



U.S. Department of Housing and Urban
Development
451 Seventh Street, SW
Washington, DC 20410
www.hud.gov
espanol.hud.gov

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

Project Information

Project Name: Lincoln-Place-II

HEROS Number: 900000010375315

Project Location: 1110 W 13th St, Vancouver, WA 98660

Additional Location Information:

Project also includes future off-site parking lot located at 1101 W 13th St. (APN# 59400000).

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

Lincoln Place II (the "Project") is a new 40-unit permanent supportive housing (PSH) project to be developed by the Vancouver Housing Authority (VHA). The project will be completed in a single phase of development and consist of one (1) four-story, wood-framed building on a concrete slab foundation. The building has a total residential gross square footage (GSF) of 25,039 and will contain 40 studio units serving individuals exiting homelessness or who have recently transitioned out of homelessness who may have complex behavioral, mental, or physical health challenges. The ground floor of the development will feature a community room with a full-service kitchen, as well as bike storage, staff offices, and health clinic. The upper floors are virtually identical and include centralized laundry facilities, case management offices, and workspace for maintenance staff. Site improvements include an off-site parking lot available to residents and staff. As the project will be entirely constructed above ground (e.g., no basements or underground parking), ground disturbance will be generally limited to site utility and building foundation work. The depth of ground disturbance is not expected to exceed 4-5' below grade. The primary project site (the "Site") is located at 1110 W 13th St. (APN# 61810000) in Vancouver, WA. The project will also feature an off-site parking lot (the "off-site lot") located at 1101 W 13th St. (APN# 59400000) available to residents and staff. The Site is a 0.27-acre paved lot enclosed by a fence. Topographically, the area is flat with a gentle slope to the west. Vegetation on the site is limited to small swaths of non-native pasture grasses and forbs that are limited to areas that are not covered in asphalt. Historically, the Site had a residential structure from at least 1905 to 1971. In 1990 the property was used for storage until 2016. The property has remained unoccupied since with no structures. The off-site lot is a 0.11 vacant lot with flat topography. Construction is expected to take roughly 14 months, beginning in June 2024.

Funding Information

Grant Number	HUD Program	Program Name	
n/a	Public Housing	Housing Choice Voucher Program	\$3,769,260.00

Lincoln-Place-II

Vancouver, WA

900000010375315

Estimated Total HUD Funded Amount: \$3,769,260.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$19,738,959.00

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

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

Law, Authority, or Factor	Mitigation Measure or Condition
Endangered Species Act	Provide a GULD rated filter catch basin for street runoff. Rooftop HVAC systems will be painted and maintained to ensure paint is not chipping or peeling due to the potential of galvanized metals releasing zinc into the runoff. Galvanized metals in roofing or gutters will be painted and maintained to prevent rain from introducing zinc into the runoff. These mitigation measures will be implemented during construction.
Contamination and Toxic Substances	Mitigation measures to obtain compliance for contamination and toxic substances are described in the building permit plans designed by MKE & Associates, Inc and Access Architecture. See "Radon Mitigation Permit Plans" and ""Lincoln Place II Addendum Narrative" update attachments. VHA hired a 3rd party engineering review of the proposed mitigation plans that confirmed the MKE & Associate design including additional recommendations. See the "Vapor Barrier Engineering" attachment dated April 1, 2024, by PBS engineering.
Noise Abatement and Control	Based on the Normally Unacceptable noise levels at all NALs on all floors, interior noise mitigation of 31 dB at a minimum will have to be completed in the proposed building at the Subject Property as required by the HUD Sound Transmission Classification Assessment Tool (STraCAT), factoring in a 3 dB margin of error per the HUD Guidelines. According to the Noise Study, prepared by and dated April 16, 2024, ABD completion of an analysis of the proposed building using HUD's Sound Transmission Classification Assessment Tool (STraCAT) online calculator. The calculated noise attenuation provided by the basis-of-design facade

	<p>elements (with composite STC ratings of 34.01, 35.44, and 35.64 dB) is sufficient for both the measured exterior DNL of 71 dB as well as the desktop noise calculated DNL of 73 dB. Per HUD Notice CPD-16-19, balconies are considered exempt from the noise assessment except where bedrooms and studio apartments have direct access to balconies. For new construction projects in Unacceptable and Normally Unacceptable noise areas, bedrooms and studio apartments with balconies are permitted by HUD if the following conditions are met: (1) interior noise levels must meet 45 dB as documented by the Sound Transmission Classification of the dwelling unit's exterior walls factoring in fenestration; (2) appropriate ventilation is provided by a mechanical ventilation system and not by opening doors or windows; and (3) an Operations and Maintenance plan is in place that requires periodically inspecting seals and repairing or replacing building components when their performance diminishes.</p>
Climate Change	<p>Wildfire - Project will be utilizing brick and fiber cement cladding materials, both of which are non-combustible. For roofing we will be using a TPO membrane roof that has a Class A fire rating. Encourage building developers to use: - Noncombustible materials (e.g., stone, brick, stucco) for new construction. -Fire-resistant roofing and building materials and prohibit wooden shingles and wood shake roofs. -Enclose foundations in wildfire-prone areas, rather than exposing undersides to blown embers. Extreme Heat - The project will be utilizing doublepane windows. Central spaces will be air conditioned via central rooftop units and the units will be airconditioned through the use of ductless minisplits. The property will be equipped with air conditioning. Localized Flooding - Stormwater will be addressed through an onsite stormwater infiltration system in accordance with low impact development (LID) practices. Localized flash flooding is possible. The following mitigation measures should be put in place: The owner will consider an evacuation and safety plan. Routinely clean and repair stormwater drains. Drought - Native and drought tolerant landscaping has been incorporated into the project design. Design and install water-smart landscapes, including the</p>

Lincoln-Place-II

Vancouver, WA

900000010375315

	incorporation of drought-tolerant plant species into landscaping to reduce dependence on irrigation. Use permeable streets, parking lots,
Permits, reviews, and approvals	The project has been approved for building permit issuance and has also received land use approval from the City of Vancouver. The outstanding civil permit will be obtained prior to construction activities.
Historic Preservation	The cultural resource survey report by Archaeological services LLC recommended "inadvertent discovery" procedural notes on the ground disturbing construction plans and that a professional archaeologist be present to monitor the initial ground disturbing grading activities.

Project Mitigation Plan

Summarized above 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 are to be incorporated into project contracts, development agreements and other relevant documents.

Determination:

<input checked="" type="checkbox"/>	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
<input type="checkbox"/>	Finding of Significant Impact

Preparer Signature: *Bryan Monroe* Date: 6/18/2024

Name / Title / Organization: Bryan Monroe / / VANCOUVER

Certifying Officer Signature: *S Whitley* Date: 6/18/2024

Name/ Title: Samantha Whitley Housing Programs Manager

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environment Review Record (ERR) for the activity / project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

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

Project Information

Project Name: Lincoln-Place-II

HEROS Number: 900000010375315

Responsible Entity (RE): VANCOUVER, DEPARTMENT OF COMMUNITY
PRESERVATION & DEVEL. VANCOUVER WA, 98668

RE Preparer: Bryan Monroe

State / Local Identifier:

Certifying Officer: Samantha Whitley

Grant Recipient (if different than Responsible Entity): N/A

PHA Code: WA008

Point of Contact:

Consultant (if applicable): EBI Consulting

Point of Contact:

Project Location: 1110 W 13th St, Vancouver, WA 98660

Additional Location Information:

Project also includes future off-site parking lot located at 1101 W 13th St. (APN# 59400000).

