

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

9/5/2024

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

9/5/2024

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 9/5/2024, King County DCHS/ HHCDD, 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 funds under Section 8 of the Housing Act of 1937, as amended Project Based Vouchers which will be provided by HUD to the King County Housing Authority (KCHA) to undertake a project known as Spring District Affordable Housing being proposed by Bridge Housing for the purpose of providing housing to low- and moderate-income households. The total of HUD funding is approximately \$153,000/year in project-based vouchers. The overall total cost of the project at 2100 120th Avenue NE, Bellevue, WA 98005 is \$136,000,000.

The project is part of a larger 6.88-acre property owned by Sound Transit, which will be subdivided into six properties in mid-2024. Two of the six properties will be sold to NE 120TH ETOD LLLP, an entity controlled by BRIDGE Housing, at financing closing in November 2024. The proposed project consists of new construction of a 7-story building and a 6-story building. When completed, the two buildings will total 234 units and 86 parking spaces. Building 2 will house 150 units and Building 6 will house 84 units. Building amenities include bike storage, community rooms, outdoor terraces, a Resident Services Office, EV charging stations, playground, and access to multi-use trails that traverse and connect the entire Spring District. The site will be accessed through an entrance to the east via 120th Avenue NE.

BRIDGE will provide 234 permanently rental homes affordable to those earning 30% to 60% of the Area Median Income, including 73 family-sized units with two and three bedrooms and 40 units for individuals with development disabilities in partnership with Open Doors for Multicultural Families.

King County has completed an environmental review of the described project to which includes 8 Project Based Section Vouchers from the King County Housing Authority in the amount of approximately \$153,000 annual value and \$19,125 per unit.

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/legacy/depts/community-human-services/housing/services/community-development/cd-environmental-review.aspx> Scroll to the bottom of page and open “2024 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 Lynn Scherer via email at Community.Development@kingcounty.gov. All comments received by 5:00 PM PDT September 20, 2024 will be considered by HCD prior to authorizing submission of a request for release of funds. Comments should specify which Notice they are addressing.

ENVIRONMENTAL CERTIFICATION

HHCCD certifies to HUD that Simon Foster in his capacity as Director - Housing, Homelessness 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 at SEACPDRROF@hud.gov regarding HOME funds Potential objectors should contact HUD via email to verify the actual last day of the objection period.

Simon Foster – 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: Spring-District

HEROS Number: 900000010381251

Project Location: 2100 120th Ave NE, Bellevue, WA 98005

Additional Location Information:

The subject property address is 2100 120th Avenue NE, Bellevue, WA 98005 (north of 1533 120th Ave NE).

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

The project is part of a larger 6.88-acre property owned by Sound Transit, which will be subdivided into six properties in mid-2024. Two of the six properties will be sold to NE 120TH ETOD LLLP, an entity controlled by BRIDGE Housing, at financing closing in November 2024. The proposed project consists of new construction of a 7-story building and a 6-story building. When completed, the two buildings will total 234 units and 86 parking spaces. Building 2 will house 150 units and Building 6 will house 84 units. Building amenities include bike storage, community rooms, outdoor terraces, a Resident Services Office, EV charging stations, playground, and access to multi-use trails that traverse and connect the entire Spring District. The site will be accessed through an entrance to the east via 120th Avenue NE. The project sponsor is applying for eight (8) Project-Based Vouchers to fund the affordable housing. The housing crisis impacts King County residents from all walks of life, from extremely low-income renters on fixed income to moderate income working families. BRIDGE, the project sponsor, believes that the Spring District is a unique opportunity to create a truly diverse community with a range of housing types and income levels. Recognizing the dearth of affordable options in Bellevue and the Eastside, BRIDGE will provide 234 permanently rental homes affordable to those earning 30% to 60% of the Area Median Income, including 73 family-sized units with two and three bedrooms and 40 units for individuals with development disabilities in partnership with Open Doors for Multicultural Families.

Funding Information

Grant Number	HUD Program	Program Name	
14.871	Public Housing	Project-Based Voucher Program	\$153,000.00

Estimated Total HUD Funded Amount: \$200,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$131,824,182.00

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
Endangered Species Act	Please refer to the attached HUD Drainage Memo for flow control measures and water quality treatment mitigation.
Noise Abatement and Control	The final calculated DNL for all noise sources combined is 67 dB, which is considered Normally Unacceptable. AEI recommends completion of STC calculations as required by Section 51.104(a) to demonstrate that interior levels do not exceed the established 45 dB level. The minimum combined wall, window, and door STC rating required to reduce the interior noise levels, factoring in the 3 dB margin of error, is 25 dB.
Hazards and Nuisances including Site Safety and Site-Generated Noise	Duration will be limited to several days during construction. The only infrastructure existing there now is for transit, and it is not considered to be near noise-sensitive receptors.
Permits, reviews, and approvals	See attached.
Contamination and Toxic Substances: Radon	New construction should follow the ANSI/AARST CC-1000 (2018-0523) Soil Gas System in New Construction of Buildings and post construction testing must be performed after construction is complete.
Contamination and Toxic Substances/Environmental Justice	Based on the presence of fill on the Property, AEI recommends preparing a Soil Management Plan (SMP) for potential "discoveries" to guide future contractors and excavation workers in identifying, segregating, stockpiling, sampling, transporting, and disposing of any contaminated soil that may be encountered during future redevelopment. If potential contaminated soil is encountered during future excavation and redevelopment activities at the Property, the soil should be characterized, managed, and disposed of in accordance with local, state, and national codes of practice.

Project Mitigation Plan

Stormwater management on site will comply with the requirements of the Programmatic Biological Opinion to avoid and minimize adverse effects to marine species. STC calculations will be completed to demonstrate that interior levels do not exceed the established 45 dB level. A Soil Management Plan will be implemented for future ground-disturbing activities. New construction will follow the ANSI/AARST CC-1000 (2018-0523) Soil Gas System in New Construction of Buildings, and post construction testing will be performed after construction is complete.

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: Lynn Scherer Date: 9.2.24

Name / Title/ Organization: Lynn Scherer / Project Manager / KING COUNTY

Certifying Officer Signature: Kristin Pula Date: Sep 3, 2024
Kristin Pula (Sep 3, 2024 17:17 PDT)

Name/ Title: Kristin Pula, Capital Programs Manager

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).

Spring District Sig page 8-29-24

Final Audit Report

2024-09-04

Created:	2024-09-04
By:	Lynn Scherer (lscherer@kingcounty.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAAUrUWCuzWsBs2OVunW9JqK3jFxFxKrkMQld

"Spring District Sig page 8-29-24" History

-  Document created by Lynn Scherer (lscherer@kingcounty.gov)
2024-09-04 - 0:02:46 AM GMT
-  Document emailed to Kristin Pula (kpula@kingcounty.gov) for signature
2024-09-04 - 0:03:29 AM GMT
-  Email viewed by Kristin Pula (kpula@kingcounty.gov)
2024-09-04 - 0:16:46 AM GMT
-  Document e-signed by Kristin Pula (kpula@kingcounty.gov)
Signature Date: 2024-09-04 - 0:17:02 AM GMT - Time Source: server
-  Agreement completed.
2024-09-04 - 0:17:02 AM GMT

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

Project Information

Project Name: Spring-District

HEROS Number: 900000010381251

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

RE Preparer: Lynn Scherer

State / Local Identifier:

Certifying Officer: Kristin Pula

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable): AEI CONSULTANTS

Point of Contact: Lindsay Garrard

Project Location: 2100 120th Ave NE, Bellevue, WA 98005

Additional Location Information:

The subject property address is 2100 120th Avenue NE, Bellevue, WA 98005 (north of 1533 120th Ave NE).

Direct Comments to:

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

The project is part of a larger 6.88-acre property owned by Sound Transit, which will be subdivided into six properties in mid-2024. Two of the six properties will be sold to NE 120TH ETOD LLLP, an entity controlled by BRIDGE Housing, at financing closing in November 2024. The proposed project consists of new construction of a 7-story building and a 6-story building. When completed, the two buildings will total 234 units and 86 parking spaces. Building 2 will house 150 units and Building 6 will house 84 units. Building amenities include bike storage, community rooms, outdoor terraces, a Resident Services Office, EV charging stations, playground, and access to multi-use trails that traverse and connect the entire Spring District. The site will be accessed through an entrance to the east via 120th Avenue NE. The project sponsor is applying for eight (8) Project-Based Vouchers to fund the affordable housing. The housing crisis impacts King County residents from all walks of life, from extremely low-income renters on fixed income to moderate income working families. BRIDGE, the project sponsor, believes that the Spring District is a unique opportunity to create a truly diverse community with a range of housing types and income levels. Recognizing the dearth of affordable options in Bellevue and the Eastside, BRIDGE will provide 234 permanently rental homes affordable to those earning 30% to 60% of the Area Median Income, including 73 family-sized units with two and three bedrooms and 40 units for individuals with development disabilities in partnership with Open Doors for Multicultural Families.

