

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

3/7/2025

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

3/7/2025

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, Homelessness, and Community Development Division (HHCDD).

**REQUEST FOR RELEASE OF FUNDS**

On or about 3/24/2025, King County DCHS/ HHCDD, having completed an environmental review of the project described below, will submit a request to the 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 Redmond Plymouth Housing being proposed by the Plymouth Housing Group for the purpose of providing housing to low-income households, the total of HUD funding is approximately \$2,707,800. The overall total cost of the project at 16725 Cleveland Street in Redmond, Washington 98052 is \$49,339,137.

Plymouth Housing is proposing a newly constructed 6-story affordable housing development for individuals experiencing homelessness with an income restriction of 30 percent area median income. The project will include ground floor commercial space, a community courtyard, community rooms, and parking. KCHA is providing 100 Project Based Section 8 Vouchers at an annualized value of \$27,078 each.

**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 "2025 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 [community.development@kingcountywa.gov](mailto:community.development@kingcountywa.gov). All comments received by 5:00 PM PDT 3/22/2025 will be considered by HCCDD prior to authorizing submission of a request for release of funds. Comments should specify which Notice they are addressing.

## **ENVIRONMENTAL CERTIFICATION**

HCDD certifies to HUD that Sunaree Marshall 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: the HUD Seattle Office of Public Housing at U.S. Department of Housing and Urban Development, 909 First Ave., Suite 320 Seattle, WA 98104-1000 [Seattlepublichousing@hud.gov](mailto:Seattlepublichousing@hud.gov) regarding Project Based Vouchers. Potential objectors should contact HUD via email to verify the actual last day of the objection period.

*Sunaree Marshall*— 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](http://www.hud.gov)  
[espanol.hud.gov](http://espanol.hud.gov)

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

Project Information

**Project Name:** Redmond-Plymouth-Housing-PSH

**HEROS Number:** 900000010361328

**Start Date:** 10/24/2023

**Project Location:** 16725 Cleveland Street, Redmond, WA 98052

**Additional Location Information:**

The project is located at 16725 Cleveland Street in Redmond, Washington 98052, King County Parcel No. 1225059019.

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

Plymouth Housing is proposing a newly constructed 6-story affordable housing development for individuals experiencing homelessness with an income restriction of 30 percent area median income. The project will include ground floor commercial space, a community courtyard, community rooms, and parking.

Funding Information

Grant Number	HUD Program	Program Name	
14.871	Public Housing	Project-Based Voucher Program	\$2,707,800.00

**Estimated Total HUD Funded Amount:** \$2,707,800.00

**Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** \$ 49,339,137

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.

Redmond-Plymouth-  
Housing-PSH

Redmond, WA

900000010361328

Law, Authority, or Factor	Mitigation Measure or Condition
Endangered Species Act	The USFWS concurred with a determination of May Affect, Not Likely to Adversely Affect based on implementation of the project as described in the consultation request. The project received confirmation from NOAA Fisheries of coverage under the HUD Programmatic Biological Opinion (WCRO-2020-005112). NOAA considered all requirements of the parent programmatic to be satisfied, and no additional conservation recommendations were offered.
Noise Abatement and Control	An outdoor seating area is modeled to have a noise level of 66 dB. A solid wood fence at least 6 feet tall will be located between Redmond Way and the seating area on the west side of the building, in a length and position that provides at least the modeled mitigation of the positioning shown in the included project design sketch.

**Project Mitigation Plan**

The mitigation plans outlined above are part of the overall project design plan and will be included in relevant agreements and specifications as project plans are finalized. The Senior Construction Manager will be responsible for ensuring that project agreements and specifications are followed during project construction.

**Determination:**

<input checked="" type="checkbox"/>	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
<input type="checkbox"/>	Finding of Significant Impact

Preparer Signature: Rob Sayre-McCord A2349EE0C57E438 Date: 3/7/2025

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

Certifying Officer Signature: Kristin Pula 1DDCEA0A790B439 Date: 3/7/2025

Name/ Title: Kristin Pula/Capital Programs Manager/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).**

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

Project Information

**Project Name:** Redmond-Plymouth-Housing-PSH

**HEROS Number:** 900000010361328

**Start Date:** 10/24/2023

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

**RE Preparer:** Rob Sayre-McCord

**State / Local Identifier:**

**Certifying Officer:** Kristin Pula

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

**Point of Contact:** Julie Nordgren

**Consultant (if applicable):** Landau Associates, Inc.

**Point of Contact:** Alyssa Johnson / Amy Maule

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:** 16725 Cleveland Street, Redmond, WA 98052

**Additional Location Information:**

The project is located at 16725 Cleveland Street in Redmond, Washington 98052, King County Parcel No. 1225059019.

**Direct Comments to:** communitydevelopment@kingcountywa.gov

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

Plymouth Housing is proposing a newly constructed 6-story affordable housing development for individuals experiencing homelessness with an income restriction of 30 percent area median income. The project will include ground floor commercial space, a community courtyard, community rooms, and parking.

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

The purpose of this proposed action is to provide housing for individuals who are at risk of displacement or homelessness. These individuals require public housing assistance through permanent supportive housing as their fixed incomes put them at high risk for displacement. Plymouth Housing is a tax exempt 501(c)(3) non-profit organization who provides highly sought after housing assistance.

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

The site is currently owned by the City of Redmond (City) and was formerly developed with a structure that was demolished in 2023. The neighboring property to the east is currently being used for laydown space and construction staging.

