

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

7/24/2025

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

7/24/2025

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 and Community Development Division (HCDD).

REQUEST FOR RELEASE OF FUNDS

On or about 8/8/2025, King County DCHS/ HCDD, having completed an environmental review of the project described below, will submit a request to the Department of Housing and Urban Development (HUD) for the release of Community Development Block Grant (CDBG) funds under Title I of the Housing and Community Development Act of 1974 as amended. to undertake a project known as SKBA Sidewalks being proposed by the Sahak Khemararam Buddhist Association (SKBA) for the purpose of providing a sidewalk in a low-income area, the total of HUD funding is approximately \$765,000. The overall total cost of the project at 824 S 100th St, Seattle WA (Unincorporated King County) is \$1,000,000.

The project is a final permitting requirement for final completion of the overall SKBA Temple/Community Center Master Plan Project. However, this project is coming in at the end and is in the Right of Way (ROW) and will serve as a pedestrian conduit for the surrounding (Census Qualified) Block Groups. The project is for 834 linear feet of sidewalk (6 feet wide) over a previously paved shoulder. The sidewalks will be on the north-east corner of the intersection of 8th Ave South and 100th Street South in the Glendale/Boulevard park area of Unincorporated King County. Maximum depth of excavation will be 2 feet. King County Department of Local Services has already permitted this project under B04C0114 (see attached plan set). There is an existing stormwater system that will conduct stormwater and there are no changes to it.

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 David Mecklenburg via email at Dave.Mecklenburg@kingcounty.gov. All comments received by 5:00 PM PDT 8/8/2025 will be considered by HCDD 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: HUD Region X Community Planning and Development (CPD) office: U.S. Department of Housing and Urban Development, 909 First Avenue, Suite 310, Seattle, WA 98104 OR SEACPDRROF@hud.gov regarding CDBG funds. 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
espanol.hud.gov

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

Project Information

Project Name: SKBA-Sidewalks

**HEROS
Number:** 900000010403512

Start Date: 06/06/2024

Project Location: 824 S 100th St, Seattle, WA 98168

Additional Location Information:

The Project site is located in the Right of Way (ROW) at the cross-streets of 8th Avenue South and 824 South 100th Street in Glendale, part of Unincorporated King County. The mailing/street address lists City of Seattle, but it is not formally in the City Limits. The area around the site is primarily residential with a light industrial, commercial area to the North. There is a steep slope down South 100th Street toward 8th Ave, which continues down to the end of the project parcel.

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

The project is a final permitting requirement for final completion of the overall SKBA Temple/Community Center Master Plan Project. However, this project is coming in at the end and is in the Right of Way (ROW) and will serve as a pedestrian conduit for the surrounding (Census Qualified) Block Groups. The project is for 834 linear feet of sidewalk (6 feet wide) over a previously paved shoulder. The sidewalks will be on the north-east corner of the intersection of 8th Ave South and 100th Street South in the Glendale/Boulevard park area of Unincorporated King County. (See Project location below). Maximum depth of excavation will be 2 feet. King County Department of Local Services has already permitted this project under B04C0114 (see attached plan set). There is an existing stormwater system that will conduct stormwater and there are no changes to it.

Funding Information

| Grant Number | HUD Program | Program Name | |
|----------------|--|---|--------------|
| B-24-UC-530001 | Community Planning and Development (CPD) | Community Development Block Grants (CDBG) (Entitlement) | \$765,000.00 |

**Estimated Total HUD Funded
Amount:** \$765,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$1,000,000.00

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

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

| Law, Authority, or Factor | Mitigation Measure or Condition |
|------------------------------------|---|
| Wetlands Protection | Please see attached documentation for 8Step Process and SKBA-Sidewalk-Wetland-Info-Final.pdf. The wetland is immediately adjacent to the project area, but the project, as designed and permitted should not affect the wetland. The measures below were already part of design. |
| Contamination and Toxic Substances | Currently, there is an ECHO report on stormwater drainage that is due to EPA. The small, non-profit agency has not had the capacity to supply this information. With the CDBG funding for the sidewalk, they will follow up on stormwater reports and nullify the violation found in the ECHO report. |
| Permits, reviews, and approvals | King County Master Permit B04C0114 A traffic control and Temporary Erosion and Soil Control Permit shall be issued prior to construction and will be uploaded here. |