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

Affordable housing is in critically short supply in King County. This project will provide 234 units of transit-oriented permanent affordable housing to low-income families and individuals, including 40 households with Intellectual and Developmental Disabilities (IDD). BRIDGE Housing will provide permanent affordable housing at the Spring District to households earning 30% to 60% of Area Median Income or less. Open Doors for Multicultural Families will provide support, advocacy and services for the 40 households and individuals with intellectual and developmental disabilities living at the project. According to the U.S Census Bureau Data for Bellevue, WA, the estimated population was 152,767 in 2022 - an increase of 0.59% since 2020. The population has increased 24.84% since 2010. The subject property is part of the Bel-Red Subarea. The Comprehensive Plan states "Historically an area with warehouses and manufacturing, BelRed has begun to transition with the departure of many of the traditional uses, the expansion of the Medical Institution district, and the introduction of more retail shops, auto dealerships, and office developments. The new BelRed Subarea Plan, adopted in 2009, targets significant investments to take advantage of planned light rail stations and an economic niche different from Downtown. The Spring District development is under construction and aims to be a catalyst around the 120th Avenue station. Overall, BelRed is expected to grow by about 5,000 housing units and 10,000 jobs over the next two decades. The proposed multifamily construction project will be in the vicinity of the under-construction Spring District (120th Avenue) Light Rail Station and several bus stops, providing future residents

with easy access to public transportation. The proposed project will contribute to goals of the Comprehensive Plan and BelRed Subarea Plan.

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

The project is part of a larger 6.88-acre property owned by Sound Transit, and the subject property is vacant except for a temporary stormwater detention pond. The site is within walking distance of a Link light rail station opening in spring 2024, allowing for a 6-minute ride to Microsoft headquarters. When the initial Eastside segment is fully extended to Seattle in 2025, it will bring the Spring District within a 30-minute ride of Downtown Seattle. The area is in the midst of large-scale redevelopment, including new buildings for Meta, the University of Washington, and is also walkable to numerous amenities such as retail stores, childcare, medical offices, parks, and a new market hall. The project will provide much needed affordable housing for low-income families in a high opportunity area with excellent access to job centers in Bellevue and Redmond, such as Meta, Amazon and Microsoft, brand new parks and recreational areas on-site and throughout the Spring District, and high-performing K-12 schools in the Bellevue School District.

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

- [2024_02_09_100_DD_Bldg_6_Combined_Set.pdf](#)
- [2024_02_09_100_DD_Bldg_2_Combined_Set.pdf](#)
- [Site_Photos.pdf](#)
- [Site_figures.pdf](#)
- [2023_09_08_Spring_District_Drawings.pdf](#)

Determination:

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

Approval Documents:

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
14.871	Public Housing	Project-Based Voucher Program	\$153,000.00

Estimated Total HUD Funded, Assisted or Insured Amount: \$200,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$131,824,182.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The subject property is not located within 2,500 feet of the end of a civil airport runway or within 15,000 feet of the end of a military airfield runway. 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	According to review of the U.S. Fish & Wildlife Service Coastal Barrier Resources System Mapper, the subject property is located within a state that does not contain CBRS units and, as such, is not located within a coastal barrier resource area. The 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	Based on a review of the FEMA FIRM Community Panel Numbers 53033C0368G and 53033C0656G, both dated August 19, 2020, the subject property is located in Zone X (unshaded), areas of minimal flood hazard outside of the 100- and 500 - year floodplains. No preliminary or

		<p>pending FIRM panels were identified for the project area. Additionally, the subject property is located in the City of Bellevue, Community #530074, which is a participating community in the National Flood Insurance Program (NFIP). The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area; therefore, flood insurance is not required. The project is in compliance with flood insurance requirements.</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5</p>		
<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to the U.S. EPA Green Book and NEPAAssist, the subject property is not located in a non-attainment area for any National Ambient Air Quality Standard (NAAQS) criteria air pollutants. However, the site is noted as within a maintenance area for the Carbon Monoxide (1971) NAAQS. AEI contacted the Puget Sound Clean Air Agency to determine if multifamily construction projects located within a maintenance area are subject to conformance with the State Implementation Plan. In a response from the EPA Air and Radiation Division dated December 21, 2023, Ms. Tess Bloom confirmed that the subject property is no longer within a maintenance area for the Carbon Monoxide (CO) (1971) standard. The address is part of the Seattle-Tacoma area that was re-designated to attainment in 1996 with the CO standard; the 20-year maintenance status period concluded in 2016. Thus, the subject property is not located in a nonattainment or maintenance area for any criteria air pollutants, and the project is in compliance with the Clean Air Act.</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Washington coastal zone is comprised of 15 coastal counties with marine shorelines, including</p>

		<p>Wahkiakum. The coastal zone includes all lands and waters within these coastal counties, as well as submerged lands seaward out to three nautical miles (about 3.5 miles). The subject property is located in King County, which is within the coastal zone. However, according to the HUD Region X Environmental Guidance website, concurrence from the Washington Department of 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 (CZM) Program. It is during the local permitting process that a project might be subject to CZM and further review by the Dept of Ecology. The project is in compliance with the Coastal Zone Management Act.</p>
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>On August 23, 2024, NMFS issued notification (attached) that this project complies with the Programmatic agreement, emphasizing that any galvanized metals must be coated or covered. According to the US Fish and Wildlife Service (FWS) IPaC Official Species List, six (6) threatened, endangered, or candidate species may be located in the area: North American Wolverine, Marbled Murrelet, Yellow-billed Cuckoo, Northwestern Pond Turtle, Bull Trout, and Monarch Butterfly. According to the FWS Critical Habitat Mapper, Lake Washington, into</p>

		<p>which the subject property drains, provides critical habitat for the Bull Trout. * North American Wolverines (Threatened) have large spatial requirements. They select areas that are cold and receive enough winter precipitation to reliably maintain deep persistent snow late into the warm season. Home ranges of adult wolverines range from less than 38.5 square miles to 348 square miles. * Marbled Murrelets (Threatened) are uncommon in Washington. The species is found in marine waters in general proximity to nesting habitat, which includes large conifer trees. * Yellow-billed Cuckoos (Threatened) display a strong preference for large, continuous riparian zones with cottonwoods and willows. In Washington, nesting also takes place in fir woodlands and open brushy hillsides. The species formerly bred uncommonly in parts of western Washington but is now a very rare migrant statewide. * Northwestern Pond Turtles (Proposed Threatened) occur in open upland habitats that receive extensive sun exposure such as prairies in the Puget Sound region, oak-pine savanna and other more open forest types in the Columbia Gorge, and pasture. However, as the Northwestern Pond Turtle is only considered Proposed Threatened, the species is not subject to Section 7 consultation. * Bull Trout (Threatened) is most common in high mountainous areas where snowfields and glaciers are present. They mainly occur in deep pools of large, cold rivers and lakes. * Monarch Butterfly (Candidate) can be found anywhere with growing milkweed. The core of the Monarch's migration route and breeding habitat is located within Illinois, Indiana, Iowa, Kansas, Minnesota, Missouri, Ohio, Oklahoma,</p>
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		<p>Texas, and Wisconsin. However, as the Monarch Butterfly is only considered Candidate, the species is not subject to Section 7 consultation. The subject property consists of vacant land, some tree cover, a driveway, and a stormwater detention pond in an industrial area of Bellevue. The subject property does not provide sufficient habitat for the above-listed protected terrestrial species. Please refer to the attached letter for AEI's effect determinations. AEI submitted the project to the Washington Fish and Wildlife Service for concurrence with the finding of No Effect to terrestrial species. In a response dated March 11, 2024, Mr. Ryan McReynolds of the FWS indicated that based on location and nature of the proposed action, they would agree that several of the No Effect determinations for terrestrial species are appropriate; suitable habitats are not present in the action area, and no potential exposures or effects are foreseeable. The NOAA Essential Fish Habitat (EFH) Mapper also identified Lake Washington as EFH for the Pacific Salmon. Based on the Region X NMFS-HUD Consultation Guidance, the project would involve the development of new impervious surface area and modify existing stormwater management; therefore, a No Effect determination cannot be made. However, as the project is not located in a floodplain or a riparian area and does not involve complex infrastructure, the project would qualify for the HUD Programmatic Biological Opinion.</p>
<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Properties that are located near hazardous industrial operations handling fuels or chemicals of an explosive or flammable nature are subject to HUD safety standards (24 CFR 51, Subpart C). In the case of tanks</p>

