JOINT NOTICES OF FINDING OF NO SIGNIFICANT IMPACT AND NOTICES OF INTENT TO REQUEST RELEASE OF FUNDS
10/27/2026

King County Dept. of Community and Human Services Housing, Homelessness and Community Development Division 401 Fifth Avenue, Suite 500
Seattle, WA 98104
Telephone Number (206) 263-9105

10/27/2026

These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the King County Department of Community and Human Services (DCHS), Housing and Community Development Division (HCD).

REQUEST FOR RELEASE OF FUNDS

On or about 11/16/2026, King County DCHS/HCD, having completed an environmental review of the project described below, will submit a request to the Department of Housing and Urban Development (HUD) for the release of HOME funds under Title II of the National Affordable Housing Act (NAHA) of 1990 as amended AND for the release of funds under HOME-ARP Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) ("ARP") AND for the release of funds under Section 8 of the Housing Act of 1937, as amended Project Based Vouchers which will be provided by HUD to the King County Housing Authority (KCHA) to undertake a project known as the Low-Income Housing Institute Skyway Project for the purpose of providing housing to low-income households, the total of HUD funding is approximately $5,000,000. King County Housing Authority has awarded this project 21 Project Based Section 8 Vouchers, whose annualized value is $23,840 per unit. The overall total cost of the project at 12724 Renton Avenue South is $42,000,000.

The Project proposes to construct a new mixed-use residential building on the western parcel, with a four-classroom early learning center and play area on the ground level. The ground level also includes a residential play area and common room, and the second floor has a common area deck. The existing residential building on the western parcel will be demolished to make room for the new mixed-use building. The new building will provide 54 units of affordable housing to those individuals and families in the Skyway neighborhood who may otherwise be displaced due to pressures of gentrification in Seattle and the surrounding King County cities. The Project will limit rents to those earning between 30% and 50% of the area's median income, and the Project will reserve 40 units for households experiencing homelessness, 28 of which are two-bedroom or larger to support larger families. On-site bike storage and parking for seven cars will be provided on the western parcel; this includes three handicap spots and four electric vehicle charging stations. The eastern parcel will provide additional remote parking (15 spots) with landscaping.

FINDING OF NO SIGNIFICANT IMPACT

The Environmental Review Record (ERR) documents the environmental review determinations for the proposed project described above. King County has determined a Finding of No Significant Impact (FONSI) on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR). The ERR will be made available to the public electronically. The King County ERR can be accessed

online at the following website: https://kingcounty.gov/en/dept/dchs/human-social-services/housing-homeless-services/funding-opportunities/environmental-review. Scroll to the bottom of page and open “2026 Environmental Assessments” menu to view ERR for this project.

PUBLIC COMMENTS

Any individual, group, or agency may submit written comments on the ERR to King County Community Development Project/Program Manager Rob Sayre-McCord via email at rsayremccord@kingcounty.gov. All comments received by 5:00 PM PDT 11/15/2026 will be considered by HCD prior to authorizing submission of a request for release of funds. Comments should specify which Notice they are addressing.

ENVIRONMENTAL CERTIFICATION

HCD certifies to HUD that Susan McLaughlin in her capacity as Director - Housing, and Community Development Division, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD’s approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows King County use Program funds.

OBJECTIONS TO RELEASE OF FUNDS

HUD will accept objections to its release of funds and the King County’s certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of King County; (b) King County has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to: HUD Region X Community Planning and Development (CPD) office: U.S. Department of Housing and Urban Development, 909 First Avenue, Suite 310, Seattle, WA 98104 OR SEACPDRROF@hud.gov regarding HOME funds; or SeattlePublicHousing@hud.gov regarding Project Based Vouchers. Potential objectors should contact HUD via email to verify the actual last day of the objection period.

Susan McLaughlin– Director — King County Housing, Homelessness and Community Development Division

U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

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

Project Information

Project Name: LIHI-Skyway-Affordable-Housing

HEROS Number: 900000010465572

Start Date: 04/18/2025

Responsible Entity (RE): KING COUNTY, 401 Fifth Avenue SEATTLE WA, 98104

RE Preparer: Olivia Sohn

State / Local Identifier: WA

Certifying Officer: Kristin Pula

Grant Recipient (if different than Responsible Entit y):

Point of Contact:

Consultant (if applicable): Shannon & Wilson

Point of Contact: Olivia Sohn

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: 12724 Renton Ave S, Seattle, WA 98178

Additional Location Information:
The Project is located on two parcels in the Skyway neighborhood of unincorporated King County at 12724 Renton Avenue South (King County Parcel numbers 7580200255 and 7580200245). The Project parcels are owned by the Low Income Housing Institute (LIHI). The parcels are separated by one private residential property.

Direct Comments to:

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
The western parcel (approximately 0.64 acres) is mostly vacant with asphalt and landscaped surfaces on the west end and a single-story residence at the south end. There is also an uncovered basement foundation at the west end of the parcel that is surrounded by a chain-link fence. The eastern parcel (approximately 0.24 acres) is a vacant lot with a vegetated surface. The Project site also includes the adjacent right-of-way (ROW) along Renton Avenue South, which is approximately 0.16 acres. The total Project site area, including the ROW, is approximately 1.04 acres. The Project proposes to construct a new mixed-use residential building on the western parcel, with a four-classroom early learning center and play area on the ground level. The ground level also includes a residential play area and common room, and the second floor has a common area deck. The existing residential building on the western parcel will be demolished to make room for the new mixed-use building. The new building will provide 54 units of affordable housing to those individuals and families in the Skyway neighborhood who may otherwise be displaced due to pressures of gentrification in Seattle and the surrounding King County cities. The Project will limit rents to those earning between 30% and 50% of the area's median income, and the Project will reserve 40 units for households experiencing homelessness, 28 of which are two-bedroom or larger to support larger families. On-site bike storage and parking for seven cars will be provided on the western parcel; this includes three handicap spots and four electric vehicle charging stations. The eastern parcel will provide additional remote parking (15 spots) with landscaping.

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:
The proposed Project is intended to benefit low-income and unhoused populations in the City of Seattle and greater King County area by providing permanent supportive housing.

Existing Conditions and Trends [24 CFR 58.40(a)]:
The Project site is comprised of two parcels separated by a private residential property. Both parcels are relatively flat and appear to have been graded, which is evidenced by fill soils and the use of retaining walls at the north end of each parcel. Existing Site Conditions: The western parcel (approximately 0.64 acres) is mostly vacant with asphalt, concrete, and vegetated surfaces at the west end and a single-story residence and associated landscaping at the east end of the parcel. There is also an uncovered basement foundation at the west end of the parcel that is surrounded by a chain-link fence. The vegetation on the western portion of the west parcel is primarily composed of dense Himalayan blackberry and cultivated fruit trees. Other species present include one paper birch, purple foxglove, butterfly bush, common groundsel, herb Robert, and red dead-nettle. The two soil layers observed in a data pit were

separated with black plastic sheeting, and garbage was observed in the soil. The residential portion of the western parcel consists of a house with a landscaped front yard, unpaved driveway to the east, and a backyard surrounded by a wooden fence. Vegetation in the front yard includes a pine tree, bamboo, rhododendron, and boxwood shrubs. The backyard is mostly mowed lawn with planted trees and shrubs, including fruit trees, cherry laurel, a yellow cedar cultivar, lawn grasses, and lawn weeds, such as hairy cat's ear and common dandelion. There is also a fir tree directly east of the driveway. The soil appeared to be fill and contained glass and metal debris. The eastern parcel (approximately 0.24 acres) is a vacant lot with a vegetated surface. It is primarily vegetated with Himalayan blackberry, Scotch broom, common tansy, orchard grass, common dandelion, hairy cat's ear, bull thistle, purple foxglove, common mullein, and one black cottonwood tree. Some debris, such as Jersey barriers, were observed on the lot. The Project site also includes the adjacent right-of-way (ROW) along Renton Avenue South, which is approximately 0.16 acres. The total Project site area, including the ROW, is approximately 1.04 acres. Shannon & Wilson found none of the following critical areas on the Project site or in the surrounding study area: wetlands, aquatic areas, wildlife habitat conservation areas, or wildlife habitat networks. More information about these findings can be found in the Existing Conditions Letter (Shannon & Wilson, 2025). Current Trends: The King County Regional Homelessness Authority (KCRHA) describes the current situation with homelessness as an "emergency" in the executive summary of their five-year plan. KCRHA's website, the Unsheltered Point-in-Time Count for King County, which HUD requires to be taken bi-annually, was 16,868 people in 2024 who are experiencing homelessness. This figure grew by 26% since 2022 and is widely accepted to be an undercount. A goal of the KCRHA's 5-year plan is to increase the number of affordable permanent housing units. The 2022 Skyway-West Hill Community Service Area Subarea Plan, an element of the Comprehensive Plan, includes this community vision statement, which is supported by the Subarea Plan and Comprehensive Plan: "Skyway-West Hill will grow into a vibrant, walkable neighborhood where housing is affordable and local, community-based businesses are thriving. Skyway-West Hill will be an ethnically diverse and civically engaged community where the collective voice, wisdom, and expertise of its residents and business owners are vital in ongoing civic decision-making." One of the County's goals for the Skyway area is to have an increased number of affordable housing units and reduce the risk of residential displacement, particularly for households of color which are a majority in the Skyway population. This Project is consistent with KCRHA's goal and compatible with the County's zoning and Comprehensive Plan.

