

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

Project Information

Project Name: Senior-Activity-Center

HEROS Number: 900000010502688

Start Date: 10/10/2025

Responsible Entity (RE): CHEYENNE, 2101 Oneil Ave Cheyenne WY, 82001

RE Preparer: Amy Gorbey

State / Local Identifier:

Certifying Officer: Patrick Collins

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable): Granite Peak Environmental

Point of Contact: Karlyn Soriano

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: 2101 Thomes Ave, Cheyenne, WY 82001

Additional Location Information:

N/A

Direct Comments to:

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

The proposed project includes repurposing of the existing on-site structure, formerly used as the Senior Activity Center, into municipal offices and service centers. The property is currently owned by the Cheyenne Housing Authority (CHA), which constructed the building in the 1970s to house the Senior Activity Center. On July 17, 2025, CHA's Executive Director notified the City of Cheyenne that the CHA Board of Commissioners had confirmed the organization's intent to discontinue all CDBG-eligible activities at the site and relinquish the property in accordance with HUD regulations. CHA further indicated that the administration and operation of senior services had been transferred to a new nonprofit organization operating out of the recently completed Laramie County Senior Center facility in east Cheyenne. The new facility is better suited to serve Cheyenne's growing senior population. With the relocation of the Senior Activity Center's programs and services, the former site now stands vacant and underutilized. The site shares a city block with City of Cheyenne administration buildings and offices, and the city would like to acquire the site to expand their office spaces for city programs and services. Acquiring the site would allow the city to effectively accommodate future growth and community needs and ultimately enhance services for all Cheyenne residents. The scope of the project is limited to a change in the site's use from senior citizen programming to City of Cheyenne services. While future interior renovations are anticipated in the future to better accommodate city offices once CDBG funds have been repaid, no new construction is planned for this property in the foreseeable future. An appraisal was conducted by JRS Appraisal Services and prepared by John R. Sherman, MAI, Wyoming State Certified General Real Estate Appraiser (Certification No. 27). The city received the report for the Senior Activity Center on November 13, 2025. Based on the appraised value of the buildings for 2023 and 2025, the city determined the CDBG repayment amount to be \$375,250. The city awaiting final approval from the HUD Region 8 office to confirm the repayment amount and provide instructions for remittance. Once the repayment is completed, \$375,000 funds will be available to use in an eligible CDBG activity. The city plans to combine these funds with existing carry-over funds to support land acquisition for an affordable housing development projected to create approximately 340 housing units.

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

The HVAC, window, and lighting systems at the site were improved in 2021 and 2023 using HUD CDBG-CV 2020 funds to benefit the Senior Activity Center. Due to a change in use at the site, federal requirements under 24 CFR Part 58 mandate an environmental review to assess the impact of using CDBG funds for these improvements. This review is required before repaying HUD for the depreciated value of the improvements, as all HUD-assisted activities, including repayments resulting from a change of use, must undergo an environmental determination prior to making financial commitments or reallocating funds. Completion of this review will allow the funds to be reallocated toward projects that support HUD's national objective of benefiting low-to-moderate income (LMI) households.

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

The site is currently owned by the Cheyenne Housing Authority (CHA) and contains a single-story structure originally constructed in the 1970s by the CHA. The building formerly housed the Senior Activity Center from the time it was constructed until July 2025. Prior to the Senior Activity Center, the site was developed as residential homes for several decades. The site currently shares a legal parcel with the adjacent senior apartment building. However, the City intends to subdivide the parcel to separate the site and the apartment building as part of the property transfer from the CHA to the City of Cheyenne. Site cover consists of landscaped yard space and paved walk/driveways. Surrounding properties include the senior apartments to the north, insurance and medical offices to the east, a parking garage to the south, municipal buildings to the southwest, and a parking lot to the west.

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

[SAC Site visit.jpg](#)

[2 SAC Site visit.jpg](#)

[1 SAC Site visit .jpg](#)

[Site Map.pdf](#)

Determination:

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

Approval Documents:

7015.15 certified by Certifying Officer
on:

7015.16 certified by Authorizing Officer
on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
B-21-MC-56-00021	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$0.00
B-23-MC-56-00021	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$0.00

Estimated Total HUD Funded, \$0.00
Assisted or Insured Amount:

Estimated Total Project Cost [24 CFR 58.2 (a) \$1,250,000.00
(5)]:

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	☐ Yes ☒ No	The project site is approximately 5,405 feet southwest of the nearest civilian airport runway (see Attachment #1). Although the Wyoming Air National Guard does utilize the runway at the Cheyenne Regional Airport, Director of Properties and Compliance for the Cheyenne Regional Airport, Kyle Malacina, confirmed via a phone interview on 11/5/2024 that the airport is considered a public, civilian-based operation. Since the project site is located more than 2,500 feet away from the civilian airport, the project is in compliance with 24 CFR Part 51 Subpart D. It should also be noted that the F.E. Warren Air Force Base is located

