

U.S. Department of Housing and Urban
Development

451 Seventh Street, SW

Washington, DC 20410

www.hud.gov

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

Project Information

Project Name: Shoreline-198th-Street-Modular-Housing

HEROS Number: 900000010125726

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

RE Preparer: David Mecklenburg

State / Local Identifier:

Certifying Officer: Kristin Pula

Grant Recipient (if different than Responsible Entity): King County Housing Authority

PHA Code:

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 19804 Aurora Ave N, Shoreline, WA 98133

Additional Location Information:

The location of the site is 3 adjacent parcels on the East side of a commercial arterial corridor in North King County in the City of Shoreline. Immediately adjacent to the site, is mostly residential use. Current ownership of the parcels is held by the City of Shoreline who had cleared the site of its service station buildings prior to consideration of the housing project. A long-term lease arrangement being made to facilitate this development. The current site is vacant, but had fueling tanks and other automotive support businesses on site.

Direct Comments to:

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

Catholic Housing Services will build a new 100 unit, five story residential building, plus basement garage on Washington State Route 99 in the City of Shoreline: 19804 Aurora Ave. N 98133. The units will be a mixture of Studios and 1-Bedrooms primarily serving a formerly homeless population. The building's footprint will be 13,031 SF and total building area will be 75,735 SF. King County Assessor's Parcels: 222730-0025, 222730-0030, & 222730-0036 will be converted from vacant property. The building will have an average height of 65 feet, and 8.25 inches, and an overall height of 75'. Units will be modular and assembled together onsite. Materials will include a mixture of masonry, glass, cementitious siding, along with aluminum windows and coping. Roofing will be thermoplastic polyolefin over coverboard and R49 Polyiso insulation base layer. While the front of the building is on a major arterial, the surrounding area is primarily developed residential. The nearest body of water is Echo Lake at 339 feet away.

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

King County faces an unprecedented affordable housing crisis. Rents continue to rise dramatically throughout the County, with increases especially pronounced in inner ring cities such as Bellevue, Redmond, Renton, and Shoreline. From 2005 to 2015, average rents increased by a total of 26% in Shoreline, impacting middle income working families. For households living at the margin of poverty, rising rents can and do push them into homelessness. In North King County, the 2016 homeless point in time count found a 181% increase in unsheltered people experiencing homelessness. Overall, 2017 found a 22% increase in the total number of unsheltered people experiencing homelessness. Facilitating the development of quality affordable housing that can be developed at lower cost, greater speed, or both, is one possible solution for the critical housing shortage in our communities. King County, through the Housing Finance Program (HFP) in the Community Services Division (CSD) of the Department of Community and Human Services (DCHS), is interested in piloting modular design and construction to demonstrate the feasibility of that construction type in affordable housing. King County is also prioritizing housing that supports individuals experiencing homelessness or exiting homelessness and the dedication of at least 100 units to those individuals, 40 of which are experiencing mental health challenges, supports the County priority.

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

The City Council's decision to collaborate with King County is driven, in part, by the increasing cost of housing, which is contributing to the rising number of people experiencing homelessness. There is a demonstrated need for more affordable housing, both locally and regionally. The 2020 annual

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

[Base-NEPA-Assist-Map-ShorelineModular.pdf](#)

[19804-Aurora-Ave-North-CHS-Shoreline Modular-StreetView.pdf](#)

[19804-Aurora-Ave-North-CHS-Shoreline Modular-SateliteGoogle.pdf](#)

[19804-Aurora-Ave-North-CHS-Shoreline Modular-BasicGoogle.pdf](#)

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[DSC_0109.JPG](#)

[DSC_0108.JPG](#)

[DSC_0107.JPG](#)

[DSC_0106.JPG](#)

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[DSC_0100.JPG](#)

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[Detail 2227300036 04-21-2020.PDF](#)

[Detail 2227300030 04-21-2020.PDF](#)

[Detail 2227300025 04-21-2020.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
WA002000213	Public Housing	Project-Based Voucher Program

Estimated Total HUD Funded, Assisted or Insured Amount: \$600,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$5,100,000.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Paine Field is 13 miles away and the next nearest airport is Boeing field which is even further. (See map) The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Note 53033C0040 F FIRM, Panel 40 of 1725: The project is located in Zone X. The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood

		insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act. Per the NEPA Assistance Map (attached) there is a non-attainment for the area. Carbon monoxide is in Maintenance Mode.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a Coastal Zone, but it has been determined to be consistent with the State Coastal Management Program. The project is in compliance with the Coastal Zone Management Act. Please note that the plans sent to Ecology for their determination are the same plans uploaded in the Project Summary Section.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project will have No Effect on listed species. I have completed the HUD Region X No Effect Checklist. Due to the nature of the construction on previously disturbed site and the stormwater design, there is no effect.
Explosive and Flammable Hazards Above-Ground Tanks][24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are no current or planned stationary above ground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.