Direct Comments to: City of Vancouver
Community Development Block Grant Program
415 W. 6th Street
PO Box 1995
Vancouver, WA, 98668

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

Lincoln Place II (the "Project") is a new 40-unit permanent supportive housing (PSH) project to be developed by the Vancouver Housing Authority (VHA). The project will be completed in a single phase of development and consist of one (1) four-story, wood-framed building on a concrete slab foundation. The building has a total residential gross square footage (GSF) of 25,039 and will contain 40 studio units serving individuals exiting homelessness or who have recently transitioned out of homelessness who may have complex behavioral, mental, or physical health challenges. The ground floor of the development will feature a community room with a full-service kitchen, as well as bike storage, staff offices, and health clinic. The upper floors are virtually identical and include centralized laundry facilities, case management offices, and workspace for maintenance staff. Site improvements include an off-site parking lot available to residents and staff. As the project will be entirely constructed above ground (e.g., no basements or underground parking), ground disturbance will be generally limited to site utility and building foundation work. The depth of ground disturbance is not expected to exceed 4-5' below grade. The primary project site (the "Site") is located at 1110 W 13th St. (APN# 61810000) in Vancouver, WA. The project will also feature an off-site parking lot (the "off-site lot") located at 1101 W 13th St. (APN# 59400000) available to residents and staff. The Site is a 0.27-acre paved lot enclosed by a fence. Topographically, the area is flat with a gentle slope to the west. Vegetation on the site is limited to small swaths of non-native pasture grasses and forbs that are limited to areas that are not covered in asphalt. Historically, the Site had a residential structure from at least 1905 to 1971. In 1990 the property was used for storage until 2016. The property has remained unoccupied since with no structures. The off-site lot is a 0.11 vacant lot with flat topography. Construction is expected to take roughly 14 months, beginning in June 2024.

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

Lincoln Place II (the "Project") is a direct response to the considerable shortage of affordable housing in Clark County, particularly housing that meets the additional needs of people exiting homelessness. In a 2021 Homeless Crisis Response System Report, Council for the Homeless highlighted the need for additional deeply affordable permanent housing options in Clark County, as well as additional funding for supportive services. This call to action is backed by data showing a continuous year-on-year increase in the homeless population in Clark County. Most recently, the 2023 Point in Time Count found 1,300 people experiencing homelessness, up 9% from the year before. The proposed action will bring new units of permanent supportive

housing (PSH) to Clark County, serving individuals exiting homelessness or who have recently transitioned out of homelessness who may have complex behavioral, mental, or physical health challenges. All 40 units will be rent restricted, with 20 of the units serving households earning at or below 30% of the area median income (AMI) and the other 20 units serving households earning at or below 50% AMI. Transitioning out of homelessness can be especially challenging for people facing complex mental, behavioral, or physical health problems that make it difficult to maintain permanent housing. The project will include wraparound supportive services, shown to significantly decrease the risk of returning to homelessness.

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

Building on the success of Lincoln Place apartments, a 30-unit permanent supportive housing (PSH) development constructed in 2016, VHA earmarked the neighboring vacant lot as an ideal location for the project to increase the efficiencies of service delivery. This location is also conveniently located near transit service, parks/recreation, social services, and the downtown Vancouver commercial district. This project will activate an existing vacant land and streetscape in a growing central Vancouver neighborhood. Existing residents of the community will enjoy right-of-way improvements along both street frontages and an attractive building intentionally designed to fit the neighborhood context.

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

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:

[HEROS ERR SIGNATURE PAGE 6-18-2024.pdf](#)

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
n/a	Public Housing	Housing Choice Voucher Program	\$3,769,260.00

Estimated Total HUD Funded, Assisted or Insured Amount: \$3,769,260.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$19,738,959.00

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	Based on a review of the Federal Aviation Administration (FAA) circle search for airports and the EPA NEPAAssist mapping tool, the Subject Property is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The Pearson Field Airport is a civil airport, located 5,200-feet southeast. The subject property 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	EBI reviewed the Federal Emergency Management Agency (FEMA) Flood Insurance Map, Community Map Panel # 53011C0368D, dated September 5, 2012. No other maps, preliminary or otherwise are available. The Subject Property Flood Zone Determination

		<p>appears to be Zone X, defined as an area outside the 100-year (1%) and 500-year (2%) floodplains. The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. 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.</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5</p>		
<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project's county or air quality management district is in attainment status for most criteria pollutants. Vancouver is in maintenance status for ozone or carbon monoxide. The chief engineer of the Southwest Clean Air Agency also confirmed that emissions from the project would "not require any permit from our agency, violate any requirement in the ozone or carbon monoxide maintenance plans, or threaten the attainment status for either pollutant." The project is in compliance with the Clean Air Act.</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Concurrence from Dept. of Ecology for Coastal Zone Management is no longer required under a Part 58 or Part 50 Environmental Review in Washington State. However, at the time of project development, the activity may trigger review if it falls under other parts of the CZMA regulations for federal agency activities (Title 15 CFR Part 930, subpart C), or consistency for activities requiring a federal license or permit (Title 15 CFR Part 930, Subpart D) and will be subject</p>

		to all enforceable policies of the Coastal Zone Management Program. It is during the local permitting process that a project might be subject to CZM and further review by the Dept of Ecology.
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Based on a review of the USFWS online Critical Habitat Portal (http://criticalhabitat.fws.gov), the proposed development is not located within a designated critical habitat. EBI also utilized the USFWS Information for Planning and Consultation (IPaC) online project review tool (http://ecos.fws.gov/ipac) to identify any species that are federally listed or proposed for listing under the Endangered Species Act (ESA) as either endangered or threatened, and that are known to occur within the subject property vicinity. According to the IPaC report, three such federal-listed (i.e. endangered or threatened) species, one proposed threatened species, and one candidate species are known to occur within the Subject Property vicinity. A review of the identified species and their associated habitats with respect Subject Property show suitable habitats capable of supporting the listed species were not noted at the Subject Property. As such, the proposed development is anticipated to have 'No Effect' on the identified species. EBI reviewed the 2020 Programmatic Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for the U.S. Department of Housing and Urban Development Housing Programs in Washington State Appendix A (Consultation Guidance for Washington State) and determined that the Subject Property and proposed construction</p>

		<p>footprint is located entirely within Clark County, Washington, in a densely urban area approximately 0.36 miles northeast of the Columbia River which is an Essential Fish Habitat (EFH) and designated critical habitat for several salmon species and Eulachon. Based on this preliminary review possible impacts due to stormwater discharge are possible. Additional review and consultation with NMFS is required. The information was submitted to the City of Vancouver, tracking ID HUD WCRO-2020-00512, response date April 5, 2024, stating "Runoff from the roof and on-site parking lot would be conveyed to an infiltration system and treated on site. A bioretention facility would be installed in the off-site parking lot. Runoff from the frontage improvements would be collected in a GULD-rated Contech ZPG filter catch basin prior to conveyance to the municipal system. On site addition of treatment will reduce, though not completely avoid, stormwater effects in the receiving water body, the Columbia River. HUD projects have an independent obligation to manage the stormwater load, therefore NMFS reiterates the program's conditions: 1) Any rooftop HVAC system must be under a roofed structure or painted. If it's painted it requires regular maintenance to ensure paint is not chipping or peeling due to the potential of galvanized metals releasing zinc into the runoff (which is harmful to fish in the freshwater environment). 2) Galvanized metals in roofing or gutters must be painted to prevent rain from introducing zinc into the runoff. If paint begins to flake or peel, paint must be refreshed. Please be sure to provide post-construction follow-up materials within 60 days post-project. "</p>
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<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>EBI Review- Based upon site reconnaissance, interviews, and a review of state and local records, EBI identified no evidence of former or existing ASTs located at the Subject Property. No industrial facilities handling explosive or fire-prone materials such as liquid propane, gasoline or other storage tanks are adjacent to or visible from the Subject Property. EBI submitted letters to local and state authorities to gather data about the multiple ASTs located within one mile of the Subject Property. Results are pending. The RE finds there are several AST sites within a mile of the project site. The RE has prepared an AST evaluation of nearby tanks using the HUD acceptable distance calculator. The RE finds that the project meets acceptable separation distance requirements.</p>
<p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not include any activities that could potentially convert agricultural land to soils. According to the U.S. Census, the Subject Property is located in an Urbanized Area or Urbanized Cluster Area. The project is in compliance with the Farmland Protection Policy Act.</p>
<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>EBI reviewed the Federal Emergency Management Agency (FEMA) Flood Insurance Map, Community Map Panel # 53011C0368D, dated September 5, 2012. No other maps, preliminary or otherwise are available. The Subject Property Flood Zone Determination appears to be Zone X, defined as an area outside the 100-year and 500-year (2% annual chance of flooding) floodplains. As such, no further action appears warranted regarding this factor. This project does not occur in a floodplain. The Subject Property appears to be in compliance with Executive Order 11988. The RE</p>