Project Mitigation Plan

Prior to completion of the project, the Project Owner shall clear the ECHO violation noted in the Contamination and Toxics Section of the Laws and Authorities. The violation itself is one of reporting and therefore needs data updating. King County will work with the Project Owner to ensure this permit is updated and acceptable and will upload documentation thereof to this Environmental Review Record. The Unanticipated Discovery Plan uploaded into the Historic Preservation Section of the Laws and Authorities shall be made part of bidding and construction documents. The plan set as described in Wetlands shall be followed. Any deviation thereof will require re-evaluation of this Environmental Review Record and inclusion of mitigation measures that may need to be followed should a deviation be unavoidable. Resolution of deviation to show concordance with local, State, and Federal permitting laws and authorities shall also be uploaded by King County as Responsible Entity. The Project Owner, its consultants, the General Construction Contractor, and King County shall collaborate to correct and mitigate any such possibility in a timely manner.

Determination:

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

SKBA-Sidewalks

Seattle, WA

900000010403512

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

DocuSigned by:
Preparer Signature: *David Mecklenburg* **Date:** 7/23/2025
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Name / Title/ Organization: David Mecklenburg / Project Manager / KING COUNTY

DocuSigned by:
Certifying Officer Signature: *Kristin Pula* **Date:** 7/23/2025
1DDCEA0A790B439...

Name/ Title: Kristin Pula / Chief of Capital Programs

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: SKBA-Sidewalks

HEROS Number: 900000010403512

Start Date: 06/06/2024

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

RE Preparer: David Mecklenburg

State / Local Identifier:

Certifying Officer: Kristin Pula

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

Point of Contact:

Consultant (if applicable)
:

Point of Contact:

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: 824 S 100th St, Seattle, WA 98168

Additional Location Information:

The Project site is located in the Right of Way (ROW) at the cross-streets of 8th Avenue South and 824 South 100th Street in Glendale, part of Unincorporated King County. The mailing/street address lists City of Seattle, but it is not formally in the City Limits. The area around the site is primarily residential with a light industrial, commercial area to the North. There is a steep slope down South 100th Street toward 8th Ave, which continues down to the end of the project parcel.

Direct Comments to:

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

The project is a final permitting requirement for final completion of the overall SKBA Temple/Community Center Master Plan Project. However, this project is coming in at the end and is in the Right of Way (ROW) and will serve as a pedestrian conduit for the surrounding (Census Qualified) Block Groups. The project is for 834 linear feet of sidewalk (6 feet wide) over a previously paved shoulder. The sidewalks will be on the north-east corner of the intersection of 8th Ave South and 100th Street South in the Glendale/Boulevard park area of Unincorporated King County. (See Project location below). Maximum depth of excavation will be 2 feet. King County Department of Local Services has already permitted this project under B04C0114 (see attached plan set). There is an existing stormwater system that will conduct stormwater and there are no changes to it.

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

The project will be installing 834 linear feet of sidewalk over an existing paved shoulder in the King County right of way. The Project Owner, Sahak Khemararam Buddhist Association is a small volunteer-run non-profit operating in the Glendale/Boulevard Park area of Unincorporated King County. This sidewalk is required as part of their overall masterplan for the project, although the sidewalk is located in a Low Moderate Income Census Block group and the sidewalk will be beneficial to all of the block group's residents who currently have to use a paved shoulder. If the project is not completed, the Association will not receive occupancy for their master project. King County code requires a full sidewalk fronting the property/parcel.

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

The area is mostly residential, located on a steep slope. The current paved shoulder is not compliant as a sidewalk and will most likely deteriorate. A fully code compliant

sidewalk will allow pedestrian residents and visitors to the Association to safely access it and other locations in the immediate area.

