

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

Project Information

Project Name: Eastgate-PSH

HEROS Number: 900000010180939

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

RE Preparer: David Mecklenburg

State / Local Identifier:

Certifying Officer Mark Ellerbrook
r:

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

Point of Contact:

**Consultant (if applicab
le):**

Point of Contact:

Project Location: 13638 SE Eastgate Way, Bellevue, WA 98005

Additional Location Information:

The property is located on an undeveloped surplus property currently owned by King County within the City of Bellevue city limits. The parcel on which the property sits is zoned Office and Limited Business 2 (OLB 2), with multifamily residential allowed outright in the zone. Prior to the application for federal funds, Inland undertook the

subdivision of the parcel in accordance with the City of Bellevue's process, submitting the Master Site Plan on July 31, 2020. Upon closing the project site (Parcel "2") will be owned by Plymouth Housing and the project will move forward regardless of activity on the other sites. The project is designed to be self-sufficient and finished even if the other properties are not developed. The area surrounding the parcel is mostly commercial. Interstate 90 and Eastgate Way front the South part of the property.

Direct Comments to:

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

Horizon Housing Alliance (HHA) is proposing Eastgate PSH as a 4-story, 95-unit apartment building with associated offices, amenity rooms, service rooms, and parking. This project will provide permanent housing designed and programmed for people exiting homelessness. Eastgate PSH will be the first permanent supportive housing development in East King County providing valuable housing resource to this region of the county. This site will provide 24/7 staff, including Property Management and Case Management services. Many of Plymouth's residents are recovering from trauma, chemical dependency, and mental illness. As with other Housing First models, the building team and social services staff will work with each resident to maximize opportunities for self-sufficiency and ensure housing stability. The project will be using a total of 92 Project-Based Section 8 Vouchers (5 VASH, and 87 Mainstream). This new 4-story building will provide safe, high quality and energy efficient housing for single adults exiting homelessness. It will include features to increase resident opportunities for success and to minimize impact on the surrounding community. The building will have a total of 95 studio units. The first floor will have property management and supportive services staff space in addition to the building lobby. Residential units will also be located on the ground floor. The upper floors (2-4) will be all residential units. Building amenities include an interior community room and exterior courtyard. Other design features include: Well-designed front desk area to help monitor entry of residents and guests, Multipurpose room with kitchenette and community space for activities to reduce isolation, Resident shared laundry room, Floors that are wear resistant and easy to clean, Fully furnished rooms to assist with transition from homelessness. Zoning will require at least 63 stalls, although the plan includes 65 stalls. The Project is also less than .5 miles to Bellevue College and the Eastgate Park and Ride Transit Station. Site improvements will include parking for residents and staff shared with the CFH shelter. Eastgate PSH residents will have exclusive use of the outdoor amenity space to the west of the apartment building. The project will mitigate noise pollution from nearby Interstate 90 by means of barriers and construction methods (outlined in the Related Laws and Authorities section). The Project will be using vacant surplus King County property. Currently, the project owner does not have ownership of the parcel, but is in the process of obtaining ownership once a parcel subdivision and Master Plan permitting process is completed by the City of Bellevue along with concurrent ownership transfer/closing in the summer of 2021. There will be no relocation issues. An ASTM Phase I and II indicated the potentiality of some contaminants. Testing and mitigation will follow risk based models if further issues are detected (and are to be found in the Laws and Authorities and Mitigation Sections of this Environmental Assessment. All stormwater will be infiltrated on site.) Redevelopment will also allow for replacement of non-native vegetation on much of the project site with native plantings. Per the critical areas study (attached) slope stabilization and grading will be a necessary part of this project and has been accounted for in project budget. The current area is mostly business park/commercial usage and the impact upon the community will be positive in that it is

redeveloping a derelict vacant parcel that is not in any critical habitats and affords the residents a different option from exiting homelessness into the City of Seattle supportive housing environment.

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

A key factor in preventing people exiting homelessness from returning to it is the provision of supportive housing services. The Eastgate PSH will provide permanent housing designed and programmed for people exiting homelessness. The project need is for people who are ready to live independently with wrap around services designed to help them maintain housing stability. In light of the potentially turbulent nature of the housing market in a post-COVID-19 King County, this project will be able to help lessen the impacts to 95 individuals and serve as a model for other regionally located projects of this type. According to the Regional Affordable Housing Task Force, "[King County will] need 156,000 more affordable homes today and another 88,000 affordable homes by 2040 to ensure that no low-income or working households are cost burdened. That means we need to build, preserve or subsidize a total of 244,000 net new homes by 2040 if we are to ensure that all low-income families in King County have a safe and healthy home that costs less than 30 percent of their income." This project is a step in the direction of alleviating that need, and, as means of converting unused public land, may serve as a bridgehead into more developments of this type.

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

The property is located on an undeveloped surplus property currently owned by King County within the City of Bellevue city limits. The parcel on which the property sits is zoned Office and Limited Business 2 (OLB 2), with multifamily residential allowed outright in the zone. As mentioned above, the need for affordable housing, especially in the wake of COVID-19, remains high.

