

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

Project Information

Project Name: John Jones Navigation Center

Responsible Entity: City of Key West

Project Grant/Contract Number: 22CV-S14/H2485

Preparer Name and Title: Jim Bouquet, P.E, Engineering Project Manager

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Direct Comments to: Jim Bouquet, P.E.

Project Location: 5537 College Road, Key West, Florida 33040 (see Project Site Map in Appendix A)

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

The City of Key West (the City) plans to remove the existing 9,024-square-foot Keys Overnight Temporary Shelter (KOTS) tent facility at 5537 College Road on Stock Island, Key West, Monroe County, Florida. KOTS would be replaced at the same location with a newly constructed permanent structure, the John Jones Navigation Center (JJNC). JJNC will include updated infrastructure such as a fire-safety sprinkler system, lighting, site security fencing, dependable climate control, improved plumbing, a compliant mechanical system, energy-efficient operations, accessibility, and reliable electricity. The new building footprint will cover approximately 10,422 square feet. The new JJNC will continue to provide temporary housing for approximately 150 low-income homeless people. The current number of employees at the

existing tent facility (four) is not expected to increase with the new JJNC. The project site totals 42,926 square feet within Parcel 00072080-000101. Parcel area is 13.94 acres (607,226 square feet). All project-related ground disturbance would occur within this 42,926-square-foot project area. The City would continue to lease approximately 42,593 square feet from Monroe County (see Project Site Map in Appendix A), with the remaining project area occupied by City right-of-way. The project site is approximately 3 miles east of the City and is adjacent to Sunset Marina to the northeast and Cow Key Channel to the west. The Monroe County administrative building complex hosting the Building Department, Code Enforcement, Juvenile Detention Center, and Sheriff's Office is located at the parcel to the southwest. The JJNC project involves demolition and removal of the existing facility and clearing and grading of the entire project site. The proposed new concrete structure will consist of one elevated story over covered space, with total height of approximately 26.3 feet (2.2 feet lower than the City maximum allowed height of 28.5 feet). The project will increase lot coverage from 25.2 to 25.4 percent, well below the allowed 40 percent. The impervious area will be reduced by 1.77 percent from 46.35 to 44.58 percent, and the area that to be landscaped (open space) will increase from 53.65 to 55.42 percent. Irrigation will be provided to landscaped areas. While the current facility has no on-site parking, the project will add 18 parking spaces for cars and 96 additional bicycle/scooter parking spaces (87 for tenants and nine for employees and visitors). A pedestrian concrete entry pathway provides access from Sunset Marina Road northwest to the JJNC entrance. Vehicle access would be via Sunset Marina Road at the southwest side of the new building. On March 25, 2021, a wetland delineation survey identified wetlands surrounding the project site, except for the landward (southeast) side. The project has been designed so that no project activities would occur in wetlands or other waters of the United States. The project site extends to the 2-foot wetland setback line, along which a 2-foot-high concrete retaining wall with fencing on top will be constructed to shield these wetland areas. Erosion, sedimentation, and turbidity control measures will be implemented throughout construction, and exposed surface soil areas will be minimized. The required runoff retention will be accommodated on site by the facility's new stormwater drainage system. Should the area be inundated during an extreme storm event, water would drain to the north into the adjacent coastal waters. Three trees entangled in the existing fence will be removed. Four existing trees within the proposed landscaped area will be retained and protected from damage during construction. Design of the new JJNC includes energy-efficient materials, insulation, and lighting. Additionally, an optional solar walkway canopy may provide a grid-tied system, reducing electrical demand of the facility. The entire project site is within the 100-year floodplain. No in-water, dredging, or bulkhead work is proposed. According to Letter of Map Revision (LOMR) Case Number 21-04-3573P, dated January 24, 2022, the project site is within zone AE, with a flood elevation of 10 feet, but not within the coastal special flood hazard area (VE). The finished floor (first floor) of the new JJNC building is designed 3.5 feet above the base flood elevation. A 500-gallon aboveground propane tank would be installed on 25.8 feet by 27.3 feet, 8-inch-thick concrete pad located approximately 35 feet west of the JJNC structure. The tank will provide fuel for the gas-powered dryers and water heaters in the JJNC. The pad will also provide space for the trash and recycling area. The pad perimeter will be enclosed by fencing. A temporary contractor staging area will be located within the project site. Excavations are expected to be minimal (approximately 12 inches). Some fill will be brought to the site for the foundation slab base. Trench depth for buried piping will be approximately 36 inches. The elevator piston cylinder will extend approximately 12 feet below ground surface, and caps for building foundation piles will not exceed 24 feet in depth. Any groundwater displaced during