Maps, photographs, and other documentation of project location and description:[7483-CAM-02-14-25.pdf](#)[DSC_0035.JPG](#)[DSC_0030.JPG](#)[DSC_0027.JPG](#)[DSC_0022.JPG](#)[DSC_0017.JPG](#)[DSC_0013.JPG](#)[DSC_0007.JPG](#)[SKBA-Sidewalks-IMAP-Aerial-12-18-2024.jpg](#)[SKBA-Sidewalks-GoogleEarth.jpg](#)**Determination:**

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

Approval Documents:

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

| Grant / Project Identification Number | HUD Program | Program Name | Funding Amount |
|--|--|---|-----------------------|
| B-24-UC-530001 | Community Planning and Development (CPD) | Community Development Block Grants (CDBG) (Entitlement) | \$765,000.00 |

**Estimated Total HUD Funded, \$765,000.00
Assisted or Insured Amount:**

**Estimated Total Project Cost [24 CFR 58.2 (a) \$1,000,000.00
(5)]:**

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

| | | |
|---|---|--|
| Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6 | Are formal compliance steps or mitigation required? | Compliance determination (See Appendix A for source determinations) |
| STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6 | | |
| Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | The Project site is: 1.64 miles to Boeing Field, 4.89 miles to SeaTac Airport, and 38.07 Miles to McChord AFB. Therefore, the project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. |
| Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501] | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act. |
| Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a] | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. |
| STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5 | | |
| Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act. |
| Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Per HUD Region X Guidance (see attachment, highlights) on Page 3. The project is in compliance with the Coastal Zone Management Act. |
| Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)] | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Site contamination was evaluated as follows: None of the above. On-site or nearby toxic, hazardous, or radioactive |

| | | |
|---|---|--|
| | | substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. The project is exempt from radon consideration. The adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. |
| Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | This project will have No Effect on listed species based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office. (HUD NMFS Programmatic and US FWS Washington Guidance and iPAC report) This project is in compliance with the Endangered Species Act. |
| Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Based on the project description the project is a sidewalk project that includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements. |
| Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Farmland subject to FPPA requirements does not have to be currently used for cropland. USDA/NRCS regulations contained at 7 CFR Part 658.2 define "committed to urban development" as land with a density of 30 structures per 40-acre area; lands identified as "urbanized area" (UA) on the Census Bureau Map which is the dataset for the NEPA Assist map included as attachment. The project is in compliance with the Farmland Protection Policy Act. The project is in compliance with the Farmland Protection Policy Act. |
| Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | This project does not occur in the FFRMS floodplain. The Project is in Zone X per the FIRM and FIRMette |

| | | |
|--|---|---|
| | | (Attached). The project is in compliance with Executive Orders 11988 and 13690. |
| Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The State has concurred as have the Tribes who responded. The rest allowed the response period to elapse. The project is in compliance with Section 106. |
| Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation. |
| Sole Source Aquifers 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 | The project is not located on a sole source aquifer area, nor the watershed of one. The project is in compliance with Sole Source Aquifer requirements. |
| Wetlands Protection Executive Order 11990, particularly sections 2 and 5 | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | The project results will impact on- or off-site wetlands. An 8 Step Process has been completed. With mitigation, identified in the mitigation section of this review, the project will be in compliance with Executive Order 11990. For specific information on process: see SKBA-Sidewalk-Wetland-8-StepProcess Notice documents include affidavits, Notices, and correspondence SKBA-Sidewalk-Wetland-Info-Final.pdf contains evaluation, letters, plan sets, and other important information that supports the County's determination. |
| Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | This project is not within proximity of a NWSRS river. The closest such river is the Middle Fork of the Snoqualmie which is over 49 miles to the east and in a different watershed. The project is in compliance with the Wild and Scenic Rivers Act. |
| HUD HOUSING ENVIRONMENTAL STANDARDS | | |
| ENVIRONMENTAL JUSTICE | | |
| Environmental Justice 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. There will be mitigation for Contamination and Toxic Substances which consists of meeting delinquent reporting requirements and not physical mitigation. The Wetland 8-Step Process has been followed and following the plan will not affect the Wetland adjacent to the project. Therefore, these impacts do not affect the Environmental Justice of the project when completed. The project is in compliance with Executive Order 12898. |
|--|--|--|