		Attached map begins with Radius Determination and detailed satellite images of the surrounding area from 2020. No above ground storage tanks were found within the 1 miles radius.
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 the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106. Additionally, please see prior historical review of the property, which was carried out during a much larger local infrastructure project. This information was also submitted to SHPO for review along with the general project plans which can be found in the Project Summary.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	A Noise Assessment was conducted. The noise level was normally unacceptable: 74.0 db. See noise analysis. The Construction specifics will attenuate the noise to acceptable levels and is part of the mitigation plan (see Mitigation Measures). The project is in compliance with HUD's Noise regulation with mitigation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is not located on a sole source aquifer area. The nearest SSA is over 11 miles away. 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	The project is not on a wetland and the Current Stormwater design is engineered to accommodate infiltration and diversion to the levels of forested land. (Please see uploads for Endangered Species Act for specifics on stormwater mitigation and control.

Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

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

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

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

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The Zoning for the site is already in compliance with The City of Shoreline's Development Code. (Listed as MB) 20.40.040.C "The purpose of the mixed business zone (MB) is to encourage the development of vertical and/or horizontal mixed-use buildings or developments along the Aurora Avenue and Ballinger Way corridors."	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	While the site is situated on a slope, the construction project will actually serve to stabilize the slope. Stormwater runoff is designed at no -impact (equivalent of forest-covered ground) and has been determined to have no impact on Coastal Zone.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	3	There will need to be minimal mitigation per noise from Aurora Avenue North, a busy north-south arterial which the	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		west side of the property fronts. However, increase of R# rating in insulation facing the N,S,W along with specified window treatments and sealing (per Noise Study, see Related Laws and Authorities, Noise) will mitigate the issue during construction.	
Energy Consumption/Energy Efficiency	2	Evergreen Sustainable Development Standard (ESDS) is required.	
SOCIOECONOMIC			
Employment and Income Patterns	2	The Aurora corridor is the main road of the City of Shoreline and home to its largest employers along with numerous small businesses.	
Demographic Character Changes / Displacement	1	The project will be safely housing 100+ individuals who are very low income/formerly homeless. The current use of the site is vacant land.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	Shoreline Community College Distance: 2.8 miles: Bus Access Edmonds Community College Distance: 3.2 miles: Bus Access University of Washington Distance: 11 miles: Bus Access UW Bothell Campus/Cascadia College Distance: 23 miles: Bus Access Dale Turner YMCA. Distance: .3 miles The proximity of two Community Colleges with enrollment and work-training programs is a positive aspect of the location Currently, the Covid-19 Crisis has affected determination of capacity and access across Washington State. However, there should be no significant barriers in the future. The building will have high speed internet access to allow for distance learning by population.	
Commercial Facilities (Access and Proximity)	2	The project is located near the main commercial area of Shoreline, and on a major bus line that goes directly there. Easy proximity to affordable good and	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>services was a major component to choosing this site. Nearby amenities (sample)</p> <ol style="list-style-type: none"> 1. Lakomka Euro Deli Food 20011 Aurora Ave N, Shoreline, WA 98133 0.2 mi 2. Costco Wholesale Grocery, household items, personal care items 1175 N 205th St, Shoreline, WA 98133 0.4 mi 3. Fred Meyer Grocery, household items, personal care items 18325 Aurora Ave N, Shoreline, WA 98133 0.8 mi 4. Bartell Drugs Pharmacy, food, household items, personal care items 18420 Aurora Ave N, Shoreline, WA 98133 0.8 mi 	