		<p>attempted to use the Federal Flood Standard Support tool but found no community data available. The FEMA map provided in the partner worksheet shows the project site is approximately .25 of a mile from the 500-year flood plain boundary and 40 feet in elevation above the 500-year flood plain boundary elevation. The project site is in compliance with Executive Order 11988.</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>The Responsible Entity acted as the consulting party with the regional tribes identified using the HUD TDAT tool. Invitation to comment was sent on January 31st, 2024, by the RE (see attached Tribal Contact and Comment Request Letter). The notice included the project description, details, and site plans. The notice also included a copy of the archaeological cultural resources survey prepared by Archaeological Services LLC. The survey report recommended an inadvertent discovery plan be placed on the construction / grading plans. The RE has confirmed that the inadvertent discovery notes are on the face of the approved construction / grading plans. No comments were received from tribes during the 30-day comment period. The Responsible Entity reviewed the property use and structural history and found that a building (circa 1901) was demolished from the proposed parking lot site in May of 2023. The Responsible Entity reviewed information to determine whether a regulatory violation through a choice limiting action had occurred. According to VHA the building was abandoned and boarded up when purchased in July of 2022. The structure was a community nuisance with multiple break-ins and camping inside the structure. The VHA decided to eliminate the hazard by</p>

		<p>demolishing the building. The VHA and Washington Department of Commerce requested a Section 106 review in August of 2022 from SHPO who subsequently determined the structure not eligible for listing on August 19, 2022. A demolition permit was issued by the City of Vancouver to the VHA contractor in May of 2023. The timeline of events based on City permit records and applicant provided information is as follows: 7-1-2022- VHA acquires Lincoln Place II parking lot site (Non-HUD funds) 8-19-2022- SHPO determines existing building to be ineligible for historic listing/registers. (Non-HUD funds) 5-17-2023-Vancouver building demolition permit issued (Non-HUD funds) 5-23-2023- VHA submits complete land use permit application (Non-HUD funds) 8-30-2023- SHPO determines no impact to historic resources for project sites 9-2023- VHA board approves the use of project-based vouchers (HUD funding nexus begins) 11-2023- HUD approves project-based vouchers 11-29-2023- VHA requests EA review assistance from Responsible Entity The RE finds that no HUD funding was dedicated/used prior to the nexus of the project-based voucher approval by the VHA board and subsequent HUD approval. Based on Section 106 consultation there are no historic properties impacted. The project is in compliance with Section 106. No comments were received from contacted tribes. The recommended inadvertent discovery notes are on the ground disturbing construction plans. The VHA intends to have professional archaeologists monitor the initial site grading activities to ensure protection of below ground cultural resources.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Based on the Normally Unacceptable noise levels at all NALs on all floors,</p>

<p>amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>		<p>interior noise mitigation of 31 dB at a minimum will have to be completed in the proposed building at the Subject Property as required by the HUD Sound Transmission Classification Assessment Tool (STraCAT), factoring in a 3 dB margin of error per the HUD Guidelines. According to the Noise Study, prepared by and dated April 16, 2024, ABD completion of an analysis of the proposed building using HUD's Sound Transmission Classification Assessment Tool (STraCAT) online calculator. The calculated noise attenuation provided by the basis-of-design facade elements (with composite STC ratings of 34.01, 35.44, and 35.64 dB) is sufficient for both the measured exterior DNL of 71 dB as well as the desktop noise calculated DNL of 73 dB. Per HUD Notice CPD-16-19, balconies are considered exempt from the noise assessment except where bedrooms and studio apartments have direct access to balconies. For new construction projects in Unacceptable and Normally Unacceptable noise areas, bedrooms and studio apartments with balconies are permitted by HUD if the following conditions are met: (1) interior noise levels must meet 45 dB as documented by the Sound Transmission Classification of the dwelling unit's exterior walls factoring in fenestration; (2) appropriate ventilation is provided by a mechanical ventilation system and not by opening doors or windows; and (3) an Operations and Maintenance plan is in place that requires periodically inspecting seals and repairing or replacing building components when their performance diminishes. The RE finds that eliminating outdoor gathering areas and implementing the mitigation measures proposed by ABD Engineering and Design April 16, 2024 (Found in "EBI</p>
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		Vancouver Washington Noise Assessment-Final" attachment) can bring the project into compliance for noise impacts.
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 Responsible Entity contacted Region 10 EPA for concurrence on the potential for Sole Source Aquifer impacts. According to the response, dated February 10, 2024, EPA staff found that the proposed project will not have a significant adverse impact on the Troutdale Aquifer System provided that the best management practices described in the submitted engineering stormwater plans are followed.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are no surface water bodies, marshy areas or other visible indications of potential wetlands areas on or adjacent to the Subject Property. According to the NWI Wetlands Map, there are no wetland areas in the vicinity of the Subject Property. The Subject Property appears to be in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to the National Park Service, US Department of the Interior, Nationwide Rivers Inventory, the Subject Property is not within proximity of a Wild and Scenic River System. The Subject Property appears to be 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	The Responsible Entity finds that the EPA EJSCREEN review provided in the partner worksheet does not adequately reflect the local race and poverty statistics and further notes that the "Neighborhoods at Risk" analysis used the wrong census tract for the project. The RE has provided a comparative analysis of the census tracts surrounding the project site with the balance of the city. (See attached "City