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

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

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

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
|--|--------------------|---|-------------------|
| LAND DEVELOPMENT | | | |
| Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design | 2 | The project is creating a sidewalk over a current shoulder. It has been permitted by King County Department of Local Services. | |
| Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff | 2 | The project has already been permitted for this land development factor by King County Department of Local Services. The Project Summary screen has the authorized plan sets. | |
| Hazards and Nuisances including Site Safety and Site-Generated Noise | 2 | There will be no additional noise generated by completion of the project and it is infrastructure and not residential housing. | |
| SOCIOECONOMIC | | | |
| Employment and Income Patterns | 2 | The sidewalk will have no impact on this factor. | |
| Demographic Character Changes / Displacement | 1 | There will be no changes to demographics. | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
|---|--------------------|--|-------------------|
| Environmental Justice EA Factor | 1 | The sidewalk provides a safer alternative than the current, deteriorating shoulder. This should actually improve pedestrian access for the primarily Low-Moderate Income Census Block Group. | |
| COMMUNITY FACILITIES AND SERVICES | | | |
| Educational and Cultural Facilities (Access and Capacity) | 1 | While there is no adjacent educational facility, the community center will be more accessible once the sidewalk is finished. Completion of the sidewalk is a requirement for Certificate of Occupancy for the community center and temple. | |
| Commercial Facilities (Access and Proximity) | 2 | There are no immediate commercial facilities that will benefit or be denigrated because of the sidewalk. | |
| Health Care / Social Services (Access and Capacity) | 2 | Not applicable for this project. | |
| Solid Waste Disposal and Recycling (Feasibility and Capacity) | 2 | Not applicable for this project. | |
| Waste Water and Sanitary Sewers (Feasibility and Capacity) | 2 | Not applicable for this project. | |
| Water Supply (Feasibility and Capacity) | 2 | Not applicable for this project. | |
| Public Safety - Police, Fire and Emergency Medical | 1 | Sidewalks provide a safer pedestrian experience than the shoulder. | |
| Parks, Open Space and Recreation (Access and Capacity) | 2 | Not applicable for this project. | |
| Transportation and Accessibility (Access and Capacity) | 1 | The sidewalk will increase accessibility with ADA compliant curb cuts and design. | |
| NATURAL FEATURES | | | |
| Unique Natural Features /Water Resources | 2 | Per the Biologist's letter (found in the Wetland Protection section of Laws and Authorities) there will be no impact on Unique Natural Features or Water Resources | |

| Environmental Assessment Factor | Impact Code | Impact Evaluation | Mitigation |
|---|--------------------|---|-------------------|
| Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.) | 2 | The shoulder is already devoid of vegetation. Landscaping around the sidewalk will include native vegetation. | |
| Other Factors 1 | 2 | Not applicable for this project. | |
| Other Factors 2 | 2 | Not applicable for this project. | |
| CLIMATE AND ENERGY | | | |
| Climate Change | 2 | The sidewalk will likely not increase or decrease conditions that increase climate change. | |
| Energy Efficiency | 2 | The sidewalk will likely not increase or decrease conditions that increase energy efficiency. | |

Supporting documentation

Additional Studies Performed:

The survey and mapping can be found in the Wetland Protection Section of the Laws and Authorities.

Field Inspection [Optional]: Date and completed by:

[7483-CAM-02-14-25.pdf](#)

[DSC_0035.JPG](#)

[DSC_0030.JPG](#)

[DSC_0027.JPG](#)

[DSC_0022.JPG](#)

[DSC_0017.JPG](#)

[DSC_0013.JPG](#)

[DSC_0007.JPG](#)

[SKBA-Sidewalks-IMAP-Aerial-12-18-2024.jpg](#)

[SKBA-Sidewalks-GoogleEarth.jpg](#)

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

King County Department of Local Services: Permitting: Ty Peterson: Product Line Manager Kim Barker: Engineer IV Chris Ricketts (retired) Engineer IV Scott Smith: Permitting Supervisor Remy Mathonnet, KC Ecologist Project Owner Retained Professionals John Altmann, Certified Biologist Carol Crane: Consultant Hal Hagenson: Engineer For list of Tribes and Washington State Department of

Archaeology and Historic Preservation Personnel, please see Historic Preservation Section of the Laws and Authorities.