Health Care / Social Services (Access and Capacity)	2	<ol style="list-style-type: none"> 1. Hopelink Food bank and emergency services 17837 Aurora Ave N, Shoreline 98133 1.0 mi 2. International Community Health Services Medical, dental, pharmacy, Suboxone treatment 16549 Aurora Ave N, Shoreline 1.8 mi 3. Neighborcare Health at St Vincent de Paul Medical 13555 Aurora Ave N, Seattle 98133 3.3 mi 4. Valley Cities Behavioral Health at St Vincent de Paul Mental health and substance abuse treatment 13555 Aurora Ave N, Seattle 98133 3.3 mi 5. WorkSource North Seattle Workforce Development Services 9600 College Way N, Seattle, WA 98103 6. WorkSource Connection @ Shoreline Community College Workforce Development Services 16101 Greenwood Avenue N Shoreline, WA 98133-5696 <p>Currently, the Covid-19 Crisis has affected determination of capacity and access across Washington State. However, there should be no significant barriers in the future.</p>	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	<p>The City of Shoreline and the finished project will be using Recology for Waste Disposal and Recycling. No impacts are anticipated.</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	Prior to the Aurora Ave. Corridor Project, the site was the home of several businesses, now demolish. The site is therefore already equipped with Waste Water and Sanitary Sewers. Wastewater and Sewers provided through Ronald Wastewater District	
Water Supply (Feasibility and Capacity)	2	As with the wastewater answer above, the site was previously occupied by businesses and already has adequate water supply on site. Water supplied by City of Seattle Public Utilities	
Public Safety - Police, Fire and Emergency Medical	2	The Project site in Shoreline is already being served by King County Sherriff (contracted through City of Shoreline). Fire services provided by City of Shoreline Fire Department Emergency Medical Through King County Medic One.	
Parks, Open Space and Recreation (Access and Capacity)	2	Echo Lake Park Municipal park 19901 Ashworth Ave N, Shoreline 98133 0.4 mi Dale Turner Family YMCA - with fitness center, gym, pool, and climbing wall 19290 Aurora Ave N, Shoreline 98133 0.3 mi Shoreline Park and Fields Sports fields, swimming pool 19030 1st Ave NE, Shoreline 98155 1.2 mi Hillwood Park Municipal Park 19001 3rd Ave NW, Shoreline 98177 1.2 mi	
Transportation and Accessibility (Access and Capacity)	2	The site is very well served by mass transit. In addition to a short walking distance to the Aurora Transit Center in nearby Aurora Village, frequent service by King County Metro and Sound Transit make this an attractive location. Furthermore, in the future, quick bus access to the Link Light Rail Station at 145th & Interstate 5 will offer additional options for residents. The Current Nearest Stops (in descending order of proximity) Aurora Ave N & N 200th St	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		Rapid Ride Transit Stop E Line serving Aurora corridor and to Downtown Seattle, 301, 342, 373 5 minutes at peak times, 20 to 30 minutes off peak times. Distance from Site: 417 ft Ave N & N 200th St 101, 115, 130, 301 30 minutes Distance from Site: 0.1 mi N 200 th St & Whitman Ave N 301, 331 running every30 minutes Distance from Site: 0.2 mi Aurora Village Transit Center 301, 303, 373, 346, 115CT, 130CT, 331, 342, 101CT, CT Swift, E Line 5 minutes at peak Distance from Site: 0.3 mi	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	Echo Lake is the closest waterbody. It is currently surrounded by urban development, the majority of which is private property in the form of multi-family apartment complexes. The NE corner has open space occupied by a municipal park. As mentioned elsewhere, stormwater will be infiltrated on site and will not affect the lake.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	Again, the area is heavily urbanized. The only vegetation to be disturbed will be the weeds, (many of them invasive Scotch Broom, see site photos). There is no wildlife or wilderness areas nearby.	
Other Factors	2	No other factors identified.	

Supporting documentation

[EA-FactorsAnalysisBackUp-ShorelineModularHousing.docx](#)

[Shoreline-ZoningMap-01.png](#)

[Shoreline-Utility-List.pdf](#)

[Shoreline-SewerInfo.pdf](#)

[Shoreline-GarbageServices.pdf](#)

[Shoreline Fire - Suppression.pdf](#)

[Shoreline Fire - EMS.pdf](#)

[Police Department _City of Shoreline.pdf](#)

[EchoLake-and-Park.png](#)

[Dale-Turner-YMCA.pdf](#)
[201823EconomicDevelopmentS.pdf](#)

Additional Studies Performed:

-ESA Phase 1 January 2019 -ESA Phase 2 June 2020 -Noise Study: April 2020 -CZMA
Conformance Letter - Shoreline NEPA Stormwater Mitigation Memo - WA DAHP EZ-1
And Tribal Notification Package - WA Dept. of Ecology No Further Action
Determination - Underground Storage Tank Removal Report -Shoreline Mixed-Use
Development Traffic Analysis

[EA-AnalysisBackUp-ShorelineModularHousing.docx](#)
[Shor_Traffic Report_200709.pdf](#)
[CPC Shoreline - 5 Transit Oriented Dev Site Map.pdf](#)
[CPC Shoreline - 4 Location Efficiency Maps.pdf](#)
[Shor_Noise Study_200415\(1\).pdf](#)
[Shor_NEPA Stormwater Mitigation Memo_200525.pdf](#)
[Section-106-Communications\(1\).pdf](#)
[DAHP_NoAdverseEffect\(1\).pdf](#)
[LAI_198th and Aurora Phase II_v3\(1\).pdf](#)
[CPC Shoreline_Phase I ESA_190113\(1\).pdf](#)
[CSID 12994 Aurora Gunderson NFA Memo\(1\).pdf](#)
[LAI Aurora-Gunderson UST Site Assessment_rpt - 01-18-16\(1\).pdf](#)
[Shor_Phase II ESA_200619\(1\).pdf](#)
[Shor_Phase I ESA_190114.pdf](#)
[CZMA-Email-Documentation-ShorelineModular\(1\).pdf](#)

Field Inspection [Optional]: Date and completed
by:

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[Detail 2227300030 04-21-2020.PDF](#)

[Detail 2227300025 04-21-2020.PDF](#)

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

- WA State Department of Ecology - Tribes (list)
Muckleshoot/Puyallup/Snoqualmie/Stillaguamish/Suquamish/Tulalip/Duwamish -
WA DAHP - City of Shoreline - Landau Associates (Phase I) - Robinson-Nobel (Phase
II) - A3 Acoustics, LLP (Noise Study) - Jeremy Oslund, Catholic Housing Services -
Gibson Traffic Consultants - Core Design for civil and stormwater retention design -
Bazan Architects, Architect of Record

List of Permits Obtained:

Building Permit* City of Shoreline - Planning and Community Development
Stormwater City of Shoreline - Planning and Community Development Plumbing
Permit City of Shoreline - Planning and Community Development Electrical Permit
Washington State L&I Mechanical City of Shoreline - Planning and Community
Development Clearing and Grading City of Shoreline - Planning and Community
Development Wastewater Developer Extension Ronald Water District Modular
Construction Permit Washington State L&I

Public Outreach [24 CFR 58.43]:

The FONSI/RROF will be printed in The Seattle Times and on King County's website in September, 2020 for a 15 day public comment period. Additional public meetings were held: Catholic Housing Services presented and answered questions about the project at the Echo Lake Neighborhood Association meeting in September 2018 and with the Hillwood Neighborhood Association in November 2018. CHS discussed the project with the Shoreline City Council in September 2018 and hosted a community meeting in partnership with the City in April 2019. The community meeting presented the project design, population served by the project, presented design alternatives, and took and answered verbal and written questions from community members. The meeting notice was posted on the Shoreline website, shared with a local news blog, and mailed to all neighbors within 500 feet of the project.

Cumulative Impact Analysis [24 CFR 58.32]:

The Shoreline Modular Housing site will have positive cumulative impact on the environment. The project site currently is vacant, but was previously occupied by automotive service buildings and businesses. As a result of the 3 year Aurora Corridor project carried out by the City of Shoreline, the site structures were demolished and

the City assumed ownership of the property. As such, the ground and soil were already disturbed from the previous use, and the site remains next to a main thoroughfare Aurora Avenue (US 99). The site is within close distance of major transit hubs. The housing itself will be funded with Section 8 VASH vouchers allowing for 100 units of affordable housing for individuals who are homeless or at risk of being homeless. Stormwater infiltration will be 100% on site and equal that of a forested parcel, thus allowing for an improvement over the former, pollution-risk use, ensuring that endangered species will not be harmed, nor affect other hydrological conditions. The project will incorporate modular construction to help ensure consistency with environmental and code requirements. The combination of providing safe, decent and environmentally friendly housing will enable Catholic Housing Service to address an underserved population. As the developer, Catholic Housing Services has been instrumental in providing low and moderate income persons with housing options in King County. Overall, the cumulative impacts of this project are positive. The review of the Laws and Authorities demonstrate that the environment will not be harmed as a result of individual and collective actions produced by this project. This project will enhance the environment by housing 100+ people who otherwise could be negatively impacting the environment on a daily basis through activities such as unmonitored camping, etc.

