

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

**Project Information**

**Project Name:** Island-Center-Apartments

**HEROS Number:** 900000010087943

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

**RE Preparer:** Lynn Scherer, Quincy Williams

**State / Local Identifier:**

**Certifying Officer:** Mark Ellerbrook

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

**Point of Contact:**

**Consultant (if applicable):**

**Point of Contact:**

**Project Location:** 9914 SW 188th St, Vashon, WA 98070

**Additional Location Information:**

Census Tract 0277.01. The property is currently connected to sewer district and has 5 water shares which are part of the purchase of the property. Vashon HouseHold and Water District 19 have worked together and their Board provided the agency with a Certificate of Water Availability based on the model that is being proposed. A water

engineer was engaged by Vashon HouseHold and they examined fixture count and appliances for the project and found that the 5 water shares were more than sufficient to provide water for the number of people in the project. This information was provided to Water District 19 as part of overall due diligence.

**Direct Comments to:**

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

Vashon Island has unique struggles to provide affordable housing in our community. Primary factors include increased costs due to needing to ship building materials to the island, water availability with locations within the sewer district, and the lack of zoning that allows higher density projects that are traditionally funded by government funders. The proposed project, Island Center Apartments, alleviates some of these issues by using an alternative housing model within current zoning to maximize the number of people to be housed on the site; Island Center Apartments will serve 40 people at or below 30% median income including homeless, seniors, and disabled populations. Vashon HouseHold is able to do this because zoning of the site is R-8, which means up to 8 units of housing per acre; the site is 1.32 acres on 2 parcels. In this case, each of the buildings being proposed counts as 1 unit because 8 unrelated people can occupy a single family home. Further density was explored but not feasible because of water limits and also keeping to proper scale for the neighborhood which is rural and single family homes. In the City of Seattle and other municipalities throughout the State it is defined as Congregate Housing. Island Center Apartments will contain 5 two story residential style houses of approximately 1,653 sq. ft on each floor, with 4 housing units on each floor for a total of 8 per building. These micro units will be approximately 330 sq. ft and will contain a private bathroom, sink, small refrigerator, and microwave. A sixth building of approximately 830 sq. feet will be a common house that will serve all tenants at the property. This common house will have two residential style kitchens, laundry room containing 4 sets of washer and dryers, and space for eating and social gatherings.

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

Vashon Island has unique struggles to provide affordable housing in our community. Primary factors include increased costs due to needing to ship building materials to the island, water availability with locations within the sewer district, and the lack of zoning that allows higher density projects that are traditionally funded by government funders. The proposed buildings will replace a dilapidated, concrete block 2 story structure that contained 4 units of housing at one time. The building is not habitable and will be demolished. The proposed project, Island Center Apartments, alleviates some of these issues by using an alternative housing model within current zoning to maximize the number of people to be housed on the site; 40 people at or below 30% median will be served. The population will include formerly homeless, seniors and disabled persons. Island Center Apartments will contain 5 two story residential style houses of approximately 1,653 sq. ft on each floor, with 4 housing units on each floor for a total of 8 per building. These micro units will be approximately 330 sq. ft and will contain a private bathroom, sink, small refrigerator, and microwave. A sixth building of approximately 830 sq. feet will be a common house that will serve all tenants at the property. This common house will have two residential style kitchens, laundry room

containing 4 sets of washer and dryers, and space for eating and social gatherings. The project is requesting a .5 FTE social services coordinator at the project. This person will assist in eviction prevention, basic living skills, particularly for people moving from homelessness, and assistance in referring people to food banks, medical and behavioral health services. The addition of a Social Services Coordinator for this project will only enhance our ability to get tenants in to needed counseling, employment programs, or additional school or training.