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

- [SitePlanBPre120-112403.pdf](#)
- [Google-Earth-EastgateSite.png](#)
- [Eastgate Housing Campus Geotechnical Report Addendum - Critical Areas.pdf](#)
- [Eastgate Geo tech- updatedreport-01152020.pdf](#)
- [Bellevue Zoning Map - Backup.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
CFDA 14.871	Public Housing	Project-Based Voucher Program
CFDA 14.879	Public Housing	Project-Based Voucher Program
E19-UC-530001	Community Planning and Development (CPD)	HOME Program
E20-UC-530001	Community Planning and Development (CPD)	HOME Program
E21-UC-530001-	Community Planning and Development (CPD)	HOME Program

Estimated Total HUD Funded, Assisted or Insured Amount: \$5,703,705.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$27,909,454.00

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 project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. NEPAAssist map screenshots showing distance between the site and two nearest airports are attached. King County International airport and Renton Municipal airport are located 58,084 ft and 51,650 ft, respectively, from the project site. The project is in compliance with Airport Hazards requirements.

<p>Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.</p>
<p>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. Please see FIRM 53033C0658G with notation page attached indicating project site is in Zone X.</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>The project's county or air quality management district is in attainment status for all criteria pollutants. Attached screenshots from NEPAassist website show that the project is located within maintenance areas for carbon monoxide (CO) and Ozone. However, both of these maintenance areas ended in 2016. The Washington State Department of Ecology Maintenance State Implementation Plan website show that the CO maintenance area for Seattle-Tacoma, which encompasses the project location, ended on October 11, 2016, and that the Ozone Maintenance Area ended on November 25, 2016. Reference: NEPAassist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx. Accessed January 14, 2021. Washington State Dept. of Ecology, https://ecology.wa.gov/Regulations-Permits/Plans-policies/State-implementation-plans/Maintenance-SIPs. Accessed January 20, 2021. 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>As of July 22, 2020, Washington State Department of Ecology (Ecology) notified HUD of the following: "Ecology has concluded that it is unnecessary for U.S. Department of Housing and Urban Development (HUD) to continue to send project information in order to receive Ecology's concurrence that the funding phase of the project is consistent with Washington's CZMP. Therefore, we are writing to inform you that HUD no longer needs to require applicants to send Ecology letters seeking our concurrence on projects for which HUD plans to release federal funding." Concurrence from Ecology for Coastal Zone Management is no longer required under a Part 58 or Part 50 Environmental Review in Washington State. However, at the time of project development, the activity may trigger review if it falls under other parts of the CZMA regulations for federal agency activities (Title 15 CFR Part 930, subpart C), or consistency for activities requiring a federal license or permit (Title 15 CFR Part 930, Subpart D) and will be subject to all enforceable policies of the Coastal Zone Management Program. It is during the local permitting process that a project might be subject to CZM and further review by Ecology. References: U.S. Department of Housing and Urban Development, Environmental Guidance website. https://www.hud.gov/states/shared/working/r10/environment. Accessed January 21, 2021. 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health</p>

		<p>and safety of project occupants or conflict with the intended use of the property. The adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.</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>This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area. Please review LAI-Final-EastgatePSHNoEffectsDeterminationT M Attachment, Pages 1-3 for a summary of the determination which included use of both USFWS and NMFS HUD Region X checklists along with detailed attachments showing that no species or critical habitat is on the project site. As part of the conditions for meeting these checklists, all stormwater will be infiltrated on site. This project is in compliance with the Endangered Species Act.</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>The following resources were reviewed to determine the presence or planned addition of tanks within a 1 mile radius of the project location: Google Earth (image date 7/25/2019) to identify tanks within a 1-mile radius of the project location. Screenshot of image is attached showing location of tanks identified. City of Bellevue's permit department for permits related to tank installation. Review results identified several liquid propane tanks, as shown on the attached map. The tanks were under 1,000 gallons; therefore, not covered by the regulation. No permits related to planned tanks or facilities likely to require tanks were identified in the City's permit database. References: City of Bellevue. 2021. https://bellevuewa.gov/city-government/departments/development/permits. Accessed January 20, 2021.</p>

		Google, Inc. Google Earth Pro. Imagery Date July 25, 2019; accessed January 20, 2021.
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	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not occur in a floodplain. 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 there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	A Noise Assessment was conducted. The noise level was normally unacceptable: 74.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation with mitigation. The only exterior common area is located on the west side of the project site and will be enclosed on the east, west, and south sides, and has a roof. Analysis of traffic noise, which is generated from I-90 and Eastgate Way, was completed using the HUD DNL calculator, which indicated maximum noise levels of 74 dB. A barrier analysis of the partial enclosure indicates that noise levels will be attenuated to 64 dBA or below in all exterior use areas. Analysis of indoor noise, completed using the HUD STraCAT calculator, indicates that the proposed building construction methods and technologies will provide noise reduction of 10 dB below the HUD interior noise level maximum of 45 dB. No rail lines were located within 3,000 feet of the project site, and aircraft operations from the two closest airports will not result in an increase in noise levels at the project site. References: J.C. Brennan & Associates. 2021. HUD/NEPA Noise Analysis for the