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

As with many locations in King County, real estate property prices have made site acquisition difficult and often out of the price-range of affordable housing developers. Parcels available near public transportation are particularly expensive. This parcel became available when the City acquired the property during the Aurora Avenue Corridor Project. In its commitment to affordable housing, the City is providing a long term lease on the property at \$1.00 per year for 99 years and there is no purchase price. The site was, as previously mentioned, developed for automotive servicing. Per the Toxics review, all underground storage tanks have been disposed and the Phase II review shows no significant residual effects requiring further cleanup. Sewer, water and other utility hookups are already in place. The lower floor is intended to be occupied by a community services provider, offering further opportunities for not only tenants but other residents of Shoreline and surrounding areas to receive necessary services. Considering both the advantageous site control cost and the proximity to a heavily used transit corridor and center that allows for tenant mobility, there was no other site of affordable nature in the area.

No Action Alternative [24 CFR 58.40(e)]

The "no action" alternative was considered and rejected. The City wants the property to be used to its full extent within Zoning standards and to help alleviate the emergency condition of high homeless rates in the area. A multi-unit building with close walking proximity to transit along with numerous services and employment

opportunities along the Aurora Ave Corridor is considered the best use of the property.

Summary of Findings and Conclusions:

The proposal has no significant impacts on the environment, both natural and built at the project site chosen. The cost aspect and support of the City are a critical component in making this truly affordable housing. The site has been already used for commercial properties but is clear of any other demolition needs, and it is also ready from a utility perspective. The agency has a long history and strong presence in the area at making not only affordable housing, but supportive housing for those exiting homelessness. Lastly, the location is ideal and would ordinarily be speculatively purchased on the private market, thereby raising rental values in the area, not only for those at Very Low Income, but Moderate to Median incomes as well.

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
Noise Abatement and Control	Please see detailed mitigation measures as outlined in documentation upload, pages 5-9 (document numbering) or 7-9 (pdf pages). These mitigation measures shall be part of the construction specifications and documents and will accordingly be monitored and inspected during construction.	N/A	
Permits, reviews and approvals	Building Permit* City of Shoreline - Planning and Community Development Stormwater City of Shoreline - Planning and Community Development Plumbing Permit City of Shoreline - Planning and Community Development Electrical Permit Washington State L&I Mechanical City of Shoreline - Planning and Community Development Clearing and Grading City of Shoreline - Planning and Community Development	N/A	

	Wastewater Developer Extension Ronald Water District Modular Construction Permit Washington State L&I		
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Mitigation Plan

Noise Abatement and Control: Mitigation measures shall be incorporated into the Construction Documents at the Direction of the Agency's Project Manager, Jeremy Oslund. (See Noise Abatement under Related Laws and Authorities for noise study and construction specifications for abatement). Project Manager shall submit final bid-construction specs to Responsible Entity for uploading into this section of HEROS. ? The Agency's project manager shall also submit copies of pertinent permits to the Reliable Entity for upload. ? Upon final completion of the project, Certificate of Occupancy and Final Acceptance by Client/Architect will be transmitted for upload to indicate successful close of project and inclusion of mitigation measures.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

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

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

✓ No

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

Yes

Screen Summary

Compliance Determination

Paine Field is 13 miles away and the next nearest airport is Boeing field which is even further. (See map) The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[Aiport-Map-PaineField-Boeingfield.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

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:

[Flood Insurance FEMA Map.tif](#)

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

Note 53033C0040 F FIRM, Panel 40 of 1725: The project is located in Zone X. The structure or insurable property is not located in a FEMA-designated Special Flood

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

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

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

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

Yes

No

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

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

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

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

Screen Summary

Compliance Determination

The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act. Per the NEPA Assistance Map (attached) there is a non-attainment for the area. Carbon monoxide is in Maintenance Mode.

Supporting documentation

[Air-Quality-Map-NEPA-Assist.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

This project is located in a Coastal Zone, but it has been determined to be consistent with the State Coastal Management Program. The project is in compliance with the Coastal Zone Management Act. Please note that the plans sent to Ecology for their determination are the same plans uploaded in the Project Summary Section.