		approximately 5,365 feet west/northwest of the site. However, this base is a missile base and does not have an active runway. Therefore, there is no APZ associated with this military facility.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	☐ Yes ☒ No	The site is located in a state that does not have Coastal Barrier Resource System (CBRS) units. Therefore, the project is in compliance with the CBRA. A figure showing the site's location in relation to national CBRS units is provided in Attachment #2.
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	Based on the project description, the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. Furthermore, the site is not located in a FEMA-designated special flood hazard area or a 100-yr/500-yr flood plain. Attachment #3 includes a FEMA FIRMet showing the project site is located in an "Area of Minimal Flood Hazard". Therefore, flood insurance is not required for this project, and it is in compliance with the Flood Disaster Protection Act and National Flood Insurance Reform Act.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	☐ Yes ☒ No	Based on the project description, this project does not include any activities that would require further evaluation under the Clean Air Act. Therefore, the project is in compliance with the Clean Air Act. Furthermore, as shown on the online NEPAassist screening tool (see Attachment #4), the project site is in attainment for all priority pollutants outlined in the Clean Air Act including ozone, lead, sulfur dioxide, carbon monoxide, PM 2.5, PM 10, and nitrogen dioxide. In fact, the entirety of Laramie County, WY is considered an attainment zone for air pollutants, according to the

		US EPA Green Book (see Attachment #5).
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	☐ Yes ☒ No	According to the Office for Coastal Management within the National Oceanic and Atmospheric Administration (NOAA), Wyoming does not participate in the National Coastal Zone Management Program since it does not have any coastline (see Attachment #6). Therefore, the project is in compliance with the CZMA.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	☐ Yes ☒ No	Several historical resources/databases were queried to understand the past use of the site to determine whether contamination/toxic substances may be present. A summary of the findings is below: * Attachment #7 - Sanborn Fire Insurance Maps were obtained through the Library of Congress for the various years from 1883 to 1923. The maps revealed the site was developed as early as 1886 with residential dwellings. The site and its surrounding area appear residential up until 1923. No contamination or toxic substances were identified by the Sanborn Maps. * Attachment #8 - Google Earth provided aerial imagery of the site from 1994-2025. In each of the images, the existing structure on the site is visible and appears similar to present-day conditions. Throughout each of the images, the areas surrounding the site transform from what appears to be a mixed residential/commercial neighborhood to a primarily commercial neighborhood. No contamination/toxic substances were identified on or near the site during the review of historical imagery. * Attachment #9 - Historical topographic maps of the site and surrounding area were obtained through Lightbox/EDR. Maps were available from 1911-2017. Each map shows the site within Cheyenne city limits and approximately three blocks

		southwest of the Wyoming State Capitol Building. The present-day structure is first shown on the 1994 map. None of the topographic maps indicated contamination and/or toxic substances located on or near the site. * Attachment #10 - EPA's online UST Finder tool did not identify any underground storage tanks located on or near the site. * Attachment #11 - According to the Wyoming DEQ's SPILL database, no spills or releases were recorded in the same Section (31), Township (14N), and Range (66W) as the project. The review of the database did not indicate any releases of contaminants/toxic substances on or near any of the project areas. * Attachment #12 - EPA's online NEPAAssist tool searched for EPA facilities, including Hazardous Waste/RCRA, Air Pollution, Waste Discharge, Toxic Release, Superfund, and Brownfield facilities. No such facilities were identified on the site. Furthermore, evaluation of the identified facilities around the site did not identify any potential sources of contamination that could impact the site. * Site Visit - Amy Gorbey, from the City of Cheyenne, completed a site visit on October 22, 2025, to observe site conditions as part of this EA. No hazardous substances, storage containers, or other potentially toxic substances were observed during the site visit. Based on the review of these resources, contamination/toxic substances were not identified at any of the project areas. * A Phase I ESA was completed for the site by RSB Environmental in March 2021. The ESA did not identify any RECs, HRECs, or CRECs as defined by ASTM Standard E1527-13. The report did identify that, while considered a non-scope item per the ASTM Standard, hazardous building
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		materials such as asbestos-containing materials could be present in the building due to its age. Although this Phase I ESA is expired per ASTM Standards, there has not been a significant change of use of the site other than the Senior Center relocating. It is unlikely that any significant changes have occurred at the site since the completion of this Phase I ESA. * The City of Cheyenne provided an Environmental Impact Disposition and Review completed for the site in 1971. The review was completed to satisfy NEPA requirements associated with the HUD-funded housing project that constructed 75 senior apartments adjacent to the site. The environmental review did not identify any contamination or toxic substances associated with the site at that time, and there have been no substantial change to site use since the review was completed. Based on the review of these resources, contamination/toxic substances were not identified at the project site.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	☐ Yes ☒ No	The scope of the project is limited to changing the use of the existing on-site structure from a senior activity center to office space for the City of Cheyenne. Due to the nature of the project, it is extremely unlikely that any plant/wildlife communities and/or habitats would be adversely affected since no substantial change is being made to the site. A list of threatened and endangered species that may be located within the proposed project location or be affected by the proposed project was generated by the Wyoming Ecological Services Field Office of the Fish and Wildlife Service (FWS). The list, included as Attachment #13, identified a total of eight mammals, birds, fishes, insects, and flowering plants that are