List of Permits Obtained:

King County Master Permit B04C0114 A traffic control and Temporary Erosion and Soil Control Permit shall be issued prior to construction and will be uploaded here.

Public Outreach [24 CFR 58.43]:

Initial Public Outreach was conducted in 2004 when the project was first permitted and the County no longer has those records. The project itself was awarded 2024 CDBG funding at the September 2023 public meeting of the Joint Recommendations Committee: the designated recommending body for the King County CDBG Consortium. More recently, two notices as part of the 8-Step Process for Wetland Protection were posted in the Seattle Times and King County Website. For details and samples of the notices and supporting documentation, please see Wetland Protection Section of the Laws and Authorities. The full FONSI notice shall be published on the King County Website at <https://kingcounty.gov/en/dept/dchs/human-social-services/housing-homeless-services/funding-opportunities/environmental-review> for required 15 day public comment.

Cumulative Impact Analysis [24 CFR 58.32]:

The sidewalk will replace a currently deteriorating paved shoulder and is part of King County code requirements for the development of the adjacent parcel. There is already a fully permitted storm system that the sidewalk was designed for so there will be no immediate or cumulative impact that would not occur if the shoulder was left as it currently exists.

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

Alternatives considered were shortening the sidewalk. For No Action, see below. Neither of these options were allowable without significant administrative problems regarding expended CDBG funding and ultimately the master plan of the Project Owner being rejected and potentially never completed.

No Action Alternative [24 CFR 58.40(e)]

No action would leave an unsafe shoulder for pedestrian use. The County would need to pay back CDBG funding that was awarded to this eligible project. The community center and temple of the project owner would not be allowed to open. For a full consideration, please see Wetland Protection Section of the Laws and Authorities.

Summary of Findings and Conclusions:

There are some components of mitigation which will be discussed in the Mitigation Section of this review, namely, adhering to project plans and rectifying missing report information on the stormwater permit issued to the project owner. Aside from these factors, this project will not have a significant impact on the environment and the improvement of pedestrian facilities will improve the LMI-eligible census tract it is located in. Should any changes need to be undertaken that would adversely change this determination, the County, as Responsible Entity, will reopen the Review and carry out necessary procedures as required by Local, State, and Federal permitting authorities.

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 |
|------------------------------------|---|---------------------------------------|------------------------|-----------------|
| Wetlands Protection | Please see attached documentation for 8Step Process and SKBA-Sidewalk-Wetland-Info-Final.pdf. The wetland is immediately adjacent to the project area, but the project, as designed and permitted should not affect the wetland. The measures below were already part of design. | N/A | See below | |
| Contamination and Toxic Substances | Currently, there is an ECHO report on stormwater drainage that is due to EPA. The small, non-profit agency has not had the capacity to supply this information. With the CDBG funding for the sidewalk, they will follow up on stormwater reports and nullify the violation found in the ECHO report. | N/A | See below | |

Project Mitigation Plan

Prior to completion of the project, the Project Owner shall clear the ECHO violation noted in the Contamination and Toxics Section of the Laws and Authorities. The violation itself is one of reporting and therefore needs data updating. King County will work with the Project Owner to ensure this permit is updated and acceptable and will upload documentation thereof to this Environmental Review Record. The Unanticipated Discovery Plan uploaded into the Historic Preservation Section of the Laws and Authorities shall be made part of bidding and construction documents. The plan set as described in Wetlands shall be followed. Any deviation thereof will require re-evaluation of this Environmental Review Record and inclusion of mitigation measures that may need to be followed should a deviation be unavoidable. Resolution of deviation to show concordance with local, State, and Federal permitting laws and authorities shall also be uploaded by King County as Responsible Entity. The Project Owner, its consultants, the General Construction Contractor, and King County shall collaborate to correct and mitigate any such possibility in a timely manner.