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

Vashon HouseHold (Non-Profit Housing provider sponsor of project) currently has a full waitlist of 60 people who would fit the criteria for this project. Tentatively the priority populations are: 16 units will be for homeless, 12 for seniors, 8 for developmentally disabled persons, 8 for people with chronic mental illness. There will be crossover eligibility based on these standards and the final group if set-asides do not materialize fully after a 30 day period would be individuals at 30% median income or below. The Island Center Apartments project meets the Consolidated Plan Goals of intervention and stabilization of people who are homeless, and increasing access to affordable housing. It meets the goals of the All Home Plan by creating permanent supportive housing for people who are homeless. It meets the goals of the Comprehensive Plan by developing affordable housing near high capacity transit and by developing housing in pedestrian-friendly areas that are well served by transit. The property is located on Vashon Highway SW which is the main arterial running the full length of the island from North End ferry terminal to Seattle and South End ferry terminal to Tacoma. Public transportation is available seven days a week serviced by Metro Routes 118 and 116 along this full island route. They provide service from 4:15 AM to 10:00 PM Monday to Friday and from 10 AM to 6 PM on weekends. These times are well in line with the lifestyle of island residents. The property location is within .7 miles to the middle of Vashon town or .2 miles to local carry out market for basic needs. The property is ideal for easy access even by walking ten minutes to middle of town. The local food bank and medical clinic are one mile from the site. The Island Center Forest with walking and biking trails is located within .3 miles of the site for recreational purposes. The project proposes to prioritize people who are homeless. This is because culturally on the island there is not a shelter for people to go to on temporary basis. People live in barns, tents, on private land, and move from house to house of friends. We are proposing that units can go to a priority group of homeless that may overlap with disabled, senior, and people with mental illness.

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

[Island Center Apt. Site Photos.pdf](#)

[20190517\\_092650.jpg](#)

[20190517\\_092633.jpg](#)

[20190517\\_092601.jpg](#)

[20190517\\_092559.jpg](#)

**Determination:**

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

**Approval Documents:**

**7015.15 certified by Certifying Officer**

**on:**

**7015.16 certified by Authorizing Officer**

**on:**

**Funding Information**

Grant / Project Identification Number	HUD Program	Program Name
M19DC530200	Community Planning and Development (CPD)	HOME Program

**Estimated Total HUD Funded, Assisted or Insured Amount:** \$1,584,550.00

**Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** \$6,626,230.00

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

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
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<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	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.
<b>Coastal Barrier Resources Act</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
<b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements. See supporting documentation worksheet and flood insurance documents. FEMA MAP Number 5033C0950 F Firm Panel 950 of 1725.
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b>		
<b>Air Quality</b> 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. See uploaded document. Per the project description and Threshold Question 1 above, the project does not trigger any mitigation requirements for this law. All of the State of Washington is in attainment per consultation with Jeff Hunt at EPA. Email is Hunt.Jeff@epa.gov on May 28, 2019. Websites: <a href="https://www.hudexchange.info/environmental-review/air-quality/">https://www.hudexchange.info/environmental-review/air-quality/</a> <a href="https://www.epa.gov/green-book">https://www.epa.gov/green-book</a> <a href="https://www.ecfr.gov/cgi-bin/text-idx?SID=848153bca35ba61a26b9483027c83ede&amp;mc=true&amp;node=se40.20.81_1">https://www.ecfr.gov/cgi-bin/text-idx?SID=848153bca35ba61a26b9483027c83ede&amp;mc=true&amp;node=se40.20.81_1</a>

		348&rgn=div8 <a href="https://www3.epa.gov/airquality/urbanair/sipstatus/reports/wa_areabypoll.html">https://www3.epa.gov/airquality/urbanair/sipstatus/reports/wa_areabypoll.html</a>
<b>Coastal Zone Management Act</b> 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. Region X State of Washington CZMA document is attached/uploaded.
<b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) & 58.5(i)(2)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. On-site or nearby toxic or hazardous substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property, specifically, lead-based paint, and assumed PCBs and mold. 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.
<b>Endangered Species Act</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project has been determined to have No Effect on listed species. This project is in compliance with the Endangered Species Act without mitigation as 100% of storm runoff will be infiltrated on site. Region X State of Washington ESA document is attached/uploaded.
<b>Explosive and Flammable Hazards</b> 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 aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.
<b>Farmlands Protection</b> 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.

<b>Floodplain Management</b> 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.
<b>Historic Preservation</b> 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. Region X State of Washington Historic Preservation document attached/uploaded.
<b>Noise Abatement and Control</b> 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	On 12.13.19 King County conducted an in-person noise assessment on the site using a decibel monitor. The posted speed limit on this segment of the street is 25 mph, with traffic often traveling 30-35 mph depending on the time of day. Ambient noise while standing outside about 10' from the highway was approximately 60 dBs and ranged up to 75 dBs when trucks went by. The loudest noise was when a transit bus stopped at the nearby bus stop, which measured 85 dBs . The noise level was approximately 5-8 db's softer behind the trees that line the roadway. dBs was measured again inside of a car parked at the same distance from the road to mimic indoor conditions, and no sound exceeded 45 db's. Also attached are photos of the public airfield and the most recent available information about airport traffic, which averages approximately 38 flights per week. King County believes that the noise level to residents will be acceptable, given the planned mitigation of more trees and shrubs along the road, and insulated windows and walls. Pending the final design plan, a permeable asphalt parking surface might be recommended for noise and accessibility concerns instead of gravel parking.
<b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is located on a sole source aquifer. Following consultation with the regional EPA office, and Brian Sturdivant. Regional Environmental