		considered threatened, endangered, or candidate species that could be impacted at the site. No critical habitats were identified in the project area. The FWS online IPaC tool was utilized to evaluate potential impacts to the identified species, and the assessment determined the project will have no effect on the species of concern at the site. The completed IPaC review and letter serving as Clearance to Proceed with Federally-Insured Loan and Grant Project Requests is included as Attachment #14.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	☐ Yes ☒ No	As shown on Attachment #12, the site is not on or near a hazardous facility with explosive or flammable hazards. Additionally, there are no plans to install a hazardous facility in the area. The scope of the project is limited to changing the use of the on-site building from a senior activity center to office space for the City of Cheyenne and does not include activities that will increase residential density of the site. Furthermore, a list of every known aboveground and below ground storage tank in Wyoming is available on the Wyoming DEQ's website. The list, current as of 5/29/25, shows there are only two facilities in Cheyenne with active aboveground storage tanks (see Attachment #15). Both facilities are more than 4,000 feet from the site (see Attachment #16). Therefore, the project is in compliance with 24 CFR Part 51 Subpart C.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	☐ Yes ☒ No	The scope of the project does not include new construction or the acquisition/conversion of undeveloped land. The site is located within city limits and has been developed since the 1800s. The proposed project activities will not alter this land use. Furthermore, the USDA's Web Soil Survey maps the site as 100% Urban Land, which is not

		considered prime farmland (See Attachment #17). Therefore, the project is in compliance with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	☐ Yes ☒ No	The scope of the project meets an exemption for floodplain management regulations. Furthermore, the site is not located in a FEMA-designated special flood hazard area or a 100-yr/500-yr flood plain. Attachment #3 includes a FEMA FIRMette showing the project site is located in an "Area of Minimal Flood Hazard". Additionally, as documented by the Wyoming Ecological Services Field Office of the USFWS (see Attachment #13) and the National Wetlands Inventory (NWI; see Attachment #18), no wetlands or other riparian areas were identified on or near the site. This was also confirmed during a site visit completed by Amy Gorbey with the City of Cheyenne on October 22, 2025, as part of this environmental review. Since the site is outside of the floodplain, additional considerations for floodplain management are not applicable to this project, and the project is in compliance with Executive Orders 11988 and 13690.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	☐ Yes ☒ No	The Wyoming State Historic Preservation Office (SHPO) was consulted regarding the project. On October 24, 2025, SHPO provided a letter to the City of Cheyenne concurring that the project has no effect to historic properties, and the site is not eligible for listing on the National Register of Historic Places. The letter, received on November 19, 2025, is included as Attachment #19. Per guidance in the "When to Consult with Tribes Under Section 106" worksheet, tribal consultation was not required for this project due to its limited scope. The signed worksheet is provided in Attachment #20.

Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	☐ Yes ☒ No	The scope of the project is limited to changing the use of the site from a senior activity center to office space for the City of Cheyenne and does not include any new construction or building rehabilitation. Therefore, the project is in compliance with the Noise Control Act.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	☐ Yes ☒ No	The scope of the project is limited to the acquisition of a property and repayment of previously spent CDBG funds. Therefore, the project is unlikely to have an adverse impact on groundwater resources. Furthermore, the site is not located on or near a sole source aquifer (SSA). According to NEPAassist, the nearest SSA is approximately 85 miles northwest of the site (see Attachment #21). Therefore, this project will not impact any SSA and is in compliance with SSA requirements under the Safe Drink Water Act.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	☐ Yes ☒ No	The scope of this project does not include any new construction activities. Instead, the scope is limited to changing the use of the on-site structure from a senior activity center to office space for the City of Cheyenne. Furthermore, no wetlands are located on or near the site that would be impacted by any changes of site use. This was confirmed via the NWI Surface Water & Wetlands mapping tool (see Attachment #18), through review of aerial imagery (see Attachment #8), and during the site visit completed as part of this environmental review. Therefore, the project is in compliance with EO 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	☐ Yes ☒ No	The site is not in proximity to any waterbody designated as a National Wild and Scenic River System (NWSRS) or an NWSRS Study Area, nor is it in proximity to a river included in the Nationwide Rivers Inventory (NRI). The nearest NWSRS is the Cache la Poudre Wild and Scenic River located

		approximately 40 miles southwest of the site, and the nearest NRI is the Cache la Poudre North Fork located approximately 33 miles southwest of the site (see Attachment #22). Given the geographical distance between the site and the nearest NWSRS/NRI and the project's limited scope, the project will not impact any protected rivers and therefore is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	☐ Yes ☒ No	No adverse environmental impacts were identified in the project's total environmental review. Therefore, the project is in compliance with Executive Order 12898. Furthermore, the project will allow for the expansion of municipal services and programs to better serve Cheyenne's growing population. All municipal services will be consolidated to the same city block making access easier for residents. Services previously provided at the site when it was used as the Senior Activity Center have been relocated to a space that is better suited for the operational needs of the program. Senior center staff retained their jobs at the new location, and more senior citizens will be served at the larger facility.