		<p>of Vancouver Environmental Justice Determination". Based on the 2020 decennial demographic data, the area surrounding the project is comparatively similar to the rest of the City in terms of racial composition. The RE does not find a disparity in racial composition in the project area. Also based on census data, the RE has determined that the area surrounding the project has a lower income and higher poverty rate population compared to the City of Vancouver as a whole. The RE has determined that the proposed project will benefit the populations with lower income facing poverty in the surrounding area as it continues to redevelop.</p>
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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	Multi-family residential uses are permitted by the City zoning code. The project has received land use permit approval demonstrating compliance with local comprehensive and zoning plan regulations. The project appears consistent with community's land use and development plans and no change in zoning will be required. The project appears compatible with surrounding	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		land uses and will not contribute to urban sprawl.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	The project does not appear to significantly affect or be affected by slope conditions. There are no indications of cross-lot runoff, swales, or drainage flows on site, fill material, or active rills or gullies on the property. Structural fill placed per geotechnical report recommendations post-demolition of SFH at 1101 W 13th St. Based on the development of adjacent sites, it appears the soils are stable and suitable for the proposed improvements. The valuation assumes that the subject is developed in accordance with appropriate engineering for soil stability. A review of soil suitability will also be required as part of the structural building permit review process.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	No additional nuisances or hazards were observed. The proposed development activities will not result in any significant noise generation or result in the surrounding neighborhood being exposed to excessive noise levels. Construction generated noise will be mitigated by standard municipal ordinances. The project does not appear to be affected by natural hazards such as: faults, cliffs, unprotected water bodies, seismic activity, wind/storm hazards, poisonous plants, insects and animals, hazardous terrain. The project does not appear to be affected by built hazards such as: dangerous intersection, inadequate separation of pedestrian and vehicle traffic, quarries, dumps, oil or gas	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		wells. The project does not appear to be affected by nuisances such as: animal livestock operations, slaughterhouses, noxious odors, glare from parking area, urban blight. The project does not appear to be influenced by any of the following: building deterioration, deferred maintenance, obsolete public facilities, inadequate off-street parking.	
SOCIOECONOMIC			
Employment and Income Patterns	2	The project will not significantly increase or decrease long term employment opportunities. The project will create conditions favorable to commercial, industrial or institutional operation or development. No impacts are anticipated from the proposed new construction.	
Demographic Character Changes / Displacement	2	The project does not appear to severely alter residential, commercial or industrial uses. The project does not appear to destroy or harm any community institution(s) or gathering space(s). the subject's CMA has a lower median household income and a much higher percentage of renters compared to the greater SMA. Household income is a measure of the householder and other persons 15 years and older living in the household, whether related to the householder or not. Household income is also a more accurate reflection of the community at large. There is a lack of affordable housing options for households within the CMA and the SMA.	
Environmental Justice EA Factor	2	Based on the 2020 decennial demographic data, the area surrounding the project is	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>comparatively similar to the rest of the City in terms of racial composition. The RE does not find a disparity in racial composition in the project area. Based on American Community Survey 5-year estimate data there is however a significant income and poverty disparity in the surrounding census tracts (20.3 and 27.1%) compared to the City as a whole (12.5%). The RE has determined that the proposed project will benefit the populations with lower income in the surrounding area as it continues to redevelop.</p>	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	<p>No school-aged children will reside at this project. Additional or alternative services do not appear to be needed to ensure safe, suitable access to schools. No impacts are anticipated from the proposed new construction.</p>	
Commercial Facilities (Access and Proximity)	2	<p>The downtown core is a walkable area (.5 miles) with a variety of retail shops, eateries, art galleries, and community amenities, and it hosts many community events throughout the year. Adequate and convenient retail services appear located nearby and meet the needs of project occupants/users. The nearest full service grocery store is located .6 miles from the project site. The existing retail and commercial services should benefit from the additional residents provided by the project. No impacts are anticipated from the proposed new construction.</p>	
Health Care / Social Services (Access and Capacity)	2	<p>Social services will be located on-site. Emergency and non-emergency health service appear to be available and accessible and there appears to</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>be capacity in the number of providers and medical staff serving the area. The closest hospital is located 1.6 miles away. The closest fire station is located 1.2 miles away. The closest Police station is 1.2 miles away. Social services are currently near prospective users/residents. The supply of trained social workers, counselors, and related administrative personnel appear to support any increase in demand for service resulting from the needs of the project residents. No impacts are anticipated from the proposed new construction</p>	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	<p>No evidence of improper solid waste management or the improper disposal of hazardous substances or petroleum products was observed at the time of reconnaissance. The existing solid waste disposal system appears adequate to serve the proposed development and will not overload the design capacity of the facilities. A review of the solid waste facilities was reviewed and approved through the City land use permit review. No impacts are anticipated from the proposed new construction.</p>	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	<p>The existing wastewater system appears to adequately serve the proposed development and will not overload the design capacity. The City of Vancouver utility service providers approved the project for sanitary and storm sewer capacity as part of the land use permit approval process. No impacts are anticipated from the proposed new construction. EBI recommends the developer provide "Will Serve" letters for sewer services.</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Water Supply (Feasibility and Capacity)	2	The existing wastewater system appears to adequately serve the proposed development and will not overload the design capacity. The City of Vancouver utility service providers approved the project for municipal water service capacity as part of the land use permit approval process. No impacts are anticipated from the proposed new construction. EBI recommends the developer provide "Will Serve" letters for sewer services.	
Public Safety - Police, Fire and Emergency Medical	2	Emergency services such as the Emergency Management Service (EMS), Fire and Police services appear to be located within a reasonable proximity to the Subject Property and reportedly have the capability to be onsite within 15 minutes. The City of Vancouver reviewed and approved the project in terms of building safety and water supply as part of the land use permit process. No impact is anticipated at this time, however area emergency services information should be posted during construction. The project's location appears to provide adequate access to police, fire and emergency medical services and the average response time and capacity of police, fire, and emergency medical services is sufficient. Residents will be safe and secure. No impacts are anticipated from the proposed new construction.	
Parks, Open Space and Recreation (Access and Capacity)	2	Open spaces, recreational and cultural facilities appear to be located within a reasonable proximity to the project and are safely accessible through pedestrian walkways, bicycle routes or mass	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		transportation. The project is not projected to overload these facilities. There is programming available at these facilities. No impacts are anticipated from the proposed new construction.	
Transportation and Accessibility (Access and Capacity)	2	Access to the subject site is average, with a local arterial (W Mill Plain Boulevard) about a block to the north and the major I-5 arterial about a mile to the east. The nearest public transportation is a bus stop about a block to the north at W Mill Plain and Lincoln Avenue. Mass transportation is available in the community and there is adequate capacity and frequency of service to provide access to employment, retail, educational institutions, healthcare, and recreation. There is adequate capacity in the roadway system to absorb additional traffic generated by the project. A traffic analysis was performed by the applicant and reviewed by the City of Vancouver Transportation engineer as part of the land use permit approval process. No adverse impacts are anticipated from the proposed new construction.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	No unique natural features or areas were identified within visible distance of the Subject Property. Unique natural features or areas include bluffs, cliffs, public or private scenic areas, and/or special natural resources on the property or in the vicinity of the property. The project will contain landscaping. It will be designed in such a way as to avoid the introduction of invasive species, and maintenance will be conducted	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		so as to avoid the use of harmful chemicals.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	Based on a review of the USFWS online Critical Habitat Portal (http://criticalhabitat.fws.gov), the proposed development is not located within a designated critical habitat. EBI also utilized the USFWS Information for Planning and Consultation (IPaC) online project review tool (http://ecos.fws.gov/ipac) to identify any species that are federally listed, or proposed for listing under the Endangered Species Act (ESA) as either endangered or threatened, and that are known to occur within the Subject Property vicinity. According to the IPaC report, three such federal-listed (i.e. endangered or threatened) species, one proposed threatened species, and one candidate species are known to occur within the Subject Property vicinity. A review of the identified species and their associated habitats with respect Subject Property show suitable habitats capable of supporting the listed species were not noted at the Subject Property As such, the proposed development is anticipated to have 'No Effect' on the identified species. The project will not damage or destroy rare, threatened, or endangered species or their habitats. In this manner, it also will have no effect on state or federal threatened species, endangered species, or species of concern.	
Other Factors 1	2	The Subject Property's county or air quality management district is in attainment status for most criteria	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		pollutants. The City of Vancouver is in maintenance for ozone and CO2.The Subject Property appears to be in compliance with the Clean Air Act.	
Other Factors 2	2	No other factors of concern were identified at or in the vicinity of the Subject Property.	
CLIMATE AND ENERGY			
Climate Change	3	EBI has completed the Climate Risk Review (attached). Current climate risks were not identified. The following potential foreseeable future climate risks were identified: Wildfire, Extreme Heat, Localized Flooding, and Drought.	Wildfire - Project will be utilizing brick and fiber cement cladding materials, both of which are non-combustible. For roofing we will be using a TPO membrane roof that has a Class A fire rating. Encourage building developers to use: -Noncombustible materials (e.g., stone, brick, stucco) for new construction. -Fire-resistant roofing and building materials and prohibit wooden shingles and wood shake roofs. -Enclose foundations in wildfire-prone areas, rather than exposing undersides to blown embers. Extreme Heat - The project will be utilizing doublepane windows. Central spaces will be air conditioned via central rooftop units and the units will be airconditioned through the use of ductless

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
			minisplits. The property will be equipped with air conditioning. Localized Flooding - Stormwater will be addressed through an onsite stormwater infiltration system in accordance with low impact development (LID) practices. Localized flash flooding is possible. The following mitigation measures should be put in place: The owner will consider an evacuation and safety plan. Routinely clean and repair stormwater drains. Drought - Native and drought tolerant landscaping has been incorporated into the project design. Design and install water-smart landscapes, including the incorporation of drought-tolerant plant species into landscaping to reduce dependence on irrigation. Use permeable streets, parking lots,
Energy Efficiency	2	The project will take advantage of following energy saving measures: insulation, window design and placement, lighting, heating/cooling, hot water systems. The project is	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		located near transit, shopping, services and employment locations.	