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

[F01APETopo.pdf](#)

[Site Photos from Phase 1 Report Redmond Property \(04-11-24\).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

<b>Grant / Project Identification Number</b>	<b>HUD Program</b>	<b>Program Name</b>	<b>Funding Amount</b>
14.871	Public Housing	Project-Based Voucher Program	\$2,707,800.00

**Estimated Total HUD Funded, Assisted or Insured Amount:** \$2,707,800.00

**Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** \$49,339,137.00

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

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No military airports are located within 15,000 feet of the Plymouth Housing Redmond Property, and no civilian airports are located within 2,500 feet of the project location. See attached. The Plymouth Housing Redmond Project Site is located on property acquired by the City of Redmond. The proposed project is not located immediately beyond the end of a runway or within 2,500 feet of a civilian airport or 15,000 feet of a military airport. See the attached map. NEPAassist website. <a href="https://nepassisttool.epa.gov/nepassist/nepamap.aspx">https://nepassisttool.epa.gov/nepassist/nepamap.aspx</a> . Accessed June 5, 2024.
<b>Coastal Barrier Resources Act</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in Washington, a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

<p><b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>FEMA Map No. 53033C0386H, dated August 19, 2020 (attached), shows that the Plymouth Housing Redmond project is located outside of special flood hazard areas (i.e., 100-year floodplain) and outside the 0.2% annual chance flood hazard area. The project is in compliance with flood insurance requirements. Reference: FEMA. Web Page: Flood Map Service Center. Available online at: <a href="https://msc.fema.gov/portal/home">https://msc.fema.gov/portal/home</a>. Federal Emergency Management Agency. Accessed June 5, 2024.</p>
<p><b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b></p>		
<p><b>Air Quality</b> Clean Air Act, as amended, particularly section 176(c) &amp; (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Attached screenshots from the NEPAssist website show that the Plymouth Housing Redmond project is located within past maintenance areas for ozone and carbon monoxide (CO). The 20-year maintenance period has ended for these maintenance areas, but strategies to reduce air pollution must remain in effect. Construction equipment and vehicles and construction workers' vehicles will generate minor amounts of localized CO and ozone. Emissions from these sources are regulated by vehicle and equipment emission standards, which are established on a per-source/vehicle basis, rather than cumulatively as proposed project impacts. Using well-maintained equipment and turning off construction equipment when not in use will reduce construction engine emissions. Construction-related air quality impacts, including the impact of operating construction-related equipment and vehicles, are expected to be de minimis. The finished project is a newly constructed 6-story affordable housing development. An incremental increase of vehicle emissions in the immediate project area</p>



		<p>would occur from resident and employee vehicle operation and an incremental increase of ozone in the immediate project area would occur from minor residential sources such as electronics; however, no significant impacts to air quality would occur from the project. References: NEPAassist, <a href="https://nepassisttool.epa.gov/nepassist/nepamap.aspx">https://nepassisttool.epa.gov/nepassist/nepamap.aspx</a>. Accessed June 5, 2024. Ecology. Past Maintenance SIPs. <a href="https://ecology.wa.gov/Regulations-Permits/Plans-policies/State-implementation-plans/Maintenance-SIPs">https://ecology.wa.gov/Regulations-Permits/Plans-policies/State-implementation-plans/Maintenance-SIPs</a>. Washington State Department of Ecology. Accessed June 5, 2024.</p>
<p><b>Coastal Zone Management Act</b> Coastal Zone Management Act, sections 307(c) &amp; (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>As of July 22, 2020, Washington State Department of Ecology (Ecology) notified HUD of the following: "Ecology has concluded that it is unnecessary for U.S. Department of Housing and Urban Development (HUD) to continue to send project information in order to receive Ecology's concurrence that the funding phase of the project is consistent with Washington's CZMP. Therefore, we are writing to inform you that HUD no longer needs to require applicants to send Ecology letters seeking our concurrence on projects for which HUD plans to release federal funding." Concurrence from Ecology for Coastal Zone Management 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 CZMA regulations for federal agency activities (Title 15 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 Coastal Zone Management Program. It is during</p>

		<p>the local permitting process that a project might be subject to CZM and further review by Ecology. References: U.S. Department of Housing and Urban Development, Environmental Guidance website. <a href="https://www.hud.gov/states/shared/working/r10/environment">https://www.hud.gov/states/shared/working/r10/environment</a>. Accessed June 5, 2024.</p>
<p><b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) &amp; 58.5(i)(2)]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>A Phase I ESA dated April 11, 2024, performed at the Plymouth Housing Project property by Adapt Consulting (Adapt) did not reveal any RECs, and no significant data gaps were encountered that would affect Adapt's ability to assess the presence of RECs. Review of CDC's publicly available county radon data (attached) shows that in King County, state-reported pre-mitigation radon levels have been tested at least 3,174 times during the most recent 10-year period, and the average result is 0.96 (pCi/L), well below the EPA's recommended limit of 4.0 (pCi/L). References: Adapt Consulting 2024. Phase I Environmental Site Assessment, 16725 Cleveland Street Redmond Property, Redmond, WA 98052. Accessed April 11, 2024. CDC. 2024. National Environmental Public Health Tracking Network. Radon Data. <a href="https://ephtracking.cdc.gov/DataExplorer/?c=31">https://ephtracking.cdc.gov/DataExplorer/?c=31</a>. Accessed August 9, 2024.</p>
<p><b>Endangered Species Act</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>This project was found Likely to Adversely Affect listed species, and formal consultation was conducted. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act.</p>
<p><b>Explosive and Flammable Hazards</b> Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The following resources were reviewed to determine the presence or planned addition of tanks within a 1-mile radius of the project location: * Google Earth (imagery date April 13, 2024) to identify tanks within a 1-mile radius of the</p>