installation of these materials would be contained and managed on site. Any staging or stockpiling of materials, equipment, or vehicles outside the project site will be on previously developed land requiring no ground disturbance. An estimated 16 temporary workers will be employed during demolition and construction. Siltation screens will be installed prior to construction to mitigate sediment runoff from the site during stormwater events. Water will be applied during construction as necessary for fugitive dust control. Estimated project construction duration is 18 months. During construction of the new shelter facility, City funds will be used to establish a temporary facility on the project site to accommodate the area’s homeless. Following completion of the new shelter, the temporary facility would be disassembled, and no further phases are planned.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]: The City created the KOTS in 2004 to provide shelter and showers for approximately 150 homeless and low-income people each night. The existing facility includes seven temporary structures on Stock Island behind the Monroe County Sheriff’s office at 5537 College Road. The gates open for intake at 6:00 p.m. each evening and close for intake at 9:00 p.m. Clients may leave at any time but may not re-enter until the following day. Clients must depart by 7:30 a.m. the following morning. The purpose of this proposed project is to construct a permanent facility to provide safe, updated temporary housing to the low-income and homeless population in the City and Monroe County. The proposed project is needed as the existing facility, the only temporary homeless housing available in the City and Monroe County, is at the end of its useful life. A replacement facility is necessary to safely accommodate homeless people in the City of Key West and Monroe County.

Existing Conditions and Trends [24 CFR 58.40(a)]: The project site is developed with the existing KOTS facility including temporary tents and Quonset hut-styled buildings. The temporary tents have deteriorated over the years and the buildings have been subjected to the extreme climate conditions of the area. These conditions are expected to further deteriorate if the proposed project is not implemented.

Funding Information

Grant Number	HUD Program	Funding Amount
22CV-S14	Community Development Block Grant Coronavirus Aid, Relief, and Economic Security (CARES) Act (CDBG-CV)	\$4.3 million

Estimated Total HUD Funded Amount:\$4.3 million

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:\$6.8 million

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

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The requirements of 24 CFR Part 51 Subpart D prohibit incompatible land uses on property within runway protection zones, clear zones, and accident potential zones (APZs). The National Plan of Integrated Airport Systems (NPIAS) was reviewed for civil, commercial service airports within 2,500 feet, and for military airports within 15,000 feet of the project site. The civil airport closest to the project site is Key West International Airport, approximately 8,300 feet southwest of the project site boundary. The center of Naval Air Station (NAS) Key West Boca Chica Field is approximately 21,580 feet east of the project site. The project site is approximately 17,200 from the nearest NAS Key West runway end, and is within 15,000 feet of the installation boundary. Mapping provided by NAS Key West shows that the project site is outside its Air Installations Compatible Use Zones and APZ areas. The project would not involve incompatible uses, such as construction of new homes, substantial rehabilitation of existing homes, acquisition of undeveloped land, or activities that significantly prolong the physical or economic life of existing incompatible facilities or change uses of the facilities to incompatible uses. Source: Appendix B
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The proposed project complies with the Coastal Barrier Resources Act. This project site is not within a Coastal Barrier Resource System

Improvement Act of 1990 [16 USC 3501]		(CBRS) Unit, and therefore would not impact a CBRS Unit. Source: Appendix C
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	The proposed project is in compliance. The entire project site (42,926 square feet) is within the 100-year floodplain (Flood Zone AE) according to the LOMR effective January 24, 2022, for Flood Insurance Rate Map (FIRM) Panel 12087C1509K. The City is a participant in the National Flood Insurance Program (NFIP) requiring adoption and enforcement of floodplain management regulations that meet or exceed minimum NFIP standards and requirements. The existing facility is covered by flood insurance, and the City will obtain flood insurance for the proposed new construction. Source: Appendix D
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	According to the U.S. Environmental Protection Agency (EPA) Green Book Criteria Pollutant Nonattainment Summary Report, Monroe County is not within a nonattainment area for any of the criteria pollutants. Source: Appendix E
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	The entire project site is within a coastal zone as defined by the State's Coastal Zone Management Program. The project would not adversely affect the coastal zone. The proposed JJNC would replace the existing KOTS tent facility. Based on the geographic location within the coastal zone, the project is subject to state review. Consultation with the Florida State Clearinghouse began with a letter dated April 12, 2023, to obtain written confirmation from the State that the proposed activities would comply with general consistency concurrence criteria. In an e-mail dated June 9, 2023, the Florida State Clearinghouse indicated that it had reviewed the proposal under the following authorities: Presidential Executive Order 12372; § 403.061(42), Florida Statutes; the Coastal Zone Management Act, 16 United States Code (U.S.C.) §§ 1451-1464, as amended; and the National Environmental Policy Act, 42 U.S.C. §§ 4321-4347, as amended. The letter indicated that based upon the size of the proposed project site (13.94 acres) and environmentally sensitive areas, the project requires an Environmental