Supporting documentation on completed measures

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

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

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

✓ No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary**Compliance Determination**

The Project site is: 1.64 miles to Boeing Field, 4.89 miles to SeaTac Airport, and 38.07 Miles to McChord AFB. Therefore, the project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[Airport-Distance-BoeingField.jpg](#)

[SeaTac-Airport-Distance.jpg](#)

[McChord-Distance-SKBA.jpg](#)

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

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

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

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

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

✓ Yes

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

[SKBA-FIRMette-10-1-24.pdf](#)
[FIRM-53033C0640G.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**

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.

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

Yes

☒ No

Air Quality

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

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

✓ Yes

No

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

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

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

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

Screen Summary**Compliance Determination**

The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act.

Supporting documentation

[SKBA-AirQuality-Attainment-Maint.jpg](#)

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

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

Screen Summary**Compliance Determination**

Per HUD Region X Guidance (see attachment, highlights) on Page 3. The project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[Region X Guidance 2025-cz.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

| General Requirements | Legislation | Regulations |
|--|-------------|--|
| It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property. | | 24 CFR 58.5(i)(2) 24 CFR 50.3(i) |
| Reference | | |
| https://www.onecpd.info/environmental-review/site-contamination | | |

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

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

☒ None of the above

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

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

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

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

No

Explain:

✓ 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:

There is no building. It is a sidewalk.

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.

8. Mitigation

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental impacts cannot be mitigated, then HUD assistance may not be used for the project at this site.

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan*.

Can all adverse environmental impacts be mitigated?

No, all adverse environmental impacts cannot feasibly be mitigated.
Project cannot proceed at this location.

- ✓ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.
Provide all mitigation requirements** and documents in the Screen Summary at the bottom of this screen.

* Refer to CPD Notice [CPD-23-103](#) for additional information on radon mitigation plans.

** Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

9. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls*, or use of institutional controls**.

Currently, there is an ECHO report on stormwater drainage that is due to EPA. The small, non-profit agency has not had the capacity to supply this information. With the CDBG funding for the sidewalk, they will follow up on stormwater reports and nullify the violation found in the ECHO report.

If a remediation plan or clean-up program was necessary, which standard does it

follow?

Complete removal

✓ Risk-based corrective action (RBCA)

Other

* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

** Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: None of the above. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. The project is exempt from radon consideration. The adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.

Supporting documentation

[SKBA-Detailed Facility Report _ ECHO _ US EPA.pdf](#)
[SCS-Detailed Facility Report _ ECHO _ US EPA.pdf](#)
[SDS-RCRAInfo Facility _ Envirofacts _ US EPA.pdf](#)
[SCI-RCRAInfo Facility _ Envirofacts _ US EPA.pdf](#)
[SKBA-NEPAAssist-ToxicsScreen.jpg](#)

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

Explain your determination:

The project is installing a sidewalk over previously paved impervious shoulder in the King County Right of Way with a fully permitted storm system already in place which will not be changed. There will be no increase to impervious surface and per Wetlands Screen, the project will not affect the adjacent wetland. (Please see Wetlands Screen in Laws and Authorities for information). The project will conform to Table A in both NMFS and US F&WS Washington State Programmatic.

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

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

Screen Summary**Compliance Determination**

This project will have No Effect on listed species based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office. (HUD NMFS Programmatic and US FWS Washington Guidance and iPAC report) This project is in compliance with the Endangered Species Act.