		<p>project location. Screenshot of image is attached showing location of tanks identified. * City of Redmond's permit website for permits related to tank installation. Review results identified the following: * A total of eight tanks were identified that met the criteria for calculating an acceptable safe distance from the project, ranging in size from approximately 100 gallons to 100,000 gallons, and ranging from approximately 1,458 feet to 5,170 feet from the project location. * Some of the tanks identified could contain water or other inert materials; however, for the purposes of this review, all tanks were conservatively assumed to contain flammable or combustible materials. HUD's Acceptable Separation Distance (ASD) Electronic Assessment Tool was used to calculate the ASD for each aboveground storage tank (AST). All tanks were located further away than their ASD. See attachments for a map, list of locations, illustration of tanks, and a summary table showing distance, volume, and ASD for each tank. References: City of Redmond Projects. Available online at: <a href="https://www.redmond.gov/406/Projects">https://www.redmond.gov/406/Projects</a>. City of Redmond, Washington. Accessed June 17, 2024. Google, Inc. Google Earth Pro. Imagery Date August 23, 2022; accessed June 17, 2024. HUD. 2023. Acceptable Separation Distance Electronic Assessment Tool. <a href="https://www.hudexchange.info/programs/environmental-review/asd-calculator/">https://www.hudexchange.info/programs/environmental-review/asd-calculator/</a>. Accessed June 17, 2024.</p>
<p><b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The property was previously developed and is not in an area zoned for farmland.</p>
<p><b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>FEMA Map No. 53033C0386H, dated August 19, 2020, shows that the project is not located in the FFRMS flood zone,</p>

		<p>because the project is not located in the 0.2% Annual Chance Flood Hazard area. Reference: FEMA Flood Map Service Center. <a href="https://msc.fema.gov/portal/home">https://msc.fema.gov/portal/home</a>. Federal Emergency Management Agency. Accessed June 5, 2024.</p>
<p><b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Project information was sent by Rob Sayre-McCord on June 4th, 2024 to Tribal Historic Preservation Offices (THPOs) for indigenous tribes with interest in the area according to TDAT, and to The Washington State Department of Archaeological and Historical Preservation (DAHP). DAHP sent a letter of concurrence determining that the project does not affect historic properties. No responses were received from the SHPOs and the 30-day response period was reached on July 4, 2024. A Cultural Resources Assessment was conducted by Cultural Resources Consultants (CRC) for the project site, and the report dated July 3, 2024, concludes that no protected cultural resources were identified during our fieldwork. During construction activities, the Inadvertent Discovery Plan (IDP) attached (also an attachment to the Cultural Resources Assessment), will be followed. 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. 2024. CRC. Cultural Resources Assessment for the Plymouth Redmond PSH Project, Redmond, King County, Washington. July 3, 2024. DAHP. 2024. Letter of Concurrence Re: Plymouth Housing Redmond Permanent Supportive Housing Project. Department of Archaeological and Historical Properties. June 4.</p>
<p><b>Noise Abatement and Control</b> Noise Control Act of 1972, as</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Due to text limits, a full explanation is attached along with supporting</p>

<p>amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>		<p>documents. Summary of conclusions is as follows: The only locations with calculated noise levels above the acceptable DNL of 65 dB were Project Point A, the indoor point at which noise is expected to be greatest, which was calculated to be 72 dB, and Project Point B, the outdoor eating area along the east side of the building, which was calculated to be 66 dB. Summary of noise level exceedances and proposed mitigation measures are provided below: * Point A (72 dB): A noise report completed for the site by A3 provides recommendations to lower indoor noise to below the required indoor noise limit of 45 dB. The recommendations include using a minimum of STC 35 for windows and sliding glass doors with exposure to the light rail, a minimum of STC 33 for windows and sliding glass doors with exposure to Redmond Way, and at least a standard exterior wall with one layer of gypsum board on the unit side. To supplement the A3 building materials analysis, HUD's Sound Transmission Classification Assessment Tool (STraCAT) was used, based on specified wall section provided by the project architect and the minimum window design recommended by A3. Screenshots of the STraCAT analysis are provided in attached supporting documentation. Recommendations will be incorporated into the project design. * Architectural plans show a third-floor balcony near Project Point A. After reviewing HUD definitions of noise-sensitive outdoor spaces (Sturdivant 2024) and consulting with the Project architects, this area was determined not to be a noise-sensitive outdoor use. The area is a shared gathering space with no specific use or safety concerns requiring relative quiet. Speech communication is neither required for safety nor is it an</p>
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		integral part of the intended use. Alternative shared gathering spaces are planned inside the building (e.g., resident lounges). * Point B (66 dB): A minimum 6-foot standard wooden fence with no gaps is planned between Redmond Way and outdoor Point B, as shown in the supporting documentation. HUD's Barrier Performance Module was used to calculate the reduction in noise from the fence. The final noise level after accounting for noise reduction from the fence is modeled to be acceptable, or at 65 dB. See attached for full summary of analysis.
<b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Per the U.S EPA NEPAassist Mapping tool, the project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements. Please see attached map for more information on the nearest sole source aquifer to the project site.
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	USFWS National Wetlands Inventory mapping does not identify any wetlands in the project vicinity. Reference: USFWS. Wetlands Mapper. <a href="https://www.fws.gov/wetlands/data/mapper.html">https://www.fws.gov/wetlands/data/mapper.html</a> . Accessed June 13, 2024.
<b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The nearest Wild and Scenic River is more than 25 miles from the property location. Reference: National Wild and Scenic Rivers System. <a href="https://www.rivers.gov/map.php">https://www.rivers.gov/map.php</a> . Accessed June 6, 2024.
<b>HUD HOUSING ENVIRONMENTAL STANDARDS</b>		
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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.