Maps, photographs, and other documentation of project location and description:
Project Vicinity Map 02-06-2026.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
14.871	Public Housing	Project-Based Voucher Program	$5,000,000.00

Estimated Total HUD Funded, Assisted or Insured Amount: $5,000,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: $42,000,000.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	☐ Yes ☑ No	In summary, no civil airports were identified within 2,500 feet of the Project site and no military airports were identified within 15,000 feet of the Project site. A map showing the Project site location and nearest airports is included as an attachment. The three nearest airports identified are civilian airports and include Renton Municipal Airport (0.9 miles to the east), Seattle-Tacoma International Airport (3.36 miles to the southwest), and Boeing Field/King County International Airport (2.87 miles to the northwest). The nearest military airport is Gray Army Airfield at Joint Base Lewis-McChord, 32 miles south of the Project site. The Project is in compliance with Airport Hazards requirements.

Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	☐ Yes ☑ No	The Project is located in a state that does not contain CBRS units. Therefore, this Project is in compliance with the Coastal Barrier Resources Act.
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	According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), Panel Number 53033C0976G, with the effective date of August 19, 2020, the entire Project site is located in Zone X, which is not within the 100-year floodplain and is described as an ''area of minimal flood hazard.'' The FEMA FIRMette for the Project site is attached. As such, the structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The Project is in compliance with flood insurance requirements.
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	The Environmental Protection Agency (EPA) maintains a map of counties designated as nonattainment areas, which shows that King County is not a designated nonattainment area for any pollutants (see attached map). EPA's supporting Green Book data confirms that part of King County (identified as the Seattle-Tacoma area, which the Project site falls in) is a maintenance area for carbon monoxide > 12.7 parts per million (ppm) (moderate) and 0.121 ppm up to 0.138 ppm 1-hour ozone (marginal). The Washington State Department of Ecology's (Ecology's) map of maintenance areas (attached) confirms that the project site is in King County's maintenance area for carbon monoxide and ozone. The 20-year

		maintenance periods for these pollutants ended on October 11, 2016 (CO) and November 25, 2016 (O?). EPA environmental engineer Tess Bloom confirmed in an email on November 13, 2025, that general conformity requirements no longer apply beyond the maintenance period; however, it is best practice under the National Environmental Policy Act to quantify the Project emissions. Additionally, Ecology developed a State Implementation Plan called the Puget Sound Carbon Monoxide Maintenance Plan in February 1996. A 10-year update was released in 2003 and then 2019. The Seattle-Tacoma Ozone Maintenance Plan received EPA approval in March 1996 with a 10-year update approved in 2004. In 2014, the EPA approved Ecology's 8-hour ozone maintenance plan. In order to demonstrate Project compliance with the National Ambient Air Quality Standards (NAAQS), the Clean Air Act, and the Maintenance Plans, construction-related emissions were estimated using a detailed, equipment-based methodology to determine emissions that the Project could produce during construction. After construction is complete, other Project emissions associated with long-term operation and vehicular traffic are anticipated to be negligible. The EPA de minimis table indicates that the de minimis level for ozone in all maintenance areas is 100 tons per year and the de minimis level for carbon monoxide in all maintenance areas is 100 tons per year. As documented in the attached Air Quality Analysis - Ozone and Carbon Monoxide Memorandum (Shannon & Wilson, 2026), the construction-related emissions for the criteria pollutants

		were under 2 tons. In summary, the Project site is in a former carbon monoxide and ozone maintenance area but will not exceed de minimis emissions levels. Construction-related best management practices for dust control, limiting equipment idling, and other measures will also help reduce impacts on air quality. The Project has demonstrated conformity with NAAQS and complies with the Clean Air Act and the Maintenance Plans. Additional information regarding air quality and how Project-related emissions were calculated can be found in the attached Air Quality Analysis - Ozone and Carbon Monoxide Memorandum (Shannon & Wilson, 2026).
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	☐ Yes ☑ No	Concurrence from the Washington State Department of Ecology (Ecology) for Coastal Zone Management (CZM) is no longer required under a Part 58 or Part 50 Environmental Review in Washington State. However, at the time of Project development, the activity may trigger review if it falls under other parts of the Coastal Zone Management Act (CZMA) regulations for federal agency activities (Title 15 Code of Federal Regulations [CFR] Part 930, subpart C), or consistency for activities requiring a federal license or permit (Title 15 CFR Part 930, Subpart D) and will be subject to all enforceable policies of the CZM Program. It is during the local permitting process that a project might be subject to CZM and further review by Ecology. Project consistency with respect to the proposed Project's intersection with the enforceable policies in the following five authorities: 1. State Shoreline Management Act: The Project is not located in shoreline jurisdiction. 2. State Water Pollution Control Act: No wetlands or other water bodies were identified within the Project study area.

		Impacts to off-site Waters of the State will be prevented by treatment and infiltration of stormwater on the Project parcels. Overflow from the infiltration tanks will drain to the street drainage system under Renton Avenue South. Soil amendment will be used in landscape areas in the right-of-way since full dispersion, infiltration/bioretention/permeable pavement, and basic dispersion are infeasible in the right-of-way. 3. State Clean Air Act: The Project does not require any clean air permits and will protect air quality during construction with use of appropriate Best Management Practices. 4. State Ocean Resources Management Act: The Project is not located in or adjacent to coastal waters. 5. State Marine Spatial Plan: The Project is not located within the Marine Spatial Plan study area. In summary, this Project is located in a Coastal Zone, but it has been determined to be consistent with the State Coastal Management Program. The Project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	☐ Yes ☑ No	Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. Radon testing indicated radon levels below 4.0 pCi/L. The project is in compliance with contamination and toxic substances requirements.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	☐ Yes ☑ No	This Project is in compliance with the Endangered Species Act. The No Effect Letter (Shannon & Wilson, 2026), NMFS Action Notification Form, and Technical Information Report (KPFF, 2026) are attached.

Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	☐ Yes ☑ No	The existing ASTs identified within a 1-mile radius of the Project site are identified on the attached map. Shannon & Wilson visited these sites in late May 2025. Four of the identified ASTs are of more than 100-gallon capacity and contain common liquid industrial fuels. As stated above, the Acceptable Separation Distance Calculator was used for the four identified ASTs that are of more than 100-gallon capacity. All the identified ASTs are farther than the ''acceptable separation distance for people'' from the Project site. The calculations and results are attached. In summary, the Separation Distance from the project is acceptable. The Project is in compliance with explosive and flammable hazard requirements.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	☐ Yes ☑ No	The United States Department of Agriculture Natural Resources Conservation Service Web Soil Survey map (attached) identifies the soil map units on the Project site as Urban land, 0-5% slopes and Urban Land-Alderwood Complex, 5-12% slopes. The farmland classification of both soil units is ''not prime farmland.'' The Project site is located in an urban area within unincorporated King County. Per the definition in 7 Code of Federal Regulations (CFR) Part 658.2a, ''farmland does not include land already in or committed to urban development or water storage. Farmland 'already in' urban development or water storage includes all such land with a density of 30 structures per 40-acre area. Farmland already in urban development also includes lands identified as 'urbanized area' (UA) on the Census Bureau Map.'' The Project location meets the definition of land already in urban development and, per the Urban Areas layer of the United State Census

		Bureau Geography Division's TIGERweb map, the Project site is within the Seattle-Tacoma urban area (see the Farmlands Protection Map attachment). In summary, this Project does not include any activities that could potentially convert agricultural land to a non-agricultural use. 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 Project does not meet the definition of a critical action and is not located in a FFRMS floodplain. The Federal Flood Standard Support Tool, which uses the CISA data, expired on May 7, 2025 because Executive Order 14148 revoked Executive Order 14030, which included the Federal Flood Risk Management Standard. In the absence of CISA data, 0.2-Percent-Annual-Change (500-Year) Flood Approach (0.2PFA) was used to make this determination based on the available FEMA FIRM map. According to the FEMA FIRM Panel Number 53033C0976G, with the effective date of August 19, 2020, the entire Project site is located in Zone X, which is outside of the 500-year floodplain and is described as an ''area of minimal flood hazard.'' The FIRMette is attached. The nearest floodplain mapped by FEMA is the Zone AE floodplain associated with the Black River, which is 0.75 miles south of the Project site. Per the King County iMap's elevation contours layer, the Project site is approximately 400 vertical feet above the Zone AE floodplain. Since the Project site is located outside of the 500-year floodplain, the Project is in compliance with the floodplain management requirements. In summary, this Project does not occur in the FFRMS floodplain. 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	Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The Project is in compliance with Section 106.
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	A3 Acoustics conducted an Environmental Noise Study dated September 11, 2024, which analyzed the Day-Night Average Noise Level (DNL) at five Noise Assessment Locations (NALs) for the building envelope on the Project site, based on the HUD Noise Assessment Guidelines for evaluating the DNL. The DNLs for each of the five NALs, shown in Table 2 (page 6) of the Environmental Noise Study, ranged from 68-72 decibels, which is in the ''normally unacceptable'' range. Their calculations were based on Unincorporated King County traffic data, HUD worksheets, and the Project site plan. With implementation of the recommended mitigation detailed in the response to Question 4 above, the Project will be in compliance with HUD's noise regulations. The Environmental Noise Study Report is attached. In summary, the Project is in compliance with HUD's Noise regulation with mitigation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	☐ Yes ☑ No	The Project site is not located within the boundary of a sole source aquifer (see attached map). Per the Technical Information Report, which has been attached to the Endangered Species Act worksheet, stormwater from the Project site drains southeast to the intersection of Airport Way and Perimeter Road West and bypasses the mapped boundary of the Cedar Valley Aquifer Source Area SSA, discharging into Lake Washington (KPFF, 2026). The Project proposes to construct a mixed-use building that would provide 54 units of affordable housing and an early learning center. The proposed development

		would be connected to public water and sewer, both via the Skyway Water and Sewer District. Low impact development methods would be implemented in compliance with the County's Stormwater Manual and best management practices would be installed during construction to prevent sediment-laden runoff from leaving the site. Stormwater at the site would be collected via roof drains, area drains, and catch basins, and routed to infiltration tanks under parking lots. Infiltrating sand filters would provide water quality treatment from pollution-generating impervious surfaces. In the event of tank overflow, excess stormwater will be conveyed to the County's stormwater system via a 12-inch-diameter pipe along Renton Avenue South. This flow will ultimately be discharged into an un-named open stream channel more than 0.25 miles downstream of the site through a 30-inch-diameter culvert under the roadway. In the right-of-way, where full dispersion, infiltration, and basic dispersion are infeasible, soil amendment will be used in the landscape areas. The attached map shows the Project location in relation to the nearest sole source aquifer, the Cedar Valley Aquifer. In summary, the Project is not located on a sole source aquifer area. The Project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	☐ Yes ☑ No	Two Shannon & Wilson biologists conducted a site visit on April 2, 2025, to document existing conditions and evaluate the site for the presence of wetlands. No wetlands or other water bodies were identified on the Project site. More information about the existing Project site conditions can be found in the attached Existing