		<p>containing common liquid fuels, the requirement for an acceptable separation distance (ASD) calculation only applies to storage tanks that have a capacity of more than 100 gallons. Based on review of aerial imagery within a 1-mile radius of the subject property, AEI observed several approximately 2,500 and 5,000-gallon ASTs located within a 0.25-mile radius of the subject property. One approximately 10,000-gallon AST was observed approximately 2,219 feet / 0.42-miles from the subject property's HUD Collateral. To demonstrate compliance with 24 CFR Part 51 Subpart C, AEI has utilized the HUD ASD Electronic Assessment Tool to determine the threshold capacities for tanks located within 1 mile of the subject property. To fail ASDs for Thermal Radiation for People (most conservative distance), tanks must exceed 43,000 gallons in capacity when located 0.25 miles (1,320 feet) from the property; 225,000 gallons when located 0.50 miles (2,640 feet) from the property; and 595,000 gallons when located 0.75 miles (3,960 feet) from the property. Based on these capacities and calculations, ASTs that do not exceed these capacity thresholds are located at acceptable separation distances for Blast Over Pressure, Thermal Radiation for People, and Thermal Radiation for Buildings, and ASD calculations are therefore not required in these circumstances. Utilizing HUD's online Acceptable Separation Distance (ASD) Assessment Tool for a 2,500-gallon pressurized AST, the ASDs for buildings and people are 76.80 feet and 405.12 feet, respectively. The ASD for Blast Over Pressure is 296.52 feet. Bellevue Public Safety Training Center, located approximately 818 feet / 0.15 miles</p>
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		<p>from the HUD Collateral area, is observed with one (1) approximately 2,500-gallon presumed propane AST. Based on this information and the location of the propane AST, it is at an acceptable separation distance from the building and common areas where people may congregate. Utilizing HUD's online Acceptable Separation Distance (ASD) Assessment Tool for a 5,000-gallon non-diked AST, the ASDs for buildings and people are 105.81 feet and 540.74 feet, respectively. Sound Transit Operations & Maintenance Facility East, located approximately 389.57 feet from the closest HUD Collateral area, is observed with one (1) presumed emergency generator containing approximately 5,000-gallons of presumably diesel fuel. Based on this information and the location of the AST, it is at an acceptable separation distance from the building and common areas where people may congregate (i.e. the playground). Safeway Ice Cream Plant, located approximately 1,094 feet from the closest HUD Collateral area, is observed with two (2) approximately 5,000-gallon ASTs. The remaining ASTs on site are not presumed to contain fuels or chemicals of an explosive or flammable nature based on their size and appearance as well as the nature of the facility. Based on this information and the location of the approximately 5,000-gallon ASTs, they are at an acceptable separation distance from the building and common areas where people may congregate. King County Metro East Base, located approximately 475 feet from the closest HUD Collateral Area, is observed with one (1) presumed emergency generator containing approximately 5,000 gallons of presumably diesel fuel. Based on this information and the location of the AST,</p>
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		it is at an acceptable separation distance from the building and common areas where people may congregate. 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	According to NEPAassist, the subject property is in an urbanized area. In addition, review of the USDA Web Soil Survey indicates the majority of subject property soils (93.7%) is not classified as prime farmland. The subject property is already committed to urban development; therefore, the project would not have an impact on prime farmland. 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	Based on a review of the FEMA FIRM Community Panel Numbers 53033C0368G and 53033C0656G, both dated August 19, 2020, the subject property is located in Zone X (unshaded), areas of minimal flood hazard outside of the 100- and 500 - year floodplains. No preliminary or pending FIRM panels were identified for the project area. Additionally, the subject property is located in the City of Bellevue, Community #530074, which is a participating community in the National Flood Insurance Program (NFIP). The project is in compliance with Executive Order 11988.
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 the project will have No Adverse Effect on historic properties. Conditions: None. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106. Review of the National Register of Historic Places (NRHP) and Washington Department of Archaeology & Historic Preservation (DAHP) WISAARD maps indicates that neither the subject property nor the immediate surrounding properties are

		<p>listed on the NRHP. In September 2015, ICF International completed a Historic and Archeological Resources Technical Report for the Sound Transit Link Light Rail Operations and Maintenance Satellite Facility Final Environmental Impact Statement. The subject property is included within the report's study area. The facility was completed under the BNSF Preferred Alternative option, as directed by the EPA in a letter dated October 30, 2015. ICF's report details projected impacts for each alternative. Due to HEROS character restrictions, please refer to the attached Historic Preservation Discussion. King County submitted the project to the DAHP for Section 106 review. In a response letter dated March 8, 2024, the DAHP concurred with the finding of No Historic Properties Affected. King County contacted the following Tribes identified by HUD's Tribal Directory Assessment Tool (TDAT) to have interest in King County, WA: Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Warm Springs Reservation of Oregon, Muckleshoot Indian Tribe, Puyallup Tribe of the Puyallup Reservation, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, and Suquamish Indian Tribe of the Port Madison Reservation, as well as Duwamish Tribe. All were sent copies of the DAHP submission and proposed Unanticipated Discovery Plan.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>AEI Consultants (AEI) has performed a HUD-compliant noise assessment for the proposed construction of the Spring District TOD Apartments ("subject property"), which is in an industrial area of Bellevue, WA. The site is located directly north of 1533 120th Avenue NE. Based on a review of available maps, the subject property's HUD Collateral is</p>