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
<b>LAND DEVELOPMENT</b>			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The proposed Project conforms with the City of Redmond Comprehensive Plan, which includes goals for affordable and supportive housing. The Project conforms with the Town Center mixed-use zone, a zone designated for mid- to high-rise commercial and office with residential and mixed-use buildings.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Geotechnical evaluation has been completed for the site. The investigation found the site to be suitable for the proposed Project and provides recommendations for erosion control, excavations, subgrade preparation drainage/waterproofing, and other considerations.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	The proposed Project poses no hazards or nuisances. No site safety concerns were identified.	
<b>SOCIOECONOMIC</b>			
Employment and Income Patterns	1	The Project includes commercial space and is expected to have a minor but beneficial impact to the existing employment and income patterns of the surrounding area.	
Demographic Character Changes / Displacement	2	The Project is located in a developed urban residential area and would not displace any current residents and conforms to applicable zoning.	
Environmental Justice EA Factor	2	The Project would not have any negative effects on the environment and would not have disproportionately high adverse	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		impacts on low-income and/or minority communities.	
<b>COMMUNITY FACILITIES AND SERVICES</b>			
Educational and Cultural Facilities (Access and Capacity)	2	The proposed Project adds additional residential housing; therefore, there may be a small increase in demand for educational and cultural services and facilities. It is expected that the incremental increase in demand from the additional housing can be met by the existing educational and cultural facility capacity.	
Commercial Facilities (Access and Proximity)	1	The site is located close to many commercial facilities and commercial space will be provided as part of the Project. New residents may have a small but positive impact on local commercial businesses.	
Health Care / Social Services (Access and Capacity)	2	Because the proposed Project increases residential population, a demand for healthcare and social services and facilities may be associated with residents. However, healthcare services will not be adversely affected due to the size of the Project, and it is expected that the incremental increase in demand can be met by the existing capacity.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The site will be provided with onsite garbage pickup. Solid waste services will not be adversely affected. Waste created by construction and by the completed Project will be hauled offsite and disposed at permitted facilities. Because the proposed Project increases residential population, a demand for recycling services and facilities may be associated with residents. However, recycling services will not be adversely affected due to the size of the Project, and it is expected that the incremental increase in demand can be met by the existing capacity.	
Waste Water and Sanitary Sewers	2	Access to municipal wastewater/sanitary sewer service will be provided to the proposed Project. Wastewater/sanitary	



<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
(Feasibility and Capacity)		sewer services will not be adversely affected because it is expected that the incremental increase in demand will be met by the existing system capacity.	
Water Supply (Feasibility and Capacity)	2	Access to the City water supply will be provided to the proposed Project. Water supply will not be adversely affected as it is expected that water needs at the site will be met by the existing water supply capacity.	
Public Safety - Police, Fire and Emergency Medical	2	Public safety services, including police, fire, and emergency medical services, will be available to residents. However, public safety services will not be adversely affected due to the size of the Project, and it is expected that the incremental increase in demand can be met by the existing capacity.	
Parks, Open Space and Recreation (Access and Capacity)	2	The proposed housing Project will be constructed on a previously developed property. The proposed Project includes outdoor spaces and improved landscaping. No designated recreation areas or parks will be removed as part of the Project. Recreational facilities will not be adversely affected by the Project.	
Transportation and Accessibility (Access and Capacity)	2	Residents utilizing the completed Project may use local roadways and transit. The Project area is served by Sound Transit with stops along Redmond Way and Avondale Way, and a Light Rail station is under construction at a location adjacent to the south of the Project. Many services, such as grocery stores, parks, and schools, are within walking distance. It is expected that transportation needs at the Project will be met by existing transportation capacities. Due to the limited size of the proposed Project, no adverse impacts to transportation networks or services are anticipated.	
<b>NATURAL FEATURES</b>			

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
Unique Natural Features /Water Resources	2	The Project is located in downtown Redmond in an area designated for growth and there are no unique natural features in the Project vicinity. The proposed Project will neither discharge nor draw from any groundwater, and runoff from the Project will be treated at a regional facility prior to discharge to the Sammamish River. Therefore, no adverse effects on these natural features or water resources are anticipated.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The site where the proposed Project will be constructed is a vacant, previously developed property and does not contain habitat associated with species of local importance. Therefore, no adverse impacts to significant vegetation or wildlife are anticipated.	
Other Factors 1			
Other Factors 2			
<b>CLIMATE AND ENERGY</b>			
Climate Change	2	The Project will provide landscaping that will include species of deciduous trees. Mature trees may help regulate temperature at the site, thereby offsetting potential impacts associated with extreme heat/urban heat island effects. Geotechnical recommendations will be followed to support soil suitability/stability. The Project is located inland and at 46 feet elevation above sea level, which is predicted to rise approximately 2 feet in the region by 2060. Flooding impacts from climate change are addressed in the floodplain impacts section. The Project is not located in an area that is expected to have extreme weather events, droughts, or wildfires that are outside the range of what normal construction can withstand.	
Energy Efficiency	2	The Project design includes domestic heat pumps for hot water, solar panels on the roof, ENERGY STAR-rated appliances, low-	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		flow toilets, and an energy recovery ventilation system. The Project will follow Evergreen Sustainable Design Systems (ESDS) building performance design standards.	

**Supporting documentation**

[WA24-22633-GEO - Redmond - Geotech Report 5-16-24.pdf](#)  
[RZCZoningMap\\_201904091331188172.pdf](#)

**Additional Studies Performed:**

Studies below are uploaded in support of previous sections: A3 Acoustics. Environmental Noise Analysis - PSH Redmond. July 1, 2024. Adapt Environmental & Geotech. 2024. Phase I Environmental Site Assessment, 16725 Cleveland Street Redmond Property, Redmond, WA 98052. April 11, 2024. Adapt Environmental & Geotech. 2024. Geotechnical Engineering Evaluation, Proposed Mixed-Use Property, Plymouth Housing Group. May 17. Biological Assessment, Landau Associates, Inc. August 9, 2024. CRC 2024. Cultural Resources Assessment for the Plymouth Redmond PSH Project, Redmond, King County, Washington. Cultural Resources Consultants, LLC. July 3.