		Conditions Letter for Skyway Housing Development Project prepared by Shannon & Wilson (November 2025). In summary, the Project will not impact on- or off-site wetlands. The Project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	☐ Yes ☑ No	The nearest Wild and Scenic Rivers are the Pratt River and Middle Fork Snoqualmie River, approximately 29 miles east of the Project site. The nearest Study River is the Skagit River, approximately 62 miles north of the Project site. The nearest Nationwide Rivers Inventory River is the South Fork Snoqualmie River, approximately 21 miles east of the Project site. The attached map shows the Project site location relative to these rivers. In summary, the Project is not within proximity of a NWSRS river. The Project 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. The project is in compliance with Executive Order 12898.

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			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The Project proposes a mixed-use residential building with a four-classroom early learning center on the western parcel and a remote parking lot on the eastern parcel. The western Project parcel is zoned Community Business (CB) and the eastern parcel is zoned Residential, with 18 dwelling units per acre (R-18). The CB zone allows for mixed-use developments that include housing and retail/services, which is the type of development being proposed on the western parcel (King County Code [KCC] 21A.04.100.2). The R-18 zone allows accessory uses that are compatible with urban residential communities, so the proposed remote parking lot meets the allowable criteria (KCC 21A.04.080.4). Therefore, the proposed Project is compatible with the County's Comprehensive Plan and zoning. The proposed development is in a neighborhood with a mix of commercial, residential, and public facility uses. Although the proposed development at 60 feet tall may be one of the larger buildings in the area, it has been thoughtfully designed and landscaped by professional architects and landscape architects and meets the design standards found in KCC 21A.38.050.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	The Project parcels themselves are relatively flat, but the overall topography of the Renton Avenue South corridor and Project site slopes gently to the east. The Project parcels were previously graded, and the fill is supported by retaining walls at their north end. The United States Department of Agriculture's Natural Resources Conservation Services maps the site as primarily Urban land, 0-5% slopes with a small fraction of Urban land-Alderwood complex, 5-12% slopes. Per Pangeo's 2022 Geotechnical Report, the site soils consist of loose to medium-dense existing fill with medium-dense to very dense moraine deposits and medium-dense to very dense glacial drift below. During the site visit, Shannon & Wilson biologists dug three data pits on the property	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		and observed sandy loam soil with gravels and debris such as glass, metal, and plastic sheeting in the upper 16 inches of the soil profile at each location. The Geotechnical Report found the potential for earthquake-induced soil liquefaction to be low, so no special design considerations were recommended, and competent soil material was identified at each test boring location, so conventional footings were found to be appropriate. The report also found that groundwater is not likely to significantly impact the site during excavation. Further information can be found in the Geotechnical Report. Stormwater will be the primary source of runoff. On each parcel, runoff will be collected via roof drains, area drains, and catch basins, and routed to the infiltration tanks under the parking lots. In addition to an infiltration tank, each parcel will have a sand filter vault to provide water quality treatment for water from pollution-generating impervious surfaces. Soil amendment will be used in landscape areas in the right-of-way since full dispersion, infiltration/bioretention/permeable pavement, and basic dispersion are infeasible at this location. Overflow from the infiltration tank facilities will drain to King County's street drainage system at Renton Avenue South.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	The Project is not anticipated to be significantly affected by natural hazards; the Project is located in an area of minimal flood hazard (Federal Emergency Management Agency [FEMA] National Flood Hazard Layer map, effective 2020) and there are no identified site-specific geologic hazards according to the Project's Geotechnical Report. King County iMap shows that the Project site is not in a landslide, steep slope, erosion, seismic, or coal mine hazard zone or area subject to debris flows. The broader area is susceptible to damage from volcanoes and earthquakes, but the King County Flood Control District's 2010 Lahar Inundation Zone map shows that the Project site is not	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		located in a lahar inundation zone (King County Flood Control District map, 2010). The Project is also not anticipated to be affected by air pollution generators; there are no major air pollution generators in the immediate vicinity of the site. The nearest air pollution generators are Interstate 5 (I-5), approximately 1.5 miles to the west, and King County Airport and the Boeing manufacturing facility, 1 mile to the east. There are no man-made site hazards of concern that would affect the Project site; the only potential hazard is Renton Avenue South at the front of the Project site, but the outdoor play areas would be located away from the road on the far side of the building and they would be surrounded by fencing to keep residents and early learning center attendees away from the road. Renton Avenue South is a collector road that passes through the Bryn Mawr-Skyway neighborhood. The primary source of noise that would affect the Project parcels is the noise from vehicle traffic on the roadway. The Noise Study (A3 Acoustics, 2024) found that the noise levels at the site of the proposed building are in the ''normally unacceptable'' range; therefore, the building design includes special windows, exterior walls, and ventilation design in key areas to reduce the noise exposure of occupants. The Project would not increase noise output to the surrounding area except during construction.	
SOCIOECONOMIC			
Employment and Income Patterns	1	The development is meant to support people who are unhoused, re-entering the workforce, or are employed but cannot afford the current housing market. The Project would provide 54 permanent supportive housing units and common spaces that would be operated by the Low Income Housing Institute (LIHI). Housing would be designated for those earning between 30% and 50% of the area's median income, and the Project would reserve 40 units for households experiencing homelessness, 28 of	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		which are two-bedroom or larger to support larger families. LIHI would provide community services for residents in the building's common spaces which would include job readiness training.	
Demographic Character Changes / Displacement	1	The proposed Project would not result in significant changes to the demographics of the area. The development is intended to support the local community, which is ''in the midst of a sustained housing crisis'' per the King County Affordable Housing Committee's Regional Affordable Housing Dashboard. This development is intended to provide affordable housing in response to the elevated demand. Currently, the Project parcels are mostly vacant with one residential building that would be demolished to make room for the new development. The existing residential building is being used as a professional office, so there are no current residents on the Project site that would be displaced.	
Environmental Justice EA Factor			
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	The building will provide affordable housing for families with children. Based on the number of housing units and their suitability for families, we estimate the Project could result in approximately 75 new students entering the Renton School District. This is a preliminary projection, and the specific number or age distribution of children (i.e., elementary, middle, or high school) is not currently known. Randy Matheson, Executive Director, Community Relations for the Renton School District, confirmed in an email on October 27, 2025 that the Renton School District has ample capacity to welcome new students to schools that would serve this development. Local schools that serve this location are Lakeridge Elementary School, Dimmitt Middle School, and Renton High School. The email correspondence with Randy Matheson is attached. The proposed mixed-use	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		building will also include a four-classroom early learning center, play area, and other community amenities on the ground level.	
Commercial Facilities (Access and Proximity)	2	We estimate that the Project could house approximately 108 adults and 75 children (two adults per unit, at 54 units). Overall, there is adequate access to retail services from the Project site that will meet the needs of residents. The facilities within walking distance (3 blocks) are limited to the post office, the library, a Vietnamese deli, an espresso shop, a convenience store, a salon, two auto body shops, and a spa, but there is a large commercial area approximately 1.2 miles to the southeast in Renton, which offers several grocery stores (Fred Meyer, Safeway, Walmart Supercenter, and several specialty grocery stores). This area also includes a selection of restaurants, fast food chains, hardware stores, and a Salvation Army food bank. There is also an affordable grocery store, Grocery Outlet, 1 mile northwest of the Project site on Renton Avenue South. The Grocery Outlet and commercial area in Renton are easily accessible by public transportation: the Renton Avenue South & 76th Avenue South bus stop (ID: 56460) is directly across the street from the Project site and the 106 bus line runs every 15 minutes to both locations. Given the number of options, these facilities provide a range of services and relatively affordable options. The proposed development would draw business to these nearby neighborhood, community, and regional retail areas. No retail or commercial services are anticipated to be adversely impacted by the proposed Project.	
Health Care / Social Services (Access and Capacity)	1	Given the Project site's proximity to Seattle, there are many hospitals and clinics to service the proposed development. The nearest hospitals to the Project site are Kaiser Permanente Renton Medical Center (2.7 miles) and Valley Medical Center (4.4 miles). Other nearby hospitals include St. Anne Hospital in Burien (9.2 miles away) and several in Seattle:	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Swedish Hospital Cherry Hill Campus (11.4 miles), Harborview Medical Center (10.8 miles), Virginia Mason Hospital (11 miles), Kindred Hospital First Hill (11.2 miles). A Google Maps search shows that there are approximately nine doctors' offices, three addiction treatment centers, and five mental health facilities within a 2-mile radius of the Project site, primarily in Renton, and these resources are reasonably accessible by public transportation (bus). In addition, the Skyway Resource Center just opened in May 2025 on an adjoining parcel. The Skyway Resource Center is occupied by a number of social services, including King County Public Health, Seattle King County NAACP, mental health and drug/alcohol counseling providers, and others. The proposed early learning center would provide an opportunity for on-site daycare services to residents. LIHI would provide community services for residents in the building's common spaces, such as holiday parties, live music events, job readiness training, homework club, and ballot parties. The proposed development is intended to address the shortage of affordable, supportive housing in King County and support local people and families who are unhoused or would otherwise be displaced by gentrification, and is not anticipated to have a significant impact on the available nearby medical and social services. As stated above, the Project is compatible with the zoning set forth in the County's Comprehensive Plan, which considers the availability of these services in its creation and adoption processes.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	During construction, the Project would generate construction debris when demolishing the existing residential building and old pavements. The contractor would be responsible for proper disposal of construction materials, which could include construction material scraps, wrappings, paint cans, etc. Once construction is completed, the Project would generate waste typical of residential developments. Garbage, compost,	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		and recycling would be centrally collected by the Waste Management service. Per King County's "Where Does My Waste Go?" diagram, recycling would be hauled to private materials recovery facilities. Garbage would be hauled by Waste Management to the King County recycling and transfer station and from there, King County would transport waste to the Cedar Hills Regional Landfill, which has serviced the county since 1965. At the landfill, the on-site Bio Energy Washington Plant captures methane gas and converts it to pipeline-quality biogas, which is sold to the Puget Sound Energy regional pipeline. Compost would be hauled by Waste Management to their private composting facility. No significant increase or decrease in local solid waste services is anticipated as a result of this project. As stated above, the Project is compatible with the zoning set forth in the County's Comprehensive Plan, which considers the availability of these services in its creation and adoption processes.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The Project would connect to the Skyway Water & Sewer District for sewage services. Skyway Water & Sewer District is a Special Purpose District that serves the West Hill area of unincorporated King County, an approximately 2.7-square-mile area. The building would house a projected number of 183 people, who would generate up to about 18,300 gallons of sewage per day, in addition to sewage generated by the early learning center, per the HUD website, which quotes a U.S. Geological Survey (USGS) finding that the average person generates 80-100 gallons of sewage per day. Cynthia Heye Lamothe, General Manager at Skyway Water & Sewer District, confirmed via phone call on December 5, 2025, that all the District's sewage is transmitted to King County for treatment, and there are no combined sewer overflows in the District. The Project is compatible with the zoning set forth in the County's Comprehensive Plan, which considers the availability of services	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		such as sewage capacity in its creation and adoption processes. The Project has received a Certificate of Sewer Availability from the Skyway Water and Sewer District, signed by Brian Hendrickson on February 10, 2025 (attached).	