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

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

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

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	3	Minor Adverse Impact - The intended use of the site as office space is in conformance and compatible with city plans. The building matches the scale and design of the surrounding neighborhood and no building modifications are anticipated as a result of the project. The city will have to subdivide the parcel to separate the site from the adjacent senior housing building which is still owned and operated by the Housing Authority. However, the city is well equipped to manage this change, and it will not have any major or long-term impacts to the site or City staff. Lastly, the site currently has an "Exempt" zoning status since it is owned by a municipal agency; therefore, its reuse as city offices will be consistent with city zoning regulations.	Since the City of Cheyenne will be acquiring the property, no additional mitigation is necessary.
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	No impact - No soil will be disturbed due to the limited scope of the project.	N/A
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	No impact - No hazards or nuisances will result from the limited scope of the project.	N/A
SOCIOECONOMIC			
Employment and Income Patterns	1	Minor beneficial impact - Employees of the former senior activity center were maintained and provided employment at the new location. The expansion of city offices and services will provide the city with opportunities to increase employment as needed to meet the expanding needs of city operations.	N/A
Demographic Character Changes / Displacement	2	No impact - Since the site is not a residential property, no residents will be displaced. Services offered to senior citizens at the former location are now offered and have been	N/A

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		expanded at the new senior center location. The primary demographic utilizing the site will shift from senior citizens to adults; however, this will be a neutral shift.	
Environmental Justice EA Factor	1	Minor beneficial impact - The City of Cheyenne will be able to consolidate all municipal offices, programs, and services to one city block. This will result in centralized municipal services that are easy for residents to access. The additional space will also allow for the city to expand their services to better meet the demands of Cheyenne's growing population. Senior citizens will continue to receive the same services and programming at a larger, new facility that is better designed to meet the needs of the community.	N/A
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	No impact - No educational or cultural facilities would be impacted by the project.	N/A
Commercial Facilities (Access and Proximity)	1	Minor beneficial impact - The site was previously utilized by a municipal organization as a senior center but is currently vacant. The anticipated outcome of the proposed project would include the site being utilized by the City of Cheyenne for city offices and services. Reuse of the facility as city offices will enhance the urban core and surrounding area by the reoccupation and reuse of a currently vacant property.	N/A
Health Care / Social Services (Access and Capacity)	1	Minor beneficial impact - Health care facilities would not be affected by the project. Some social services provided by the former senior activity center have been relocated to a new facility that is better suited to provide these services. The project would also result	N/A

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		in the City of Cheyenne offering more office space for city employees and programs, allowing the City to better serve Cheyenne residents.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	No impact - No changes to solid waste and/or recycling are anticipated as a result of the limited scope of the project.	N/A
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	No impact - Wastewater and sanitary sewer systems will not be impacted by the project.	N/A
Water Supply (Feasibility and Capacity)	2	No impact - Water supply will not be impacted by the project.	N/A
Public Safety - Police, Fire and Emergency Medical	2	No impact - No changes to public safety are anticipated as a result of the limited scope of the project.	N/A
Parks, Open Space and Recreation (Access and Capacity)	2	No impact - The site does not contain any parks, open spaces, or recreation areas.	N/A
Transportation and Accessibility (Access and Capacity)	2	No impact - Transportation will not be impacted due to the limited scope of the project.	N/A
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	No impact - No unique natural features or water resources are present at the site.	N/A
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	No impact - No vegetation or wildlife will be impacted by the project due to its limited scope and urban setting.	N/A
Other Factors 1			
Other Factors 2			
CLIMATE AND ENERGY			
Climate Change	2	No impact - The scope of the project does not include any activities that could affect climate.	N/A
Energy Efficiency	2	No impact - No changes in energy efficient features are anticipated as a result of the project.	N/A

Supporting documentation**Additional Studies Performed:**

Field Inspection [Optional]: Date and completed

by:

Amy Gorbey

10/22/2025 12:00:00 AM

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

* U.S. Fish and Wildlife Service (CBRS Online Mapper & IPaC tool) * FEMA National Flood Hazard Layer FIRMette Online Mapping Tool * NEPAassist Online Tool * EPA Green Book * NOAA Office for Coastal Management * National Wetlands Inventory Online Mapping Tool * USDA Web Soil Survey * Wyoming DEQ (SPILL Report & Storage Tank List) * Wyoming State Geological Survey Geologic Hazards Map * Google Earth * Library of Congress (Sanborn Fire Insurance Map Online Collection) * Lightbox/EDR (Topographic maps of Cheyenne, WY) * EPA UST Finder Online Mapping Tool * Wyoming State Historic Preservation Office * Environmental Impact Disposition and Review Report (Completed in 1971 for HUD Project #WYO 2-3; Housing Authority of the City of Cheyenne) * Phone Interview - Kyle Malacina (Director of Properties and Compliance for the Cheyenne Regional Airport, completed by Amy Gorbey on 11/5/2024)

List of Permits Obtained:**Public Outreach [24 CFR 58.43]:**

A public comment period for the proposed amendments to the City of Cheyenne's Program Year 2025 Consolidated Plan and Annual Action Plan will be held from December 8, 2025, through January 2026. A public notice announcing the comment period and public hearings will be published on December 8, 2025. A public meeting will occur during the City Council meeting on December 22, 2025, followed by a second public hearing at the Finance Committee meeting on January 6, 2026. Public comments will be accepted at both meetings and throughout the comment period. The amendments address (a) the historic use of \$375,000 in CDBG funds for site improvements; (b) the disposition of the property and repayment of \$375,000 for the depreciated value of HUD-funded improvements to be reprogrammed for affordable

housing land acquisition; and (c) the site's future use as municipal program and office space. Public outreach includes distribution of announcements to community partners, including members of the Laramie County Community Partnership and local nonprofit organizations, as well as dissemination of a city press release.