		Officer at HUD, it has been determined that this project will not contaminate the aquifer and create a significant hazard to public health, and 100% of runoff will be infiltrated onsite . The project is in compliance with Sole Source Aquifer requirements. Region X Sole Source Aquifer Checklist is uploaded/attached.
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.
<b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
<b>HUD HOUSING ENVIRONMENTAL STANDARDS</b>		
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Our review of Laws and Authorities demonstrated no adverse environmental impacts were identified in the project's total environmental review. No persons especially persons of color or with disabilities will be displaced. The project will enable vulnerable populations (homeless, disabled and seniors) to have access to a new service that will improve their lives. 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
<b>LAND DEVELOPMENT</b>			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	See attached "EA Factors" document.	None.
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	See attached "EA Factors" document.	None. Here is the response from the Civil Engineer: Yes, the King County standard for flow control and low impact development is significantly higher, requiring us to meet flow durations all the way up to the 50 year, 24 hour storm. We are meeting those requirements with 100% infiltration, so short answer: The 2 year 24 hour storm event is expected to fully infiltrate in the three underground infiltration trenches on site. Jared Underbrink, PE, Project Manager CG Engineering   p. 425.778.8500   www.cgengineering.com
Hazards and Nuisances including Site Safety and Site-Generated Noise	3	See attached "EA Factors" document.	Professional abatement during demolition to remove hazards and clean up existing contamination. Double-paned windows or equivalent insulation to mitigate street noise for residents.
Energy Consumption/Energy Efficiency	2	See attached "EA Factors" document.	None. Additional features to the project will be utilization of solar panels on each residential unit, and a rain bank system that will be used for greywater flushing of toilets and any irrigation on site. This is an exciting feature as it will demonstrate the ability to use significantly less water as part of a water share.
<b>SOCIOECONOMIC</b>			
Employment and Income Patterns	1	See attached "EA Factors" document.	None
Demographic Character Changes / Displacement	2	See attached "EA Factors" document.	None.
<b>COMMUNITY FACILITIES AND SERVICES</b>			

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
<b>LAND DEVELOPMENT</b>			
Educational and Cultural Facilities (Access and Capacity)	2	See attached "EA Factors" document.	None.
Commercial Facilities (Access and Proximity)	2	See attached "EA Factors" document.	None.
Health Care / Social Services (Access and Capacity)	1	See attached "EA Factors" document.	None.
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	See attached "EA Factors" document.	Qualified abatement service to handle hazardous construction debris.
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	See attached "EA Factors" document.	None. Additional features to the project will be utilization of a rain bank system that will be used for greywater flushing of toilets and any irrigation on site. This is an exciting feature as it will demonstrate the ability to use significantly less water as part of a water share.
Water Supply (Feasibility and Capacity)	2	See attached "EA Factors" document.	None.
Public Safety - Police, Fire and Emergency Medical	2	See attached "EA Factors" document.	None.
Parks, Open Space and Recreation (Access and Capacity)	2	See attached "EA Factors" document.	None.
Transportation and Accessibility (Access and Capacity)	2	See attached "EA Factors" document.	None.
<b>NATURAL FEATURES</b>			
Unique Natural Features /Water Resources	2	See attached "EA Factors" document.	None.
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	1	See attached "EA Factors" document.	None.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
<b>LAND DEVELOPMENT</b>			
Other Factors		See attached "EA Factors" document.	None.

**Supporting documentation**

[EA Factors for HEROS upload updated 5-12-20.pdf](#)

[Island Center- Phase I ESA \(05-11-20\)\(1\).pdf](#)

[Vashon-subarea-plan-20181029.pdf](#)

[Certificate of Water Availability\(1\).pdf](#)

[Vashon Island Ground Water Report.pdf](#)

[Vashon Island Ground Water Map.pdf](#)

[Adapt Asbestos Survey Vashon HouseHold Property \(08-16-19\).pdf](#)

[WA19-21223-PH2 - Limited Phase II Screen - Vashon HouseHold \(07-02-19\)\(002\)\(1\).pdf](#)

[RE Letter of Satisfaction with Sampling Methods for Island Center Apartments.pdf](#)

[State of Ecology No Action for TSP Needed\(2\).pdf](#)