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

by:

Julia A. Navidi

4/1/2024 12:00:00 AM

[Site Photos from Phase 1 Report Redmond Property \(04-11-24\).pdf](#)

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

City of Redmond Projects. <https://www.redmond.gov/406/Projects>. Accessed June 17, 2024. City of Redmond. 2014. Comprehensive Plan, Ordinance 2733, Housing. March 29. City of Redmond. 2019. City of Redmond Zoning Map. March 16. City of Redmond. 2019. Downtown Traffic Counts, 2019 Average Weekday Traffic. <https://www.redmond.gov/863/Traffic-Counts>. May 29 2019. City of Redmond. 2020. City of Redmond, Washington, Traffic Study Standards. December. City of Redmond. 2022. Traffic Counts, 2022 Average Weekday Traffic. <https://www.redmond.gov/863/Traffic-Counts>. May 29 2022. Ecology, Past Maintenance SIPs, <https://ecology.wa.gov/Regulations-Permits/Plans-policies/State-implementation-plans/Maintenance-SIPs>. Washington State Department of Ecology. Accessed June 5, 2024. Environmental Works. 2024. Plymouth Housing Redmond PSH Site Plan, Schematic Design - Base Plan. Environmental Works Community Design Center. July 2024. EPA. 2024. Sole Source Aquifers, Online Map Viewer. <https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada18>

77155fe31356b. US Environmental Protection Agency. Accessed June 6, 2024  
FEMA Flood Map Service Center. <https://msc.fema.gov/portal/home>. Accessed June 5, 2024. GCR Companies 2024. AirportIQ 5010 (Airport Master Records): <https://www.airportiq5010.com/5010Web/>. GCR Companies. Accessed July 29, 2024. Google, Inc. Google Earth Pro. Imagery Date August 23, 2022. Accessed June 17, 2024. HUD. 2023. Acceptable Separation Distance Electronic Assessment Tool. <https://www.hudexchange.info/programs/environmental-review/asd-calculator/>. Accessed June 17, 2024. HUD. 2024. Barrier Performance Module (BPM) Calculator. <https://www.hudexchange.info/environmental-review/bpm-calculator/>. Accessed August 2, 2024. HUD. 2024. Day Night Noise Calculator. <https://www.hudexchange.info/environmental-review/dnl-calculator/>. Accessed August 2, 2024. HUD. 2009. HUD Noise Guidebook: Chapter 4--Noise Attenuation. US Department of Housing and Urban Development. March. <https://www.hudexchange.info/resource/313/hud-noise-guidebook/>. Accessed August 2, 2024. King County 2024. Noise Contours for King County International Airport. <https://gis-kingcounty.opendata.arcgis.com/datasets/kingcounty::noise-contours-one-decibel-for-king-county-international-airport-noise-contours-1db-area/>. Accessed August 2, 2024. Mueller, Josh. 2024. RE: Downtown traffic increase %. Josh Mueller, Senior Transportation Strategist, City of Redmond. Correspondence with Alyssa Johnson, Landau Associates. August 1. National Wild and Scenic Rivers System. <https://www.rivers.gov/map.php>. Accessed June 6, 2024. NEPAassist. <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>. Accessed June 5, 2024. Sound Transit 2011. East Link Project, Final Environmental Impact Statement, Appendix H2: Noise and Vibration Technical Report. July. USFWS. Wetlands Mapper. <https://www.fws.gov/wetlands/data/mapper.html>. Accessed June 13, 2024.

#### List of Permits Obtained:

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

Plymouth's community outreach for the Redmond PSH Project has been intentional, extensive, and ongoing. To ensure communication from the get-go to our surrounding neighbors (by and large small businesses, including many minority-owned businesses), Plymouth staff spent several afternoons on foot, talking with business owners and staff nearby and inviting them to an event on April 17, 2024 called the Neighborhood Business Focus Group that was sponsored by and held at Centro Cultural Mexicano. There, Plymouth staff, board members, and Plymouth clients with lived experience presented about Plymouth programming. It was followed by a lengthy time for Q&A.

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

The proposed Project as evaluated does not include any related activities, does not cause any adverse environmental impacts, and will not result in a significant impact on the quality of the environment.

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

The current Project is the result of alternatives that have been considered. The Project was originally planned in a location in Kenmore in which a development agreement between Kenmore and Plymouth was required. City Council approval was required to execute the development agreement in the form of an ordinance; however, the ordinance did not pass. In January 2024, the City offered the current Project site and funding to support the permanent housing Project.

No Action Alternative [24 CFR 58.40(e)]

In the case of a no-build alternative, the site would remain vacant and would likely be developed with a commercial business or privately owned residential property that would not fulfill the need for low-income stable housing in the community.

Summary of Findings and Conclusions:

Law, Authority, or Factor/Mitigation Measure Geotechnical/Geotechnical recommendations will be followed as discussed in the Geotechnical Report. ESA / Stormwater and design plans will be followed as noted in the Stormwater Drainage Report. Noise / A solid fence at least 6 feet in height will be installed north of the outdoor seating area planned on the west side of the Project in order to reduce noise levels to an acceptable 65 dB. Historic / An unanticipated discovery protocol will be followed during ground-disturbing activities.