		<p>located within 15 miles of King County International Airport, Renton Municipal Airport, and Seattle-Tacoma International Airport. In addition, the subject property is located within 15 miles of Kenmore Air Harbor Seaplane Base (Kenmore), Kenmore Air Harbor Seaplane Base (Seattle), Seattle Seaplanes Seaplane Base, and Will Rogers Wiley Post Memorial Seaplane Base. In addition, the subject property is located within 3,000 feet of one (1) mainline Sound Transit light-rail railroad. The Sound Transit Operations and Maintenance Facility/Rail Yard is located adjacent to the subject property. Lastly, the subject property is located within 1,000 feet of 120th Avenue NE. Due to HEROS character restrictions, please refer to the attached Noise Assessment for additional details. Based on review of the Site Plan, AEI utilized the southeast corner of Building #2 as a representative building noise assessment location (NAL) for each noise source. Additionally, in accordance with the HUD Noise Guidebook Chapter 5, AEI subtracted 6.5 feet from measurements to the facade of the proposed building for the effective distance in DNL calculations. The HUD Noise Assessment is to be completed in decibels (dB) for each of the noise sources that have met the threshold criteria. The noise environment at the site will come under one of the following categories: Acceptable (DNL not exceeding 65 dB), Normally Unacceptable (DNL above 65 dB but not exceeding 75 dB), and Unacceptable (DNL above 75 dB). The final calculated DNL for all noise sources combined is 67 dB, which is considered Normally Unacceptable. AEI recommends completion of STC calculations as required by Section</p>
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		51.104(a) to demonstrate that interior levels do not exceed the established 45 dB level. The minimum combined wall, window, and door STC rating required to reduce the interior noise levels, factoring in the 3 dB margin of error, is 25. According to the latest site plans, exterior congregating areas will consist of a playground area at Building 2 and a second-floor patio terrace at Building 6. AEI completed additional DNL calculations for both exterior congregating areas. The final calculated DNL for all noise sources combined is 59 dB at the playground area, which is considered Acceptable. In addition, the patio terrace is shielded by Building 6 with no line of sight to 120th Avenue NE. It can thus be assumed that noise levels at this area would also be considered Acceptable.
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 subject property is not located on, nor does it affect, a sole source aquifer designated by the EPA. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on a review of the U.S. Fish & Wildlife Service National Wetlands Inventory (NWI) map, there are no wetland areas on or in the vicinity of the subject property. The project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the National Wild & Scenic Rivers system maintained by the U.S. Bureau of Land Management (BLM), National Park Service (NPS), U.S. Fish & Wildlife (FWS), and the U.S. Forest Service (FS), and the National River Inventory maintained by the NPS, the subject property is not located within proximity to a Wild and Scenic River, Study River, or Nationwide Inventory River. Therefore, 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	Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. 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	According to the Bellevue Zoning Map, the subject property is in the Bel-Red Office/Residential Node 2 (BR-OR-2). BelRed is a major mixed-use employment and residential area characterized by a transit-oriented, nodal development pattern, over time replacing the area's original low intensity light industrial and commercial past. The city will encourage land uses in the BelRed area which promote employment, retail, and residential opportunities. The purpose of the BelRed-OR-2 Land Use District is to provide an area for a mix of office, housing, and retail uses, with office as the predominant use. The district is located within a node but outside the node's core, and building heights provide for a	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>transition between the node's core and areas outside the node. Multifamily construction with two or more dwelling units per structure are permitted in the BR-OR-2 Zone. The city is in the process of updating the 20-Year Comprehensive Plan, which is updated about every 10 years. The Bellevue 2044 Comprehensive Plan will be adopted in September 2024. The current Comprehensive Plan was completed in 2015 with amendments dating to 2022. According to the Comprehensive Plan Land Use Chapter, Bellevue is expected to grow by about 30,200 people and 52,000 jobs by 2035. Bellevue has sufficient land capacity to accommodate about 23,000 additional housing units and about 83,300 jobs, giving it more than enough capacity to meet projected growth to 2035. Future growth is largely limited to the redevelopment of existing areas. Recent planning efforts have identified the areas of BelRed and Eastgate as opportunities for additional infill redevelopment that leverage convenient access to transit. The subject property is part of the Bel-Red Subarea. The Comprehensive Plan states "Historically an area with warehouses and manufacturing, BelRed has begun to transition with the departure of many of the traditional uses, the expansion of the Medical Institution district, and the introduction of more retail shops, auto dealerships, and office developments. The new BelRed</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>Subarea Plan, adopted in 2009, targets significant investments to take advantage of planned light rail stations and an economic niche different from Downtown. The Spring District development is under construction and aims to be a catalyst around the 120th Avenue station. Overall, BelRed is expected to grow by about 5,000 housing units and 10,000 jobs over the next two decades. The proposed multifamily construction project will be in the vicinity of the under-construction Spring District (120th Avenue) Light Rail Station and several bus stops, providing future residents with easy access to public transportation. The proposed project will contribute to goals of the Comprehensive Plan and BelRed Subarea Plan.</p>	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	<p>According to the September 2023 Phase I ESA prepared by UEP, the subject property soils include Pleistocene till and outwash clay, silt, sand, gravel, cobbles, and boulders. Locally includes nonglacial sediments, modified land, and artificial fill. Soil at the property has been identified as largely fill glacial till deposits. The topography of the site slopes slightly downward to the north. Excess surface water runoff either infiltrates the ground surface or flows into catch basins installed in the paved parking areas connected to a detention pond on the Property that discharges to the City of Bellevue storm system. Shallow groundwater has been measured between approximately 6 and 14</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		feet BGS at the Subject Property. Shallow groundwater at the southern adjoining automotive facility was measured to flow to the southeast. The project will be constructed in compliance with the City of Bellevue Stormwater Management Guide.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	3	Noise-sensitive receptors are not in the surrounding area of the project. The duration and frequency of heavy construction equipment operation near sensitive receptors during the construction of the project would be limited on any given day and would not be expected to last more than a few days at a time. Construction-related noise would result in short-term and temporary impacts that would cease after completion of construction. Construction phase noise will be mitigated by standard procedures. Residential uses associated with the proposed project operation would not generally be considered a source of substantial operational noise, and the proposed development will not result in any significant noise generation levels within the neighborhood. However, the project will be exposed to noise over 65 dB from surrounding noise sources. This is previously discussed under Noise Abatement and Control in Related Laws and Authorities. Based on review of the NPMS Public Viewer Map, two (2) hazardous non-HVL product pipelines operated by Olympic Pipeline Company are located approximately 0.97 miles from the	Duration will be limited to several days during construction. The only infrastructure existing there now is for transit, and it is not considered to be near noise-sensitive receptors.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		subject property. AEI has contacted Olympic Pipeline Company to obtain information regarding the pipeline contents, pipeline diameter, and maximum allowable operating pressure. Based on their distance from the subject property, the pipelines are not anticipated to be a concern. No other hazards or nuisances were identified.	
SOCIOECONOMIC			
Employment and Income Patterns	2	According to the U.S Census Bureau Data for Bellevue, WA, the median household income in 2022 was \$149,661 and the per capita income in the past 12 months was \$85,845. In addition, the percentage of the population in poverty was 7.2%. The Bureau Data also states that 67% of the population over the age of 16 is in the labor force and 70% of residents over 25 years old have a Bachelor's degree or higher. According to the City of Bellevue website, Bellevue's economy is driven by four (4) major industry clusters: Information Technology, Business Services, Retail and Tourism. The largest employers in Bellevue include Amazon, Microsoft, T-Mobile, Meta, Overlake Hospital, Bellevue School District, City of Bellevue, Salesforce, Bellevue College, and Bungie. The Comprehensive Plan Economic Development Chapter states that Bellevue is the second largest employment center in King County, the economic hub of the Eastside, and one of the most livable communities in the Northwest. Bellevue's stable	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>commercial and office base, combined with the highest per capita taxable retail sales in King County, have allowed the city to deliver high-quality services while keeping taxes low. Bellevue has been able to weather economic downturns, such as the 2009 "Great Recession," in part due to its strong and diverse local economy. According to the Comprehensive Plan Land Use Chapter, Bellevue is expected to grow by about 52,000 jobs by 2035. Specifically, the BelRed area is expected to grow by about 10,000 jobs over the next two decades. The proposed multifamily development will be in a convenient location to major employment centers of Bellevue and Seattle.</p>	
Demographic Character Changes / Displacement	2	<p>According to the U.S Census Bureau Data for Bellevue, WA, the estimated population was 152,767 in 2022 - an increase of 0.59% since 2020. The population has increased 24.84% since 2010. According to the Comprehensive Plan Land Use Chapter, Bellevue is expected to grow by about 30,200 people by 2035. The population primarily consisted of White (44%), Asian (39%), Hispanic (65.8%), White (22.6%), and Two or More Races (23.3%) residents in 2022. Additionally, 12.8% of the population is over 65 years old. No demographic character changes or displacement are expected to result from the development.</p>	