		Eastgate Development in Bellevue, WA. January 13.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is not located on a sole source aquifer area. 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	USFWS NWI mapping shows that the project footprint does not overlap any wetlands areas. The PFOC site is 1500 ft away from the Project Site footprint. Site specific wetland delineation did not identify wetlands in the Eastgate PSH project area. Reference: USFWS. Wetlands Mapper. https://www.fws.gov/wetlands/data/mapper.html . Accessed January 14, 2021 and confirmed March 26, 2021 The Watershed Company. 2020. Critical Areas Report, Eastgate Housing Campus. July NOTE< this study was conducted prior to the subdivision process being undertaken. 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	The middle fork of the Snoqualmie River designated as Wild & Scenic is over 38 miles away (along with a totally different watershed being in the way.) The project is in compliance with the Wild and Scenic Rivers Act. See NEPA-Assist Map.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. Those issues, such as Noise and Toxics will be mitigated during the construction process as described. 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	1	The parcel on which the property sits is zoned Office and Limited Business 2 (OLB 2), Which allows multi-family housing as a use. The City of Bellevue Comprehensive Plan includes a Human Services policy to support an intentional local community response to homelessness with housing and supportive services provided to families, youth, and single adults. Refer to Project Summary Screen 2 for Zoning Info	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Geotechnical evaluation has been completed for the site. The investigation found the site to be suitable for the proposed construction and provides recommendations for site preparation and temporary erosion controls. Refer to Project Summary Screen 2 for Geotech Report	Soil suitability/Slope/Erosion issues will be address through site preparation, temporary erosion controls and full stormwater infiltration via biofilter vaults.
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	The proposed project includes residences and support areas and poses no hazards or nuisances. No site safety concerns were identified. Noise mitigation measures are under Laws and Authorities, Noise. See Attachment for that section.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Energy Consumption/Energy Efficiency	2	The proposed project will be provided electricity and natural gas. The completed facility will be weatherized/insulated and will include energy efficient lighting and appliances where practical. Project will use Evergreen Sustainable scorecard standards.	
SOCIOECONOMIC			
Employment and Income Patterns	2	The project is not anticipated to significantly impact the existing employment and income patterns of the surrounding area. The project will provide some employment opportunities during construction and after completion. The diversity of business in the project area may offer employment opportunities for some residents.	
Demographic Character Changes / Displacement	2	The project is located in a developed urban area near businesses. The project would not displace any current residents and conforms to applicable zoning.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	1	Because the proposed project increases residential housing capacity, a demand for educational and cultural services and facilities may be associated with residents. However, services provided by educational facilities will not be adversely affected due to	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>the size of the project and its conformance with zoning requirements, and it is expected that the incremental increase in demand can be met by the existing capacity. Additionally, the project includes community rooms that will provide space for educational and cultural services. Of note: Bellevue College is located a mere 2,000 feet to the NE and is walkable. The University of Washington is 11 miles away and accessible by a variety of transit options including bus (and eventually) LinkLight Rail</p>	
Commercial Facilities (Access and Proximity)	1	The site is located close to commercial facilities, and new residents may have small, but positive, impact on local commercial businesses.	
Health Care / Social Services (Access and Capacity)	1	This project provides social services by providing stable housing and services for people exiting homelessness. Because the proposed project increases residential population, a demand for health care and social services and facilities may be associated with program participants. However, health care services will not be adversely affected due to the size of the project and its conformance with zoning requirements, and it is	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>expected that the incremental increase in demand can be met by the existing capacity and onsite facilities. Overlake Hospital and Kaiser Permanente are located 3.8 miles away.</p>	
<p>Solid Waste Disposal and Recycling (Feasibility and Capacity)</p>	<p>2</p>	<p>The site has onsite garbage pickup and is in conformance with applicable zoning. Solid waste services will not be adversely affected. Waste created by construction and by the completed project will be hauled offsite and disposed at permitted facilities. Because the proposed project increases residential population, a demand for recycling services and facilities may be associated with program participants. However, recycling services will not be adversely affected due to the size of the project and its conformance with zoning requirements, and it is expected that the incremental increase in demand can be met by the existing capacity.</p>	
<p>Waste Water and Sanitary Sewers (Feasibility and Capacity)</p>	<p>2</p>	<p>Access to municipal waste water/sanitary sewer service will be provided to the proposed project. Waste water/sanitary sewer services will not be adversely affected because the project is in conformance with existing zoning, and it is expected</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		that the incremental increase in demand will be met by the existing system capacity.	
Water Supply (Feasibility and Capacity)	2	Access to City water supply will be provided to the proposed project. Water supply will not be adversely affected as the project is in conformance with existing zoning, and it is expected that water needs at the site will be met by the existing water supply capacity.	
Public Safety - Police, Fire and Emergency Medical	2	A demand for public safety services, including police, fire and emergency medical services, may be associated with program participants. However, public safety services will not be adversely affected due to the size of the project and its conformance with zoning requirements, and it is expected that the incremental increase in demand can be met by the existing capacity.	
Parks, Open Space and Recreation (Access and Capacity)	2	The proposed housing project will be constructed on a vacant lot that is mostly cleared and not currently used for recreation. No designated recreation areas currently occur in the project area. However, there are nearby parks, such as Sunset Park (1500 ft) and Robinswood Park (4,417 ft) that are close by as well as the athletic activity fields of Bellevue College (2,000 ft)	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>Furthermore, there are larger regional parks such as Mercer Slough and Kelsy Creek park that are in the vicinity. See "NearbyParks" map.</p>	
<p>Transportation and Accessibility (Access and Capacity)</p>	<p>2</p>	<p>The project area is served by several King County Metro bus routes within walking distance. The Eastgate Park and Ride is 0.4 miles from the project site, and connects to multiple routes that go all over Bellevue and King County. This will include connecting routes to Link Light Rail stations nearby.</p> <p>Residents/employees utilizing the completed project may use public transit and it is expected that the incremental increase in demand can be met by the existing capacity. No adverse impact to transit or other transportation networks are anticipated. The project is on land that was already accessed from Richards Road, and will not affect public access to neighboring facilities, businesses or service facilities. Therefore, the project will have no adverse effects to accessibility.</p>	
NATURAL FEATURES			
<p>Unique Natural Features /Water Resources</p>	<p>2</p>	<p>The project is located in an urban setting and there are no unique natural features or agricultural lands in the project vicinity. The</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		proposed project will not discharge or draw from any ground water. No surface waters occur in the project area, and stormwater runoff will be managed as necessary to avoid adverse impact to surface waters. Therefore, no adverse effects on these natural features is anticipated.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The proposed project is located within a developed urban corridor. The site was historically used as a gravel pit and asphalt and concrete batch plant, the project area is currently covered with gravel surface and graded fill. The project will result in the removal of 14 trees in fair to good condition. The site does not contain habitat associated with species of local importance, and no adverse impacts to significant vegetation or wildlife is anticipated. Per the landscaping plan (see Schedule, Pg. 4) 101 trees will be planted.	
Other Factors	2	None Identified	