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
Endangered Species Act	The USFWS concurred with a determination of May Affect, Not Likely to Adversely Affect based on implementation of the project as described in the consultation request. The project received confirmation from NOAA Fisheries of coverage under the HUD Programmatic Biological Opinion (WCRO-2020-005112). NOAA considered all	N/A	Project designs, where relevant to the determination, will be followed as noted in the correspondence with USFWS and NMFS.	

	requirements of the parent programmatic to be satisfied, and no additional conservation recommendations were offered.			
Noise Abatement and Control	An outdoor seating area is modeled to have a noise level of 66 dB. A solid wood fence at least 6 feet tall will be located between Redmond Way and the seating area on the west side of the building, in a length and position that provides at least the modeled mitigation of the positioning shown in the included project design sketch.	N/A	A solid fence at least 6 feet in height will be installed north of the outdoor seating area planned on the west side of the Project in order to reduce noise levels to an acceptable 65 dB.	

**Project Mitigation Plan**

The mitigation plans outlined above are part of the overall project design plan and will be included in relevant agreements and specifications as project plans are finalized. The Senior Construction Manager will be responsible for ensuring that project agreements and specifications are followed during project construction.

**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

No military airports are located within 15,000 feet of the Plymouth Housing Redmond Property, and no civilian airports are located within 2,500 feet of the project location. See attached. The Plymouth Housing Redmond Project Site is located on property acquired by the City of Redmond. The proposed project is not located immediately beyond the end of a runway or within 2,500 feet of a civilian airport or 15,000 feet of a military airport. See the attached map. NEPAassist website. <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>. Accessed June 5, 2024.

#### Supporting documentation

[Airport Backup.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

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

#### Supporting documentation

[Coastal-Barrier-Resources-Map.pdf](#)

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

Yes

✓ No



## Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?

No. This project does not require flood insurance or is excepted from flood insurance.

✓ Yes

2. Upload a FEMA/FIRM map showing the site here:

[FloodPanel PlymouthRedmond 6-5-2024.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**

FEMA Map No. 53033C0386H, dated August 19, 2020 (attached), shows that the Plymouth Housing Redmond project is located outside of special flood hazard areas (i.e., 100-year floodplain) and outside the 0.2% annual chance flood hazard area. The project is in compliance with flood insurance requirements. Reference: FEMA. Web Page: Flood Map Service Center. Available online at: <https://msc.fema.gov/portal/home>. Federal Emergency Management Agency. Accessed June 5, 2024.

**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):

**Screen Summary**

**Compliance Determination**

Attached screenshots from the NEPAAssist website show that the Plymouth Housing Redmond project is located within past maintenance areas for ozone and carbon monoxide (CO). The 20-year maintenance period has ended for these maintenance areas, but strategies to reduce air pollution must remain in effect. Construction

equipment and vehicles and construction workers' vehicles will generate minor amounts of localized CO and ozone. Emissions from these sources are regulated by vehicle and equipment emission standards, which are established on a per-source/vehicle basis, rather than cumulatively as proposed project impacts. Using well-maintained equipment and turning off construction equipment when not in use will reduce construction engine emissions. Construction-related air quality impacts, including the impact of operating construction-related equipment and vehicles, are expected to be de minimis. The finished project is a newly constructed 6-story affordable housing development. An incremental increase of vehicle emissions in the immediate project area would occur from resident and employee vehicle operation and an incremental increase of ozone in the immediate project area would occur from minor residential sources such as electronics; however, no significant impacts to air quality would occur from the project. References: NEPAssist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>. Accessed June 5, 2024. Ecology. Past Maintenance SIPs. <https://ecology.wa.gov/Regulations-Permits/Plans-policies/State-implementation-plans/Maintenance-SIPs>. Washington State Department of Ecology. Accessed June 5, 2024.

**Supporting documentation**

[NEPAssist Air Quality 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**

As of July 22, 2020, Washington State Department of Ecology (Ecology) notified HUD of the following: "Ecology has concluded that it is unnecessary for U.S. Department of Housing and Urban Development (HUD) to continue to send project information in order to receive Ecology's concurrence that the funding phase of the project is consistent with Washington's CZMP. Therefore, we are writing to inform you that HUD no longer needs to require applicants to send Ecology letters seeking our concurrence on projects for which HUD plans to release federal funding." Concurrence from Ecology for Coastal Zone Management 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 CZMA regulations for federal agency activities (Title 15 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 Coastal Zone Management Program. It is during the local permitting process that a project might be subject to CZM and further review by Ecology. References: U.S. Department of Housing and Urban Development, Environmental Guidance website. <https://www.hud.gov/states/shared/working/r10/environment>. Accessed June 5, 2024.

**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)
<b>Reference</b>		
<a href="https://www.onecpd.info/environmental-review/site-contamination">https://www.onecpd.info/environmental-review/site-contamination</a>		

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

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

None of the above

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

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

2. Were any on-site or nearby toxic, hazardous, or radioactive substances\* (excluding radon) found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)

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

✓ No

Explain:

A Phase I ESA dated April 11, 2024, performed at the property by Adapt Consulting, did not reveal any RECs.

Yes

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

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

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

Yes

Explain:

✓ No

\* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years,



any new environmental review must include a consideration of radon using one of the methods in Section A below.

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

Yes

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

No

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

Yes

No

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

Explain:

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:

Review of CDC's publicly available county radon data (attached) shows that in King County, state-reported pre-mitigation radon levels have been tested at least 3,174 times during the most recent 10-year period, and the average result is 0.96 (pCi/L), well below the EPA's recommended limit of 4.0 (pCi/L). CDC. 2024. National Environmental Public Health Tracking Network. Radon Data. <https://ephtracking.cdc.gov/DataExplorer/?c=31>. Accessed August 9, 2024.