[19401 - Infiltration Considerations - Vashon Household\(1\).pdf](#)

[19401 - GES Report - Vashon Household\(1\).pdf](#)

[Island Center Homes Trip Analysis- Final.pdf](#)

**Additional Studies Performed:**

See attached: -Asarco Tacoma Smelter Site: Final Interim Action Plan for the Tacoma Smelter Plume -GES Soils Report - ESA Phase 1 - April 2018, and May 2020 -ESA Phase 2 -Adept Asbestos Survey Vashon Island Ground Water Report -WashDOT Vashon Island Trips Analysis 19401 - Infiltration Considerations - Vashon Household(1).pdf

[19401 - Infiltration Considerations - Vashon Household\(2\).pdf](#)

[Island Center Homes Trip Analysis- Final\(1\).pdf](#)

[Vashon-subarea-plan-20181029\(1\).pdf](#)

[Adapt Asbestos Survey Vashon HouseHold Property \(08-16-19\)\(1\).pdf](#)

[WA20-21223-PH1 - Vashon HouseHold Property - Phase I ESA \(05-11-20\) \(002\).pdf](#)

[WA State Tacoma Plume plan 6-12.pdf](#)

[19401 - GES Report - Vashon Household\(2\).pdf](#)

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

by:

Quincy Williams

5/17/2019 12:00:00 AM

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

- WA State Department of Ecology - Tribes (list) - WA DAHP - King County Permits - Vashon Social Services Network: Smaller size units are used in the project because of high demand on the island and community input. Discussions with the Vashon Social Service Network indicate that many of the clients in need do not desire large units and also do not often cook. This is another reason the project chose to provide the Common House approach. - Vashon HouseHold is also a founding member of the Vashon Social Services Network which meets monthly. The organizations in this group include Vashon Youth and Family Services, the DOVE project for domestic violence, the Interfaith Council on Homelessness, Vashon Senior Center, and SEEDS 4 Success that serves the developmentally disabled community. - Chris Szala, with Vashon HouseHold, was interviewed several times in person and via email. - Former Site Owner Len Lofland was interviewed via written questionnaire on April 9, 2018. - Narinder Walia, with King County Department of Local Services, Permitting Division, responded to a Phase I public records request on April 23, 2020. - Carin Brice, with Vashon Island Fire and Rescue, responded to a public records request on May 1, 2020.

[11-AttB-Vashon-DPA.docx](#)

[King County Historic Preservation Map Island Center\(1\).pdf](#)

[Letter from DAHP2020-01-00560\\_011420\(1\).pdf](#)

[Letter to Tribes Including Duwamish\(1\).pdf](#)

**List of Permits Obtained:**

Permit Reviewing Agency Mitigation Measures Building Permit\* DLS - Permitting Division Landscaping prior to occupancy Stormwater mitigation prior to occupancy Demonstration project conditions\*\* prior to permit issuance Electrical Permit Washington State L&I (206) 515-2800 None/TBD Plumbing Permit King County Public Health (206) 477-8050 None/TBD Side Sewer Permit Vashon Sewer District (206) 463-9219 None/TBD

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

The FONSI/RROF will be printed in The Seattle Times and on King County's website. Chris Szala, Executive Director of Vashon HouseHold, discussed the project and solicited public input on the following dates: May 8, 2018 Water District 19 Board Meeting September 6, 2018 General Public Meeting Methodist Church November 13, 2018 Water District 19 Board Meeting February 19, 2019 Water District 19 Board Meeting March 21, 2019 - General Public Meeting Methodist Church June 20, 2019 General Public Meeting Methodist Church September 26, 2019 General Public Meeting Methodist Church February 13, 2020 General Public Meeting Methodist Church A link to submit comments directly to King County was posted on the Vashon-

Maury Island Beachcomber newspaper site on October 2, 2019 here: <https://www.vashonbeachcomber.com/news/vashon-household-updates-development-progress/> As well as on King County's website: <https://kingcounty.gov/depts/local-services/permits/planning-regulations/legislation-public-review-comment/housing-demo.aspx> invited people to offer additional feedback during (from October 2-31, 2019). Comments were sent to the [permittedlegislation@kingcounty.gov](mailto:permittedlegislation@kingcounty.gov) email box. Comments were reviewed and commenters received replies from Harry Reinert, King County Project/Program Manager IV of Permitting. Additionally Vashon Household and King County staff members jointly attended a meeting on July 18, 6-8pm at Vashon High School: 2020 Comprehensive Plan Midpoint Update Community Meeting. Staff shared information about the demonstration project ordinance and Island Center Apartments. King County Staff also attended a meeting on September 23, 6-9pm at Vashon High School: Community Service Area Annual Town Hall. Staff shared information about the demonstration project ordinance and the proposed Island Center Apartments project.