Supporting documentation

- [EastgateLandscapePlans.pdf](#)
- [kcmetro_east_link_study_area_routes_lg.jpg](#)
- [EastgatePH-NearbyParks.jpg](#)
- [DistancetoBellevueCollege.jpg](#)
- [DistancetoOverlake.jpg](#)

Additional Studies Performed:

A number of these studies are located within corresponding sections of Related Laws and Authorities Adapt Consulting. 2020. Phase I Environmental Site Assessment,

Eastgate Housing Campus, 13620 Southeast Eastgate Way. September 14. Earth Solutions NW, LLC. 2020. Geotechnical Engineering Study and Critical Areas Report, Eastgate Housing Campus, 13620 Southeast Eastgate Way. January 15. Earth Solutions, NW, LLC. 2020. Geotechnical Addendum, Critical Areas - Performance Standards, Polaris at Eastgate, 13620 Southeast Eastgate Way. July 22. J.C. Brennan & Associates. 2021. HUD/NEPA Noise Analysis for the Eastgate Development in Bellevue, WA. January 13. The Watershed Company. 2020. Critical Areas Report, Eastgate Housing Campus. July. The Watershed Company. 2020. Polaris at Eastgate, Arborist Report. July 31. ZipperGeo. 2020. Phase II Environmental Site Assessment, Eastgate Housing Campus, 13620 Southeast Eastgate Way. January 14. ZipperGeo. 2019. Technical Memorandum, Groundwater and Surface Water Sampling and Analysis, Eastgate Property, 13620 Southeast Eastgate Way. December 13.

[Eastgate Housing Campus Geotechnical Report Addendum - Critical Areas\(1\).pdf](#)
[Eastgate Geo tech- updatedreport-01152020\(1\).pdf](#)

Field Inspection [Optional]: Date and completed by:

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

Adapt Consulting. 2020. Phase I Environmental Site Assessment, Eastgate Housing Campus, 13620 Southeast Eastgate Way. September 14. City of Bellevue. 2020. City of Bellevue Land Use Code. <https://bellevue.municipal.codes/LUC>. Accessed January 26, 2021. City of Bellevue. 2015. Comprehensive Plan. <https://bellevuewa.gov/city-government/departments/community-development/planning-initiatives/comprehensive-plan>. Accessed January 26, 2021. Earth Solutions NW, LLC. 2020. Geotechnical Engineering Study and Critical Areas Report, Eastgate Housing Campus, 13620 Southeast Eastgate Way. January 15. Earth Solutions, NW, LLC. 2020. Geotechnical Addendum, Critical Areas - Performance Standards, Polaris at Eastgate, 13620 Southeast Eastgate Way. July 22. FEMA Flood Map Service Center. <https://msc.fema.gov/portal/home>. Accessed January 14, 2021. Google, Inc. Google Earth Pro. Imagery Date July 25, 2019; accessed January 20, 2021. J.C. Brennan & Associates. 2021. HUD/NEPA Noise Analysis for the Eastgate Development in Bellevue, WA. January 13. National Wild and Scenic Rivers System. <https://www.rivers.gov/map.php>. Accessed January 15th, 2021. NEPAassist website. <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>. Accessed January 14, 2021. The Watershed Company. 2020. Critical Areas Report, Eastgate Housing Campus. July. The Watershed Company. 2020. Polaris at Eastgate, Arborist Report. July 31. U.S. Department of Housing and Urban Development, Environmental Guidance website. <https://www.hud.gov/states/shared/working/r10/environment>. Accessed January 21, 2021. USEPA. 2020. Sole Source Aquifers. <https://epa.maps.arcgis.com/apps/webappviewer/index.html>. Accessed April 20. USFWS. Wetlands Mapper. <https://www.fws.gov/wetlands/data/mapper.html>.