Water Supply (Feasibility and Capacity)	2	The proposed development, which would house a projected number of 183 people and service an early learning center, would receive water from the Skyway Water & Sewer District. The projected number of residents would consume up to 18,300 gallons of water per day, per HUD's website (accessed November 2025) which quotes a USGS finding that the average person uses 80-100 gallons per day, with some additional water usage for the early learning center. The Project will construct a connection to the District's water main. The Project is compatible with the zoning set forth in the County's Comprehensive Plan, which considers the availability of services such as water capacity in its creation and adoption processes. The Project has received a Certificate of Water Availability from the Skyway Water and Sewer District, signed by Brian Hendrickson on February 10, 2025 (attached).	
Public Safety - Police, Fire and Emergency Medical	2	The Project is located in unincorporated King County in the jurisdiction of King County police and King County Fire District #20. There is a sheriff's office that services the Skyway neighborhood 0.1 mile northwest of the Project site on Renton Avenue South and the District #20 fire administration building is 0.1 mile north of the Project site on 76th Avenue South. As discussed in the ''Health Care and Social Services'' section above, the nearest medical center with an emergency room is Valley Medical Center, which is 4.4 miles from the Project site. Within a 12-mile radius of the Project site, there are seven major medical facilities, including Valley Medical Center. As stated above, the Project is compatible with the zoning set forth in the County's Comprehensive Plan, which considers the availability of these	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		services in its creation and adoption processes. No significant increase or decrease in local emergency services is anticipated as a result of this development. The integrated social services (i.e., community building, job readiness services) and safe housing components of the proposed Project may actually reduce the need for emergency services within the target community.	
Parks, Open Space and Recreation (Access and Capacity)	2	The Project would provide indoor and outdoor amenities for early learning center attendees and residents. These amenities include an outdoor play area for the early learning center, an outdoor play area for the building residents, an indoor common room, and a common area deck. As shown in the Project plans, LIHI would also provide community building activities for residents such as homework club, art and culture events, live music, holiday gatherings, and job readiness events. The development would be within close proximity to Skyway Park, which is accessible to pedestrians via sidewalks, located approximately 0.4 miles northwest of the Project site. There are also two schools within 0.5 miles of the Project site, accessible by public transportation, Albert Talley High School and Dimmitt Middle School, both of which provide ample open recreation space; the middle school campus also includes the Renton/Skyway Boys and Girls Club. Within a 2-mile radius, there are several additional parks and bike trails (Black River Riparian Forest, Lake to Sound Trail, Cedar River Trail Park, Lakeridge Park, Taylor Creek Headwaters), the Renton History Museum, and the Renton IKEA Performing Arts Center.	
Transportation and Accessibility (Access and Capacity)	2	Each Project parcel will have a two-way driveway for access from Renton Avenue South, a collector road that travels through the Skyway neighborhood, connecting the City of Renton to south Seattle. The other three sides of each parcel are interior property lines. I-5 can be accessed 2 miles from the Project site via	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Washington State Route 900. The Project site is just under 1 mile west of Boeing Airfield. There is a Metro bus stop in front of the building site that serves route 106. As part of the construction of the Project, this stop might be moved slightly northwest or southeast along Renton Avenue South, with its final location to be determined. The proposal would require street improvements at Renton Avenue South, including new pavement, curbs, sidewalks, street trees, and other landscape plantings in the public right-of-way. The Skyway library, Skyway Park, post office, Renton Skyway Boys & Girls Club, Dimmitt Middle School, Albert Talley High School, and several places of worship are within 0.5 miles of the development and accessible by sidewalk. In addition to car parking, the development would provide bike storage for residents. The development design is implementing standards to be compliant with the 2010 Americans with Disabilities Act, including three handicap parking spaces and accessible entryways. Per the Traffic Impact Analysis (Kimley-Horn, 2024), the Project is anticipated to generate 382 average daily trips, 47 of which would occur during the morning peak-hour, and 48 of which would occur during the evening peak-hour. The anticipated parking demand for the Project is 27 vehicles, which will be accommodated by the 30 parking spaces proposed by the Project. The level of service analysis of the 2 site access points and 2 nearby intersections concludes that the intersections would operate at acceptably level of service C or better after construction. Overall, the analysis concludes that the Project is anticipated to pass King County's Traffic Concurrency requirements.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	The Project site is located in a densely populated suburban setting. King County iMap and the U.S. Fish and Wildlife Service's National Wetlands Inventory do not identify any wetlands or other water bodies within 600 feet of the Project site.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Shannon & Wilson documented upland conditions on the Project site and did not observe any wetlands or other water bodies on the Project site or adjacent properties during the site visit; more information can be found in the Existing Conditions Letter (Shannon & Wilson, 2025). No other unique natural features were identified on the Project site or in the immediate vicinity. Therefore, the Project would not impact any unique natural features, and no mitigation measures are required.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The Project site vegetation consists of non-native shrub and herbaceous vegetation. Twelve trees were surveyed on the Project site by Superior NW Enterprises, per the Pre-Construction Assessment report (2024). Dominant species include Himalayan blackberry, Scotch broom, ornamental shrubs, such as cherry laurel and hydrangeas, lawn grasses, foxglove, common tansy, dandelion, and other common weeds. Most of the trees are ornamental varieties such as blue spruce and fruit trees (cherry, apple, pear). The western property also has fruit trees, one European birch, one ponderosa pine tree, and several smaller, ornamental trees, and the eastern property has one black cottonwood tree. More information about the Project site trees can be found in the Pre-Construction Assessment of existing trees (Superior NW Enterprises, 2024). The Washington Natural Heritage Program Data Explorer mapping tool does not identify any known rare plants or high-quality ecosystems at the project sites. The nearest mapped known rare plant is Pacific pea, identified 0.7 miles southwest of the Project site. No threatened or endangered plant species were observed during Shannon & Wilson's April 2025 site visit. The Project site contains substantial areas of invasive species, noxious weeds, and weeds of concern, including a number that are included on the 2025 King County Noxious Weed List. Species included Himalayan blackberry, butterfly	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		bush, common cats ear, common groundsel, English ivy, bull thistle, common tansy, Robert's geranium, Scotch broom, poison hemlock, bittersweet nightshade, and cherry laurel. The Project will remove all site vegetation and enhance the site perimeter with native/adapted species. Per the site landscape plan, only Pacific Northwest-adapted vegetation would be planted, a significant proportion of which are native trees, shrubs, and groundcovers. Deciduous trees would be planted in expanded planting strips along Renton Avenue South. New trees would be planted to replace removed trees, with a net increase of trees overall. LIHI has committed to maintaining the landscape without the use of herbicides or pesticides. The National Marine Fisheries Services (NMFS) Endangered Species Act (ESA) Critical Habitat Mapper identifies critical habitat for Chinook salmon (federal threatened [FT]) and steelhead trout (FT) in Lake Washington, approximately 2.36 miles downstream of the Project site. Impacts to ESA-listed species, critical habitat, and essential fish habitat managed by the NMFS have been addressed via NMFS' Endangered Species Act Section 7 Formal Programmatic Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for the U.S. Department of Housing and Urban Development Housing Programs in Washington State (NMFS, 2020). The U.S. Fish and Wildlife Service (USFWS) Official Species List, provided by the Washington Fish and Wildlife Office in Lacey, Washington, on November 21, 2025, identifies the potential presence of the following USFWS-managed listed species within the study area: marbled murrelet (FT), yellow-billed cuckoo (FT), northwestern pond turtle (federal proposed threatened), bull trout (FT), monarch butterfly (federal proposed threatened), and Suckley's cuckoo bumble bee (federal proposed endangered). However, the Project would have	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		no effect on these bird, reptile, and insect species due to the absence of these species, suitable habitat, and their critical habitats from the Project action area. The Project would also have no effect on bull trout, since it meets the required parameters and conditions for new construction identified in Table A of the Endangered Species Act: Consultation Guidance for Washington State produced in collaboration by HUD and USFWS. More information is provided in Shannon & Wilson's attached No Effect Letter (2026).	
Other Factors 1	2	Cultural: The western parcel on the proposed Project site is occupied by one existing residential building that was built in 1941. The Project received a letter confirmation from the Department of Archaeological and Historic Preservation dated December 1, 2025, that the building is not eligible for listing in the National Register of Historic Places and that the project will not affect historic properties.	
Other Factors 2			
CLIMATE AND ENERGY			
Climate Change			
Energy Efficiency	2	The proposed development will use electricity for air and domestic water heating, cooling, lighting, and plug loads. A photovoltaic array will be installed on the roof to offset some residential electrical use with solar energy. No natural gas will be used. The Project will be designed to meet or exceed the requirements of the 2021 Washington State Energy Code and will also target a variety of Evergreen Sustainable Development Standard (ESDS) criteria. Strategies proposed on the Project to control energy impacts include heat pump hot water plant, energy recovery ventilators (ERVs), and the solar array. The proposed building would subscribe to Comcast and Lumen for telephone and internet. Electrical service would be provided by Seattle City Light. Per the Traffic Impact Analysis (Kimley-Horn, 2024), the Project is anticipated to generate 382 average daily	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		trips, 47 of which would occur during the morning peak-hour, and 48 of which would occur during the evening peak-hour.	