		<p>Resource Permit from the South Florida Water Management District (SFWMD). The letter also stated: "...no objections to the subject project and, therefore, it is consistent with the Florida Coastal Management Program (FCMP). The state's final concurrence of the project's consistency with the FCMP will be determined during any environmental permitting processes, in accordance with Section 373.428, Florida Statutes." The SFWMD issued an Environmental Resource Permit for the project on July 10, 2023. Source: Appendix F</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>HUD policy requires that project sites and adjacent areas be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances that could affect the health and safety of property occupants. Under 24 CFR Part 58.5(i)(2)(i), a review was completed to determine whether hazardous materials, contamination, toxic chemicals and gases, or radioactive substances are present and may affect the health and safety of occupants or conflict with the intended property use. The proposed project would not involve any additional occupants. A Phase I Environmental Site Assessment (ESA) report completed on November 12, 2021, did not identify any existing or historical recognized environmental conditions (REC) for the project site. The Phase I ESA report identified multiple surrounding properties with registered active aboveground storage tanks (AST) and underground storage tanks (UST) within 0.25 miles southeast and northeast of the project site. It stated that Sunset Marina, approximately 400 feet northeast of the project site, has two registered USTs and two ASTs on site. Capacities of those ASTs are 2,000 and 3,000 gallons. The registered USTs are both 20,000-gallon tanks. Former wastewater tanks and infrastructure, including four active propane tanks, were observed in the Monroe County salvage yard. The site inspection report, dated April 12, 2023, indicated that all visible plumbing showed no visible signs of leaks, staining, or damage, and emitted no odor. Three propane ASTs and a flammables cabinet were observed on the northern property line of the project site. The following were noted in both the Phase I ESA report and the site inspection report: USTs, ASTs, and the salvage yard</p>

hosting former wastewater tanks, propane AST tanks, salvage trucks, cars, and other miscellaneous debris. Multiple old cars were observed on the property east of the project site. Adjacent to the project site, the Monroe County government complex has a registered diesel UST for an emergency generator, which is approximately 150 to 300 feet from the project site. No evidence of soil staining, current or past releases, ground staining, or stressed vegetation was observed at the project site or on the portions of the contiguous properties that were visible—and no odors were detected. No RECs or other indications of site contamination were noted during the inspection. Site contamination was evaluated by use of the EPA NEPA Assist mapping and the EPA Facility Registry Service (FRS) to identify Superfund (National Priority List [NPL]) and Brownfields (Assessment Cleanup and Redevelopment Exchange System [ACRES]) sites within 1 mile of the project site, as well as Resource Conservation and Recovery Act (RCRA), Toxic Release Inventory System (TRIS), and Toxic Substances Control Act (TSCA) sites within 3,000 feet of the project site. No NPL or ACRES facilities were identified within 1 mile of the project site, and no TRIS or TSCA listings were identified within 3,000 feet of the site. Eight RCRA listings were identified within 3,000 feet of the project site. The facilities nearest to the project site are: 1) Monroe County Public Works Sheriffs Administration at 5501 College Road (approximately 932 feet east of the project site), was listed in EPA's Enforcement and Compliance History Online (ECHO) detailed facility report as an active RCRA very-small-quantity generator with no current violations of RCRA. 2) Key West Resource Recovery at 5701 West Junior College Road (approximately 1,191 feet east of the project site) was listed in EPA's ECHO detailed facility report as an inactive RCRA facility not currently classified in any hazardous waste database, and with no current RCRA violations. The facility has been demolished and was replaced with the Key West Transit facility in 2015. The project would not remove or add residents from the vicinity of these listed facilities, and therefore would not expose new populations to hazards or nuisances. The intended use of the project site, similar to

		<p>the existing use, would not be affected by these listed facilities. The City would implement measures to minimize exposure of workers and the public to any hazardous materials that may be discovered during construction, including preparation of a soil management plan to manage any contaminated soil that may be encountered during construction. Source: Appendix G</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Review of this project site was completed by use of an Official Species List from the U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Consultation (IPaC) website. Identified species of concern in the vicinity of the project site are: 1) Florida panther (<i>Puma [=Felis] concolor coryi</i>) – endangered, 2) West Indian manatee (<i>Trichechus manatus</i>) – threatened, 3) puma (=mountain Lion) (<i>Puma [=Felis] concolor</i> [all subsp. except <i>coryi</i>]) – threatened, 4) Bachman's warbler (=wood) (<i>Vermivora bachmanii</i>) – endangered, 5) eastern black rail (<i>Laterallus jamaicensis</i> ssp. <i>jamaicensis</i>) – threatened, 6) roseate tern (<i>Sterna dougallii dougallii</i>) – threatened, 7) American alligator (<i>Alligator mississippiensis</i>) – threatened, 8) American crocodile (<i>Crocodylus acutus</i>) – threatened, 9) eastern indigo snake (<i>Drymarchon couperi</i>) – threatened, 10) Florida Keys mole skink (<i>Plestiodon egregius egregius</i>) – proposed threatened, 11) green sea turtle (<i>Chelonia mydas</i>) – threatened, 12) hawksbill sea turtle (<i>Eretmochelys imbricata</i>) – endangered, 13) leatherback sea turtle (<i>Dermochelys coriacea</i>) – endangered, 14) loggerhead sea turtle (<i>Caretta caretta</i>) – threatened, 15) gulf sturgeon (<i>Acipenser oxyrinchus [=oxyrhynchus] desotoi</i>) – threatened, 16) Stock Island tree snail (<i>Orthalicus reses</i> [not incl. <i>nesodryas</i>]) – threatened, 17) Bartram's hairstreak butterfly (<i>Strymon acis bartrami</i>) – endangered, 18) Florida leafwing butterfly (<i>Anaea troglodyta floridalis</i>) – endangered, 19) Miami blue butterfly (<i>Cyclargus [=Hemiargus] thomasi bethunebakeri</i>) – endangered, 20) big pine partridge pea (<i>Chamaecrista lineata keyensis</i>) – endangered, 21) Blodgett's silverbush (<i>Argythamnia blodgettii</i>) – threatened, 22) Cape Sable thoroughwort (<i>Chromolaena frustrata</i>) – endangered, 23) Everglades bully (<i>Sideroxylon reclinatum</i> ssp. <i>austrofloridense</i>) – threatened,</p>