[communicationswriteup.docx](#)  
[Certificate of Water Availability.pdf](#)

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

Island Center Apartments site was selected for its positive cumulative impact on the environment. The project site currently has a vacant/uninhabited multi family structure constructed in the 1950's. The site occupies land that includes grass and gravel/dirt mix. The site is next to a main thoroughfare (Vashon Highway). Historically, Vashon Island has a lack of affordable housing options for homeless and vulnerable populations (disabled, seniors). This unhoused population can negatively impact environments by adding to unsanitary physical issues (trash) and increased vagrancy. A housing facility provides this population with safe decent housing thereby impacting the environment in a positive way. The project will incorporate energy efficient features thus creating positive environmental impact. Island Center Apartments will include the following: \* Central laundry to reduce in-unit energy usage \* High-efficiency central gas domestic water heater in each building \* Rooftop solar PV panels \* High performance vinyl windows with max. U-value 0.28 exceed energy code requirements \* Energy Star Appliances \* LED light fixtures at the interiors and exteriors \* Efficient digital controls for heating system to allow night time setbacks

The combination of providing safe, decent and environmentally friendly housing will enable Vashon Island to address an underserved population. As the developer, Vashon HouseHold (VH) has been instrumental in providing low and moderate income persons with housing options on the Island. VH in coordination with other non-profit agencies was able to identify the lack of housing and provide guidance in identifying properties with the least impact on the environment. The site was partially selected due to its minimal environmental footprint. Because of the requirement of 100 percent infiltration of storm water runoff contained on site, the property will ensure

that endangered species will not be harmed. This is also vital because Vashon Island is located on a Sole Source Aquifer. Containing runoff will protect the aquifer. 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 40 people who otherwise would be negatively impacting the environment on a daily basis.

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

Vashon Island has limited buildable parcels available near public transportation, with the number of water shares required for development, are on the King County Sewer District, and are not encumbered by wetlands. This parcel became available when the private owners contacted Vashon HouseHold and gave that agency a first right of refusal before putting the property on the open market. The owners stated that they were supportive of affordable housing and wanted to provide that opportunity on Vashon Island. At that time there was only one other buildable parcel for sale that had available water shares but it was not hooked up to sewer, water, power, or other infrastructure and would have required more time and resources. Overall the parcel selected was only one that was economically feasible to build on within affordable housing budget limits.

**No Action Alternative [24 CFR 58.40(e)]**

The "no action" alternative was considered and rejected because of the dire situation homeless people on Vashon Island face - particularly those who also live with additional issues like disability, mental health problems, and PTSD trauma that contributes to increased vulnerability. Presently, people in this situation are squatting in barns and sheds, and not accessing additional services that could provide important help. In the absence of this housing project, they are likely to remain homeless and living in dangerous conditions.

**Summary of Findings and Conclusions:**

Island Center Apartments project will produce the following beneficial impacts: \* Environmentally friendly structure will assist homeless persons with housing. Alternative is persons using places not meant for human habitation (barns, park etc...) which adds to adverse environmental conditions (trash). \* Community vision of housing affordability is consistent with community development and housing goals described in the Washington Growth Management Act, King County Comprehensive Plan and County wide Planning Policies. The following describes changes to the proposed project necessary to avoid significant impacts. \* The abandoned/vacant existing structure will be torn down. Due to the age of the structure, it is assumed that Lead and Asbestos is present. Asbestos and Lead abatement will be required during demolition as well as the safe removal of any equipment that may contain toxic substances.

**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.

<b>Law, Authority, or Factor</b>	<b>Mitigation Measure or Condition</b>	<b>Comments on Completed Measures</b>	<b>Complete</b>
Contamination and Toxic Substances	On October 10, 2019, Washington State Department of Ecology sent a letter to King County Department of Community and Human Services. The letter included the following language: "Ecology does not recommend this property enter the Voluntary Cleanup Program. No soil remediation for the contamination associated with the Tacoma Smelter Plume is needed for this project".	N/A	
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	None.	N/A	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	None. Here is the response from the Civil Engineer: Yes, the King County standard for flow control and low impact development is significantly higher, requiring us to meet flow durations all the way up to the 50 year, 24 hour storm. We are meeting those requirements with 100% infiltration, so short answer: The 2 year 24 hour storm event is expected to fully infiltrate in the three underground infiltration trenches on site. Jared Underbrink, PE, Project Manager CG Engineering   p. 425.778.8500   www.cgengineering.com	N/A	
Hazards and Nuisances including	Professional abatement during demolition to remove hazards and	N/A	