Supporting documentation

[LUP-83273 Lincoln Place II Land Use Staff Report.pdf](#)

[Climate Risk Review.pdf](#)

Additional Studies Performed:

Phase I ESA, HEROS, Phase II ESA, Tier I VES, Noise Assessment with STraCAT analysis, Section 106 SHPO/THPO Consultation, endangered species desk review, Climate Risk Review, NMFS consultation, and EPA consultation.

[Climate Risk Review\(1\).pdf](#)

[1723000963 Vancouver WA NR Species Review.pdf](#)

[24-4625 VHA - Lincoln Place II HUD Noise Study - 240416.pdf](#)

[24353 13thSt PhaseII FINAL signed.pdf](#)

[2024 01 19 Lincoln Place II Phase I ESA.pdf](#)

Field Inspection [Optional]: Date and completed

by:

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

All agencies and persons consulted following 50.4, as provided in the Related Laws and Authorities Section, including NEPAassist, FEMA, CBRS Mapper, iPac, TigerWeb, SHPO, SSA, EPA, NPS Wild and Scenic Rivers, as well as additional reference documents, agencies and persons consulted are outlined within the ERR.

<https://www.epa.gov/nepa/nepassist>

<https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=showCircleSearchAirportsForm>

<https://coast.noaa.gov/czm/mystate/>

<https://www.fws.gov/CBRA/Maps/Mapper.html>

<https://msc.fema.gov/portal/home>

<https://www.fema.gov/flood-insurance/work-with-nfip/community-status-book>

<https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466>

<https://www.epa.gov/nepa/nepassist>

<https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=9ebb047ba3ec41ada1877155fe31356b>

<https://www.fws.gov/wetlands/>

<https://www.rivers.gov/map.php>

<https://nps.maps.arcgis.com/apps/View/index.html?appid=ff42a57d0aae43c49a88daee0e353142>

<https://www.hudexchange.info/resources/>

topic=%5B%22Environmental%20Review%22%5D&relmat=1&q=&tt=&predefdr=&orderby=searchDate&loc=%5B%5D&ct=%5B%5D&dr=&na=0&cp=1#poc The EDR Radius MapTM Report with GeoCheck(R); Historical Resources (City Directories, Aerial Maps, Topographic Maps, Sanborn Maps) City of Vancouver Planning Dept- Mark Person City of Vancouver Transportation Engineer- Eric Hahn City of Vancouver Fire Marshal- Andrew Jorgenson City of Vancouver Solid Waste-- Amanda Romero City of Vancouver Water Engineer- Giff Hancock City of Vancouver Sewer Engineer- Aaron Odegard City of Vancouver Stormwater Engineer- Mike Swanson City of Vancouver Building plans examiner- Ryan McTague

List of Permits Obtained:

The project has been approved for building permit issuance and has also received land use approval from the City of Vancouver. The outstanding civil permit will be obtained prior to construction activities.

Public Outreach [24 CFR 58.43]:

No public outreach has been performed at this time. This ERR will be available to the public review as part of HUD's environmental review process approval.

Cumulative Impact Analysis [24 CFR 58.32]:

There are no cumulative impacts anticipated. No undue impacts from the project will occur to factors such as healthcare, transportation, water and sewer utilities, infrastructure, and schools. Any foreseeable future climate hazards identified in the attached Climate Risk Review are being addressed per the suggested mitigation measures.

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

VHA considered other sites but always held a preference for the subject property due to its direct proximity to existing Lincoln Place Apartments, a 30-unit permanent supportive housing (PSH) building. The programming intent has been to construct a physical connection between the two buildings via a ground floor breezeway in order to improve the efficiencies of service delivery for residents. Throughout the design phase, careful consideration was paid to the overall neighborhood context and potential environmental impact of the project. This approach helped to drive decisions around building footprint, landscaping, stormwater management, and materials selection.

No Action Alternative [24 CFR 58.40(e)]

The "no action" alternative is that the subject properties will remain vacant lots and not provide much needed permanent supportive housing for individuals experiencing homelessness in the Vancouver community.

Summary of Findings and Conclusions:

Analysis of the environmental assessment factors has concluded that the project is not anticipated to impact the environment. However, potential foreseeable future climate risks were identified. Mitigation measures for these conditions are highlighted in the following section of the ERR or attached Climate Risk Review

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Endangered Species Act	Provide a GULD rated filter catch basin for street runoff. Rooftop HVAC systems will be painted and maintained to ensure paint is not chipping or peeling due to the potential of galvanized metals releasing zinc into the runoff. Galvanized metals in roofing or gutters will be painted and maintained to prevent rain from introducing zinc into the runoff. These mitigation measures will be implemented during construction.	N/A	The information was submitted to the City of Vancouver, tracking ID HUD WCRO-2020-00512, response date April 5, 2024, stating "Runoff from the roof and on-site parking lot would be conveyed to an infiltration system and treated on site. A bioretention facility would be installed in the off-site parking lot. Runoff from the frontage improvements	

			<p>would be collected in a GULD-rated Contech ZPG filter catch basin prior to conveyance to the municipal system. On site addition of treatment will reduce, though not completely avoid, stormwater effects in the receiving water body, the Columbia River. HUD projects have an independent obligation to manage the stormwater load, therefore NMFS reiterates the program's conditions: 1)Any rooftop HVAC system must be under a roofed structure or painted. If it's painted it requires regular maintenance to ensure paint is not chipping or peeling due to the potential of galvanized metals releasing zinc into the runoff (which is harmful to fish in the freshwater environment). 2)</p>	
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			Galvanized metals in roofing or gutters must be painted to prevent rain from introducing zinc into the runoff. If paint begins to flake or peel, paint must be refreshed. Please be sure to provide post-construction followup materials within 60 days post-project. "	
Contamination and Toxic Substances	Mitigation measures to obtain compliance for contamination and toxic substances are described in the building permit plans designed by MKE & Associates, Inc and Access Architecture. See "Radon Mitigation Permit Plans" and ""Lincoln Place II Addendum Narrative" update attachments. VHA hired a 3rd party engineering review of the proposed mitigation plans that confirmed the MKE & Associate design including additional recommendations. See the "Vapor Barrier Engineering" attachment dated April 1, 2024, by PBS engineering.	N/A	The proposed recommendations for the Vapor Barrier and Radon Mitigation System will be part of the architectural plans.	
Noise Abatement and Control	Based on the Normally Unacceptable noise levels at all NALs on all floors, interior noise mitigation of 31 dB at a minimum will have to be completed in the proposed building at	N/A	Based on the Normally Unacceptable noise levels at all NALs on all floors, interior noise mitigation of 31	