Supporting documentation

Tree Assessment - Superior NW Enterprises - 06-13-2024.pdf
Traffic Impact Analysis - Kimley-Horn - 09-2024.pdf
Geotechnical Feasibility Study - PanGEO Incorporated - 09-21-2022.pdf
COA Water 12712 Renton Ave S LIHI Skyway Housing LLC Updated 2-10-2025 Signed.pdf
COA Sewer 12712 Renton Ave S LIHI Skyway Housing LLC Updated 2-10-2025 Signed.pdf
115008-200-HUD-WS-2-Environmental Assessment Factors-Attachment-School District Coordination.pdf

Additional Studies Performed:

The following studies were completed during development of the Project and were referenced during preparation of this environmental review (these documents were uploaded under various Related Laws and Authorities topics or under the Environmental Assessment Factors section). 1. Environmental Noise Study: Prepared by A3 Acoustics, LLP, 3 October 2023 2. Geotechnical Feasibility Study: Prepared by PanGEO Incorporated, 11 September 2024 3. Phase I Environmental Site Assessment: Prepared by Bluestone Environmental, NW, 21 April 2025 4. Technical Information Report: Prepared by KPFF, January 2026 5. Existing Conditions Letter: Prepared by Shannon & Wilson, 19 November 2025 6. USFWS No Effect Letter: Prepared by Shannon & Wilson, 13 January 2026 7. Asbestos Assessment: Prepared by Bluestone Environmental, NW, 21 October 2024 8. Pre-Construction Assessment for Property Re-Development Along Renton Avenue South (tree assessment): Prepared by Superior NW Enterprises, 13 June 2024 10. Radon Scientific Data Review Letter: Prepared by Shannon & Wilson, 9 October 2025 11. Air Quality Analysis - Ozone and Carbon Monoxide Memorandum: Prepared by Shannon & Wilson, 13 January 2026 12. Traffic Impact Analysis: Prepared by Kimley-Horn, September 2024

Field Inspection [Optional]: Date and completed by:
Amy Summe, Olivia Sohn 4/2/2025 12:00:00 AM

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

In addition to the studies listed above, the following information sources and agency websites were also consulted during preparation of this environmental review: Washington Department of Ecology website and personnel, Anya Caudill and Farren Thorpe (related to air quality, November 2025) Environmental Protection Agency, Tess Bloom of Region 10 (related to air quality, November 2025) LIHI's General Contractor (equipment-related information related to air quality, November 2025) Puget Sound Clean Air Agency, Erik Sagani? (related to air

quality, November 2025) King County Website (related to air quality, Comprehensive Plan and Subarea Plan, October-November 2025) Randy Matheson, Renton School District (related to the "education and cultural facilities" section, October 2025)

List of Permits Obtained:

All appropriate permits will be acquired from local, state, regional, and federal agencies as applicable, prior to commencing the project. Applicable permits include but may not be limited to building permits (plumbing, mechanical, electrical), grading permit, Puget Sound Clean Air Agency Notice of Demolition, and National Pollutant Discharge Elimination System Construction Stormwater General Permit (if this is required, a Stormwater Pollution Prevention Plan will be prepared). A Project Temporary Erosion and Sediment Control Plan is included in the Project plan set and a Spill Prevention and Emergency Cleanup Plan would also be developed.

Public Outreach [24 CFR 58.43]:

In accordance with HUD regulations, a public notice of the Finding of No Significant Impact and Request for Release of Funds will be published, and a 15-day comment period will begin. All comments received by the end of the period (if notice is published: publication date plus fifteen days; if notice is mailed and posted: mailing and posting date plus eighteen days) will be considered by King County prior to authorizing submission of a request for release of funds.

Cumulative Impact Analysis [24 CFR 58.32]:

No significant cumulative impacts were identified for this project during the environmental assessment.

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

The Project site is currently owned by LIHI and is the only suitable property based on cost; ease of development; and proximity to target service population, public transportation and employment opportunities. As such, no alternative sites were considered.

No Action Alternative [24 CFR 58.40(e)]

The Project parcels are owned by LIHI. Under the no action alternative, the Project site would remain vacant until an alternative use for the site could be identified. The benefits to the community as expressed in the Statement of Purpose and Need would not be realized. The "no action" alternative does not meet the stated purpose and need of the current proposal.

Summary of Findings and Conclusions:

The proposed project will provide permanent supportive housing in a previously developed location on Renton Avenue South. No wetlands or other water bodies were identified on the Project site and the site is not located within a floodplain. No public facilities, public or commercial services, or groups of individuals are expected to be adversely impacted by the project. The project is consistent with King County's current zoning, comprehensive plan, and other goals for this area. No historic properties or areas of archeological significance are identified either on or immediately adjacent to the subject property. The project is anticipated

to have no effect on federally listed species regulated by USFWS and the project falls within the limits of NMFS' Programmatic Biological Opinion. On each parcel, stormwater runoff will be collected via roof drains, area drains, and catch basins, and routed to the infiltration tanks under the parking lots. In addition to an infiltration tank, each parcel will have a sand filter vault to provide water quality treatment for water from pollution-generating impervious surfaces. Soil amendment will be used in landscape areas in the right-of-way since full dispersion, infiltration/bioretention/permeable pavement, and basic dispersion are infeasible at this location. Overflow from the infiltration tank facilities will drain to King County's street drainage system at Renton Avenue South. The Phase I ESA did not identify any recognized environmental conditions, historical recognized environmental conditions, or conditional recognized environmental conditions. The noise study found that proximity to Renton Avenue South would result in elevated noise levels; mitigation measures (e.g., special windows) have been incorporated into the project. The Asbestos Assessment found no asbestos-containing material or PCBs on the Project site. Lead was detected in two samples from the building exterior, so Bluestone Environmental recommends that the contractor take precautions to prevent dust generation during demolition and notes that the landfill receiving the demolition debris will likely require a Toxicity Characteristic Leaching Procedure test. Although the site is in a former maintenance area for carbon monoxide and ozone, emissions estimates provided by Washington Department of Ecology indicate that the project will not exceed EPA's de minimis levels for carbon monoxide or ozone.

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
Noise Abatement and Control	For the building envelope, the Project will install windows with a minimum of Sound Transmission Class (STC)-35 and STC-30 at the facades with exposure to Renton Avenue South, the primary noise source. For the residential unit windows on levels 2-5, the windows meeting a minimum of STC-35 will be used for the facades and corners facing Renton Avenue South and windows meeting STC-30 will be used for the remaining locations.	N/A		

	Where minimum STC-35 windows are installed, a minimum of 3-foot flex duct will be installed at the exhaust and intake air runs. See the attached Environmental Noise Study, dated September 11, 2024, prepared by A3 Acoustics LLP.			