Accessed January 14, 2021 USFWS. IPac Information for Planning and Consultation. <https://ecos.fws.gov/ipac/>. Accessed February 26, 2021. Washington State Department of Ecology, <https://ecology.wa.gov/Regulations-Permits/Plans-policies/State-implementation-plans/Maintenance-SIPs>. Accessed January 20, 2021. ZipperGeo. 2020. Phase II Environmental Site Assessment, Eastgate Housing Campus, 13620 Southeast Eastgate Way. January 14th. ZipperGeo. 2019. Technical Memorandum, Groundwater and Surface Water Sampling and Analysis, Eastgate Property, 13620 Southeast Eastgate Way. December 13.

List of Permits Obtained:

Permits to be obtained include: SEPA Determination Binding Site Plan Grading, Utilities, and Building Permits Construction Stormwater General Permit (CSGWP) Master Development Plan Utility Service Approvals: Puget Sound Energy - Power and Gas City of Bellevue - Water and Sewer Republic Services Waste Collection

Public Outreach [24 CFR 58.43]:

FONSI notice shall be published in the Seattle Times, public paper of record and available at the King County CDBG Environmental Review Website. <https://www.kingcounty.gov/depts/community-human-services/housing/services/community-development/cd-environmental-review.aspx> Public notification and comment periods are provided through the State Environmental Policy Act (SEPA) process. In addition, the following meetings were held: Public Notice meeting for the Eastgate Housing Campus land use action was held on September 16, 2020. The location virtual due to COVID Participants: Public Meeting

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project does not cause any adverse environmental impacts and will not result in a significant impact on the quality of the environment. The additional developments as part of the Eastgate Housing Campus will comply with applicable federal, state, and local regulations and are not anticipated to result in incremental adverse impacts to the environment. The "Additional Studies" referenced below include evaluation for the extent of the current parcel, which will be subdivided as part of the Eastgate Housing Campus development and include mitigation to compensate for potential impacts from other developments proposed at the campus site.

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

An initial site plan was conceptualized to determine the feasibility of the project for the funding application. Subsequent site plans were developed as a result of an iterative design process between the project's experts, project partners and community involvement to accurately assess and determine the needs of the project specific demographic that is eligible to reside at the project. The project sought design input

from the public and City of Bellevue. The site plan has been refined based on the community feedback, and modifications may occur until the final site plan is complete and approved for permitting.

No Action Alternative [24 CFR 58.40(e)]

If no action is taken at the site, the lots will eventually be developed with commercial businesses or other uses compatible with current zoning. There would continue to be a demand for homeless services in this area in the absence of the proposed project and there would be no guarantees that the use of the area would provide even market-rate housing, let alone the affordable, supportive housing that is in high demand in King County.

Summary of Findings and Conclusions:

The proposed project does not cause any adverse environmental impacts and will not result in a significant impact on the quality of the environment. For this project, mitigating measures are anticipated to generally include: For potential contaminants: further groundwater testing will be carried out during ground-work. If discovered, ASTM E2435-05 Engineering controls will include sealing routes of entry in building foundations and slabs, slab venting, and the installation of membrane barriers. Design and construction of such controls will be based, if needed, on site specific findings and specific building foundation considerations. For noise: The common area facade will be enclosed on east, west, and south sides and include a roof to attenuate noise to 64 dB. Proposed building materials and design will reduce interior noise below 45 dB. Soil suitability/Slope/Erosion issues will be address through site preparation, temporary erosion controls and full stormwater infiltration via biofilter vaults. The above mitigation measures will be implemented primarily through architectural and engineering oversight of the Prime Construction Contractor as they carry out the work of the Construction Documents, which, these mitigation measures shall be described therein. Confirmation and concordance with these mitigation measures will be undertaken during construction and reported in this Environmental Assessment at the end of construction.