	<p>the Subject Property as required by the HUD Sound Transmission Classification Assessment Tool (STraCAT), factoring in a 3 dB margin of error per the HUD Guidelines. According to the Noise Study, prepared by and dated April 16, 2024, ABD completion of an analysis of the proposed building using HUD's Sound Transmission Classification Assessment Tool (STraCAT) online calculator. The calculated noise attenuation provided by the basis-of-design facade elements (with composite STC ratings of 34.01, 35.44, and 35.64 dB) is sufficient for both the measured exterior DNL of 71 dB as well as the desktop noise calculated DNL of 73 dB. Per HUD Notice CPD-16-19, balconies are considered exempt from the noise assessment except where bedrooms and studio apartments have direct access to balconies. For new construction projects in Unacceptable and Normally Unacceptable noise areas, bedrooms and studio apartments with balconies are permitted by HUD if the following conditions are met: (1) interior noise levels must meet 45 dB as documented by the Sound Transmission Classification of the dwelling unit's exterior walls factoring in</p>		<p>dB at a minimum will have to be completed in the proposed building at the Subject Property as required by the HUD Sound Transmission Classification Assessment Tool (STraCAT), factoring in a 3 dB margin of error per the HUD Guidelines. According to the Noise Study, prepared by and dated April 16, 2024, ABD completion of an analysis of the proposed building using HUD's Sound Transmission Classification Assessment Tool (STraCAT) online calculator. The calculated noise attenuation provided by the basis-of-design facade elements (with composite STC ratings of 34.01, 35.44, and 35.64 dB) is sufficient for both the measured exterior DNL of 71 dB as well as the desktop noise calculated DNL of</p>	
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	<p>fenestration; (2) appropriate ventilation is provided by a mechanical ventilation system and not by opening doors or windows; and (3) an Operations and Maintenance plan is in place that requires periodically inspecting seals and repairing or replacing building components when their performance diminishes.</p>		<p>73 dB. Per HUD Notice CPD-16-19, balconies are considered exempt from the noise assessment except where bedrooms and studio apartments have direct access to balconies. For new construction projects in Unacceptable and Normally Unacceptable noise areas, bedrooms and studio apartments with balconies are permitted by HUD if the following conditions are met: (1) interior noise levels must meet 45 dB as documented by the Sound Transmission Classification of the dwelling unit's exterior walls factoring in fenestration; (2) appropriate ventilation is provided by a mechanical ventilation system and not by opening doors or windows; and (3) an Operations and Maintenance</p>	
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			plan is in place that requires periodically inspecting seals and repairing or replacing building components when their performance diminishes.	
Climate Change	<p>Wildfire - Project will be utilizing brick and fiber cement cladding materials, both of which are non-combustible. For roofing we will be using a TPO membrane roof that has a Class A fire rating. Encourage building developers to use: - Noncombustible materials (e.g., stone, brick, stucco) for new construction. -Fire-resistant roofing and building materials and prohibit wooden shingles and wood shake roofs. - Enclose foundations in wildfire-prone areas, rather than exposing undersides to blown embers.</p> <p>Extreme Heat - The project will be utilizing doublepane windows. Central spaces will be air conditioned via central rooftop units and the units will be airconditioned through the use of ductless minisplits. The property will be equipped with air conditioning. Localized Flooding - Stormwater will be addressed through an onsite stormwater</p>	N/A	<p>Wildfire - Project will be utilizing brick and fiber cement cladding materials, both of which are non-combustible. For roofing we will be using a TPO membrane roof that has a Class A fire rating. Encourage building developers to use: -Non-combustible materials (e.g., stone, brick, stucco) for new construction. - Fire-resistant roofing and building materials and prohibit wooden shingles and wood shake roofs. -Enclose foundations in wildfire-prone areas, rather than exposing undersides to blown embers.</p> <p>Extreme Heat -</p>	

	<p>infiltration system in accordance with low impact development (LID) practices. Localized flash flooding is possible. The following mitigation measures should be put in place: The owner will consider an evacuation and safety plan. Routinely clean and repair stormwater drains. Drought - Native and drought tolerant landscaping has been incorporated into the project design. Design and install water-smart landscapes, including the incorporation of drought-tolerant plant species into landscaping to reduce dependence on irrigation. Use permeable streets, parking lots,</p>		<p>The project will be utilizing double-pane windows. Central spaces will be air conditioned via central rooftop units and the individual units will be airconditioned through the use of ductless minisplit units. The property will be equipped with air conditioning. Localized Flooding - Stormwater will be addressed through an onsite stormwater infiltration system in accordance with low impact development (LID) practices. Localized flash flooding is possible. The following mitigation measures should be put in place: The owner will consider an evacuation and safety plan. Routinely clean and repair stormwater drains. Drought - Native and drought tolerant landscaping has</p>	
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			<p>been incorporated into the project design. Design and install water-smart landscapes, including the incorporation of drought-tolerant plant species into landscaping to reduce dependence on irrigation. Use permeable streets, parking lots, or sidewalks; and increase urban green space to reduce runoff, promote groundwater recharge, and mitigate drought impacts.</p>	
<p>Historic Preservation</p>	<p>The cultural resource survey report by Archaeological services LLC recommended "inadvertent discovery" procedural notes on the ground disturbing construction plans and that a professional archaeologist be present to monitor the initial ground disturbing grading activities.</p>	<p>N/A</p>	<p>The RE confirmed that the Inadvertent discovery procedural notes are on the ground disturbing construction plans. The VHA has confirmed it intends to have professional archaeologists monitor the initial site grading activities to ensure protection of below ground cultural resources.</p>	

Project Mitigation Plan

Summarized above 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 are to be incorporated into project contracts, development agreements and other relevant documents.

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

Based on a review of the Federal Aviation Administration (FAA) circle search for airports and the EPA NEPAassist mapping tool, the Subject Property is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The Pearson Field Airport is a civil airport, located 5,200-feet southeast. The subject property is in compliance with Airport Hazards requirements.

Supporting documentation

[Airport-Hazards-Partner-Worksheet.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

[Coastal-Barrier-Resources-Act-Partner-Worksheet.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

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

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

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

Yes

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

[FEMA FIRM Map.pdf](#)

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

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

No

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

Yes

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

Yes

✓ No

Screen Summary

Compliance Determination

EBI reviewed the Federal Emergency Management Agency (FEMA) Flood Insurance Map, Community Map Panel # 53011C0368D, dated September 5, 2012. No other maps, preliminary or otherwise are available. The Subject Property Flood Zone Determination appears to be Zone X, defined as an area outside the 100-year (1%) and 500-year (2%) floodplains. The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. 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

[Flood-Insurance-Partner-Worksheet.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 most criteria pollutants. Vancouver is in maintenance status for ozone or carbon monoxide. The chief engineer of the Southwest Clean Air Agency also confirmed that emissions from the project would "not require any permit from our agency, violate any requirement in the ozone or carbon monoxide maintenance plans, or threaten

the attainment status for either pollutant." The project is in compliance with the Clean Air Act.

Supporting documentation

[SWCAA-Ozone and CO Maintenance Area Boundary Map.pdf](#)

[SWCAA Vancouver Air Quality Maintenance Areas.pdf](#)

[Air-Quality-Partner-Worksheet.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

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

Concurrence from Dept. of Ecology for Coastal Zone Management is no longer required under a Part 58 or Part 50 Environmental Review in Washington State. However, at the time of project development, the activity may trigger review if it falls under other parts of the CZMA regulations for federal agency activities (Title 15 CFR Part 930, subpart C), or consistency for activities requiring a federal license or permit (Title 15 CFR Part 930, Subpart D) and will be subject to all enforceable policies of the Coastal Zone Management Program. It is during the local permitting process that a project might be subject to CZM and further review by the Dept of Ecology.

Supporting documentation

[Coastal Management Zones Map.pdf](#)

[Coastal-Zone-Management-Act-Partner-Worksheet.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.

Mitigation measures to obtain compliance for contamination and toxic substances are described in the building permit plans designed by MKE & Associates, Inc and Access Architecture. See "Radon Mitigation Permit Plans" and ""Lincoln Place II Addendum Narrative" update attachments. VHA hired a 3rd party engineering review of the proposed mitigation plans that confirmed the MKE & Associate design including additional recommendations. See the "Vapor Barrier Engineering" attachment dated April 1, 2024, by PBS engineering.