Cumulative Impact Analysis [24 CFR 58.32]:

Cumulative actions at this site include (a) the historic use of CDBG-funds to improve on-site systems; (b) the disposition of the site as a HUD facility, including repayment of the depreciated value of HUD-funded improvements by the City of Cheyenne; and (c) the future use of the site as municipal office/program space. Overall, the cumulative impact of project actions is beneficial. Dated on-site systems including HVAC, windows, and lighting were improved in 2021 and 2023 using CDBG funds. These improvements increased energy efficiency and prolonged the functional life of the facility at no cost to the Cheyenne Housing Authority, who owned the building and operated the Senior Activity Center at the site at the time of improvement. The current project action, including disposition of the site as a HUD facility, repayment of the depreciated value of previous HUD-funded improvements, and the acquisition of the property by the City of Cheyenne, results in (a) funding being recirculated into Cheyenne's CDBG program to maximize community benefit and (b) expansion of municipal spaces on a centralized campus to allow the City of Cheyenne to continue meeting the needs of their growing population.

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

1. Reuse as a Senior Activity Center - This alternative assumes senior programming activities resume at the site to maintain its status as a senior activity center, so the site continues to meet HUD's national objective of benefitting LMI households. This alternative would mean that the CDBG funds would not have to be repaid by the city. This alternative is not feasible because the site is not large enough to continue housing the Senior Activity Center programs. The Housing Authority of Cheyenne has already built a new facility for the Senior Activity Center and moved their operations to the new location. The new facility is better suited to house the center and meet the needs of Cheyenne's senior citizens and includes space for exercise, games/programs, social interaction, medical storage, showers, and dining services. Furthermore, neither the City of Cheyenne or the Cheyenne Housing Authority have the resources or capacity to operate a Senior Activity Center, and two Senior Activity Centers are not required to meet the needs of the senior citizen community in Cheyenne. As of June 2025, administration of Senior Services was transferred to a nonprofit housed in the new Senior Activity Center.

2. Reuse as city offices and programming - This alternative assumes the City of Cheyenne acquires the site and repurposes the building as office space for city employees. This alternative would allow the city to effectively accommodate future growth and community needs and ultimately enhance services for all Cheyenne residents. Since this site reuse does not align with

HUD's national objective to support LMI households, the city would be required to repay the depreciated value of the improvements previously made at the site using CDBG funds including the HVAC, window, and lighting systems. The repaid money in the amount of \$375,250 will then be revolved into the City of Cheyenne's CDBG program so the funds can be reallocated to an affordable housing acquisition project supporting LMI households. This alternative is preferred because it would (a) allow the site to continue serving Cheyenne residents by expanding spaces for City offices and programs, (b) help keep city offices consolidated to one city block, and (c) reallocate the repaid grant funds to the City of Cheyenne's CDBG program so the program can have a wider impact on LMI households in Cheyenne.

No Action Alternative [24 CFR 58.40(e)]

If no action is taken at the site, it will continue to be sit vacant and underutilized. This would not align with the goals of the City of Cheyenne's CDBG program, and the city would be required to reimburse HUD for the depreciated cost of the updated HVAC, window, and lighting systems at the site. This alternative is not desirable because (a) it does not align with the city's planning goals for Cheyenne's city center, (b) the building would not be maintained and could potentially become a blighted property in the heart of the city, and (c) the City of Cheyenne would need to identify office and program space at a different location that is not near their current offices, thus making city services less accessible to Cheyenne residents.

Summary of Findings and Conclusions:

The Environmental Assessment revealed the project is compliant with all federal laws and authorities. Review of environmental assessment factors identified one minor adverse impact related to the subdivision of the site's legal parcel to separate the site from the adjacent senior housing complex. However, this impact is extremely minor considering the City of Cheyenne intends to acquire the site and is well suited to assist with this change. No additional mitigation steps are required. All other environmental assessment factors either had no impact or beneficial impacts. The cumulative impact of the project is beneficial, and no mitigation factors are necessary for this project. The Environmental Assessment did not identify any significant findings associated with the project.