Environmental Justice EA Factor	2	<p>According to the EPA, 8.75% of the subject property population resides</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>below the poverty line and 88.59% of the population is described as people of color. Based on the information gathered from the regulatory database report and other information sources reviewed during the course of UEP's Phase I ESA, the subject property has been affected by the historic presence of limited surface soil contamination along the railroad spur and the likely presence of undocumented fill at the Property. However, based on the extent of previous investigations at the Property, UEP concluded that these concerns do not represent a concern to the subject property or its future residents. Based on the presence of fill on the Property, preparation of a Soil Management Plan (SMP) is recommended for potential "discoveries" to guide future contractors and excavation workers in identifying, segregating, stockpiling, sampling, transporting, and disposing of any contaminated soil that may be encountered during future redevelopment. If potential contaminated soil is encountered during future excavation and redevelopment activities at the Property, the soil should be characterized, managed, and disposed of in accordance with local, state, and national codes of practice. Based on the proportion of people of color in the subject property area, future residents should be notified of any discoveries and involved in the decision-making process.</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	The subject property will be served by the Bellevue School District. According to the Bellevue Map Viewer, students at the subject property will attend Clyde Hill Elementary School (2.6 miles away/9-min drive), Chinook Middle School (2.6 miles away/9-min drive), and Bellevue High School (2.3 miles away/9-min drive). Additional educational institutions in the area include Bellevue College, Tomolo Institute at Bellevue College, Global Innovation Exchange, DigiPen Institute of Technology, and University of Washington.	
Commercial Facilities (Access and Proximity)	2	Commercial facilities such as Safeway, Whole Foods, Walgreens, Target, Bellevue Brewing Company, Pressed Juicery, Overlake Shopping Plaza, Bellevue Marketplace, Fred Meyer, McDonalds, Starbucks, The Home Depot, Macy's, Nordstrom, and several others are located within 2 miles of the subject property.	
Health Care / Social Services (Access and Capacity)	2	Several primary care doctors, dentists, and urgent care centers are located within a 3-mile radius of the subject property. The closest hospitals to the subject property are the Seattle Children's Hospital: Bellevue Clinic and Surgery Center, Overlake Medical Center, and Kaiser Permanente Bellevue Medical Center within approximately 0.6 mile (3 minute drive) from the subject property.	
Solid Waste Disposal and Recycling	2	According to the Comprehensive Plan Utilities Chapter, solid waste management activities include solid	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
(Feasibility and Capacity)		waste planning, promotion, and monitoring the performance of private contractors who carry out collection of solid waste, recyclables, organics, and litter pick up. These services are financed through garbage rates that are set by the City Council. There are 29,000 single-family residential customer accounts, 330 multifamily accounts, and 1,600 commercial accounts in Bellevue. The city encourages waste reduction and recycling to manage demand for solid waste services. The subject property's multifamily development will likely be serviced by a private disposal company.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	According to the City of Bellevue website, Bellevue's Wastewater Division is responsible for maintenance and repairs of the main sewer lines, including the service connections within the city's right of way and dedicated easements. Bellevue's wastewater service area covers over 37 square miles, including Beaux Arts. Bellevue's wastewater system serves over 37,000 customers and includes: 13,000+ maintenance holes, 520 miles of mainline pipes, 46 pump and flush stations, 34 major connections to the King County wastewater system, and 19 miles of lake lines. King County Wastewater Treatment Division (WTD) serves about 1.9 million people within a 424-square-mile service area, which includes most urban areas of King County and parts of south Snohomish County and northeast Pierce County. The	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>Comprehensive Plan Utilities Chapter states that Bellevue owns 15 miles of submerged wastewater pipeline in Lake Washington and 4 miles of submerged wastewater pipeline in Lake Sammamish. These "lake lines" were constructed in the late 1950s and 1960s and may be nearing the end of their useful life. The city maintains them and is evaluating their condition to determine when rehabilitation and/or replacement will be necessary. The cost for this work will be substantial. Management of the lake lines is critical to maintaining and protecting water quality in Lake Washington and Lake Sammamish.</p>	
<p>Water Supply (Feasibility and Capacity)</p>	<p>2</p>	<p>According to the City of Bellevue website, Bellevue's drinking water is acquired through the Cascade Water Alliance, an association of water districts and cities, including Bellevue, which serves as a regional water supply agency and wholesale water provider. Cascade purchases water from Seattle and provides it to Bellevue and other members in a cost-effective and environmentally sensitive way. The water comes from the protected watersheds of the Cedar and South Fork Tolt rivers in the Cascade Mountains and meets or exceeds state and federal water quality requirements. More than 37,000 homes across Bellevue's service area are connected to the city's over-600 miles of pressurized water main. Bellevue's drinking water system is complex due to its topography, which ranges from 20 feet above</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>sea level on the shores of Lake Washington to over 1,400 feet above sea level near Cougar Mountain. The Utilities Department maintains its water infrastructure - which includes pipes, reservoirs, pump stations, pressure zones and fire hydrants - through regular maintenance, repair or rehabilitation, and replacement. Through the city's progressive water main replacement program, it replaces about five miles of water pipeline each year, which helps to keep water main breaks well below the national average.</p>	
Public Safety - Police, Fire and Emergency Medical	2	<p>The Bellevue Police Department is located 1.2 miles/5-min drive from the subject property. Bellevue Fire Station #6 is located 1.4 miles/5-min drive from the subject property. The Overlake Medical Center Emergency Room is located 0.8 miles/4-min drive from the subject property.</p>	
Parks, Open Space and Recreation (Access and Capacity)	2	<p>According to the Comprehensive Plan Parks and Recreation Chapter, the city lies between Lake Washington and Lake Sammamish, touching the foothills of the Cascade Mountains. Within the city are hundreds of acres of urban forests, wetlands, and streams that support wildlife. Recognizing this unique natural setting, the city has long branded itself a "City in a Park." According to surveys, the most frequently visited facilities each year are the 650 acres of open space and gardens for unstructured play and picnicking, the 45 playgrounds, the seven beach parks, and the 85 miles of trails</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>through forests, wetlands, and other natural areas. Parks and Community Services manages community and visitor centers located across the city as well as athletic fields and courts supporting organized outdoor sports such as soccer, football, lacrosse, basketball, cricket, baseball, golf, and tennis. The parks system also includes an aquatic center, three community farms, community garden plots, and off-leash dog facilities. The subject property is located within 3 miles several parks/facilities including Spring District Park, Hidden Valley Park, Zumdieck Park, McCormick Park, Cherry Crest Mini Park, Viewpoint Park, Highland Park, Willburton Hill Park, Glendale Country Club, Hidden Valley Sports Park, and Bellevue Aquatic Center.</p>	
<p>Transportation and Accessibility (Access and Capacity)</p>	<p>2</p>	<p>The subject property is in the vicinity of major roadways such as Interstate 405, Interstate 5, Interstate 90, and Route 520. The Seattle Amtrak Station is located 11 miles/19-min drive from the subject property. Several King County bus stops are in walking distance of the subject property. The under-construction Spring District Light Rail Station is located adjacent to the subject property and will service the Sound Transit East Link 2 Line. East Link light rail will have six stations in Bellevue, serving a wide range of neighborhoods and providing connections within Bellevue and to the region.</p>	
<p>NATURAL FEATURES</p>			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Unique Natural Features /Water Resources	2	No unique natural features or water resources are on site. The subject property contains a temporary constructed stormwater detention pond.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	3	According to the US Fish and Wildlife Service (FWS) IPaC Official Species List, six (6) threatened, endangered, or candidate species may be located in the area: North American Wolverine, Marbled Murrelet, Yellow-billed Cuckoo, Northwestern Pond Turtle, Bull Trout, and Monarch Butterfly. There are no critical habitats identified within the project area. The subject property consists of vacant land, some tree cover, a driveway, and a stormwater detention pond in an industrial area of Bellevue. The subject property does not provide sufficient habitat for the above-listed protected terrestrial species, and the project is anticipated to have No Effect on these species. The subject property drains into Lake Washington, which provides critical habitat for the Bull Trout according to the FWS Critical Habitat Mapper. In addition, the NOAA Essential Fish Habitat (EFH) Mapper identified Lake Washington as EFH for the Pacific Salmon. Based on the Region X NMFS-HUD Consultation Guidance, the project would qualify for inclusion under the HUD Programmatic Biological Opinion for impacts to NMFS species. This is previously discussed under Endangered Species in Related Laws and Authorities.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Other Factors 1			
Other Factors 2			
CLIMATE AND ENERGY			
Climate Change	2	According to the FEMA National Risk Index (NRI) report for the subject property census tract in King County, Washington, the overall risk index is Very High. Compared to the rest of the U.S., the subject property census tract has a Very High expected annual loss index, a Relatively Low social vulnerability index, and a Relatively High community resilience index. The following hazards were identified as Relatively High or Very High in the subject property census tract: Earthquake and Volcanic Activity. However, these natural hazards are not climate change-related.	
Energy Efficiency	2	This project will convert the parcel from vacant land into multifamily housing; this will lead to increased energy consumption at the project location as compared to its existing use. Based on the fact that the proposed development will utilize as many energy-efficient appliances and light fixtures as possible, the proposed project would not have unusual energy needs and is not expected to have a negative impact on energy consumption.	