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

Supporting documentation

[Radon Mitigation Permit Plans.pdf](#)

[Dept of Health Radon Testing Map.pdf](#)

[Lincoln Place II Addendum Narrative.pdf](#)

[Vapor Barrier Engineering.pdf](#)

[Lincoln Place II Phase II ESA.pdf](#)

[Lincoln Place II Phase I ESA.pdf](#)

[Contamination-and-Toxic-Substances-Multifamily-Partner-Worksheet.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:

Provide a GULD rated filter catch basin for street runoff.
Rooftop HVAC systems will be painted and maintained to ensure paint is not chipping or peeling due to the potential of galvanized metals releasing zinc into the runoff. Galvanized metals in roofing or gutters will be painted and maintained to prevent rain from introducing zinc into the runoff. These mitigation measures will be implemented during construction.

No mitigation is necessary.

Screen Summary**Compliance Determination**

Based on a review of the USFWS online Critical Habitat Portal (<http://criticalhabitat.fws.gov>), the proposed development is not located within a designated critical habitat. EBI also utilized the USFWS Information for Planning and Consultation (IPaC) online project review tool (<http://ecos.fws.gov/ipac>) to identify any species that are federally listed or proposed for listing under the Endangered Species Act (ESA) as either endangered or threatened, and that are known to occur within the subject property vicinity. According to the IPaC report, three such federal-listed (i.e. endangered or threatened) species, one proposed threatened species, and one candidate species are known to occur within the Subject Property vicinity. A review of the identified species and their associated habitats with respect Subject Property show suitable habitats capable of supporting the listed species were not noted at the Subject Property. As such, the proposed development is anticipated to have 'No Effect' on the identified species. EBI reviewed the 2020 Programmatic Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Consultation for the U.S. Department of Housing and Urban Development Housing Programs in Washington State Appendix A (Consultation Guidance for Washington State) and determined that the Subject Property and proposed construction footprint is located entirely within Clark County, Washington, in a densely urban area approximately 0.36 miles northeast of the Columbia River which is an Essential Fish Habitat (EFH) and designated critical habitat for several salmon species and Eulachon. Based on this preliminary review possible impacts due to stormwater discharge are possible. Additional review and consultation with NMFS is required. The information was submitted to the City of Vancouver, tracking ID HUD WCRO-2020-00512, response date April 5, 2024, stating "Runoff from the roof and on-site parking lot would be conveyed to an infiltration system and treated on site. A bioretention facility would be installed in the off-site parking lot. Runoff from the frontage improvements would be collected in a GULD-rated Contech ZPG filter catch basin prior to conveyance to the municipal system. On site addition of treatment will reduce, though not completely avoid, stormwater effects in the receiving water body, the Columbia River. HUD projects have an independent obligation to manage the stormwater load, therefore NMFS reiterates the program's conditions: 1) Any rooftop HVAC system must be under a roofed structure or painted. If it's painted it requires regular maintenance to ensure paint is not chipping or peeling due to the potential of galvanized metals releasing zinc into the runoff (which is harmful to fish in the freshwater environment). 2) Galvanized metals in roofing or gutters must be painted to prevent rain from introducing zinc into the runoff. If paint begins to flake or peel, paint must be refreshed. Please be sure to provide post-construction follow-up materials within 60 days post-project. "

Supporting documentation

[GeoTech Report - Offsite Parking Lot.pdf](#)

[GeoTech Report - Multifamily Development.pdf](#)

[Action Notification Form.pdf](#)

[Lincoln Place II - Project Plans.pdf](#)

[NMFS ESA Confirmation and Mitigation decision FINAL.pdf](#)

[Endangered-Species-Act-Partner-Worksheet.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

EBI Review- Based upon site reconnaissance, interviews, and a review of state and local records, EBI identified no evidence of former or existing ASTs located at the Subject Property. No industrial facilities handling explosive or fire-prone materials such as liquid propane, gasoline or other storage tanks are adjacent to or visible from the Subject Property. EBI submitted letters to local and state authorities to gather data about the multiple ASTs located within one mile of the Subject Property. Results are pending. The RE finds there are several AST sites within a mile of the project site. The RE has prepared an AST evaluation of nearby tanks using the HUD acceptable distance calculator. The RE finds that the project meets acceptable separation distance requirements.

Supporting documentation

[AST Data.pdf](#)

[Explosives-Partner-Worksheet.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

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

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

Yes

✓ No

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

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 soils. According to the U.S. Census, the Subject Property is located in an Urbanized Area or Urbanized Cluster Area. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[Farmlands-Partner-Worksheet.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

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

[FEMA FIRM Map.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The FEMA Map Service Center provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use **the best available information** to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site.

Does your project occur in a floodplain?

No

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

Yes

Screen Summary**Compliance Determination**

EBI reviewed the Federal Emergency Management Agency (FEMA) Flood Insurance Map, Community Map Panel # 53011C0368D, dated September 5, 2012. No other maps, preliminary or otherwise are available. The Subject Property Flood Zone Determination appears to be Zone X, defined as an area outside the 100-year and 500-year (2% annual chance of flooding) floodplains. As such, no further action appears warranted regarding this factor. This project does not occur in a floodplain. The Subject Property appears to be in compliance with Executive Order 11988. The RE attempted to use the Federal Flood Standard Support tool but found no community data available. The FEMA map provided in the partner worksheet shows the project site is approximately .25 of a mile from the 500-year flood plain boundary and 40 feet in elevation above the 500-year flood plain boundary elevation. The project site is in compliance with Executive Order 11988.

Supporting documentation

[Federal Flood Standard Support Tool Report.pdf](#)
[Floodplain-Management-Partner-Worksheet.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

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

Threshold

Is Section 106 review required for your project?

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

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

Step 1 – Initiate Consultation

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

✓ State Historic Preservation Offer (SHPO) Completed

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

✓ Confederated Tribes and Bands of the Yakama Nation Completed

✓ Confederated Tribes of Siletz Indians of Oregon	Completed
✓ Cowlitz Indian Tribe	Completed
✓ CT of the Grand Ronde Community of Oregon	Completed
✓ CT of the Warm Springs Reservation of Oregon	Completed
✓ CT of Warm Springs Reservation of Oregon	Completed
✓ Nez Perce Tribes	Completed

Other Consulting Parties

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

Consulting parties were determined by the Tribal Directory Assessment Tool (TDAT). Invitation to comment was sent on January 31st, 2024 by the Responsible Entity (see attached Comment Request Letter). No comments were received during the 30-day comment period.

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

Was the Section 106 Lender Delegation Memo used for Section 106 consultation?