		<p>24) Florida pineland crabgrass (<i>Digitaria pauciflora</i>) – threatened, 25) Florida pineland crabgrass (<i>Digitaria pauciflora</i>) – threatened, 26) Florida prairie-clover (<i>Dalea carthagenensis floridana</i>) – endangered, 27) Florida semaphore cactus (<i>Consolea corallicola</i>) – endangered, 28) key tree cactus (<i>Pilosocereus robinii</i>) – endangered, 29) sand flax (<i>Linum arenicola</i>) – endangered, and 30) wedge spurge (<i>Chamaesyce deltoidea serpyllum</i>) – endangered. No critical habitats were identified in the vicinity of the project site. No activities in water would affect threatened or endangered fish species. Three trees entangled in the existing fence would be removed. Three existing trees within the proposed landscaped area would be retained and protected from damage during construction with tree-protection fencing. Based on the developed nature of the project site, no habitat suitable for these protected species is expected to be present. In a determination dated April 26, 2021, USFWS found that projects similar to the proposed action are not likely to adversely affect any federally listed species or designated critical habitat and stated that no further Endangered Species Act coordination or consultation is required. Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.), and projects affecting these species may require development of an eagle conservation plan. No bald eagle nesting sites were identified in Florida Fish and Wildlife Conservation Commission data. The nearest nesting location is approximately 3.3 miles southeast of the project site on Boca Chica Key. A review of the Florida Natural Areas Inventory tracking list for Monroe County (last updated on April 11, 2023) identified 307 state species and natural communities of concern, including the federally listed species discussed above. Based on the developed nature of the project site, no habitat suitable for these species is expected to be present. Source: Appendix H</p>
<p>Explosive and Flammable Hazards 24 CFR Part 51 Subpart C</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Locations of HUD-assisted projects involving new residents, an increase in residential density, or introduction of new explosive and flammable hazards must have acceptable separation distances (ASD) between residences and the stationary hazardous operations that store, handle, or process chemicals or petrochemicals</p>

of an explosive or flammable nature. These include tanks within 1 mile that are either or both of the following: 1) containers 100 gallons or less in capacity, containing common liquid industrial fuels and 2) 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 version of National Fire Protection Association (NFPA) Code 58. A 500-gallon aboveground propane tank would be installed on an 8-inch-thick concrete pad approximately 35 feet west of the JJNC structure wall to fuel the gas-powered dryers and the water heater in the new building. This size of this tank is below the 1,000-gallon-capacity that would trigger need to determine and implement an ASD between the propane tank and the building. A Phase I ESA report, dated November 12, 2021, stated that Sunset Marina, approximately 400 feet northeast of the project site, has two registered ASTs on site: one 2,000-gallon and one 3,000-gallon. The Phase I ESA report cited four active propane ASTs within the Monroe County salvage yard. The tanks described in the Phase I ESA report were also noted in the site inspection report dated April 12, 2023. The 2,000- and 3,000-gallon fuel ASTs on the Sunset Marina property could present explosive or flammable hazards for users and workers at the JJNC, and thus were evaluated for ASD by use of HUD's electronic-based ASD assessment tool. The ASDs for thermal radiation from these tanks that could affect people were 369.16 and 437.09 feet, respectively. The ASDs for thermal radiation from these tanks that could affect buildings were 69.27 and 83.56 feet, respectively. Contact with Sunset Marina clarified that although the pumps for boat fueling are above ground, the tanks are underground. Therefore, the tanks at the marina would not pose a flammable or explosive hazard to the project site. The four tanks on the Monroe County salvage yard property are shown in photograph 5 of the site inspection report. Each of these four ASTs was confirmed by the City to be a 1,000-gallon propane tank—below the capacity that would trigger need to determine and implement an ASD between the propane tank and the new building. A desktop review of aerial photography identified apparent ASTs within 1 mile of the project site. In addition to