Site Safety and Site-Generated Noise	clean up existing contamination. Double-paned windows or equivalent insulation to mitigate street noise for residents.		
Energy Consumption/Energy Efficiency	None.Additional features to the project will be utilization of solar panels on each residential unit, and a rain bank system that will be used for greywater flushing of toilets and any irrigation on site. This is an exciting feature as it will demonstrate the ability to use significantly less water as part of a water share.	N/A	
Employment and Income Patterns	None	N/A	
Demographic Character Changes / Displacement	None.	N/A	
Educational and Cultural Facilities (Access and Capacity)	None.	N/A	
Commercial Facilities (Access and Proximity)	None.	N/A	
Health Care / Social Services (Access and Capacity)	None.	N/A	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	Qualified abatement service to handle hazardous construction debris.	N/A	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	None.Additional features to the project will be utilization of a rain bank system that will be used for greywater flushing of toilets and any irrigation on site. This is an exciting feature as it will demonstrate the ability to use significantly less water as part of a water share.	N/A	
Water Supply (Feasibility and Capacity)	None.	N/A	

Public Safety - Police, Fire and Emergency Medical	None.	N/A	
Parks, Open Space and Recreation (Access and Capacity)	None.	N/A	
Transportation and Accessibility (Access and Capacity)	None.	N/A	
Unique Natural Features /Water Resources	None.	N/A	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	None.	N/A	
Other Factors	None.	N/A	
Permits, reviews and approvals	Permit Reviewing Agency Mitigation Measures Building Permit* DLS - Permitting Division Landscaping prior to occupancy Stormwater mitigation prior to occupancy Demonstration project conditions** prior to permit issuance Electrical Permit Washington State L&I (206) 515-2800 None/TBD Plumbing Permit King County Public Health (206) 477-8050 None/TBD Side Sewer Permit Vashon Sewer District (206) 463-9219 None/TBD	N/A	

**Mitigation Plan**

We have a project mitigation file (electronic). Chris Szala of Vashon Household as well as Lynn Scherer will track the mitigation and update the file and HEROS as the project gets closer to breaking ground, vendors are chosen, and more detailed information becomes known.

**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. The project is in compliance with Airport Hazards requirements.

#### Supporting documentation

[01-AIRPORTS.PDF](#)

[Map of Vashon Municipal Airport to Island Center Apartments 2019-05-16 .png](#)

[Map of Island Center Apartments to Sea-Tac Airport 2019-05-16 .png](#)

[Map of Island Center Apartments to JBLM 2019-05-16png.png](#)

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

[Island Apartments CBRA Map.docx](#)

[CBRA Map 2019-05-16\\_.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:**

[Island Center Flood Insurance Map \(FIRM\) May 2019.jpg](#)

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. See supporting documentation worksheet and flood insurance documents. FEMA MAP Number 5033C0950 F Firm Panel 950 of 1725.

**Supporting documentation**

[Island Center Apartments - 03 ER Map Template - Flood Insurance\(1\).docx](#)  
[03 Flood Insurance - NFIP Participating List.pdf](#)

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

Yes

✓ No

## Air Quality

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

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

Yes

No

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

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

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

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

### 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. See uploaded document. Per the project description and Threshold Question 1 above, the project does not trigger any mitigation requirements for this law. All of the State of Washington is in attainment per consultation with Jeff Hunt at EPA. Email is Hunt.Jeff@epa.gov on May 28, 2019. Websites:

<https://www.hudexchange.info/environmental-review/air-quality/>  
<https://www.epa.gov/green-book> [https://www.ecfr.gov/cgi-bin/text-id?SID=848153bca35ba61a26b9483027c83ede&mc=true&node=se40.20.81\\_1348&rgn=div8](https://www.ecfr.gov/cgi-bin/text-id?SID=848153bca35ba61a26b9483027c83ede&mc=true&node=se40.20.81_1348&rgn=div8)  
[https://www3.epa.gov/airquality/urbanair/sipstatus/reports/wa\\_areabypoll.html](https://www3.epa.gov/airquality/urbanair/sipstatus/reports/wa_areabypoll.html)

**Supporting documentation**

[Island Center Apartments State of Washington - 04 Air Quality Nonattainment List.docx](#)

**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. Region X State of Washington CZMA document is attached/uploaded.