File Upload:

[Radon Data King County.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**

A Phase I ESA dated April 11, 2024, performed at the Plymouth Housing Project property by Adapt Consulting (Adapt) did not reveal any RECs, and no significant data gaps were encountered that would affect Adapt's ability to assess the presence of RECs. Review of CDC's publicly available county radon data (attached) shows that in King County, state-reported pre-mitigation radon levels have been tested at least 3,174 times during the most recent 10-year period, and the average result is 0.96 (pCi/L), well below the EPA's recommended limit of 4.0 (pCi/L). References: Adapt Consulting 2024. Phase I Environmental Site Assessment, 16725 Cleveland Street Redmond Property, Redmond, WA 98052. Accessed April 11, 2024. CDC. 2024. National Environmental Public Health Tracking Network. Radon Data. <https://ephtracking.cdc.gov/DataExplorer/?c=31>. Accessed August 9, 2024.

#### **Supporting documentation**

[Phase 1 Report Redmond Property \(04-11-24\).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 species or habitats?**

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

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

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

**2. Are federally listed species or designated critical habitats present in the action area?**

No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

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

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

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

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

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

**5. Formal consultation is required**

Section 7 of ESA (16 USC 1536) mandates consultation to resolve potential impacts to federally listed endangered and threatened species and critical habitats. If a HUD assisted project may affect any endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

Document and upload the following below:

- (1) A biological assessment, evaluation, or equivalent document
- (2) Biological opinion(s) issued by FWS and/or NMFS
- (3) Any other documentation of formal consultation

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

- ✓ Mitigation as follows will be implemented:

The USFWS concurred with a determination of May Affect, Not Likely to Adversely Affect based on implementation of the project as described in the consultation request. The project received confirmation from NOAA Fisheries of coverage under the HUD Programmatic Biological Opinion (WCRO-2020-005112). NOAA considered all requirements of

the parent programmatic to be satisfied, and no additional conservation recommendations were offered.

No mitigation is necessary.

**Screen Summary**

**Compliance Determination**

This project was found Likely to Adversely Affect listed species, and formal consultation was conducted. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act.

**Supporting documentation**

[2025-0011237\\_HUD\\_Redmond-Plymouth-Housing\\_LOC\\_Signed.pdf](#)

[NOAA Determination.pdf](#)

[Plymouth Redmond OM Manual\\_rev1.pdf](#)

[PLYMOUTHREDMOND-CIVIL\\_CCR\\_2024-08-23\\_rev1.pdf](#)

[PLYMOUTH REDMOND-CCR STORMWATER REPORT\\_2024-08-23.pdf](#)

[240910 Landscape Plans for Landau.pdf](#)

[PSH BA Draft 9-6-2024.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 following resources were reviewed to determine the presence or planned addition of tanks within a 1-mile radius of the project location: \* Google Earth (imagery date April 13, 2024) to identify tanks within a 1-mile radius of the project location. Screenshot of image is attached showing location of tanks identified. \* City of Redmond's permit website for permits related to tank installation. Review results identified the following: \* A total of eight tanks were identified that met the criteria for calculating an acceptable safe distance from the project, ranging in size from approximately 100 gallons to 100,000 gallons, and ranging from approximately 1,458 feet to 5,170 feet from the project location. \* Some of the tanks identified could contain water or other inert materials; however, for the purposes of this review, all tanks were conservatively assumed to contain flammable or combustible materials. HUD's Acceptable Separation Distance (ASD) Electronic Assessment Tool was used to calculate the ASD for each aboveground storage tank (AST). All tanks were located further away than their ASD. See attachments for a map, list of locations, illustration of tanks, and a summary table showing distance, volume, and ASD for each tank. References: City of Redmond Projects. Available online at: <https://www.redmond.gov/406/Projects>. City of Redmond, Washington. Accessed June 17, 2024. Google, Inc. Google Earth Pro. Imagery Date August 23, 2022; accessed June 17, 2024. HUD. 2023. Acceptable Separation Distance Electronic Assessment Tool. <https://www.hudexchange.info/programs/environmental-review/asd-calculator/>. Accessed June 17, 2024.

**Supporting documentation**

[Plymouth-Explosives Backup.pdf](#)

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

Yes

✓ No



### Farmlands Protection

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

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

Yes

No

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

This site is in Downtown Kenmore, is zoned "Downtown Commercial". The Site is currently used as a municipally owned surface parking lot for municipal vehicle storage and traffic asset storage.

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 property was previously developed and is not in an area zoned for farmland.

##### **Supporting documentation**

**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 placed on the property's continued use for flood control, wetland protection, open space, or park land, but only if:

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

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

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

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

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

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

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

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

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

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

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

Describe:

No

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

Yes

Describe:

No

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

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate

Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information<sup>1</sup> to determine flood elevation. Include documentation and an explanation of why this is the best available information<sup>2</sup> for the site. Note that newly constructed and substantially improved<sup>3</sup> structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

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

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

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

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

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

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

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

**Screen Summary**

**Compliance Determination**

FEMA Map No. 53033C0386H, dated August 19, 2020, shows that the project is not located in the FFRMS flood zone, because the project is not located in the 0.2% Annual Chance Flood Hazard area. Reference: FEMA Flood Map Service Center. <https://msc.fema.gov/portal/home>. Federal Emergency Management Agency. Accessed June 5, 2024.

**Supporting documentation**

[FloodPanel\\_PlymouthRedmond\\_6-5-2024\(1\).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” <a href="https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf">https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf</a>

**Threshold**

Is Section 106 review required for your project?