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	Since the City of Cheyenne will be acquiring the property, no additional mitigation is necessary.	N/A		
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	N/A	N/A		
Hazards and Nuisances including Site Safety and Site-Generated Noise	N/A	N/A		
Employment and Income Patterns	N/A	N/A		
Demographic Character Changes / Displacement	N/A	N/A		
Environmental Justice EA Factor	N/A	N/A		
Educational and Cultural Facilities (Access and Capacity)	N/A	N/A		
Commercial Facilities (Access and Proximity)	N/A	N/A		
Health Care / Social Services	N/A	N/A		

(Access and Capacity)				
Solid Waste Disposal and Recycling (Feasibility and Capacity)	N/A	N/A		
Waste Water and Sanitary Sewers (Feasibility and Capacity)	N/A	N/A		
Water Supply (Feasibility and Capacity)	N/A	N/A		
Public Safety - Police, Fire and Emergency Medical	N/A	N/A		
Parks, Open Space and Recreation (Access and Capacity)	N/A	N/A		
Transportation and Accessibility (Access and Capacity)	N/A	N/A		
Unique Natural Features /Water Resources	N/A	N/A		
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	N/A	N/A		
Climate Change	N/A	N/A		
Energy Efficiency	N/A	N/A		

Project Mitigation Plan

N/A - No mitigation required

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities**Airport Hazards**

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

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

✓ **No**

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 approximately 5,405 feet southwest of the nearest civilian airport runway (see Attachment #1). Although the Wyoming Air National Guard does utilize the runway at the Cheyenne Regional Airport, Director of Properties and Compliance for the Cheyenne Regional Airport, Kyle Malacina, confirmed via a phone interview on 11/5/2024 that the airport is considered a public, civilian-based operation. Since the project site is located more than 2,500 feet away from the civilian airport, the project is in compliance with 24 CFR Part 51 Subpart D. It should also be noted that the F.E. Warren Air Force Base is located approximately 5,365 feet west/northwest of the site. However, this base is a missile base and does not have an active runway. Therefore, there is no APZ associated with this military facility.

Supporting documentation

[Att 1_Airport Hazards.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)	

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Compliance Determination

The site is located in a state that does not have Coastal Barrier Resource System (CBRS) units. Therefore, the project is in compliance with the CBRA. A figure showing the site's location in relation to national CBRS units is provided in Attachment #2.

Supporting documentation

[Att 2 CBRA.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:

[Att 3_FEMA FIRMette.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 the project description, the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. Furthermore, the site is not located in a FEMA-designated special flood hazard area or a 100-yr/500-yr flood plain. Attachment #3 includes a FEMA FIRMette showing the project site is located in an "Area of Minimal Flood Hazard". Therefore, flood insurance is not required for this project, and it is in compliance with the Flood Disaster Protection Act and National Flood Insurance Reform Act.

Supporting documentation

[Att 3_FEMA FIRMette\(1\).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**

Based on the project description, this project does not include any activities that would require further evaluation under the Clean Air Act. Therefore, the project is in compliance with the Clean Air Act. Furthermore, as shown on the online NEPAassist screening tool (see Attachment #4), the project site is in attainment for all priority pollutants outlined in the Clean Air Act including ozone, lead, sulfur dioxide, carbon monoxide, PM 2.5, PM 10, and nitrogen dioxide. In fact, the entirety of Laramie

County, WY is considered an attainment zone for air pollutants, according to the US EPA Green Book (see Attachment #5).

Supporting documentation

[Att 5 US Green Book Nonattainment Counties.pdf](#)

[Att 4 NEPA Assist Clean Air.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

This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.

Screen Summary**Compliance Determination**

According to the Office for Coastal Management within the National Oceanic and Atmospheric Administration (NOAA), Wyoming does not participate in the National Coastal Zone Management Program since it does not have any coastline (see Attachment #6). Therefore, the project is in compliance with the CZMA.

Supporting documentation

[Att 6 Coastal Zone Management Programs.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)
Reference		
https://www.onecpd.info/environmental-review/site-contamination		

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 I ESA completed for the site by RSB Environmental in March 2021 did not identify any RECs associated with the property. Since this original ESA was expired, Granite Peak Environmental, a professional environmental consulting firm, also queried several historical resources and databases to determine whether any toxic or hazardous substances may be located on the site that would be impacted by the project work. A site visit was also completed by the RE as part of the environmental assessment process. No hazardous or toxic substances were identified on the site during the site visit. A detailed explanation of the findings of the historic/database review is available in the screen summary.

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

5. Was radon testing or a scientific data review conducted that provided a radon concentration level in pCi/L?

Yes

✓ No

If no testing was conducted and a review of science-based data offered a lack of science-based data for the project site, then document and upload the steps taken to look for documented test results and science-based data as well as the basis for the conclusion that testing would be infeasible or impracticable.

Explain:

The scope of the project includes the change of use of the facility as a HUD-funded local senior center to a non-HUD facility. Since site will no longer be a HUD facility in the future, site-specific data was not deemed necessary due to the scope of the project and purpose of the EA. However, out of an abundance of caution, available data-sources were surveyed to identify the average radon concern for the site's location. According to the Wyoming State Geological Survey's online Geologic Hazards Map, the site is located in an area of Cheyenne with a medium probability of containing radon at levels above 4 pCi/L. The

mean level of radon in the area is 3 pCi/L and approximately 21% of sites within this area of Cheyenne exceeded 4 pCi/L.

File Upload:

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

Non-radon contamination was found in a previous question.