**Supporting documentation**

[Map of Area for Certification.docx](#)

[Department of Ecology Consistency Decision.pdf](#)

[State of Washington CZMA Worksheet.pdf](#)

[Coastal Zone Management WA Map.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

- 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.**

On October 10, 2019, Washington State Department of Ecology sent a letter to King County Department of Community and Human Services. The letter included the following language: "Ecology does not recommend this property enter the Voluntary Cleanup Program. No soil remediation for the contamination associated with the Tacoma Smelter Plume is needed for this project".

**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 or hazardous substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property, specifically, lead-based paint, and assumed PCBs and mold. 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**

[Island Center- Phase I ESA \(05-11-20\).pdf](#)

[WA18-21223-PH1 - Vashon HouseHold Property - Phase I Update Letter \(09-16-19\).pdf](#)

[WA19-21223-ACM Vashon HouseHold \(LBP-Mold-Wetlands 09-16-19\).pdf](#)

[ER Correspondence with Brian regarding Contamination and Toxics\(1\).pdf](#)

[Island Center Apt. Phase I ESA \(FINAL 04-12-18\).pdf](#)

[Island Center Apartments - 06 ER Map - Contamination & Toxics.docx](#)

[2019-06-26 EnviroMapper Toxics and Contamination.snag](#)

[State of Ecology No Action for TSP Needed.pdf](#)

[WA19-21223-PH2 - Limited Phase II Screen - Vashon HouseHold \(07-02-19\) \(002\).pdf](#)

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

Yes

No

**Endangered Species**

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

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

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

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

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

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

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

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

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

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

Document and upload all documents used to make your determination below. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate

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

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

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

Mitigation as follows will be implemented:

- ✓ No mitigation is necessary.

Explain why mitigation will not be made here:

Based upon the Regional State of Washington checklist the activity (New Construction) is listed under Table A and meets the requirements of "No Effect" on ESA listed species and/or designated critical habitat. No mitigation is necessary since it is a No Effect activity.

**Screen**  
**Compliance Determination**

**Summary**

This project has been determined to have No Effect on listed species. This project is in compliance with the Endangered Species Act without mitigation as 100% of storm runoff will be infiltrated on site. Region X State of Washington ESA document is attached/uploaded.

**Supporting documentation**

[Island Center- Phase I ESA \(05-11-20\)\(2\).pdf](#)

[WashingtonEndangeredSpeciesNoEffect2018 Worksheet.docx](#)

[19401 - GES Report - Vashon Household.pdf](#)

[Vashon Island ESA King County Ecology Assessment.pdf](#)

[Ecology Stream Features SnipImage.jpg](#)

[Island Center Apartments ESA- Sensitive Areas \(Chinook\).pdf](#)

[Fish and Wildlife Map.docx](#)

[EPA NEPA Assist 07 ESA.docx](#)

**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 aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.

**Supporting documentation**

[Facilities near Site Records.docx](#)

[EnviroMapper.docx](#)

[Underground Storage Tanks - Hazardous.docx](#)

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

Yes

✓ No

## Farmlands Protection

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

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

Yes

No

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

This property involves new construction on land zoned for residential use, and has a former (now abandoned and dilapidated) house currently on the property.

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**

[Site Picture.jpg](#)

[Map of Stormwater and Property Layers.docx](#)

[Island Center Apartments Farmland Map.docx](#)

#### **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:**

[Island Center Flood Insurance Map \(FIRM\) May 2019.jpg](#)

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**

[Island Center Apartments Flood Hazard Areas.docx](#)

[NEPAssist Map.docx](#)

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

Yes

✓ No

## Historic Preservation

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 "Protection of Historic Properties" <a href="http://www.access.gpo.gov/nara/cfr/waisidx_10/36cfr800_10.html">http://www.access.gpo.gov/nara/cfr/waisidx_10/36cfr800_10.html</a>

### **Threshold**

#### **Is Section 106 review required for your project?**

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

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

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

### **Step 1 – Initiate Consultation**

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

- ✓ 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 Tribes                      Response Period Elapsed
- ✓ Muckleshoot Tribe                      Response Period Elapsed
- ✓ Puyallup Tribe                              Response Period Elapsed
- ✓ Snoqualmie Tribe                        Response Period Elapsed
- ✓ Stillaguamish Tribe                      Response Period Elapsed
- ✓ Tulalip Tribes                              Response Period Elapsed

Other Consulting Parties

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

DAHP concurred with our determination that no historic properties will be affected by the proposed project. See attached documents below.