Supporting documentation

[Bridge Housing Bel-Red Affordable Housing ETS Permit status 6 24 24.xlsx](#)

[Summary of Community Engagement 7-24-24.pdf](#)

[NPMS.pdf](#)

[Pipeline information request.pdf](#)

[485551 EA Factors Appendix.pdf](#)

[Community Report National Risk Index.pdf](#)
[485551 Environmental-Assessment-Factors-and-Analysis-Partner-Worksheet.docx](#)

Additional Studies Performed:

Field Inspection [Optional]: Date and completed

by:

UEP

4/30/2022 12:00:00 AM

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

National Register of Historic Places, Washington State Office of Archaeology and Historic Preservation, Washington Department of Transportation, Washington Ecological Services Field Office, U.S. Fish and Wildlife Service, U.S. Census Bureau, Federal Aviation Administration Airport Master Record, EPA NEPAassist, USDA Web Soil Survey, City of Bellevue, King County, National Marine Fisheries Service (NMFS).

List of Permits Obtained:

See attached.

Public Outreach [24 CFR 58.43]:

FONSI was posted to Seattle Times website - see affidavit, This project is located within the Bel Red Subarea Plan which was created using a comprehensive community engagement process, In 2016, Open Doors for Multicultural Families, a non profit that supports families as they navigate services, obtain specialized programming, and advocate for systems change, signed an LOI to provide services to individuals and families with developmental disabilities at Spring District Affordable Housing. In 2023, the BRIDGE Housing project team engaged with the YMCA to provide general resident services to the project, in addition to those to be provided by Open Doors.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project will result in short-term temporary construction-related impacts. The project will implement best management practices to avoid or reduce the potential for impacts during construction. Overall, development of the proposed project would not result in cumulative impacts to the area.

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

No Action Alternative [24 CFR 58.40(e)]

Under the No Action Alternative, no development would occur at the project site in the near term, and the site would remain vacant. Any impacts associated with the proposed project would not occur under the No Action Alternative, nor would the beneficial effects of the project, including the addition of multifamily housing to Bellevue. The No Action Alternative would not preclude the site from being developed at a future date in a manner consistent with its land use and zoning designations.

Summary of Findings and Conclusions:

The subject property is currently under-utilized vacant land in an area zoned for high-to medium- density. The proposed project is expected to serve as an affordable housing option, providing needed multifamily residential amenities for the increasing population of Bellevue. City services, facilities, recreation, entertainment, and transportation options are located in proximity to the site, and no adverse impacts have been identified to result from the redevelopment of the subject property.

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	Please refer to the attached HUD Drainage Memo for flow control measures and water quality treatment mitigation.	N/A	Stormwater management on site will comply with the requirements of the Programmatic Biological Opinion to avoid and minimize adverse effects to	

			marine species.	
Noise Abatement and Control	The final calculated DNL for all noise sources combined is 67 dB, which is considered Normally Unacceptable. AEI recommends completion of STC calculations as required by Section 51.104(a) to demonstrate that interior levels do not exceed the established 45 dB level. The minimum combined wall, window, and door STC rating required to reduce the interior noise levels, factoring in the 3 dB margin of error, is 25 dB.	N/A	STC calculations will be completed to demonstrate that interior levels do not exceed the established 45 dB level.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	Duration will be limited to several days during construction. The only infrastructure existing there now is for transit, and it is not considered to be near noise-sensitive receptors.	N/A		
Contamination and Toxic Substances: Radon	New construction should follow the ANSI/AARST CC-1000 (2018-0523) Soil Gas System in New Construction of Buildings and post construction testing must be	N/A	New construction will follow the ANSI/AARST CC-1000 (2018-0523) Soil Gas System in New	

	<p>performed after construction is complete.</p>		<p>Construction of Buildings, and post construction testing will be performed after construction is complete.</p>	
<p>Contamination and Toxic Substances/Environmental Justice</p>	<p>Based on the presence of fill on the Property, AEI recommends preparing a Soil Management Plan (SMP) for potential "discoveries" to guide future contractors and excavation workers in identifying, segregating, stockpiling, sampling, transporting, and disposing of any contaminated soil that may be encountered during future redevelopment. If potential contaminated soil is encountered during future excavation and redevelopment activities at the Property, the soil should be characterized, managed, and disposed of in accordance with local, state, and national codes of practice.</p>	<p>N/A</p>	<p>A Soil Management Plan will be implemented for future ground-disturbing activities.</p>	

Project Mitigation Plan

Stormwater management on site will comply with the requirements of the Programmatic Biological Opinion to avoid and minimize adverse effects to marine species. STC calculations will be completed to demonstrate that interior levels do not exceed the established 45 dB level. A Soil Management Plan will be implemented for future ground-disturbing activities. New construction will follow the ANSI/AARST CC-1000 (2018-0523) Soil Gas System in New Construction of Buildings, and post construction testing will be performed after construction is complete.

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 subject property is not located within 2,500 feet of the end of a civil airport runway or within 15,000 feet of the end of a military airfield runway. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[airport hazards within 15000 ft.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

According to review of the U.S. Fish & Wildlife Service Coastal Barrier Resources System Mapper, the subject property is located within a state that does not contain CBRS units and, as such, is not located within a coastal barrier resource area. The project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

[CBRS.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:

[FEMA FIRM.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

No

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

Yes

4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?

Yes

✓ No

Screen Summary

Compliance Determination

Based on a review of the FEMA FIRM Community Panel Numbers 53033C0368G and 53033C0656G, both dated August 19, 2020, the subject property is located in Zone X (unshaded), areas of minimal flood hazard outside of the 100- and 500 -year floodplains. No preliminary or pending FIRM panels were identified for the project area. Additionally, the subject property is located in the City of Bellevue, Community #530074, which is a participating community in the National Flood Insurance Program (NFIP). The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area; therefore, flood insurance is not required. The project is in compliance with flood insurance requirements.

Supporting documentation

[flood insurance.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

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

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

Yes

No

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

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

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

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

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

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

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

Screen Summary

Compliance Determination

According to the U.S. EPA Green Book and NEPAassist, the subject property is not located in a non-attainment area for any National Ambient Air Quality Standard (NAAQS) criteria air pollutants. However, the site is noted as within a maintenance area for the Carbon Monoxide (1971) NAAQS. AEI contacted the Puget Sound Clean Air Agency to determine if multifamily construction projects located within a maintenance area are subject to conformance with the State Implementation Plan. In a response from the EPA Air and Radiation Division dated December 21, 2023, Ms. Tess Bloom confirmed that the subject property is no longer within a maintenance area for the Carbon Monoxide (CO) (1971) standard. The address is part of the Seattle-Tacoma area that was re-designated to attainment in 1996 with the CO standard; the 20-year maintenance status period concluded in 2016. Thus, the subject property is not located in a nonattainment or maintenance area for any criteria air pollutants, and the project is in compliance with the Clean Air Act.

Supporting documentation

[Air Quality Conformance Info Response.pdf](#)

[Air Quality Conformance Info Request.pdf](#)

[NAAQS.pdf](#)

[Current Nonattainment Counties for All Criteria Pollutants _ Green Book _ US EPA.pdf](#)
[CO 1971.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**

The Washington coastal zone is comprised of 15 coastal counties with marine shorelines, including Wahkiakum. The coastal zone includes all lands and waters within these coastal counties, as well as submerged lands seaward out to three nautical miles (about 3.5 miles). The subject property is located in King County, which is within the coastal zone. However, according to the HUD Region X Environmental Guidance website, concurrence from the Washington Department of 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 (CZM) Program. It is during the local permitting process that a project might be subject to CZM and further review by the Dept of Ecology. The project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[Coastal zone management - Washington State Department of Ecology.pdf](#)
[CZM Guidance HUD Region X.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.

Screen Summary

Compliance Determination

Supporting documentation

[2016-12-19 OMFE Phase 2 ESA Report.pdf](#)
[OMFE TOD NFA_P-NW2597 NFA_2023-09-11.pdf](#)
[radon map.pdf](#)

[Contamination Discussion.pdf](#)

[Bridgehouse TOD Phase 1 ESA Update Report-HUD 9-22-23 JF - FFF.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402

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

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

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.

4. Informal Consultation is required

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

Did the Service(s) concur with the finding that the project is Not Likely to Adversely Affect?

- ✓ Yes, the Service(s) concurred with the finding.

Based on the response, the review is in compliance with this section. Document and upload the following below:

- (1) A biological evaluation or equivalent document
- (2) Concurrence(s) from FWS and/or NMFS
- (3) Any other documentation of informal consultation

Exception: If finding was made based on procedures provided by a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office, provide whatever documentation is mandated by that agreement.

No, the Service(s) did not concur with the finding.

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:

Please refer to the attached HUD Drainage Memo for flow control measures and water quality treatment mitigation.

No mitigation is necessary.