		<p>the ASTs described above, three large ASTs were observed at 5226 College Road. The tank sites are owned by the City and leased by the Florida Keys Aqueduct Authority to store water, as indicated in documentation found in the Florida Department of Environmental Protection (FDEP) Facility/Site Details and Associated Documents files. Approximately 40 facilities within 1 mile of the project site host ASTs and USTs registered under the FDEP Storage Tank Contamination Monitoring (STCM) program. This dataset lists both currently and previously regulated facilities. It also lists facilities registered with FDEP for the purpose of tracking on-site petroleum contamination. Of these, four facilities are within 1,000 feet of the project site: Monroe County-Key West Detention Center, Key West Seaplane Service Inc., Sunset Marina LLC, and Monroe County-Sheriffs Administration Building. The Key West Seaplane facility is closed, is undergoing remediation for petroleum contamination, and would not pose a flammable hazards threat to the project. As described above, the tanks at Sunset Marina are USTs and would not pose a flammable or explosive hazard at the project site. The tanks at the Monroe County-Key West Detention Center and Monroe County-Sheriffs Administration Building reportedly are USTs and would not present a flammable or explosive hazard to the project. Source: Appendix I</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Farmland Protection Policy Act (FPPA) pertains to conversion of farmland (directly or indirectly) to nonagricultural use. Under the FPPA, farmland includes prime farmland, unique farmland, land of statewide or local importance, forest land, pastureland, cropland, or other land, but not water or urban built-up land. A review of U.S. Department of Agriculture, Natural Resources Conservation Service, Web Soil Survey indicated that the project site is underlain by Islamorada muck, tidal-urban land complex, 0 to 1 percent slopes. These soils were not evaluated for farmland potential. The project site is developed with the current KOTS, and does not include soils protected under the FPPA. No further compliance activities are necessary. Source: Appendix J</p>

<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The entire project site (42,926 square feet) is within the 100-year floodplain (Flood Zone AE) according to the LOMR effective January 24, 2022, for FIRM Panel 12087C1509K. In accordance with 24 CFR Part 55, an eight-step floodplain analysis identified no practicable alternatives to the proposed project. An early public notice was published in the Key West Citizen on April 8, 2023. The comment period for the notice expired on April 24, 2023. The City also sent the notice to interested parties on April 12, 2023, with a comment period that ended on April 28, 2023. No comments were received. A final public notice was published on May 17, 2023, with a comment period that ended on May 25, 2023. The City also sent the notice to interested parties on May 22, 2023, with a comment period that ended on May 30, 2023. No comments were received. No further compliance activities are necessary. Source: Appendices D and K</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>An assessment of the project site by a cultural resources specialist concluded that the proposed project is unlikely to affect historic properties. Archaeological potential of the project site appears to be low because of grading, and possibly filling, related to development of the Monroe County administrative complex. Construction of the new JJNC would not result in adverse visual effects to neighboring properties, as all nearby buildings are less than 50 years old and therefore would not be routinely eligible for listing on the National Register of Historic Places. On this basis, conclusion was that the project is unlikely to adversely affect any historic properties. Consultation with the Florida Division of Historical Resources regarding the proposed project and a determination that no historic properties would be affected began with a letter to that office dated April 12, 2023. On May 2, 2023, the Florida Division of Historical Resources concluded that “the proposed project will have no effect on historic properties.” The letter stated that due to ground-disturbing activities, the following special condition regarding unexpected discoveries should be included during project activities: if prehistoric or historic artifacts, such as pottery or ceramics, projectile points, dugout canoes, metal implements, historic building materials, or any</p>

		<p>other physical remains that could be associated with Native American, early European, or American settlement are encountered at any time within the project site area, the permitted project shall cease all activities involving subsurface disturbance in the vicinity of the discovery. The applicant shall contact the Florida Department of State, Division of Historical Resources, Compliance Review Section at (850) 245-6333. Project activities shall not resume without verbal and/or written authorization. In the event that unmarked human remains are encountered during permitted activities, all work shall stop immediately and the proper authorities notified in accordance with Section 872.05, Florida Statutes. Consultation with the Miccosukee Tribe of Indians began with a letter dated April 13, 2023; no response was received. No further compliance activities are necessary. Source: Appendix L</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>HUD guidance at 24 CFR Part 51 requires review of potential noise generators in the vicinity of a project site, including major roadways (more than 10,000 vehicles per day) within 1,000 feet, railroads within 3,000 feet, and military or Federal Aviation Administration-regulated airfields within 15 miles. According to the HUD Noise Guidebook, the acceptable day/night noise level (DNL) is 65 decibels (dB). The purpose of this review is to ascertain the impacts of existing noise sources in the area on residents or other sensitive receptors. College Road is the only roadway within 1,000 feet of the project site. It has an annual average daily traffic (AADT) of 5,100 and would not be considered a major road. There are no rail lines within 3,000 feet of the project site. The three airports within 15 miles of the project site are Key West International Airport (approximately 1.5 miles southwest of the project site), Skydive Key West/Sugarloaf Shores (approximately 11.9 miles northeast of the project site), and Naval Air Station (NAS) Key West Boca Chica Field (approximately 4.0 miles east of the project site). Based on HUD's Airport Noise Worksheet, only operations at Key West International Airport would contribute to noise at the project site. Noise Exposure Maps and Supporting Documentation, prepared for the Monroe County Board of County Commissioners and finalized</p>