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	Complete
Contamination and Toxic Substances	<p>If confirmation of vapor-phased contamination is present at concentrations exceeding the risk-based Model Toxics Control Act (MTCA) screening levels, a building mitigation system will be designed and constructed to eliminate inhalation exposure risks associated with indoor air. The American Society for Testing and Materials (ASTM) E2435-05 (ASTM, 2005), defines these engineering controls as: "Physical modifications to a site or facility to reduce or eliminate the potential for exposure to chemicals of concern." For this project, mitigating measures are anticipated to generally include sealing routes of entry in building foundations and slabs, slab venting, and the installation of membrane barriers. Design and construction of such controls will be based, if needed, on site specific findings and specific building foundation considerations.</p>	N/A	
Noise Abatement and Control	<p>The common outdoor area facade, where outdoor noise exposure is highest, will be enclosed to the east, west, and south sides, and would also have a roof. A barrier analysis indicates that the proposed partial enclosure will attenuate noise by 10 dB, to an acceptable level of 64 dB. (refer to J.C. Brennan and Associates HUD/NEPA Noise Analysis for the Eastgate Development Noise Study in Attachment). Proposed building materials will attenuate indoor noise to acceptable levels and will not require additional mitigation. See Noise Study, Interior Noise Analysis (page) 3 for specifics on building construction specifications that will be followed to reduce noise below 45 dB.</p>	N/A	

Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	Soil suitability/Slope/Erosion issues will be address through site preparation, temporary erosion controls and full stormwater infiltration via biofilter vaults.	N/A	
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Mitigation Plan

The above mitigation measures will be implemented primarily through architectural and engineering oversight of the Prime Construction Contractor as they carry out the work of the Construction Documents, which, these mitigation measures shall be described therein. Confirmation and concordance with these mitigation measures will be undertaken during construction and reported in this Environmental Assessment at the end of construction.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

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

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

✓ **No**

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

Yes

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. NEPAAssist map screenshots showing distance between the site and two nearest airports are attached. King County International airport and Renton Municipal airport are located 58,084 ft and 51,650 ft, respectively, from the project site. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[Airport-Measurements.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ **No**

Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

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

Compliance Determination

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

Supporting documentation

[CBRA Map 2020.png](#)

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:

[53033C0658G.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

Screen Summary

Compliance Determination

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD

recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. Please see FIRM 53033C0658G with notation page attached indicating project site is in Zone X.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

Air Quality

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

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

Yes

No

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

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

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

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

Screen Summary

Compliance Determination

The project's county or air quality management district is in attainment status for all criteria pollutants. Attached screenshots from NEPAassist website show that the project is located within maintenance areas for carbon monoxide (CO) and Ozone. However, both of these maintenance areas ended in 2016. The Washington State Department of Ecology Maintenance State Implementation Plan website show that the CO maintenance area for Seattle-Tacoma, which encompasses the project

location, ended on October 11, 2016, and that the Ozone Maintenance Area ended on November 25, 2016. Reference: NEPAssist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>. Accessed January 14, 2021. Washington State Dept. of Ecology, <https://ecology.wa.gov/Regulations-Permits/Plans-policies/State-implementation-plans/Maintenance-SIPs>. Accessed January 20, 2021. The project is in compliance with the Clean Air Act.

Supporting documentation

[Eastgate-AirQuality-Maps.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

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

Screen Summary

Compliance Determination

As of July 22, 2020, Washington State Department of Ecology (Ecology) notified HUD of the following: "Ecology has concluded that it is unnecessary for U.S. Department of Housing and Urban Development (HUD) to continue to send project information in order to receive Ecology's concurrence that the funding phase of the project is consistent with Washington's CZMP. Therefore, we are writing to inform you that HUD no longer needs to require applicants to send Ecology letters seeking our concurrence on projects for which HUD plans to release federal funding."

Concurrence from Ecology for Coastal Zone Management is no longer required under a Part 58 or Part 50 Environmental Review in Washington State. However, at the time

of project development, the activity may trigger review if it falls under other parts of the CZMA regulations for federal agency activities (Title 15 CFR Part 930, subpart C), or consistency for activities requiring a federal license or permit (Title 15 CFR Part 930, Subpart D) and will be subject to all enforceable policies of the Coastal Zone Management Program. It is during the local permitting process that a project might be subject to CZM and further review by Ecology. References: U.S. Department of Housing and Urban Development, Environmental Guidance website. <https://www.hud.gov/states/shared/working/r10/environment>. Accessed January 21, 2021. The project is in compliance with the Coastal Zone Management Act.

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

Yes

 No

Contamination and Toxic Substances

General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)

1. How was site contamination evaluated? Select all that apply. Document and upload documentation and reports and evaluation explanation of site contamination below.

- American Society for Testing and Materials (ASTM) Phase I Environmental Site Assessment (ESA)
- ASTM Phase II ESA
 - Remediation or clean-up plan
 - ASTM Vapor Encroachment Screening
 - None of the Above

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

No

- Yes

3. Mitigation

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

Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated.

- ✓ Yes, adverse environmental impacts can be eliminated through mitigation. Document and upload all mitigation requirements below.