Screen Summary

Compliance Determination

Several historical resources/databases were queried to understand the past use of the site to determine whether contamination/toxic substances may be present. A summary of the findings is below: * Attachment #7 - Sanborn Fire Insurance Maps were obtained through the Library of Congress for the various years from 1883 to 1923. The maps revealed the site was developed as early as 1886 with residential dwellings. The site and its surrounding area appear residential up until 1923. No contamination or toxic substances were identified by the Sanborn Maps. * Attachment #8 - Google Earth provided aerial imagery of the site from 1994-2025. In each of the images, the existing structure on the site is visible and appears similar to present-day conditions. Throughout each of the images, the areas surrounding the site transform from what appears to be a mixed residential/commercial neighborhood to a primarily commercial neighborhood. No contamination/toxic substances were identified on or near the site during the review of historical imagery. * Attachment #9 - Historical topographic maps of the site and surrounding area were obtained through Lightbox/EDR. Maps were available from 1911-2017. Each map shows the site within Cheyenne city limits and approximately three blocks southwest of the Wyoming State Capitol Building. The present-day structure is first shown on the 1994 map. None of the topographic maps indicated contamination and/or toxic substances located on or near the site. * Attachment #10 - EPA's online UST Finder tool did not identify any underground storage tanks located on or near the site. * Attachment #11 - According to the Wyoming DEQ's SPILL database, no spills or releases were recorded in the same Section (31), Township (14N), and Range (66W) as the project. The review of the database did not indicate any releases of contaminants/toxic substances on or near any of the project areas. * Attachment #12 - EPA's online NEPAassist tool searched for EPA facilities, including Hazardous Waste/RCRA, Air Pollution, Waste Discharge, Toxic Release, Superfund, and Brownfield facilities. No such facilities were identified on the site. Furthermore, evaluation of the identified facilities around the site did not identify any potential sources of contamination that could impact the site. * Site Visit - Amy Gorbey, from the City of Cheyenne, completed a site visit on October 22, 2025,

to observe site conditions as part of this EA. No hazardous substances, storage containers, or other potentially toxic substances were observed during the site visit. Based on the review of these resources, contamination/toxic substances were not identified at any of the project areas. * A Phase I ESA was completed for the site by RSB Environmental in March 2021. The ESA did not identify any RECs, HRECs, or CRECs as defined by ASTM Standard E1527-13. The report did identify that, while considered a non-scope item per the ASTM Standard, hazardous building materials such as asbestos-containing materials could be present in the building due to its age. Although this Phase I ESA is expired per ASTM Standards, there has not been a significant change of use of the site other than the Senior Center relocating. It is unlikely that any significant changes have occurred at the site since the completion of this Phase I ESA. * The City of Cheyenne provided an Environmental Impact Disposition and Review completed for the site in 1971. The review was completed to satisfy NEPA requirements associated with the HUD-funded housing project that constructed 75 senior apartments adjacent to the site. The environmental review did not identify any contamination or toxic substances associated with the site at that time, and there have been no substantial change to site use since the review was completed. Based on the review of these resources, contamination/toxic substances were not identified at the project site.

Supporting documentation

[Att 12 NEPA Assist EPA Facilities.pdf](#)

[Att 11 SPILL Report.csv](#)

[Att 10 UST Finder.pdf](#)

[Att 9 Topos.pdf](#)

[Att 8 Aerials.pdf](#)

[Att 7 Sanborns.pdf](#)

[2021 Phase I ESA_Senior Activity Center.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.

This selection is only appropriate if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.

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

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.

Screen Summary

Compliance Determination

The scope of the project is limited to changing the use of the existing on-site structure from a senior activity center to office space for the City of Cheyenne. Due to the nature of the project, it is extremely unlikely that any plant/wildlife communities and/or habitats would be adversely affected since no substantial change is being made to the site. A list of threatened and endangered species that may be located

within the proposed project location or be affected by the proposed project was generated by the Wyoming Ecological Services Field Office of the Fish and Wildlife Service (FWS). The list, included as Attachment #13, identified a total of eight mammals, birds, fishes, insects, and flowering plants that are considered threatened, endangered, or candidate species that could be impacted at the site. No critical habitats were identified in the project area. The FWS online IPaC tool was utilized to evaluate potential impacts to the identified species, and the assessment determined the project will have no effect on the species of concern at the site. The completed IPaC review and letter serving as Clearance to Proceed with Federally-Insured Loan and Grant Project Requests is included as Attachment #14.

Supporting documentation[Att 14_IPaC.pdf](#)[Att 13_Species List.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

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

Yes

Screen Summary**Compliance Determination**

As shown on Attachment #12, the site is not on or near a hazardous facility with explosive or flammable hazards. Additionally, there are no plans to install a hazardous facility in the area. The scope of the project is limited to changing the use of the on-site building from a senior activity center to office space for the City of Cheyenne and does not include activities that will increase residential density of the site.

Furthermore, a list of every known aboveground and below ground storage tank in Wyoming is available on the Wyoming DEQ's website. The list, current as of 5/29/25, shows there are only two facilities in Cheyenne with active aboveground storage tanks (see Attachment #15). Both facilities are more than 4,000 feet from the site (see Attachment #16). Therefore, the project is in compliance with 24 CFR Part 51 Subpart C.