Supporting documentation

[SKBA-Species List_ Washington Fish And Wildlife Office.pdf](#)
[FWS WA Endangered Species Act 2020 \(2\).pdf](#)
[NMFS-HUD-consultation-guidance-E-10-1-24.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

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

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

☒ No

Yes

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

☒ No

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

Yes

Screen Summary**Compliance Determination**

Based on the project description the project is a sidewalk project that includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

☒ No

Farmlands Protection

| General requirements | Legislation | Regulation |
|---|--|--------------------------------|
| The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes. | Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.) | 7 CFR Part 658 |

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

✓ Yes

No

2. Does your project meet one of the following exemptions?

- Construction limited to on-farm structures needed for farm operations.
- Construction limited to new minor secondary (accessory) structures such as a garage or storage shed
- Project on land already in or committed to urban development or used for water storage. (7 CFR 658.2(a))

✓ Yes

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

No

Screen Summary

Compliance Determination

Farmland subject to FPPA requirements does not have to be currently used for cropland. USDA/NRCS regulations contained at 7 CFR Part 658.2 define "committed to urban development" as land with a density of 30 structures per 40-acre area; lands identified as "urbanized area" (UA) on the Census Bureau Map which is the dataset for the NEPA Assist map included as attachment. The project is in compliance with the

Farmland Protection Policy Act. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[Urbanized-Area-SKBA.jpg](#)

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 information¹ to determine flood elevation. Include documentation and an explanation of why this is the best available information² for the site. Note that newly constructed and substantially improved³ structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

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

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

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

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

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

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

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary**Compliance Determination**

This project does not occur in the FFRMS floodplain. The Project is in Zone X per the FIRM and FIRMette (Attached). The project is in compliance with Executive Orders 11988 and 13690.

Supporting documentation

[SKBA-FIRMette-10-1-24\(1\).pdf](#)
[FIRM-53033C0640G\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

| General requirements | Legislation | Regulation |
|---|--|---|
| Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects | Section 106 of the National Historic Preservation Act (16 U.S.C. 470f) | 36 CFR 800 “Protection of Historic Properties” https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf |

Threshold

Is Section 106 review required for your project?

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

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

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

Step 1 – Initiate Consultation

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

- ✓ State Historic Preservation Officer (SHPO) Completed

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

- ✓ Duwamish Tribe Completed

| | |
|-----------------------|-------------------------|
| ✓ Muckleshoot Tribe | Response Period Elapsed |
| ✓ Puyallup Tribe | Response Period Elapsed |
| ✓ Snoqualmie Tribe | Completed |
| ✓ Stillaguamish | Response Period Elapsed |
| ✓ Suquamish Tribe | Response Period Elapsed |
| ✓ Tulalip Tribe | Response Period Elapsed |
| ✓ Warm Springs Tribes | Response Period Elapsed |
| ✓ Yakama Nation | Response Period Elapsed |

Other Consulting Parties

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

Washington State DAHP is the State Historic Preservation Office and is a standard first contact for any ground disturbance project. The Tribes listed above were from TDAT and are regular partners in consultant on any KC CDBG funded project that disturbs soil.

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:

The APE can be found on the "SKBA-SidewalksEZ PROJECT FORM - 106 fillable.pdf" attachment sent to the SHPO.

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

☒ No**Step 3 –Assess Effects of the Project on Historic Properties**

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

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

☒ No Historic Properties Affected

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

Document reason for finding:☒ No historic properties present.

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

No Adverse Effect

Adverse Effect

Screen Summary**Compliance Determination**

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The State has concurred as have the Tribes who

responded. The rest allowed the response period to elapse. The project is in compliance with Section 106.

Supporting documentation

[TDAT-SKBA-12-19-2024.pdf](#)

[SKBA-CDBG-Sidewalks Tribal Comment Request - Yakama.msg](#)

[SKBA-CDBG-Sidewalks Tribal Comment Request - Warm Springs.msg](#)

[SKBA-CDBG-Sidewalks Tribal Comment Request - Tulalip1.msg](#)

[SKBA-CDBG-Sidewalks Tribal Comment Request - Suquamish.msg](#)

[SKBA-CDBG-Sidewalks Tribal Comment Request - Stillaguamish.msg](#)

[SKBA-CDBG-Sidewalks Tribal Comment Request - Snoqualmie.msg](#)