Yes

No

Step 2 – Identify and Evaluate Historic Properties

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

Subject property

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**

The Responsible Entity acted as the consulting party with the regional tribes identified using the HUD TDAT tool. Invitation to comment was sent on January 31st, 2024, by the RE (see attached Tribal Contact and Comment Request Letter). The notice included the project description, details, and site plans. The notice also included a copy of the archaeological cultural resources survey prepared by Archaeological Services LLC. The survey report recommended an inadvertent discovery plan be placed on the construction / grading plans. The RE has confirmed that the inadvertent discovery notes are on the face of the approved construction / grading plans. No comments were received from tribes during the 30-day comment period. The Responsible Entity reviewed the property use and structural history and found that a building (circa 1901) was demolished from the proposed parking lot site in May of 2023. The Responsible Entity reviewed information to determine whether a regulatory violation through a choice limiting action had occurred. According to VHA the building was abandoned and boarded up when purchased in July of 2022. The structure was a community nuisance with multiple break-ins and camping inside the structure. The VHA decided to eliminate the hazard by demolishing the building. The VHA and Washington Department of Commerce requested a Section 106 review in August of 2022 from SHPO who subsequently determined the structure not eligible for listing on August 19, 2022. A demolition permit was issued by the City of Vancouver to the VHA contractor in May of 2023. The timeline of events based on City permit records and applicant provided information is as follows: 7-1-2022- VHA acquires Lincoln Place II parking lot site (Non-HUD funds) 8-19-2022- SHPO determines existing building to be ineligible for historic listing/registers. (Non-HUD funds) 5-17-2023-Vancouver building demolition permit issued (Non-HUD funds) 5-23-2023- VHA submits complete land use permit application (Non-HUD funds) 8-30-2023- SHPO determines no impact to historic resources for project sites 9-2023- VHA board approves the use of project-based vouchers (HUD funding nexus begins) 11-2023- HUD approves project-based vouchers 11-29-2023- VHA requests EA review assistance from Responsible Entity The RE finds that no HUD funding was dedicated/used prior to the nexus of the project-based voucher approval by the VHA board and subsequent HUD approval. Based on Section 106 consultation there are no historic properties impacted. The project is in compliance with Section 106. No comments were received from contacted tribes. The recommended inadvertent discovery notes are on the ground disturbing construction plans. The VHA intends to have professional archaeologists monitor the initial site grading activities to ensure protection of below ground cultural resources.

Supporting documentation

[DAHP-No Historic Properties Impacted Aug 2023.pdf](#)

[DAHP Not Eligible Determination Aug 2022.pdf](#)

[Tribe Contact and Comment Request 1-31-24.pdf](#)

[TDAT List.pdf](#)

[DAHP Eligible Properties Map-.pdf](#)

[Historic-Preservation-Partner-Worksheet.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Noise Abatement and Control

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

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

- New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

Rehabilitation of an existing residential property

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

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster
 None of the above

4. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000’ from a major road, 3000’ from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

There are no noise generators found within the threshold distances above.

- ✓ Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

- ✓ Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Is your project in a largely undeveloped area?

- ✓ No

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

Yes

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

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

6. **HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.**

- ✓ Mitigation as follows will be implemented:

Based on the Normally Unacceptable noise levels at all NALs on all floors, interior noise mitigation of 31 dB at a minimum will have to be completed in the proposed building at the Subject Property as required by the HUD Sound Transmission Classification Assessment Tool (STraCAT), factoring in a 3 dB margin of error per the HUD Guidelines. According to the Noise Study, prepared by and dated April 16, 2024, ABD completion of an analysis of the proposed building using HUD's Sound Transmission Classification Assessment Tool (STraCAT) online calculator. The calculated noise attenuation provided by the basis-of-design facade elements (with composite STC ratings of 34.01, 35.44, and 35.64 dB) is sufficient for both the measured exterior DNL of 71 dB as well as the desktop noise calculated DNL of 73 dB. Per HUD Notice CPD-16-19, balconies are considered exempt from the noise assessment except where bedrooms and studio apartments have direct access to balconies. For new construction projects in Unacceptable and Normally Unacceptable noise areas, bedrooms and studio apartments with balconies are permitted by HUD if the following conditions are met: (1) interior noise levels must meet 45 dB as documented by the Sound Transmission Classification of the dwelling unit's exterior walls factoring in fenestration; (2) appropriate ventilation is provided by a mechanical ventilation system and not by opening doors or windows; and (3) an Operations and Maintenance plan is in place that requires periodically inspecting seals and repairing or replacing building components when their performance diminishes.

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

Based on the Normally Unacceptable noise levels at all NALs on all floors, interior noise mitigation of 31 dB at a minimum will have to be completed in the proposed building at the Subject Property as required by the HUD Sound Transmission Classification Assessment Tool (STraCAT), factoring in a 3 dB margin of error per the HUD Guidelines. According to the Noise Study, prepared by and dated April 16, 2024, ABD completion of an analysis of the proposed building using HUD's Sound Transmission Classification Assessment Tool (STraCAT) online calculator. The

calculated noise attenuation provided by the basis-of-design facade elements (with composite STC ratings of 34.01, 35.44, and 35.64 dB) is sufficient for both the measured exterior DNL of 71 dB as well as the desktop noise calculated DNL of 73 dB. Per HUD Notice CPD-16-19, balconies are considered exempt from the noise assessment except where bedrooms and studio apartments have direct access to balconies. For new construction projects in Unacceptable and Normally Unacceptable noise areas, bedrooms and studio apartments with balconies are permitted by HUD if the following conditions are met: (1) interior noise levels must meet 45 dB as documented by the Sound Transmission Classification of the dwelling unit's exterior walls factoring in fenestration; (2) appropriate ventilation is provided by a mechanical ventilation system and not by opening doors or windows; and (3) an Operations and Maintenance plan is in place that requires periodically inspecting seals and repairing or replacing building components when their performance diminishes. The RE finds that eliminating outdoor gathering areas and implementing the mitigation measures proposed by ABD Engineering and Design April 16, 2024 (Found in "EBI Vancouver Washington Noise Assessment-Final" attachment) can bring the project into compliance for noise impacts.

Supporting documentation

[EBI Vancouver Washington Noise Assessment-Final.pdf](#)
[Lincoln Place II Addendum 01 - Noise Impact Mitigation.pdf](#)
[Noise-EA-Partner-Worksheet.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

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 Responsible Entity contacted Region 10 EPA for concurrence on the potential for Sole Source Aquifer impacts. According to the response, dated February 10, 2024, EPA staff found that the proposed project will not have a significant adverse impact on the Troutdale Aquifer System provided that the best management practices described in the submitted engineering stormwater plans are followed.

Supporting documentation

[Sole-Source-Aquifers-Partner-Worksheet.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service’s National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

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

No

Yes

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

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

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

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

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

**Screen Summary
Compliance Determination**

There are no surface water bodies, marshy areas or other visible indications of potential wetlands areas on or adjacent to the Subject Property. According to the NWI Wetlands Map, there are no wetland areas in the vicinity of the Subject Property. The Subject Property appears to be in compliance with Executive Order 11990.

Supporting documentation

[Wetlands-Partner-Worksheet.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

According to the National Park Service, US Department of the Interior, Nationwide Rivers Inventory, the Subject Property is not within proximity of a Wild and Scenic River System. The Subject Property appears to be in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Wild-and-Scenic-Rivers-Partner-Worksheet.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

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

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

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

Yes

No

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

Yes

No

Explain:

The EPA EJSCREEN Report for the Subject Property was generated to show the Environmental Justice Variables in comparison to various Environmental Indexes. The Environmental Justice Indices for the selected variables are below 80%. Additionally, the one mile low-income results are 36% with the minority results at 23%. The Neighborhoods at Risk tool was completed and shows the census tract to have 18% poverty rate, 44.5% people of color, and 43.1% housing rentals. The housing to be provided will benefit low income and minority populations.

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

Screen Summary**Compliance Determination**

The Responsible Entity finds that the EPA EJSCREEN review provided in the partner worksheet does not adequately reflect the local race and poverty statistics and further notes that the "Neighborhoods at Risk" analysis used the wrong census tract for the project. The RE has provided a comparative analysis of the census tracts surrounding the project site with the balance of the city. (See attached "City of Vancouver Environmental Justice Determination". Based on the 2020 decennial demographic data, the area surrounding the project is comparatively similar to the rest of the City in terms of racial composition. The RE does not find a disparity in racial composition in the project area. Also based on census data, the RE has determined that the area surrounding the project has a lower income and higher poverty rate population compared to the City of Vancouver as a whole. The RE has determined that the proposed project will benefit the populations with lower income facing poverty in the surrounding area as it continues to redevelop.

Supporting documentation

[City of Vancouver Environmental Justice Determination.pdf](#)
[Environmental-Justice-Partner-Worksheet.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No