32- EJ Screen Palms at Morris\(1\).pdf](#)



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

Yes

✓ No