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:**

N/A.

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

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

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

**Additional Notes:**

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

project?

Yes

No

***Step 3 –Assess Effects of the Project on Historic Properties***

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

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

No Historic Properties Affected

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

**Document reason for finding:**

No historic properties present.

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

No Adverse Effect

Adverse Effect

**Screen Summary**

**Compliance Determination**

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106. Region X State of Washington Historic Preservation document attached/uploaded.

**Supporting documentation**

[Region X Island Center Apartments Historic Preservation - 11.doc](#)

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

[Letter to Tribes.pdf](#)

[King County Historic Preservation Map Island Center.pdf](#)

[Letter from DAHP2020-01-00560\\_011420.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))

Indicate noise level here: 50

Based on the response, the review is in compliance with this section. Document and upload noise analysis, including noise level and data used to complete the analysis below.

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))

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: 50

Document and upload noise analysis, including noise level and data used to complete the analysis below.

### **Screen Summary**

#### **Compliance Determination**

On 12.13.19 King County conducted an in-person noise assessment on the site using a decibel monitor. The posted speed limit on this segment of the street is 25 mph, with traffic often traveling 30-35 mph depending on the time of day. Ambient noise while standing outside about 10' from the highway was approximately 60 dBs and ranged up to 75 dBs when trucks went by. The loudest noise was when a transit bus stopped at the nearby bus stop, which measured 85 dBs . The noise level was approximately 5-8 dba softer behind the trees that line the roadway. dBs was measured again inside of

a car parked at the same distance from the road to mimic indoor conditions, and no sound exceeded 45 dbs. Also attached are photos of the public airfield and the most recent available information about airport traffic, which averages approximately 38 flights per week. King County believes that the noise level to residents will be acceptable, given the planned mitigation of more trees and shrubs along the road, and insulated windows and walls. Pending the final design plan, a permeable asphalt parking surface might be recommended for noise and accessibility concerns instead of gravel parking.

**Supporting documentation**

[Vashon airport traffic.png](#)

[Vashon airport.jpg](#)

[NEPAssist Analysis Island Center map.pdf](#)

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

Yes

No

## Sole Source Aquifers

General requirements	Legislation	Regulation
<b>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.</b>	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

✓ Yes

3. Does your region have a memorandum of understanding (MOU) or other working agreement with Environmental Protection Agency (EPA) for HUD projects impacting a sole source aquifer?

Yes

✓ No

**5. Will the proposed project contaminate the aquifer and create a significant hazard to public health?**

Consult with your Regional EPA Office. Your consultation request should include detailed information about your proposed project and its relationship to the aquifer and associated streamflow source area. EPA will also want to know about water, stormwater and waste water at the proposed project. Follow your MOU or working agreement or contact your Regional EPA office for specific information you may need to provide. EPA may request additional information if impacts to the aquifer are questionable after this information is submitted for review. Does your MOU or working agreement exclude your project from further review?

✓ No

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

Yes

**Screen Summary**

**Compliance Determination**

The project is located on a sole source aquifer. Following consultation with the regional EPA office, and Brian Sturdivant, Regional Environmental Officer at HUD, it has been determined that this project will not contaminate the aquifer and create a significant hazard to public health, and 100% of runoff will be infiltrated onsite. The project is in compliance with Sole Source Aquifer requirements. Region X Sole Source Aquifer Checklist is uploaded/attached.

**Supporting documentation**

[Island Center - Sole Source Aquifer Project Review Checklist 4-7-20.pdf](#)  
[SSA Vashon Island Map.docx](#)

**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 will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.

**Supporting documentation**

[19401 - Infiltration Considerations - Vashon Household.pdf](#)

[Island Center - distance to Wetland.png](#)

[Island Center - distance to Riverine.png](#)

[Island Center - distance to closest Wetland.png](#)

[Island Center - 14 Wetlands Map.pdf](#)

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

Yes

✓ No

## Wild and Scenic Rivers Act

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

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

No

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

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

### Screen Summary

#### **Compliance Determination**

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

#### **Supporting documentation**

[Wild and Scenic database screenshot 12-5-19.png](#)

#### **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**

Our review of Laws and Authorities demonstrated no adverse environmental impacts were identified in the project's total environmental review. No persons especially persons of color or with disabilities will be displaced. The project will enable vulnerable populations (homeless, disabled and seniors) to have access to a new service that will improve their lives. The project is in compliance with Executive Order 12898.

**Supporting documentation**

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

Yes

No