Project Mitigation Plan

Project will install windows with a minimum of Sound Transmission Class (STC)-35 and STC-30 at the facades with exposure to Renton Avenue South, the primary noise source. For the residential unit windows on levels 2-5, the windows meeting a minimum of STC-35 will be used for the facades and corners facing Renton Avenue South and windows meeting STC-30 will be used for the remaining locations. Where minimum STC-35 windows are installed, a minimum of 3-foot flex duct will be installed at the exhaust and intake air runs. See the attached Environmental Noise Study, dated September 11, 2024, prepared by A3 Acoustics LLP. Mitigation measures for noise abatement and control have been incorporated into the project plans by LIHI and its consultant team, and would be carried out by the construction contractor. LIHI and King County would be responsible for monitoring the construction contractor's installation of the noise-related mitigation measures.

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

In summary, no civil airports were identified within 2,500 feet of the Project site and no military airports were identified within 15,000 feet of the Project site. A map showing the Project site location and nearest airports is included as an attachment. The three nearest airports identified are civilian airports and include Renton Municipal Airport (0.9 miles to the east), Seattle-Tacoma International Airport (3.36 miles to the southwest), and Boeing Field/King County International Airport (2.87 miles to the northwest). The nearest military airport is Gray Army Airfield at Joint Base Lewis-McChord, 32 miles south of the Project site. The Project is in compliance with Airport Hazards requirements.

Supporting documentation

115008-200-HUD-WS-3-Airport Hazards-Attachment-Airport Hazards Map.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 Project is located in a state that does not contain CBRS units. Therefore, this Project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

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:

115008-200-HUD-WS-10-Flood Worksheets-Attachment-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

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), Panel Number 53033C0976G, with the effective date of August 19, 2020, the entire Project site is located in Zone X, which is not within the 100-year floodplain and is described as an ''area of minimal flood hazard.'' The FEMA FIRMette for the Project site is attached. As such, the structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The Project is in compliance with flood insurance requirements.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?

✓ Yes

No

Air Quality Attainment Status of Project's County or Air Quality Management District

2. Is your project's air quality management district or county in non-attainment or maintenance status for any criteria pollutants?

No, project's county or air quality management district is in attainment status for all criteria pollutants.

✓ Yes, project's management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

✓ Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

✓ Ozone

Particulate Matter, <2.5 microns

Particulate Matter, <10 microns

3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above

Carbon monoxide	100.00	ppm (parts per million)
Ozone	100.00	ppb (parts per million)

Provide your source used to determine levels here:
The emissions levels were derived from the EPA's de minimis tables (attached). [Note: the correct units are tons per year, not ppm as shown]

4. **Determine the estimated emissions levels of your project. Will your project exceed any of the de minimis or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?**

✓ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

Enter the estimate emission levels:

Carbon monoxide	0.40	ppm (parts per million)
Ozone	0.00	ppb (parts per million)

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

Yes, the project exceeds *de minimis* emissions levels or screening levels.

Screen Summary

Compliance Determination

The Environmental Protection Agency (EPA) maintains a map of counties designated as nonattainment areas, which shows that King County is not a designated nonattainment area for any pollutants (see attached map). EPA's supporting Green Book data confirms that part of King County (identified as the Seattle-Tacoma area, which the Project site falls in) is a maintenance area for carbon monoxide > 12.7 parts per million (ppm) (moderate) and 0.121

ppm up to 0.138 ppm 1-hour ozone (marginal). The Washington State Department of Ecology's (Ecology's) map of maintenance areas (attached) confirms that the project site is in King County's maintenance area for carbon monoxide and ozone. The 20-year maintenance periods for these pollutants ended on October 11, 2016 (CO) and November 25, 2016 (O?). EPA environmental engineer Tess Bloom confirmed in an email on November 13, 2025, that general conformity requirements no longer apply beyond the maintenance period; however, it is best practice under the National Environmental Policy Act to quantify the Project emissions. Additionally, Ecology developed a State Implementation Plan called the Puget Sound Carbon Monoxide Maintenance Plan in February 1996. A 10-year update was released in 2003 and then 2019. The Seattle-Tacoma Ozone Maintenance Plan received EPA approval in March 1996 with a 10-year update approved in 2004. In 2014, the EPA approved Ecology's 8-hour ozone maintenance plan. In order to demonstrate Project compliance with the National Ambient Air Quality Standards (NAAQS), the Clean Air Act, and the Maintenance Plans, construction-related emissions were estimated using a detailed, equipment-based methodology to determine emissions that the Project could produce during construction. After construction is complete, other Project emissions associated with long-term operation and vehicular traffic are anticipated to be negligible. The EPA de minimis table indicates that the de minimis level for ozone in all maintenance areas is 100 tons per year and the de minimis level for carbon monoxide in all maintenance areas is 100 tons per year. As documented in the attached Air Quality Analysis - Ozone and Carbon Monoxide Memorandum (Shannon & Wilson, 2026), the construction-related emissions for the criteria pollutants were under 2 tons. In summary, the Project site is in a former carbon monoxide and ozone maintenance area but will not exceed de minimis emissions levels. Construction-related best management practices for dust control, limiting equipment idling, and other measures will also help reduce impacts on air quality. The Project has demonstrated conformity with NAAQS and complies with the Clean Air Act and the Maintenance Plans. Additional information regarding air quality and how Project-related emissions were calculated can be found in the attached Air Quality Analysis - Ozone and Carbon Monoxide Memorandum (Shannon & Wilson, 2026).

Supporting documentation

Air Quality Analysis Memo - ShannonWilson - 01-13-2026.pdf
Screenshot of EPA De Minimis Tables.pdf
115008-200-HUD-WS-4-Air Quality-Attachment-EPA Counties Designated Nonattainment Map.pdf
115008-200-HUD-WS-4-Air Quality-Attachment-Ecology Maintenance Areas Map.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

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

✓ Yes

No

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

✓ Yes

No

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

✓ Yes, without mitigation

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

Yes, with mitigation

No, project must be canceled.

Screen Summary

Compliance Determination

Concurrence from the Washington State Department of Ecology (Ecology) for Coastal Zone Management (CZM) is no longer required under a Part 58 or Part 50 Environmental Review in Washington State. However, at the time of Project development, the activity may trigger review if it falls under other parts of the Coastal Zone Management Act (CZMA) regulations for federal agency activities (Title 15 Code of Federal Regulations [CFR] Part 930, subpart C), or consistency for activities requiring a federal license or permit (Title 15 CFR Part 930, Subpart D) and will be subject to all enforceable policies of the CZM Program. It is during the local permitting process that a project might be subject to CZM and further review by Ecology. Project consistency with respect to the proposed Project's intersection with the enforceable policies in the following five authorities: 1. State Shoreline Management Act: The Project is not located in shoreline jurisdiction. 2. State Water Pollution Control Act: No wetlands or other water bodies were identified within the Project study area. Impacts to off-site Waters of the State will be prevented by treatment and infiltration of stormwater on the Project parcels. Overflow from the infiltration tanks will drain to the street drainage system under Renton Avenue South. Soil amendment will be used in landscape areas in the right-of-way since full dispersion, infiltration/bioretention/permeable pavement, and basic dispersion are infeasible in the right-of-way. 3. State Clean Air Act: The Project does not require any clean air permits and will protect air quality during construction with use of appropriate Best Management Practices. 4. State Ocean Resources Management Act: The Project is not located in or adjacent to coastal waters. 5. State Marine Spatial Plan: The Project is not located within the Marine Spatial Plan study area. In summary, this Project is located in a Coastal Zone, but it has been determined to be consistent with the State Coastal Management Program. The Project is in compliance with the Coastal Zone Management Act.

Supporting documentation

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:

No RECs were identified in the Phase I ESA. More details are provided in the Worksheet Summary.

Yes

* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.
** Utilize EPA's Enviromapper, NEPAssist, 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:

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.

6. How was radon data collected?

All buildings involved were tested for radon

✓ A review of science-based data was conducted

Enter the Radon concentration value, in pCi/L, derived from the review of science-based data:

0.96

Provide the documentation* used to derive this value:

Per HUD guidance, when indoor air testing or scientific review of radon measurements for the local area indicate that radon levels are at or above 4 picocuries per liter (pCi/L), mitigation of radon is required. Shannon & Wilson conducted a scientific review of radon test data for King County, following the methodology described in Section III.A.ii.3 of the HUD guidance. The mean radon measurement of the buildings tested in the data set was 0.96 pCi/L, which is less than the threshold of 4 pCi/L; therefore, radon mitigation is not required by HUD guidance. More information can be found in the attached Radon Scientific Data Review letter (Shannon & Wilson, 2025). The attached CDC National Environmental Public Health Tracking Network Map for radon shows that the average radon level for King County as a whole is 1.1pCi/L, which supports the findings of the scientific review.

File Upload:

Radon Scientific Data Review Letter - ShannonWilson - 10-9-2025(1).pdf

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

Radon concentration value is greater than or equal to 4.0 pCi/L and/or non-radon contamination was found in a previous question. Continue to Mitigation.

* For example, if you conducted radon testing then provide a testing report (such as an ANSI/AARST report or DIY test) if applicable (note: DIY tests are not eligible for use in multifamily buildings), or documentation of the test results. If you conducted a scientific data review, then describe and cite the maps and data used and include copies of all supporting documentation. Ensure that the best available data is utilized, if conducting a scientific data review.

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. Radon testing indicated radon levels below 4.0 pCi/L. The project is in compliance with contamination and toxic substances requirements.

Supporting documentation

Asbestos Assessment - Bluestone Environmental NW - 10-21-2024.pdf
115008-200-HUD-WS-6-Contamination-Attachment-Radon Map.pdf
Phase I Environmental Site Assessment - Bluestone Environmental NW - 04-21-2025.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 *et seq*.); particularly section 7 (16 USC 1536).	50 CFR Part 402

1. Does the project involve any activities that have the potential to affect specifies or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.