Screen Summary

Compliance Determination

On August 23, 2024, NMFS issued notification (attached) that this project complies with the Programmatic agreement, emphasizing that any galvanized metals must be coated or covered. According to the US Fish and Wildlife Service (FWS) IPaC Official Species List, six (6) threatened, endangered, or candidate species may be located in the area: North American Wolverine, Marbled Murrelet, Yellow-billed Cuckoo, Northwestern Pond Turtle, Bull Trout, and Monarch Butterfly. According to the FWS Critical Habitat Mapper, Lake Washington, into which the subject property drains, provides critical habitat for the Bull Trout. * North American Wolverines (Threatened) have large spatial requirements. They select areas that are cold and receive enough winter precipitation to reliably maintain deep persistent snow late into the warm season. Home ranges of adult wolverines range from less than 38.5 square miles to 348 square miles. * Marbled Murrelets (Threatened) are uncommon in Washington. The species is found in marine waters in general proximity to nesting habitat, which includes large conifer trees. * Yellow-billed Cuckoos (Threatened) display a strong preference for large, continuous riparian zones with cottonwoods and willows. In Washington, nesting also takes place in fir woodlands and open brushy hillsides. The species formerly bred uncommonly in parts of western Washington but is now a very rare migrant statewide. * Northwestern Pond Turtles (Proposed Threatened) occur in open upland habitats that receive extensive sun exposure such as prairies in the Puget Sound region, oak-pine savanna and other more open forest types in the Columbia Gorge, and pasture. However, as the Northwestern Pond Turtle is only considered Proposed Threatened, the species is not subject to Section 7

consultation. * Bull Trout (Threatened) is most common in high mountainous areas where snowfields and glaciers are present. They mainly occur in deep pools of large, cold rivers and lakes. * Monarch Butterfly (Candidate) can be found anywhere with growing milkweed. The core of the Monarch's migration route and breeding habitat is located within Illinois, Indiana, Iowa, Kansas, Minnesota, Missouri, Ohio, Oklahoma, Texas, and Wisconsin. However, as the Monarch Butterfly is only considered Candidate, the species is not subject to Section 7 consultation. The subject property consists of vacant land, some tree cover, a driveway, and a stormwater detention pond in an industrial area of Bellevue. The subject property does not provide sufficient habitat for the above-listed protected terrestrial species. Please refer to the attached letter for AEI's effect determinations. AEI submitted the project to the Washington Fish and Wildlife Service for concurrence with the finding of No Effect to terrestrial species. In a response dated March 11, 2024, Mr. Ryan McReynolds of the FWS indicated that based on location and nature of the proposed action, they would agree that several of the No Effect determinations for terrestrial species are appropriate; suitable habitats are not present in the action area, and no potential exposures or effects are foreseeable. The NOAA Essential Fish Habitat (EFH) Mapper also identified Lake Washington as EFH for the Pacific Salmon. Based on the Region X NMFS-HUD Consultation Guidance, the project would involve the development of new impervious surface area and modify existing stormwater management; therefore, a No Effect determination cannot be made. However, as the project is not located in a floodplain or a riparian area and does not involve complex infrastructure, the project would qualify for the HUD Programmatic Biological Opinion.

Supporting documentation

[NMFS Pond Tributary Area .pdf](#)

[NMFS-Spring District Affordable Housing Final GeoTech Report.pdf](#)

[NMFS Appendix C Operations and Maintenance Manual .pdf](#)

[NMFS North Building - Landscape Plan - 7-25-24.pdf](#)

[NMFS Figure 6 - Water Quality .pdf](#)

[Spring District Programmatic updated 8-15-24.pdf](#)

[Landscape Plans V23.pdf](#)

[BHSD-S UE Permit - Civil Plans \(2024-03-29\).pdf](#)

[BHSD-N UE Permit - Civil Plans \(2024-03-29\).pdf](#)

[BHSD UE Permit - Drainage Report \(2024-03-29\).pdf](#)

[BHSD HUD Drainage Memo \(2024-03-29\).pdf](#)

[USFWS Response.pdf](#)

[EFH Mapper - Reporting Page.pdf](#)

[485551 USFWS Letter Submission.pdf](#)

Are formal compliance steps or mitigation required?

Yes

Spring-District

Bellevue, WA

900000010381251

✓ 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

Properties that are located near hazardous industrial operations handling fuels or chemicals of an explosive or flammable nature are subject to HUD safety standards (24 CFR 51, Subpart C). In the case of tanks containing common liquid fuels, the requirement for an acceptable separation distance (ASD) calculation only applies to storage tanks that have a capacity of more than 100 gallons. Based on review of aerial imagery within a 1-mile radius of the subject property, AEI observed several approximately 2,500 and 5,000-gallon ASTs located within a 0.25-mile radius of the subject property. One approximately 10,000-gallon AST was observed approximately 2,219 feet / 0.42-miles from the subject property's HUD Collateral. To demonstrate compliance with 24 CFR Part 51 Subpart C, AEI has utilized the HUD ASD Electronic Assessment Tool to determine the threshold capacities for tanks located within 1 mile of the subject property. To fail ASDs for Thermal Radiation for People (most conservative distance), tanks must exceed 43,000 gallons in capacity when located 0.25 miles (1,320 feet) from the property; 225,000 gallons when located 0.50 miles (2,640 feet) from the property; and 595,000 gallons when located 0.75 miles (3,960 feet) from the property. Based on these capacities and calculations, ASTs that do not exceed these capacity thresholds are located at acceptable separation distances for Blast Over Pressure, Thermal Radiation for People, and Thermal Radiation for Buildings, and ASD calculations are therefore not required in these circumstances. Utilizing HUD's online Acceptable Separation Distance (ASD) Assessment Tool for a 2,500-gallon pressurized AST, the ASDs for buildings and people are 76.80 feet and 405.12 feet, respectively. The ASD for Blast Over Pressure is 296.52 feet. Bellevue Public Safety Training Center, located approximately 818 feet / 0.15 miles from the HUD Collateral area, is observed with one (1) approximately 2,500-gallon presumed propane AST. Based on this information and the location of the propane AST, it is at an acceptable separation distance from the building and common areas where people may congregate. Utilizing HUD's online Acceptable Separation Distance (ASD) Assessment Tool for a 5,000-gallon non-diked AST, the ASDs for buildings and people

are 105.81 feet and 540.74 feet, respectively. Sound Transit Operations & Maintenance Facility East, located approximately 389.57 feet from the closest HUD Collateral area, is observed with one (1) presumed emergency generator containing approximately 5,000-gallons of presumably diesel fuel. Based on this information and the location of the AST, it is at an acceptable separation distance from the building and common areas where people may congregate (i.e. the playground). Safeway Ice Cream Plant, located approximately 1,094 feet from the closest HUD Collateral area, is observed with two (2) approximately 5,000-gallon ASTs. The remaining ASTs on site are not presumed to contain fuels or chemicals of an explosive or flammable nature based on their size and appearance as well as the nature of the facility. Based on this information and the location of the approximately 5,000-gallon ASTs, they are at an acceptable separation distance from the building and common areas where people may congregate. King County Metro East Base, located approximately 475 feet from the closest HUD Collateral Area, is observed with one (1) presumed emergency generator containing approximately 5,000 gallons of presumably diesel fuel. Based on this information and the location of the AST, it is at an acceptable separation distance from the building and common areas where people may congregate. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

[ASD map bellevue public safety.pdf](#)

[ASD Calculator 5000 gal.pdf](#)

[ASD Calculator 2500 gal.pdf](#)

[AST map.pdf](#)

[ASD map sound transit.pdf](#)

[ASD map safeway.pdf](#)

[ASD map king county metro east base.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

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

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

Yes

No

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

According to NEPAassist, the subject property is in an urbanized area. In addition, review of the USDA Web Soil Survey indicates the majority of subject property soils (93.7%) is not classified as prime farmland. The subject property is already committed to urban development; therefore, the project would not have an impact on prime farmland. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[urbanized areas.pdf](#)

[Farmland Classification.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

1. Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD's floodplain management regulations in Part 55?

Yes

(a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b).

(b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19.

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:

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

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

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

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

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

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

or other HUD assistance.

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

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

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

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

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

Describe:

No

Screen Summary

Compliance Determination

Based on a review of the FEMA FIRM Community Panel Numbers 53033C0368G and 53033C0656G, both dated August 19, 2020, the subject property is located in Zone X (unshaded), areas of minimal flood hazard outside of the 100- and 500 -year floodplains. No preliminary or pending FIRM panels were identified for the project area. Additionally, the subject property is located in the City of Bellevue, Community #530074, which is a participating community in the National Flood Insurance Program (NFIP). The project is in compliance with Executive Order 11988.

Supporting documentation

[flood insurance\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Historic Preservation

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

Threshold

Is Section 106 review required for your project?