Supporting documentation

[Att 16 AST Facilities.pdf](#)

[Att 15 Tank List.pdf](#)

[Att 12_NEPAssist EPA Facilities\(1\).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.)	7 CFR Part 658

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

Yes

✓ No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

The scope of the project is limited to acquisition of developed land only. No agricultural or undeveloped land will be impacted by the project.

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

Screen Summary**Compliance Determination**

The scope of the project does not include new construction or the acquisition/conversion of undeveloped land. The site is located within city limits and has been developed since the 1800s. The proposed project activities will not alter this land use. Furthermore, the USDA's Web Soil Survey maps the site as 100% Urban Land, which is not considered prime farmland (See Attachment #17). Therefore, the project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[Att 17_Soil Map.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:

The scope of the project is limited to a property acquisition in which the City of Cheyenne must repay the depreciated value of the improvements completed at the site through its CDBG program due to a change of use and ownership of the site.

No

Screen Summary

Compliance Determination

The scope of the project meets an exemption for floodplain management regulations. Furthermore, the site is not located in a FEMA-designated special flood hazard area or a 100-yr/500-yr flood plain. Attachment #3 includes a FEMA FIRMette showing the project site is located in an "Area of Minimal Flood Hazard". Additionally, as documented by the Wyoming Ecological Services Field Office of the USFWS (see

Attachment #13) and the National Wetlands Inventory (NWI; see Attachment #18), no wetlands or other riparian areas were identified on or near the site. This was also confirmed during a site visit completed by Amy Gorbey with the City of Cheyenne on October 22, 2025, as part of this environmental review. Since the site is outside of the floodplain, additional considerations for floodplain management are not applicable to this project, and the project is in compliance with Executive Orders 11988 and 13690.

Supporting documentation

[Att 18_NWI Mapper.pdf](#)

[Att 13_Species List\(1\).pdf](#)

[Att 3_FEMA FIRMette\(2\).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" https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

Threshold

Is Section 106 review required for your project?

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

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

A letter from the Wyoming State Historic Preservation Office (SHPO) is included in the screen summary.

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

Screen Summary

Compliance Determination

The Wyoming State Historic Preservation Office (SHPO) was consulted regarding the project. On October 24, 2025, SHPO provided a letter to the City of Cheyenne concurring that the project has no effect to historic properties, and the site is not eligible for listing on the National Register of Historic Places. The letter, received on November 19, 2025, is included as Attachment #19. Per guidance in the "When to Consult with Tribes Under Section 106" worksheet, tribal consultation was not

required for this project due to its limited scope. The signed worksheet is provided in Attachment #20.

Supporting documentation[Attachment 19.pdf](#)[Attachment 20.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

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

Screen Summary**Compliance Determination**

The scope of the project is limited to changing the use of the site from a senior activity center to office space for the City of Cheyenne and does not include any new construction or building rehabilitation. Therefore, the project is in compliance with the Noise Control Act.

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

Yes

Senior-Activity-Center

Cheyenne, WY

900000010502688

✓ No

Sole Source Aquifers

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

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

✓ Yes

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

No

Screen Summary**Compliance Determination**

The scope of the project is limited to the acquisition of a property and repayment of previously spent CDBG funds. Therefore, the project is unlikely to have an adverse impact on groundwater resources. Furthermore, the site is not located on or near a sole source aquifer (SSA). According to NEPAAssist, the nearest SSA is approximately 85 miles northwest of the site (see Attachment #21). Therefore, this project will not impact any SSA and is in compliance with SSA requirements under the Safe Drink Water Act.

Supporting documentation

[Att 21_SSA.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

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

Yes

Screen Summary**Compliance Determination**

The scope of this project does not include any new construction activities. Instead, the scope is limited to changing the use of the on-site structure from a senior activity center to office space for the City of Cheyenne. Furthermore, no wetlands are located on or near the site that would be impacted by any changes of site use. This was confirmed via the NWI Surface Water & Wetlands mapping tool (see Attachment #18), through review of aerial imagery (see Attachment #8), and during the site visit completed as part of this environmental review. Therefore, the project is in compliance with EO 11990.

Supporting documentation

[Att 18 NWI Mapper\(1\).pdf](#)

[Att 8 Aerials\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

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

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

✓ No

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

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

Screen Summary**Compliance Determination**

The site is not in proximity to any waterbody designated as a National Wild and Scenic River System (NWSRS) or an NWSRS Study Area, nor is it in proximity to a river included in the Nationwide Rivers Inventory (NRI). The nearest NWSRS is the Cache la Poudre Wild and Scenic River located approximately 40 miles southwest of the site, and the nearest NRI is the Cache la Poudre North Fork located approximately 33 miles southwest of the site (see Attachment #22). Given the geographical distance between the site and the nearest NWSRS/NRI and the project's limited scope, the project will not impact any protected rivers and therefore is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Att 22_NWSRS Figure.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. Therefore, the project is in compliance with Executive Order 12898. Furthermore, the project will allow for the expansion of municipal services and programs to better serve Cheyenne's growing population. All municipal services will be consolidated to the same city block making access easier for residents. Services previously provided at the site when it was used as the Senior Activity Center have been relocated to a space that is better suited for the operational needs of the program. Senior center staff retained their jobs at the new location, and more senior citizens will be served at the larger facility.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