✓ No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

Explain your determination:

The National Marine Fisheries Services (NMFS) Endangered Species Act (ESA) Critical Habitat Mapper identifies critical habitat for Chinook salmon (Oncorhynchus tshawytscha, federal threatened) and steelhead trout (O. mykiss, federal threatened) in Lake Washington, approximately 2.36 miles downstream of the Project site. Impacts to ESA-listed species, critical habitat, and essential fish habitat managed by the NMFS have been addressed via NMFS' Endangered Species Act Section 7 Formal Programmatic Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for the U.S. Department of Housing and Urban Development Housing Programs in Washington State (NMFS, 2020). Kathleen Wells of NMFS provided email notification on December 19, 2025 that the "project qualifies and is verified for inclusion under the parent programmatic opinion." The U.S. Fish and Wildlife Service (USFWS) Official Species List, provided by the Washington Fish and Wildlife Office in Lacey, Washington, on November 21, 2025, identifies the potential presence of the following USFWS-managed listed species within the study area: marbled murrelet (Brachyramphus marmoratus, federal threatened), yellow-billed cuckoo (Coccyzus americanus, federal threatened), northwestern pond turtle (Actinemys marmorata, federal proposed threatened), bull trout (Salvelinus

confluentus, federal threatened), monarch butterfly (Danaus Plexippus, federal proposed threatened), and Suckley's cuckoo bumble bee (Bombus suckleyi, federal proposed endangered). However, the Project would have no effect on these bird, reptile, and insect species due to the absence of these species, suitable habitat, and their critical habitats from the Project action area. The Project would also have no effect on bull trout, as it meets the required parameters and conditions for new construction identified in Table A of the Endangered Species Act: Consultation Guidance for Washington State produced in collaboration by HUD and USFWS. More information is provided in Shannon & Wilson's attached No Effect Letter (Shannon & Wilson, 2026).

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

Yes, the activities involved in the project have the potential to affect species and/or habitats.

Screen Summary

Compliance Determination

This Project is in compliance with the Endangered Species Act. The No Effect Letter (Shannon & Wilson, 2026), NMFS Action Notification Form, and Technical Information Report (KPFF, 2026) are attached.

Supporting documentation

ESA Action Notification Form Compiled 11-17-2025.pdf
Technical Information Report - KPFF - 01-2026.pdf
No Effect Letter - ShannonWilson - 01-13-2026.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

✓ No

Yes

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

✓ Yes

3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- **Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR**
- **Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.**

If all containers within the search area fit the above criteria, answer "No." For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer "Yes."

No

✓ Yes

4. Based on the analysis, is the proposed HUD-assisted project located at or beyond the required separation distance from all covered tanks?

✓ Yes

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

No

Screen Summary

Compliance Determination

The existing ASTs identified within a 1-mile radius of the Project site are identified on the attached map. Shannon & Wilson visited these sites in late May 2025. Four of the identified ASTs are of more than 100-gallon capacity and contain common liquid industrial fuels. As stated above, the Acceptable Separation Distance Calculator was used for the four identified ASTs that are of more than 100-gallon capacity. All the identified ASTs are farther than the ''acceptable separation distance for people'' from the Project site. The calculations and results are attached. In summary, the Separation Distance from the project is acceptable. The Project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

115008-200-HUD-WS-8-Explosives-Attachment-Map Photos and Calculations.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 Project site is located on urban land that is not suitable for agriculture; accordingly, the Project would not convert agricultural land to a non-agricultural use and therefore is compliant with this section. See worksheet summary for more details.

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 United States Department of Agriculture Natural Resources Conservation Service Web Soil Survey map (attached) identifies the soil map units on the Project site as Urban land, 0-5% slopes and Urban Land-Alderwood Complex, 5-12% slopes. The farmland classification of both soil units is ''not prime farmland.'' The Project site is located in an urban area within unincorporated King County. Per the definition in 7 Code of Federal Regulations (CFR) Part 658.2a, ''farmland does not include land already in or committed to urban development or water storage. Farmland 'already in' urban development or water storage includes all such land with a density of 30 structures per 40-acre area. Farmland already in urban development also includes lands identified as 'urbanized area' (UA) on the Census Bureau Map.'' The Project location meets the definition of land already in urban development and, per the Urban Areas layer of the United State Census Bureau Geography Division's TIGERweb map, the Project site is within the Seattle-Tacoma urban area (see the Farmlands Protection Map attachment). In summary, this Project does not include any activities that could potentially

convert agricultural land to a non-agricultural use. The Project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

115008-200-HUD-WS-9-Farmlands Protection-Attachment-Web Soil Survey Map.pdf
115008-200-HUD-WS-9-Farmlands Protection-Attachment-Census Bureau Farmlands Protection 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:

✓ No

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

Yes

Describe:

✓ No

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

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

floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

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

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

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

[1] Sources which merit investigation include the files and studies of other federal agencies, such as the U. S. Army Corps of Engineers, the Tennessee Valley Authority, the Soil Conservation Service and the U. S. Geological Survey. These agencies have prepared flood hazard studies for several thousand localities and, through their technical assistance programs, hydrologic studies, soil surveys, and other investigations have collected or developed other floodplain information for numerous sites and areas. States and communities are also sources of information on past flood 'experiences within their boundaries and are particularly knowledgeable about areas subject to high-risk flood hazards such as alluvial fans, high velocity flows, mudflows and mudslides, ice jams, subsidence and liquefaction.
[2] If you are using best available information, select the FVA option below and provide supporting documentation in the screen summary. Contact your local environmental officer with additional compliance questions.
[3] Substantial improvement means any repair or improvement of a structure which costs at least 50 percent of the market value of the structure before repair or improvement or results in an increase of more than 20 percent of the number of dwelling units. The full definition can be found at 24 CFR 55.2(b)(12).

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary
Compliance Determination

The Project does not meet the definition of a critical action and is not located in a FFRMS floodplain. The Federal Flood Standard Support Tool, which uses the CISA data, expired on May 7, 2025 because Executive Order 14148 revoked Executive Order 14030, which included the Federal Flood Risk Management Standard. In the absence of CISA data, 0.2-Percent-Annual-Change (500-Year) Flood Approach (0.2PFA) was used to make this determination based on the available FEMA FIRM map. According to the FEMA FIRM Panel Number 53033C0976G, with the effective date of August 19, 2020, the entire Project site is located in Zone X, which is outside of the 500-year floodplain and is described as an ''area of minimal flood hazard.'' The FIRMette is attached. The nearest floodplain mapped by FEMA is the Zone AE floodplain associated with the Black River, which is 0.75 miles south of the Project site. Per the King County iMap's elevation contours layer, the Project site is approximately 400 vertical feet above the Zone AE floodplain. Since the Project site is located outside of the 500-year floodplain, the Project is in compliance with the floodplain management requirements. In summary, this Project does not occur in the FFRMS floodplain. The Project is in compliance with Executive Orders 11988 and 13690.

Supporting documentation

115008-200-HUD-WS-10-Flood Worksheets-Attachment-FEMA FIRMette(1).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).

Step 1 – Initiate Consultation
Select all consulting parties below (check all that apply):

✓ State Historic Preservation Offer (SHPO) Completed

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

✓ Duwamish Tribe Completed
✓ Suquamish Tribe Completed

Other Consulting Parties

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

The Project requires ground disturbance activities, including demolishing one existing building on the property that is not less than 45 years old, so the Project is required to undergo Section 106 review. LIHI contacted the Washington State Department of Archaeology & Historic Preservation (DAHP) to request review of the Project under Section 106. DAHP responded via a letter dated December 1, 2025, stating that the property is not eligible for listing in the National Register of Historic Places and concurred that "no historic properties will be affected by the current project as proposed." The letter from DAHP is attached. LIHI also submitted the EZ/Project Form on November 17, 2025, to initiate consultation with DAHP under Section 106. In response to the EZ/Project Form, LIHI received a letter from the Duwamish Tribe on December 23, 2025. LIHI responded with a letter to the Tribe on January 26, 2026. The letter from DAHP, EZ/Project Form, letter from the Duwamish Tribe, and response letter to the Duwamish Tribe are attached. [NOTE TO RE: Rob, can you add the other tribes that you notified above? We added the Duwamish and Suquamish since you mentioned them in your email regarding comments. We assume other local tribes (e.g., Muckleshoot, Tulalip, etc.) were also contacted. Please amend this text as needed.]

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

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

Yes
No

Step 2 – Identify and Evaluate Historic Properties

1. **Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:**
   Property ID: 338078 Residence 12724 Renton Ave S, Seattle, Washington 98178. Map attached with EZ/Project Form.

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

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

determination below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
12724 Renton Ave S, Seattle, Washington 98178	Not Eligible	Yes	✓ Not Sensitive

Additional Notes:

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

   Yes

   ✓ No

Step 3 –Assess Effects of the Project on Historic Properties

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

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

✓ No Historic Properties Affected

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

Document reason for finding:

✓ No historic properties present.

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

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The Project is in compliance with Section 106.

Supporting documentation

2025-03-01971_NoHistoricPropertiesAffected.pdf
LIHI Duwamish Tribe Response Letter 1-26-26.pdf
20251223 Comments from DUWAMISH TRIBE_dx¿d¿w¿abš.pdf
Section 106 EZ Project Form Compiled 11-17-2025.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B

1. What activities does your project involve? Check all that apply:

✓ New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster
None of the above

4. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

There are no noise generators found within the threshold distances above.