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

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

Step 1 – Initiate Consultation

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

- ✓ State Historic Preservation Offer (SHPO) Completed
- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)
 - ✓ Confederated Tribes and Bands of the Yakama Nation Response Period Elapsed
 - ✓ Confederated Tribes of Oregon Response Period Elapsed

✓ Duwamish	Completed
✓ Muckleshoot Indian Tribe	Response Period Elapsed
✓ Puyallup Tribe of the Puyallup Reservation	Response Period Elapsed
✓ Snoqualmie Indian Tribe	Response Period Elapsed
✓ Stillaguamish Tribe of Indians	Response Period Elapsed
✓ Suquamish Tribe of the Port Madison Reservation	Completed

Other Consulting Parties

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

King County has submitted the project to the Washington Department of Archaeology and Historic Preservation (DAHP) for concurrence with the finding of No Historic Properties Affected. The Responsible Entity is responsible for conducting Section 106 consultation with interested Native American tribes. The following tribes were identified by HUD's Tribal Directory Assessment Tool (TDAT) to have interest in King County, WA: Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Warm Springs Reservation of Oregon, Muckleshoot Indian Tribe, Puyallup Tribe of the Puyallup Reservation, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, and Suquamish Indian Tribe of the Port Madison Reservation. King County will initiate Section 106 consultation with Native American tribes.

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:

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
Northern Pacific Railway Safeway Spur	Not Eligible	Yes	✓ Not Sensitive

Additional Notes:

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

Yes

✓ No

Step 3 –Assess Effects of the Project on Historic Properties

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

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

No Historic Properties Affected

✓ No Adverse Effect

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

Document reason for finding:

See Summary and attached.

Does the No Adverse Effect finding contain conditions?

Yes (check all that apply)

 No

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

Adverse Effect

Screen Summary**Compliance Determination**

Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: None. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106. Review of the National Register of Historic Places (NRHP) and Washington Department of Archaeology & Historic Preservation (DAHP) WISAARD maps indicates that neither the subject property nor the immediate surrounding properties are listed on the NRHP. In September 2015, ICF International completed a Historic and Archeological Resources Technical Report for the Sound Transit Link Light Rail Operations and Maintenance Satellite Facility Final Environmental Impact Statement. The subject property is included within the report's study area. The facility was completed under the BNSF Preferred Alternative option, as directed by the EPA in a letter dated October 30, 2015. ICF's report details projected impacts for each alternative. Due to HEROS character restrictions, please refer to the attached Historic Preservation Discussion. King County submitted the project to the DAHP for Section 106 review. In a response letter dated March 8, 2024, the DAHP concurred with the finding of No Historic Properties Affected. King County contacted the following Tribes identified by HUD's Tribal Directory Assessment Tool (TDAT) to have interest in King County, WA: Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of the Warm Springs Reservation of Oregon, Muckleshoot Indian Tribe, Puyallup Tribe of the Puyallup Reservation, Snoqualmie Indian Tribe, Stillaguamish Tribe of Indians of Washington, and Suquamish Indian Tribe of the Port Madison Reservation, as well as Duwamish Tribe. All were sent copies of the DAHP submission and proposed Unanticipated Discovery Plan.

Supporting documentation

[Spring District Unanticipated Discovery Plan.pdf](#)
[Yakama Nation letter.pdf](#)
[Stillaguamish Tribal letter.pdf](#)
[Response Requested - Spring District Affordable Housing Project\(4\).msg](#)
[Snoqualmie Tribal letter.pdf](#)
[Response Requested - Spring District Affordable Housing Project\(3\).msg](#)
[Response Requested - Spring District Affordable Housing Project\(2\).msg](#)
[Puyallup Tribal letter.pdf](#)
[Response Requested - Spring District Affordable Housing Project\(1\).msg](#)
[Muckleshoot Spring District letter.pdf](#)
[Response Requested - Spring District Affordable Housing Project.msg](#)
[Duwamish Tribal letter.pdf](#)
[Duwamish request sent 3-13-24.msg](#)
[Tribal email sent 3-11-24.msg](#)
[Oregon Tribal letter.pdf](#)
[Suquamish - Spring District Affordable Housing consultation.msg](#)
[4_5_20~1.PDF](#)
[DAHP Response_No Historic Properties 3-8-24.pdf](#)
[Historic Preservation Discussion.pdf](#)
[Draft 485551 SHPO Submission 21524.pdf](#)
[TDAT.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:

The final calculated DNL for all noise sources combined is 67 dB, which is considered Normally Unacceptable. AEI recommends completion of STC calculations as required by Section 51.104(a) to demonstrate that interior levels do not exceed the established 45 dB level. The minimum combined wall, window, and door STC rating required to reduce the interior noise levels, factoring in the 3 dB margin of error, is 25 dB.

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

AEI Consultants (AEI) has performed a HUD-compliant noise assessment for the proposed construction of the Spring District TOD Apartments ("subject property"), which is in an industrial area of Bellevue, WA. The site is located directly north of 1533 120th Avenue NE. Based on a review of available maps, the subject property's HUD Collateral is located within 15 miles of King County International Airport, Renton Municipal Airport, and Seattle-Tacoma International Airport. In addition, the subject property is located within 15 miles of Kenmore Air Harbor Seaplane Base (Kenmore), Kenmore Air Harbor Seaplane Base (Seattle), Seattle Seaplanes Seaplane Base, and Will Rogers Wiley Post Memorial Seaplane Base. In addition, the subject property is located within 3,000 feet of one (1) mainline Sound Transit light-rail railroad. The Sound Transit Operations and Maintenance Facility/Rail Yard is located adjacent to the subject property. Lastly, the subject property is located within 1,000 feet of 120th Avenue NE. Due to HEROS character restrictions, please refer to the attached Noise Assessment for additional details. Based on review of the Site Plan, AEI utilized the southeast corner of Building #2 as a representative building noise assessment location (NAL) for each noise source. Additionally, in accordance with the HUD Noise Guidebook Chapter 5, AEI subtracted 6.5 feet from measurements to the facade of the proposed building for the effective distance in DNL calculations. The HUD Noise Assessment is to be completed in decibels (dB) for each of the noise sources that have met the threshold criteria. The noise environment at the site will come under one of the following categories: Acceptable (DNL not exceeding 65 dB), Normally Unacceptable (DNL above 65 dB but not exceeding 75 dB), and Unacceptable (DNL above 75 dB). The final calculated DNL for all noise sources combined is 67 dB,

which is considered Normally Unacceptable. AEI recommends completion of STC calculations as required by Section 51.104(a) to demonstrate that interior levels do not exceed the established 45 dB level. The minimum combined wall, window, and door STC rating required to reduce the interior noise levels, factoring in the 3 dB margin of error, is 25. According to the latest site plans, exterior congregating areas will consist of a playground area at Building 2 and a second-floor patio terrace at Building 6. AEI completed additional DNL calculations for both exterior congregating areas. The final calculated DNL for all noise sources combined is 59 dB at the playground area, which is considered Acceptable. In addition, the patio terrace is shielded by Building 6 with no line of sight to 120th Avenue NE. It can thus be assumed that noise levels at this area would also be considered Acceptable.

Supporting documentation

[485551 Noise Assessment revised 030524.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Sole Source Aquifers

General requirements	Legislation	Regulation
<p>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.</p>	<p>Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)</p>	<p>40 CFR Part 149</p>

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 subject property is not located on, nor does it affect, a sole source aquifer designated by the EPA. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[sole source aquifers.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

Based on a review of the U.S. Fish & Wildlife Service National Wetlands Inventory (NWI) map, there are no wetland areas on or in the vicinity of the subject property. The project is in compliance with Executive Order 11990.

Supporting documentation

[wetlands.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

Based on the National Wild & Scenic Rivers system maintained by the U.S. Bureau of Land Management (BLM), National Park Service (NPS), U.S. Fish & Wildlife (FWS), and the U.S. Forest Service (FS), and the National River Inventory maintained by the NPS, the subject property is not located within proximity to a Wild and Scenic River, Study River, or Nationwide Inventory River. Therefore, the project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Wild and Scenic River Studies.pdf](#)

[Nationwide Rivers Inventory.pdf](#)

[wild and scenic rivers.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

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

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

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

Yes

No

2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?

Yes

No

Explain:

TBD

Based on the response, the review is in compliance with this section. Document and upload any supporting documentation below.

Screen Summary

Compliance Determination

Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. The project is in compliance with Executive Order 12898.

Supporting documentation

[pct pct of color.pdf](#)

[pct population below poverty level.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No