[SKBA-CDBG-Sidewalks Tribal Comment Request - Puyallup.msg](#)

[SKBA-CDBG-Sidewalks Tribal Comment Request - Muckleshoot.msg](#)

[SKBA-CDBG-Sidewalks Tribal Comment Request - Duwamish.msg](#)

[RE SKBA-CDBG-Sidewalks Tribal Comment Request - Snoqualmie.msg](#)

[FW SKBA-CDBG-Sidewalks Tribal Comment Request - Tulalip.msg](#)

[12 20 2024 2024-12-09043 Seattle Duwamish Tribe Comments.pdf](#)

[HistoricPreservationChecklistWashingtonState2023.doc](#)

[562420-0573-KC Property Detail.pdf](#)

[SKBA-SidewalksEZ PROJECT FORM - 106 fillable.pdf](#)

[SKBA-Unanticipated Discovery Plan.pdf](#)

[EZ-1 Form Submission SKBA Sidewalk Project.msg](#)

[2024-12-09043 NoHistoricPropertiesAffected.pdf](#)

[SKBA-EZ1-Sec106-Submission-Answer.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

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

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

New construction for residential use

Rehabilitation of an existing residential property

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

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

✓ None of the above

Screen Summary**Compliance Determination**

Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation.

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

Yes

✓ No

Sole Source Aquifers

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

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

Yes

✓ No

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

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

✓ No

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

Yes

Screen Summary**Compliance Determination**

The project is not located on a sole source aquifer area, nor the watershed of one.
The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[SSA-Map-SKBA.jpg](#)

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.

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

You must determine that there are no practicable alternatives to wetlands development by completing the 8-Step Process.

Document and upload the completed 8-Step Process as well as all documents

used to make your determination, including a map below. Be sure it includes the early public notice and the final notice with your documentation.

3. 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.

Please see attached documentation for 8Step Process and SKBA-Sidewalk-Wetland-Info-Final.pdf. The wetland is immediately adjacent to the project area, but the project, as designed and permitted should not affect the wetland. The measures below were already part of design.

Which of the following mitigation actions have been or will be taken? Select all that apply:

- Permeable surfaces
- ☒ Natural landscape enhancements that maintain or restore natural hydrology through infiltration
- Native plant species
- Bioswales
- Evapotranspiration
- Stormwater capture and reuse
- Green or vegetative roofs with drainage provisions
- Natural Resources Conservation Service conservation easements
- Compensatory mitigation
- Other

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

Screen Summary

Compliance Determination

The project results will impact on- or off-site wetlands. An 8 Step Process has been completed. With mitigation, identified in the mitigation section of this review, the

project will be in compliance with Executive Order 11990. For specific information on process: see SKBA-Sidewalk-Wetland-8-StepProcess Notice documents include affidavits, Notices, and correspondence SKBA-Sidewalk-Wetland-Info-Final.pdf contains evaluation, letters, plan sets, and other important information that supports the County's determination.

Supporting documentation

[FIRM-53033C0640G\(2\).pdf](#)
[SKBA-FIRMette-6-16-25.pdf](#)
[SKBA-Sidewalk-Wetland-Info-Preliminary.pdf](#)
[CDBG-Wetland-SKBA-Notice-15Day-Prelim.pdf](#)
[SKBA-Sidewalk-Wetland-Info-Final.pdf](#)
[Wetland-SKBA-Notice-Final.pdf](#)
[SKBA-InitialWetland-Notice.pdf](#)
[SKBA-Sidewalk-Wetland-8-StepProcess.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**

This project is not within proximity of a NWSRS river. The closest such river is the Middle Fork of the Snoqualmie which is over 49 miles to the east and in a different watershed. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[SKBA-WSR-2025.jpg](#)

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. There will be mitigation for Contamination and Toxic Substances which consists of meeting delinquent reporting requirements and not physical mitigation. The Wetland 8-Step Process has been followed and following the plan will not affect the Wetland adjacent to the project. Therefore, these impacts do not affect the Environmental Justice of the project when completed. The project is in compliance with Executive Order 12898.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

