

MEMORANDUM TO FILE

Citizen Place North Phase II Community Environmental Assessment (EA) Extension
Responsible Entity: Citizen Potawatomi Nation (CPN)
HUD NAHASDA 751 Funds

Re: Establishing Administrative Record for ERR per 24 CFR 58.47

Date: September 30, 2025

Purpose: To re-evaluate the environmental findings to determine if the original findings are still valid with the expiration of the original EA per 24 CFR 58.47(a)(1)

BACKGROUND

1. An Environmental Assessment (EA) was completed under 24 CFR Part 58 for the Citizen Place North Phase II Expansion Project with a Finding of No Significant Impact (*see* ERR for Citizen Place North Phase II Expansion Project).
2. The Tribe published a combined Finding of No Significant Impact/Request for Release of Funds for the Citizen Place North Phase II Expansion Project (*see* ERR for Citizen Place North Phase II Expansion Project).
3. HUD released the funds for the Citizen Place North Phase II Expansion Project (*see* ERR for Citizen Place North Phase II Expansion Project).
4. A HUD EA with a Finding of No Significant Impact is only viable for 5 years.
5. To date, 16 units are ready for occupancy, 18 more are in the final inspection stage, 16 are in the mid-construction stage, and 16 units still need to begin construction.
6. The construction of units to be completed will go beyond the regulatory time limit of the current EA and Finding of No Significant Impact.
7. The Tribe now proposes to extend its Finding of No Significant Impact due to a delay in construction and funding allocation that has exceeded the 5 year statutory time limit of the current EA.
8. The extension of the Finding of No Significant Impact cannot go beyond 10 years from the original published Finding of No Significant Impact/Request for Release of Funds.
9. Per 24 CFR 58.47(a), the Tribe is re-evaluating the environmental findings of the Citizen Place North Phase II Expansion Project to determine if the original findings are still valid for the proposed extension.

SUMMARY OF CURRENT REVIEW

1. A review of the original data in the ERR for the Citizen Place North Phase II Expansion Project was undertaken per 24 CFR 58.47(a)(1).

2. The HUD Statutory Checklist, supporting documentation and re-evaluation of the community storm shelter under the original ERR were analyzed.
3. Note that the U.S. Fish and Wildlife Service (USFWS), Information Planning and Consultation (IPaC) list, has since added the Monarch Butterfly, *Danaus plexippus*, to their species list as proposed threatened. There are no viable breeding or food sources for the monarch butterfly within the project area. USFWS has since removed the Least Tern, *Sterna antillarum*, from their species list and downlisted the American Burying Beetle from the status of endangered species to threatened (*see* attached USFWS IPaC Species List).
4. Elements of the HUD Environmental Assessment Checklist and supporting documentation in the original ERR were analyzed. Note that the Flood Insurance Rate Map (FIRM) identified in the HUD Statutory Checklist has been updated to Panel No. 40125C0215J (*see* FEMA Floodplain Map).

FINDINGS

1. Elements of the HUD Statutory Checklist and supporting documentation in the original ERR were analyzed and determined to still be viable.
2. Elements of the HUD Environmental Assessment Checklist and supporting documentation in the original ERR were analyzed and determined to still be viable.
3. The Responsible Entity affirms that the original findings are still valid. Therefore, per 24 CFR 58.47(b)(1) no further publication of a FONSI notice is required.

Micah Isaacs

Director, Transportation and Environment

Citizen Potawatomi Nation