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

If confirmation of vapor-phased contamination is present at concentrations exceeding the risk-based Model Toxics Control Act (MTCA) screening levels, a building mitigation system will be designed and constructed to eliminate inhalation exposure risks associated with indoor air. The American Society for Testing and Materials (ASTM) E2435-05 (ASTM, 2005), defines these engineering controls as: "Physical modifications to a site or facility to reduce or eliminate the potential for exposure to chemicals of concern." For this project, mitigating measures are anticipated to generally include sealing routes of entry in building foundations and slabs, slab venting, and the installation of membrane barriers. Design and construction of such controls will be based, if needed, on site specific findings and specific building foundation considerations.

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

Complete removal

- ✓ Risk-based corrective action (RBCA)

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. The adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.

Supporting documentation

[EastgateTechnicalMemorandum.pdf](#)

[EastgateHousingCampus-Phase-2-ESA.pdf](#)

[EastgateHousingCampus-Adapt-Phase-1-200925.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

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below. Documentation may include letters from the Services, species lists from the Services’ websites, surveys or other documents and analysis showing that there are no species in the action area.

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

Screen Summary**Compliance Determination**

This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area. Please review LAI-Final-EastgatePSHNoEffectsDeterminationTM Attachment, Pages 1-3 for a summary of the determination which included use of both USFWS and NMFS HUD Region X checklists along with detailed attachments showing that no species or critical habitat is on the project site. As part of the conditions for meeting these checklists, all stormwater will be infiltrated on site. This project is in compliance with the Endangered Species Act.

Supporting documentation

[LAI-FINAL-EastgatePSHNoEffectsDeterminationTM.pdf](#)
[HUDNMFSWAStateAppendixChecklist.pdf](#)
[FWSEndangeredSpeciesAct2020.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

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

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

No

Yes

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

No

Yes

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

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

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

No

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

Yes

Screen Summary

Compliance Determination

The following resources were reviewed to determine the presence or planned addition of tanks within a 1 mile radius of the project location: Google Earth (image date 7/25/2019) to identify tanks within a 1-mile radius of the project location. Screenshot of image is attached showing location of tanks identified. City of Bellevue's permit department for permits related to tank installation. Review results identified several liquid propane tanks, as shown on the attached map. The tanks were under 1,000 gallons; therefore, not covered by the regulation. No permits related to planned tanks or facilities likely to require tanks were identified in the City's permit database. References: City of Bellevue. 2021. <https://bellevuewa.gov/city-government/departments/development/permits>. Accessed January 20, 2021. Google, Inc. Google Earth Pro. Imagery Date July 25, 2019; accessed January 20, 2021.

Supporting documentation

[PropaneTankStreetView_SE38th.JPG](#)

[PropaneTankStreetView_RichardsRoad.JPG](#)

[KingCountyiMap_WaterTower.pdf](#)

[Explosives_Backup_TanksWaterTower.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

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

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

Yes

No

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

The property is located on an partially developed surplus property currently owned by King County within the City of Bellevue city limits. The property is not currently in agricultural use. NEPA Assist Map (attached) indicates the Property is deep within urbanized area.

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

Screen Summary

Compliance Determination

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[Eastgate-NEPAssist-Map-01.jpg](#)

Are formal compliance steps or mitigation required?

Yes

No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	24 CFR 55

1. Do any of the following exemptions apply? Select the applicable citation? [only one selection possible]

55.12(c)(3)

55.12(c)(4)

55.12(c)(5)

55.12(c)(6)

55.12(c)(7)

55.12(c)(8)

55.12(c)(9)

55.12(c)(10)

55.12(c)(11)

None of the above

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

[53033C0658G.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.

Does your project occur in a floodplain?

No

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

Yes

Screen Summary

Compliance Determination

This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.

Supporting documentation

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” http://www.access.gpo.gov/nara/cfr/waisidx_10/36cfr800_10.html

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
- ✓ Advisory Council on Historic Preservation Not Required
- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)
 - ✓ Duwamish Tribe Response Period Elapsed
 - ✓ Muckleshoot Tribe Response Period Elapsed
 - ✓ Puyallup Tribe Response Period Elapsed

- ✓ Snoqualmie Tribe Response Period Elapsed
- ✓ Stillaguamish Completed
- ✓ Suquamish Response Period Elapsed
- ✓ Tulalip Tribe Response Period Elapsed

Other Consulting Parties

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

Consultation with Washington State Department of Historic Preservation occurred per their guidelines for an "EZ-1" form in which an Area of Potential Effect (APE) is outlined via maps along with other topographic and project specifications. Tribal contact was initiated per King County's standard process in line with CPD 12-006 (also attached). Tribes were initially contacted February 25th, 2021. As of February 28th, staff performed follow up phone calls to all of the tribes and resubmitted emails with a request of some contact before 3:00 PDT on April 2nd, 2021. Only the Stillaguamish responded and they responded with no comments.

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

Step 2 – Identify and Evaluate Historic Properties

- 1. Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:**

See EZ-1 Form uploaded sent to WA State DAHP. No other historic properties are in the project site area.

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

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

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
----------------------------------	-----------------------------	---------------------	--------------------------

Additional Notes:

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

project? Yes

Document and upload surveys and report(s) below.