		<p>on February 21, 2023, show that the project site is outside the 65 dB DNL line for 2022 and the projected DNL line for 2028. The most current Air Installations Compatible Use Zone (AICUZ) Study for NAS Key West (February 2018) shows that the project site is beyond the 60 dB contour for the air station. The project would not involve establishment of new residences, an increase in residents, or introduction of other noise-sensitive uses. Use and the number of people served at the project site would remain the same as with the current facility. In addition, the permanent structure would reduce the noise exposure of those working and staying at the shelter, as compared to the temporary structures. The project does not require further evaluation under HUD's noise regulation. No further compliance activities are necessary. Source: Appendix M</p>
<p>Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to the EPA Source Water Protection, Sole Source Aquifer Protection Program, the project site is not within a sole source aquifer. The closest sole source aquifer is the Biscayne Aquifer, approximately 56 miles northeast of the project site. No further compliance activities are necessary. Source: Appendix N</p>
<p>Wetlands Protection Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The project site is on a peninsula surrounded by areas identified as Estuarine and Marine Wetland by the National Wetlands Inventory. On March 25, 2021, a wetland delineation identified wetlands surrounding the project site, except for the landward (southeast) side. The project has been designed so that no project activities would occur in wetlands or other waters of the United States. The project site extends to the 2-foot wetland setback line, along which a 2-foot-high concrete retaining wall with fencing on top would be constructed to shield these wetland areas. Erosion, sedimentation, and turbidity control measures would be implemented throughout construction, and exposed areas would be minimized. Any groundwater displaced during construction would be contained and managed on site and would not enter the wetland. The required runoff retention would be accommodated on site in the stormwater drainage facility. Should the area be inundated during an extreme storm event, overflow would drain to the north into the</p>

		adjacent coastal waters. No further compliance activities are necessary. Source: Appendix O
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No federally designated Wild and Scenic Rivers are within or in the immediate vicinity of the project site. No further compliance activities are necessary. Source: Appendix P
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Environmental justice is assurance of protection of the environment and human health equally for all people regardless of race, color, national origin, or income. Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations," requires HUD to consider how federally assisted projects may exert disproportionately high and adverse human health or environmental effects on minority and low-income populations. The minority and low-income screening factors in EPA's EJSCREEN tool were used to identify potential environmental justice populations in the area of the project site. The tool uses demographic factors as general indicators of a community's potential susceptibility to environmental factors. The minority population is the percent of individuals who list their Census racial status as a race other than white alone and/or list their ethnicity as Hispanic or Latino. Low-income in this case is the percent of a population in households where the household income is less than or equal to twice the federal poverty level. A percentage of these populations near the project site higher than the state averages is an indicator of relatively high concentrations of susceptible populations in the project area. The Florida average minority population in the EJSCREEN data was 47 percent, and the state average low-income population was 33 percent. In the area surrounding the project site, the average minority population percentage is 52 percent, and the low-income population percentage is 34 percent. Both indicators are above the state averages. The project would not generate adverse resource or health effects or adversely impact residential, commercial, or community facilities or services that may be of importance to environmental justice communities. The project would not

		<p>disproportionately generate adverse environmental impacts on environmental justice communities. The project would benefit environmental justice populations by providing a permanent facility that would provide safe, updated temporary housing to the low-income and homeless population in Key West. This project does not conflict with the goals of Executive Order 12898. No further compliance activities are necessary. Source: Appendix Q</p>
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Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list 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
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The City currently leases the project site from Monroe County, and the KOTS currently occupies it. The parcel is zoned Class 8600 “County,” which indicates a county land use. The listed land use is “Commercial Waterfront.” Adjacent parcels also are zoned for county use (Sheriff’s Office and Detention Center to the south and southeast, County administrative complex to the southwest), and residential apartments are to the north. The proposed project involves demolition and replacement of the KOTS, and the land use would not change. No new zoning approvals are required. The proposed building would be elevated 12.5 feet above ground level to mitigate flooding. Its height of approximately 26 feet and footprint would be of a scale and design compatible with adjacent development.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The project site is surrounded by the Gulf of Mexico to the north and east, and the Cow Key Channel to the west. Its elevation is 3 to 5 feet above mean sea level. On-site soil before development was identified as Isladora muck, tidal-Urban land complex, 0 to 1 percent slopes. Development included fill identified as Urban Land Complex consisting of crushed oolitic limestone or coral. The entire project site would be disturbed. During construction, an erosion control/silt fence would be installed at the borders of the project site to prevent migration of sediment off site. A Stormwater Pollution Prevention Plan will be prepared before construction, in conjunction with acquisition of coverage under the General Construction National Pollutant Discharge Elimination System

		permit. An existing stormwater retention area is on the western and southern sides of the project site. A new narrow retention area would be installed on the northeast side of the new building to retain stormwater from that side of the building. Flow from other building downspouts and inlets from the driveway and parking area would be collected to outfall into the retention area to the southwest. The new system would be permitted by the South Florida Water Management District. The overall impervious area would be reduced from 46.35 to 44.58 percent, with new areas of landscaping allowing for new permeable surface
Hazards and Nuisances including Site Safety and Noise	2	Safe access to the new facility would be improved by on-site car parking, bicycle/scooter parking, and a new pedestrian concrete entry pathway providing access from Sunset Marina Road. Fencing around the demolition and construction areas would keep the public and homeless people from the active areas. The temporary homeless shelter to be built on site to accommodate the homeless people during construction would operate during the same hours as the existing facility. The homeless people are allowed on site only at night and must leave each morning. They would not be present on site during times of construction noise.
Energy Consumption	2	The existing KOTS has electrical connections to the KEYS Energy Services distribution system. These connections also would serve the new facility. The number of homeless people that would be accommodated by the new facility would be the same as the existing facility. Overall demand for electricity is expected to remain approximately the same as the current facility. Improvements will include energy-efficient design and the potential installation of a solar walkway canopy to reduce overall electrical demand. Propane for gas-powered clothing dryers and a water heater would come from a 500-gallon propane tank.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	The number of employees working at the new facility would be the same as in the existing facility, posing no change in employment or income.
Demographic Character Changes, Displacement	2	The number of homeless people accommodated at the new facility would be the same as in the existing facility, posing no changes to the demographic character. During construction, a temporary facility would be constructed on site to accommodate the homeless people, resulting in no displacement of residents or businesses.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	Schools in the area include the Gerald Adams Elementary School (2,500 feet northeast), College of the Florida Keys (3,270 feet to the northeast), and Florida Keys Community College Community