Supporting documentation

[ShorelineModularHousingCZMLetter.pdf](#)

[Shor_CZMA Compliance_200629.pdf](#)

[NEPA-Assist-base-ShorelineModular-Map.jpg](#)

[imap-base-ShorelineModular-Map.jpg](#)

[imap-aerial-2019-ShorelineModular-Map.jpg](#)

[imap-aerial-2019-Detail ShorelineModular-Map.jpg](#)

[CZMA-Email-Documentation-ShorelineModular.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)

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

Explain:

Please see attached Shoreline-Modular Housing Toxics.pdf summary document along with uploaded ASTM Phase I and II ESAs for determination that no contaminants were identified for the project.

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

Yes

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 that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.

Supporting documentation

[LAI 198th and Aurora Phase II v3.pdf](#)

[CPC Shoreline Phase I ESA 190113.pdf](#)

[CSID 12994 Aurora Gunderson NFA Memo.pdf](#)

[LAI Aurora-Gunderson UST Site Assessment rpt - 01-18-16.pdf](#)

[Shor Phase II ESA 200619.pdf](#)

[Subsequent-NEPA-Assist-Envirofacts-Results.pdf](#)

[Shoreline Modular Toxics WriteUp.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. I have completed the HUD Region X No Effect Checklist. Due to the nature of the construction on previously disturbed site and the stormwater design, there is no effect.

Supporting documentation

[Western WA species list March 2012.pdf](#)

[RE_CHS-Shoreline Modular Endangered Species Act.pdf](#)

[ShorelineModular-WashingtonEndangeredSpeciesNoEffect-Checklist-and-Documents.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

There are no current or planned stationary above ground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements. Attached map begins with Radius Determination and detailed satellite images of the surrounding area from 2020. No above ground storage tanks were found within the 1 miles radius.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

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

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

Yes

No

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

Per NEPA Assist, the land is already developed in an Urbanized Area at Medium-Low Development. See maps.

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

[ShorelineModular-FarmlandMap2.png](#)

[ShorelineModular-FarmlandMap.png](#)

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:

[Flood Insurance FEMA Map.tif](#)

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).

Threshold (b). Document and upload the memo or explanation/justification of the other determination below:

Communications were sent to potentially impacted Tribes inviting comment and an EZ-1 form was submitted to the State Historic Preservation Officer SHPO. The SHPO determined there were no apparent historic or archaeological concerns for the project. There were no comments from the Tribes during the 30 day comment period.

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

Screen Summary

Compliance Determination

Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106. Additionally, please see prior historical

review of the property, which was carried out during a much larger local infrastructure project. This information was also submitted to SHPO for review along with the general project plans which can be found in the Project Summary.

Supporting documentation

[ShorelineModularHousing-Letter-to-tribes.pdf](#)

[Section-106-Communications.pdf](#)

[Muckleshoot_20070823.pdf](#)

[EZ-1-ShorelineModularHousing-CHS.pdf](#)

[DAHP_NoAdverseEffect.pdf](#)

[DAHP_DeterminedEligible.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:

Please see detailed mitigation measures as outlined in documentation upload, pages 5-9 (document numbering) or 7-9 (pdf pages). These mitigation measures shall be part of the construction specifications and documents and will accordingly be monitored and inspected during construction.

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 Construction specifics will attenuate the noise to acceptable levels and is part of the mitigation plan (see Mitigation Measures). The project is in compliance with HUD's Noise regulation with mitigation.

Supporting documentation

[noise-abatement-specifications.gif](#)
[Shor Noise Study 200415.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

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

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

Yes

✓ No

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

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

✓ No

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

Yes

Screen Summary

Compliance Determination

The project is not located on a sole source aquifer area. The nearest SSA is over 11 miles away. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[ShorelineModular-SoleSourceAquiferMap.png](#)

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

The project is not on a wetland and the Current Stormwater design is engineered to accommodate infiltration and diversion to the levels of forested land. (Please see uploads for Endangered Species Act for specifics on stormwater mitigation and control.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

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

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

No

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

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

Screen Summary

Compliance Determination

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Shoreline-Modular-WildScenicRivers.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

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

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

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

Yes

No

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

Screen Summary

Compliance Determination

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

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No