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

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

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

**Step 1 – Initiate Consultation**

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

- ✓ Advisory Council on Historic Preservation    Completed
- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

Other Consulting Parties

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

Project information was sent by Rob Sayre-McCord on June 4th, 2024 to Tribal Historic Preservation Offices (THPOs) for indigenous tribes with interest in the area according to TDAT, and to The Washington State Department of Archaeological and Historical Preservation (DAHP). DAHP sent a letter of concurrence determining that the project does not affect historic properties. No responses were received from the SHPOs and the 30-day response period was reached on July 4, 2024. A Cultural Resources Assessment was conducted by Cultural Resources Consultants (CRC) for the project site, and the report dated July 3, 2024, concludes that no protected cultural resources were identified during our fieldwork.

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:  
See attachments in full summary below.

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
----------------------------------	-----------------------------	---------------------	--------------------------

Additional Notes:

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

project?

Yes

Document and upload surveys and report(s) below.  
For Archeological surveys, refer to HP Fact Sheet #6, Guidance on  
Archeological Investigations in HUD Projects.

Additional Notes:

See full summary below.

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

Project information was sent by Rob Sayre-McCord on June 4th, 2024 to Tribal Historic Preservation Offices (THPOs) for indigenous tribes with interest in the area according to TDAT, and to The Washington State Department of Archaeological and



Historical Preservation (DAHP). DAHP sent a letter of concurrence determining that the project does not affect historic properties. No responses were received from the SHPOs and the 30-day response period was reached on July 4, 2024. A Cultural Resources Assessment was conducted by Cultural Resources Consultants (CRC) for the project site, and the report dated July 3, 2024, concludes that no protected cultural resources were identified during our fieldwork. During construction activities, the Inadvertent Discovery Plan (IDP) attached (also an attachment to the Cultural Resources Assessment), will be followed. 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. 2024. CRC. Cultural Resources Assessment for the Plymouth Redmond PSH Project, Redmond, King County, Washington. July 3, 2024. DAHP. 2024. Letter of Concurrence Re: Plymouth Housing Redmond Permanent Supportive Housing Project. Department of Archaeological and Historical Properties. June 4.

Supporting documentation

[Inadvertent Discovery Plan - IDP - App B from CRC Redmond Cultural Resources Report 7-3-24.pdf](#)

[CRC Redmond Cultural Resources Report 7-3-24.pdf](#)

[Tribal Notice Plymouth Attachments Compilation.pdf](#)

[DAHP Determination Letter.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:

An outdoor seating area is modeled to have a noise level of 66 dB. A solid wood fence at least 6 feet tall will be located between Redmond Way and the seating area on the west side of the building, in a length and position that provides at least the modeled mitigation of the positioning shown in the included project design sketch.

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**

Due to text limits, a full explanation is attached along with supporting documents. Summary of conclusions is as follows: The only locations with calculated noise levels above the acceptable DNL of 65 dB were Project Point A, the indoor point at which noise is expected to be greatest, which was calculated to be 72 dB, and Project Point B, the outdoor eating area along the east side of the building, which was calculated to be 66 dB. Summary of noise level exceedances and proposed mitigation measures are provided below: \* Point A (72 dB): A noise report completed for the site by A3 provides recommendations to lower indoor noise to below the required indoor noise limit of 45 dB. The recommendations include using a minimum of STC 35 for windows and sliding glass doors with exposure to the light rail, a minimum of STC 33 for windows and sliding glass doors with exposure to Redmond Way, and at least a standard exterior wall with one layer of gypsum board on the unit side. To supplement the A3 building materials analysis, HUD's Sound Transmission Classification Assessment Tool (STraCAT) was used, based on specified wall section provided by the project architect and the minimum window design recommended by A3. Screenshots of the STraCAT analysis are provided in attached supporting documentation. Recommendations will be incorporated into the project design. \* Architectural plans show a third-floor balcony near Project Point A. After reviewing HUD definitions of noise-sensitive outdoor spaces (Sturdivant 2024) and consulting with the Project architects, this area was determined not to be a noise-sensitive outdoor use. The area is a shared gathering space with no specific use or safety concerns requiring relative quiet. Speech communication is neither required for safety nor is it an integral part of the intended use. Alternative shared gathering spaces are planned inside the building (e.g., resident lounges). \* Point B (66 dB): A minimum 6-foot standard wooden fence with no gaps is planned between Redmond Way and outdoor Point B, as shown in the supporting documentation. HUD's Barrier Performance Module was used to calculate the reduction in noise from the fence. The final noise level after accounting for noise reduction from the fence is modeled to be acceptable, or at 65 dB. See attached for full summary of analysis.

#### **Supporting documentation**

[Noise Backup\(1\).pdf](#)

[Noise - Full Analysis Summary.pdf](#)

[A3 - 24-0701 Plymouth Redmond - Environmental Noise Analysis Report.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**

Per the U.S EPA NEPAassist Mapping tool, the project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements. Please see attached map for more information on the nearest sole source aquifer to the project site.

**Supporting documentation**

[SoleSourceAquiferBackup\\_06062024.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**

USFWS National Wetlands Inventory mapping does not identify any wetlands in the project vicinity. Reference: USFWS. Wetlands Mapper. <https://www.fws.gov/wetlands/data/mapper.html>. Accessed June 13, 2024.

**Supporting documentation**

[NWI map.pdf](#)

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

Yes

✓ No

## Wild and Scenic Rivers Act

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

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

✓ No

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

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

### **Screen Summary**

#### **Compliance Determination**

The nearest Wild and Scenic River is more than 25 miles from the property location.

Reference: National Wild and Scenic Rivers System. <https://www.rivers.gov/map.php>.

Accessed June 6, 2024.

#### **Supporting documentation**

[Wild and Scenic Rivers Map.docx](#)

**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