		Resource Learning Center (3,420 feet to the northeast). Cultural facilities include the American Legion Post (2,293 feet to the east). With no expected change in the residential population, the project would have no effects on these facilities.
Commercial Facilities	2	Stores and restaurants are along the Overseas Highway and North Roosevelt Boulevard 2,900 feet to the south and southeast of the project site. With no expected change in the residential population, the project would have no effects on these facilities.
Health Care and Social Services	2	Medical services in the area are provided by Lower Keys Medical Facility at 5900 College Road, 2,950 feet east of the project site. A Positive Step social services for high-risk youth and their families is adjacent to the project site to the south. With no expected change in the residential population, the project would have no effects on these services.
Solid Waste Disposal / Recycling	2	A solid waste dumpster is on the west side of the facility. The contracted hauler (Waste Management Inc.) collects solid waste. The service would remain the same for the new facility. The selected contractor would be responsible for conducting a compliant disposition of demolition and construction waste. With no expected change in the residential population, no change is anticipated in the amount of solid waste generated when the new facility is operational.
Waste Water / Sanitary Sewers	2	The existing facility has sanitary sewer service through a pipeline, and connection to the existing off-site lift station. A new 6-inch pipeline would be installed at the northwest corner of the shelter building that would connect to a new grinder pump. From there, a new 2-inch force main would connect to the existing lift station. Because of no expected change in the residential population, waste water demand would not alter. During construction, any fluids displaced from installation of the elevator piston or foundation piles would be retained and managed on site.
Water Supply	2	The existing facility has water service from the Florida Keys Aqueduct Authority through a pipeline, and connection to the southeast. The new facility would use the same interconnection. As the number of employees and homeless people would be the same in the new facility, the service demand would not change. A new fire water line would be installed from the existing off-site fire pump building to the southeast corner of the new building.
Public Safety - Police, Fire and Emergency Medical	2	The City provides fire and police services. The Sheriff's Department has offices adjacent to the project site. The Key West Fire Department has a station at 1501 North Roosevelt Boulevard, 2,000 feet to the southwest. With no expected change in the residential population, demand for these services would not alter.
Parks, Open Space and Recreation	2	The nearest park is the Key West Tropical Forest and Botanical Garden 1,725 feet to the southeast. The region has numerous recreation facilities, including beaches, marinas, campgrounds, and golf courses. Recreation facilities closest to the project site are Sunset Marina and the Key West Tropical Forest and Botanical Garden. With no expected change in the residential population, the project would have no effects on these facilities.

Transportation and Accessibility	2	The City of Key West Transit provides bus service to the area. Bus stops are 1,465 feet to the southeast along College Road. With no expected change in the residential population, demand for these services would not alter.
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Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	1	The new facility would be built within the footprint of the old facility—with no new impacts on unique natural features or water resources. An improved stormwater management system would be beneficial to existing water resources surrounding the project site. Any fluids displaced from installation of the elevator piston or foundation piles would be retained and managed on site.
Vegetation, Wildlife	2	The project site is completely developed and has minimal vegetation and wildlife. Three trees entangled in the existing fence would be removed. The City’s Urban Forestry Manager will conduct a pre-construction survey of the project site for nests or eggs of migratory birds. Best management practices, including scheduling constraints, would be implemented as needed to avoid harassment or harm to the birds. Four existing trees within the proposed landscaped area would be retained and protected from damage during construction with fencing.
Other Factors	2	The proposed design takes climate change into account by virtue of its elevated design. Given the project site’s location on the waterfront, sea level rise would increase the chance of inundation. The elevation of the facility 12.5 feet above ground level (3 to 5 feet above mean sea level) would allow the facility to withstand storm flooding. The potential addition of a solar system above the walkway may reduce energy consumption of the facility and allow continuing provision of electricity during any power outages.