✓ Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

✓ Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Is your project in a largely undeveloped area?

✓ No

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

Yes

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

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

6. **HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.**

✓ Mitigation as follows will be implemented:

For the building envelope, the Project will install windows with a minimum of Sound Transmission Class (STC)-35 and STC-30 at the facades with exposure to Renton Avenue South, the primary noise source. For the residential unit windows on levels 2-5, the windows meeting a minimum of STC-35 will be used for the facades and corners facing Renton Avenue South and windows meeting STC-30 will be used for the remaining locations. Where minimum STC-35 windows are installed, a minimum of 3-foot flex duct will be installed at the exhaust and intake air runs. See the attached Environmental Noise Study, dated September 11, 2024, prepared by A3 Acoustics LLP.

Based on the response, the review is in compliance with this section. Document and upload drawings, specifications, and other materials as needed to describe the project's noise mitigation measures below.

No mitigation is necessary.

Screen Summary

Compliance Determination

A3 Acoustics conducted an Environmental Noise Study dated September 11, 2024, which analyzed the Day-Night Average Noise Level (DNL) at five Noise Assessment Locations (NALs) for the building envelope on the Project site, based on the HUD Noise Assessment Guidelines for evaluating the DNL. The DNLs for each of the five NALs, shown in Table 2 (page 6) of the Environmental Noise Study, ranged from 68-72 decibels, which is in the ''normally unacceptable'' range. Their calculations were based on Unincorporated King County traffic data, HUD worksheets, and the Project site plan. With implementation of the recommended mitigation detailed in the response to Question 4 above, the Project will be in compliance with HUD's noise regulations. The Environmental Noise Study Report is attached. In summary, the Project is in compliance with HUD's Noise regulation with mitigation.

Supporting documentation

Environmental Noise Study - A3 Acoustics - 09-11-2024.pdf

Are formal compliance steps or mitigation required?

✓ Yes

No

Sole Source Aquifers

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

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

Yes

✓ No

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

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

✓ No

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

Yes

Screen Summary

Compliance Determination

The Project site is not located within the boundary of a sole source aquifer (see attached map). Per the Technical Information Report, which has been attached to the Endangered

Species Act worksheet, stormwater from the Project site drains southeast to the intersection of Airport Way and Perimeter Road West and bypasses the mapped boundary of the Cedar Valley Aquifer Source Area SSA, discharging into Lake Washington (KPFF, 2026). The Project proposes to construct a mixed-use building that would provide 54 units of affordable housing and an early learning center. The proposed development would be connected to public water and sewer, both via the Skyway Water and Sewer District. Low impact development methods would be implemented in compliance with the County's Stormwater Manual and best management practices would be installed during construction to prevent sediment-laden runoff from leaving the site. Stormwater at the site would be collected via roof drains, area drains, and catch basins, and routed to infiltration tanks under parking lots. Infiltrating sand filters would provide water quality treatment from pollution-generating impervious surfaces. In the event of tank overflow, excess stormwater will be conveyed to the County's stormwater system via a 12-inch-diameter pipe along Renton Avenue South. This flow will ultimately be discharged into an un-named open stream channel more than 0.25 miles downstream of the site through a 30-inch-diameter culvert under the roadway. In the right-of-way, where full dispersion, infiltration, and basic dispersion are infeasible, soil amendment will be used in the landscape areas. The attached map shows the Project location in relation to the nearest sole source aquifer, the Cedar Valley Aquifer. In summary, the Project is not located on a sole source aquifer area. The Project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

115008-200-HUD-WS-13-Sole Source Aquifers-Attachment-Sole Source Aquifers Map.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

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

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

No

✓ Yes

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

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

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

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

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

Screen Summary

Compliance Determination

Two Shannon & Wilson biologists conducted a site visit on April 2, 2025, to document existing conditions and evaluate the site for the presence of wetlands. No wetlands or other water bodies were identified on the Project site. More information about the existing Project site conditions can be found in the attached Existing Conditions Letter for Skyway Housing Development Project prepared by Shannon & Wilson (November 2025). In summary, the Project will not impact on- or off-site wetlands. The Project is in compliance with Executive Order 11990.

Supporting documentation

Existing Conditions Letter - ShannonWilson - 11-19-2025.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 nearest Wild and Scenic Rivers are the Pratt River and Middle Fork Snoqualmie River, approximately 29 miles east of the Project site. The nearest Study River is the Skagit River, approximately 62 miles north of the Project site. The nearest Nationwide Rivers Inventory River is the South Fork Snoqualmie River, approximately 21 miles east of the Project site. The attached map shows the Project site location relative to these rivers. In summary, the Project is not within proximity of a NWSRS river. The Project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

115008-200-HUD-WS-15-Wild and Scenic Rivers-Attachment-Wild and Scenic Rivers Map.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Environmental Justice

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

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

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

Yes

✓ No

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

Screen Summary

Compliance Determination

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

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U.S. Department of Housing and Urban Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
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Environmental Assessment
Determinations and Compliance Findings
for HUD-assisted Projects
24 CFR Part 58

Project Information

Project Name: LIHI-Skyway-Affordable-Housing

HEROS Number: 900000010465572

Start Date: 04/18/2025

Project Location: 12724 Renton Ave S, Seattle, WA 98178

Additional Location Information:
The Project is located on two parcels in the Skyway neighborhood of unincorporated King County at 12724 Renton Avenue South (King County Parcel numbers 7580200255 and 7580200245). The Project parcels are owned by the Low Income Housing Institute (LIHI). The parcels are separated by one private residential property.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
The western parcel (approximately 0.64 acres) is mostly vacant with asphalt and landscaped surfaces on the west end and a single-story residence at the south end. There is also an uncovered basement foundation at the west end of the parcel that is surrounded by a chain-link fence. The eastern parcel (approximately 0.24 acres) is a vacant lot with a vegetated surface. The Project site also includes the adjacent right-of-way (ROW) along Renton Avenue South, which is approximately 0.16 acres. The total Project site area, including the ROW, is approximately 1.04 acres. The Project proposes to construct a new mixed-use residential building on the western parcel, with a four-classroom early learning center and play area on the ground level. The ground level also includes a residential play area and common room, and the second floor has a common area deck. The existing residential building on the western parcel will be demolished to make room for the new mixed-use building. The new building will provide 54 units of affordable housing to those individuals and families in the Skyway neighborhood who may otherwise be displaced due to pressures of gentrification in Seattle and the surrounding King County cities. The Project will limit rents to those earning between 30% and 50% of the area's median income, and the Project will reserve 40 units for households experiencing homelessness, 28 of which are two-bedroom or larger to support larger families. On-site bike storage and parking for seven cars will be provided on the western parcel; this includes three handicap spots and four electric vehicle charging stations. The eastern parcel will provide additional remote parking (15 spots) with landscaping.

Funding Information

Grant Number	HUD Program	Program Name	
14.871	Public Housing	Project-Based Voucher Program	$5,000,000.00

Estimated Total HUD Funded Amount: $5,000,000.00

Estimated Total Project Cost [24 CFR 58.2 (a)(5)]: $42,000,000.00

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
Noise Abatement and Control	For the building envelope, the Project will install windows with a minimum of Sound Transmission Class (STC)-35 and STC-30 at the facades with exposure to Renton Avenue South, the primary noise source. For the residential unit windows on levels 2-5, the windows meeting a minimum of STC-35 will be used for the facades and corners facing Renton Avenue South and windows meeting STC-30 will be used for the remaining locations. Where minimum STC-35 windows are installed, a minimum of 3-foot flex duct will be installed at the exhaust and intake air runs. See the attached Environmental Noise Study, dated September 11, 2024, prepared by A3 Acoustics LLP.
Permits, reviews, and approvals	All appropriate permits will be acquired from local, state, regional, and federal agencies as applicable, prior to commencing the project. Applicable permits include but may not be limited to building permits (plumbing, mechanical, electrical), grading permit, Puget Sound Clean Air Agency Notice of Demolition, and National Pollutant Discharge Elimination System Construction Stormwater General Permit (if this is required, a Stormwater Pollution Prevention Plan will be prepared). A Project Temporary Erosion and Sediment Control Plan is included in the Project plan set and a Spill Prevention and Emergency Cleanup Plan would also be developed.

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LIHI-Skyway-Affordable-Housing	Seattle, WA	900000010465572

Project Mitigation Plan

Project will install windows with a minimum of Sound Transmission Class (STC)-35 and STC-30 at the facades with exposure to Renton Avenue South, the primary noise source. For the residential unit windows on levels 2-5, the windows meeting a minimum of STC-35 will be used for the facades and corners facing Renton Avenue South and windows meeting STC-30 will be used for the remaining locations. Where minimum STC-35 windows are installed, a minimum of 3-foot flex duct will be installed at the exhaust and intake air runs. See the attached Environmental Noise Study, dated September 11, 2024, prepared by A3 Acoustics LLP. Mitigation measures for noise abatement and control have been incorporated into the project plans by LIHI and its consultant team, and would be carried out by the construction contractor. LIHI and King County would be responsible for monitoring the construction contractor's installation of the noise-related mitigation measures.

Determination:

X	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

Preparer Signature: DocuSigned by: Rob Sayre-McCord A2349EE0C57F438... **Date:** 2/17/2026

Name / Title/ Organization: Rob Sayre-McCord / Project Manager / KING COUNTY

Certifying Officer Signature: DocuSigned by: Kristin Pula 1DDCEA0A790B439... **Date:** 2/20/2026

Name/ Title: Kristin Pula / Chief of Capital Programs / King County

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