For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

Additional Notes:

An Unanticipated Discovery Plan (UDP) shall be made part of the construction documents.

No

Step 3 –Assess Effects of the Project on Historic Properties

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

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

 No Historic Properties Affected

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

Document reason for finding: No historic properties present.

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

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination

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

Supporting documentation

[DAHP-EZ-1SubmissionEastgatePHHousingProject.pdf](#)
[210201128.pdf](#)

[Tulalip-FW_Eastgate PH Project_Letter Call for Comments.pdf](#)

[Suquamish-FW_Eastgate PH Project_Letter Call for Comments.pdf](#)

[Stillaguamish-RE_Eastgate PH Project_Letter Call for Comments.pdf](#)

[Puyallup2_Eastgate PH Project_Letter Call for Comments.pdf](#)

[Puyallup_Eastgate PH Project_Letter Call for Comments.pdf](#)

[Muckleshoot-FW_Eastgate PH Project_Letter Call for Comments.pdf](#)

[EastgatePHProject-TribalLetterCallforComments.pdf](#)
[12-06CPDN.pdf](#)

[EastgatePH-Letter to Tribes Including Duwamish.pdf](#)

[EZ-1 6-13-2017 final Eastgate PSH.pdf](#)

[Cultural Resource - Hanum 2002 Eastgate-Fig 1.pdf](#)

[Cultural Resource - Hanum 2002 Eastgate-1-3.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

Indicate noise level here: 74

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.

Indicate noise level here: 74

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 common outdoor area facade, where outdoor noise exposure is highest, will be enclosed to the east, west, and south sides, and would also have a roof. A barrier analysis indicates that the proposed partial enclosure will attenuate noise by 10 dB, to an acceptable level of 64 dB. (refer to J.C. Brennan and Associates HUD/NEPA Noise Analysis for the Eastgate Development Noise Study in Attachment). Proposed building materials will attenuate indoor noise to acceptable levels and will not require additional mitigation. See Noise Study, Interior Noise Analysis (page) 3 for specifics on building construction specifications that will be followed to reduce noise below 45 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

A Noise Assessment was conducted. The noise level was normally unacceptable: 74.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation with mitigation. The only exterior common area is located on the west side of the project site and will be enclosed on the east, west, and south sides, and has a roof. Analysis of traffic noise, which is generated from I-90 and Eastgate Way, was completed using the HUD DNL calculator, which indicated maximum noise levels of 74 dB. A barrier analysis of the partial enclosure indicates that noise levels will be attenuated to 64 dBA or below in all exterior use areas. Analysis of indoor noise, completed using the HUD STraCAT calculator, indicates that the proposed building construction methods and technologies will provide noise reduction of 10 dB below the HUD interior noise level maximum of 45 dB. No rail lines were located within 3,000 feet of the project site, and aircraft operations from the two closest airports will not result in an increase in noise levels at the project site. References: J.C. Brennan & Associates. 2021. HUD/NEPA Noise Analysis for the Eastgate Development in Bellevue, WA. January 13.

Supporting documentation

[Eastgate-Development-Acoustic-Study.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 project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[Eastgate-PH-SoleSourceAquiferMap.jpg](#)

Are formal compliance steps or mitigation required?

Yes

No

Wetlands Protection

General requirements	Legislation	Regulation
<p>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.</p>	<p>Executive Order 11990</p>	<p>24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.</p>

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

No

Yes

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

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

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

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

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

**Screen Summary
Compliance Determination**

USFWS NWI mapping shows that the project footprint does not overlap any wetlands areas. The PFOC site is 1500 ft away from the Project Site footprint. Site specific wetland delineation did not identify wetlands in the Eastgate PSH project area.

Reference: USFWS. Wetlands Mapper.

<https://www.fws.gov/wetlands/data/mapper.html>. Accessed January 14, 2021 and confirmed March 26, 2021 The Watershed Company. 2020. Critical Areas Report, Eastgate Housing Campus. July NOTE< this study was conducted prior to the subdivision process being undertaken. The project is in compliance with Executive Order 11990.

Supporting documentation

[EastgatePSHWetlandDelineationSketch.pdf](#)

[EastgatePSHCampusWetlandCriticalAreasReport.pdf](#)

[Wetlands-Mapper-Jan14-Initial.jpg](#)

[2021-03-26 14 23 19-Wetlands Mapper-EastGate-PH.jpg](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

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

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

No

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

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

Screen Summary

Compliance Determination

The middle fork of the Snoqualmie River designated as Wild & Scenic is over 38 miles away (along with a totally different watershed being in the way.) The project is in compliance with the Wild and Scenic Rivers Act. See NEPA-Assist Map.

Supporting documentation

[Eastgate-WSRivers-distancetoMFork-Snoq.jpg](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

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

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

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

Yes

No

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

Screen Summary

Compliance Determination

No adverse environmental impacts were identified in the project's total environmental review. Those issues, such as Noise and Toxics will be mitigated during the construction process as described. The project is in compliance with Executive Order 12898.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No