Additional Studies Performed: None

Field Inspection (Date and completed by): Michael Mendoza conducted a field inspection on April 12, 2023 (see Appendix G)

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]: 1) U.S. Environmental Protection Agency, 2) Federal Emergency Management Agency, 3) U.S. Army Corps of Engineers, 4) Florida Department of Environmental Protection, 5) Florida State Clearinghouse, 6) Florida Division of Historical Resources, 7) South Florida Regional Planning Council, 8) South Florida Water Management District, and 9) Miccosukee Tribe of Indians. Appendices: Appendix A - Project Information, Appendix B - Airport Hazards, Appendix C- Coastal Barrier Resources, Appendix D - Flood Insurance, Appendix E - Clean Air, Appendix F - Coastal Zone Management, Appendix G - Contamination and Toxic Substances, Appendix H - Endangered Species, Appendix I - Explosive and Flammable Hazards, Appendix J - Farmlands Protection,

Appendix K - Floodplain Management, Appendix L - Historic Preservation, Appendix M - Noise Abatement and Control, Appendix N - Sole Source Aquifers, Appendix O - Wetlands Protection, Appendix P - Wild and Scenic Rivers, and Appendix Q - Environmental Justice.

List of Permits Obtained: None

Public Outreach [24 CFR 50.23 & 58.43]: A “Early Notice and Public Review of a Proposed Activity in a 100-Year Floodplain” was published in the Key West Citizen on April 8, 2023. A Final Notice was published in the Key West Citizen on May 17, 2023.

Cumulative Impact Analysis [24 CFR 58.32]: The proposed project involves demolition of the existing KOTS and construction of a new replacement facility (JJNC) at the same location. The new facility would operate at the same capacity as the current facility. The project would continue to provide temporary housing for approximately 150 low-income homeless people, and the number of employees would not increase. No new impacts or increase in existing impacts are anticipated. During demolition and construction of the new JJNC, City of Key West funds would be used to establish a temporary facility on the project site to accommodate the area’s homeless population. Following completion of the new JJNC shelter, the temporary facility would be disassembled. Construction of the new facility may exert temporary impacts on air quality, noise, and traffic during construction activities. Replacement of the aging KOTS facility would provide a net long-term benefit to the City. No other projects are known to be proposed in the area, and no other cumulative effects are anticipated.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]: Other than the Proposed Action and the No Action Alternative, one alternative design was considered. An at-grade facility in the same location was considered as a way to reduce construction costs. The footprint and capacity of the at-grade facility would have been the same as the proposed action; therefore, environmental and socioeconomic impacts would have been mostly equivalent. However, given the low elevation of the site, location adjacent to the coastal area, and need to accommodate for sea level rise, the at-grade facility design was rejected. Alternative locations were not considered. Any other location for the facility would be a significant distance away. This alternative would incur roughly the same construction costs as the proposed action, but would not serve the current low-income, homeless population that relies on the existing facility. Alternative locations would not allow achievement of the goals of the Proposed Action.

No Action Alternative [24 CFR 58.40(e)]: The No Action Alternative would result in no environmental impacts. The existing KOTS facility is constructed of temporary structures built in 2004. The facility has deteriorated over the years. Under the No Action Alternative, the facility would continue to deteriorate and shortly reach the end of its useful life. The facility would have to cease operations, eliminating shelter and showers for approximately 150 homeless and low-income people each night.

Summary of Findings and Conclusions: This Environmental Assessment of the proposed JJNC has determined that the project will not significantly impact the natural or human environment. Use of CDBG-DR funds for the proposed project is appropriate. The project will replace the existing facility with one more resilient to flooding from storms and related power outages, thus

ensuring continued capacity to provide shelter for homeless during storm events. The proposed project does not require preparation of an Environmental Impact Statement.

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

Summarize below 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
Coastal Zone Management	The City would comply with the general and specific conditions set out in Environmental Resource Permit No. 44-107793-P issued by SFWMD on July 10, 2023.
Contamination and Toxic Substances	A soil management plan to manage any contaminated soil that may be encountered during construction will be prepared.
Historic Preservation	If prehistoric or historic artifacts, such as pottery or ceramics, projectile points, dugout canoes, metal implements, historic building materials, or any other physical remains that could be associated with Native American, early European, or American settlement, are encountered at any time within the project site area, the City shall cease all activities involving subsurface disturbance in the vicinity of the discovery. The City shall contact the Florida Department of State, Division of Historical Resources, Compliance Review Section, at (850) 245-6333. Project activities shall not resume without verbal and/or written authorization. In the event that unmarked human remains are encountered during permitted activities, all work shall stop immediately and the proper authorities notified in accordance with Section 872.05, Florida Statutes.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	A Stormwater Pollution Prevention Plan will be prepared before construction, in conjunction with acquisition of coverage under the General Construction National Pollutant Discharge Elimination System permit.
Vegetation, Wildlife	The City Urban Forestry Manager will conduct a pre-construction survey of the project site for nests or eggs of migratory birds. Best management practices, including scheduling constraints, would be implemented as needed to avoid harassment or harm to the birds.

Determination:

- Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.
Publish Concurrent notice per Section 58.43 and 58.45 **and obtain “Authority to Use Grant Funds”** (HUD 7015.16) per Section 58.70 and 58.71 before committing or drawing down any funds.

- Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

Preparer Signature:



Date: August 4, 2023

Print Name/Title/Organization: James W. Bouquet, P.E.
Engineering Project Manager
City of Key West, Florida

Certifying Officer Signature:





Date: 8.7.23

Print Name/Title: Teri Johnston
Mayor, City of Key West, Florida



This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).