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: Home-Forward-Civic-Station

HEROS Number: 900000010447737

Start Date: 01/14/2025

Responsible Entity (RE): GRESHAM, 1333 NW Eastman Parkway Gresham OR, 97030

RE Preparer: Rachel Nehse

State / Local Identifier:

Certifying Officer: Eric Schmidt

Grant Recipient (if different than Responsible Entity): Home Forward

Point of Contact: Robert Dell

Consultant (if applicable): Dudek

Point of Contact: Patricia Schuyler

40 CFR 1506.5(b)(4): The lead agency or, where appropriate, a cooperating agency shall prepare a disclosure statement for the contractor's execution specifying that the contractor has no financial or other interest in the outcome of the action. Such statement need not include privileged or confidential trade secrets or other confidential business information.

- ✓ By checking this box, I attest that as a preparer, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

Project Location: , Gresham, OR 97030

Additional Location Information:
The proposed Civic Station Development (Project) encompasses three separate parcels northeast of the intersection of Civic Drive and 15th Street in the City of Gresham, Oregon (Figure 1). The Project site includes three vacant parcels; two parcels (1S3E04DA-1202 and 1S3E04DA-1203) are owned by Metro while the northwest corner (0.4 acres) of a third parcel (1S3E04DD-01900) is owned by the City of Gresham (City). The Project Site consists of 2.3 acres total and is located within a mixed commercial and residential use area. The Project Site is currently zoned by the City of Gresham as Civic Neighborhood Transit High Density (CNTH). This zone is intended to encourage mixed use developments, higher density multifamily residential, office, and retail and service uses. Detached single family homes and duplexes are not permitted. The proposed Project Site is bordered by commercial land uses and a parking lot to the northeast, by additional parking areas to the southeast, to the south by NW 15th Street and commercial land uses, and to the west by NW Civic Drive and residential land uses.

Direct Comments to: Gresham City Hall
Community Development, Attn: Rachel Nehse
1333 NW Eastman Parkway
Gresham, OR 97030
Rachel.Nehse@GreshamOregon.gov

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:
The proposed Project is a partnership between the City of Gresham (Applicant) and Home Forward (developer) to construct affordable housing. The Project would provide 60 new affordable housing units reserved for individuals and families earning 60% or less of the Area Mean Income (AMI). Units would be a mixture of 2-bedroom (10), 3-bedroom (40), and 4-bedroom (10). Onsite community amenities include a residential courtyard with a two play areas for children, outdoor dining area, and lawn where residents could enjoy outdoor picnics and other activities. Pedestrian walkways would connect shared outdoor amenities and the parking lot to the residential building. The proposed Project Site is located in the city's Civic Neighborhood, which has been identified as one of the city's three core commercial areas for higher density mixed-use, pedestrian oriented development. The Civic Neighborhood is immediately adjacent to the Gresham Station Shopping Center to the south, is less than one mile from Gresham's vibrant, historic downtown to the east, and has direct Metropolitan Area Express (MAX) light rail service to downtown Portland with connecting service to

Portland International Airport. Therefore, residents of the proposed development would have access to multiple modes of public transit and amenities since the Gresham Station Shopping Center and Gresham's downtown which is home to many restaurants and retail amenities. Development of the proposed Project Site with affordable housing supports the goals outlined in the Gresham Comprehensive Plan and Gresham Housing Production Strategy.

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

The Purpose of the Civic Station Project is to provide affordable housing in an underserved area of City of Gresham. The Project would build 60 units of affordable housing in an area with high housing costs and limited affordable housing. The Project would build 60 units of affordable housing in an area with high housing costs and limited affordable housing. High housing costs, limited affordable housing supply, and scarcity of land pose challenges in the Project area. HUD's most recent comprehensive housing market analysis for Portland-Vancouver-Hillsboro, Oregon-Washington Housing Market Area (HMA), which includes the western half of Multnomah County including the City of Gresham, dated September 1, 2021, found that since 2012, home prices have generally increased at a faster rate than the median income. The National Association of Home Builders/Wells Fargo Housing Opportunity Index for the HMA, which represents the share of homes sold that would have been affordable to a family earning the local median income, decreased to 44.9 percent, down from 57.1 percent in 2020 and far below 72.9 percent in 2012. (HUD 2021). As a result, the Need for the Civic Station Project is driven by these facts: Every Home Forward property has a lengthy waitlist for affordable, safe, and well-managed housing options; there is a lack of quality affordable housing options for small and large households in Gresham, where there is access to good schools and community amenities; and the Portland metro area is experiencing increasing rents and home prices and associated displacement of low-income households. The Project would help address the City's housing needs in compliance with state requirements.

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

According to the Phase I Environmental Site Assessment (ESA) completed by Coles + Betts Environmental Consulting, LLC (C+BEC), the Project Site is currently vacant. The eastern half of the Project Site is a gravel-covered parking area while the central and eastern portions are grass-covered with a ditch, culvert and stormwater retention feature, a rock-covered area and rock-covered path, and dirt footpaths. Historical records for the Project parcels indicate the site has been vacant since at least 1860. Records indicate that Metro has owned their two parcels within the Project Sie since 2007 while the City of Gresham has owned their portion of the site since 1975. The Project Site was reportedly part of a 200-acre farm from the 1860s until the 1970s, with agricultural use of the southern portion of the property ceasing in the 1940s. The existing stormwater retention pond, which obtains stormwater from NW 15th Street, was installed in the central portion of the Project Site in approximately 2004.

Adjacent land uses consist of Northwest 16th Street and commercial land uses to the north and north and northeast, equipment storage for the City of Gresham to the Southeast, railroad tracks and a multi-tenant industrial building to the south, Northwest 15th Street and the Center for Advanced Learning to the south and southwest, and finally, Northwest Civic Drive and residential land uses to the west and northwest.

Maps, photographs, and other documentation of project location and description:
Attachment 1- Site Plan.pdf
Figure 2 Project Area.pdf
Figure 1 Project Location Portrait.pdf

Determination:

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

Approval Documents:
Home Forward Civic Station Signature Page- Signed 7-10.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	Rental Assistance Demonstration (RAD)		$0.00

Estimated Total HUD Funded, Assisted or Insured Amount: $1,800,000.00

Estimated Total Project Cost [24 CFR 58.2 (a)(5)]: $60,000,000.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	☐ Yes ☑ No	HUD's policy is to apply standards to prevent incompatible development around civil airports or military airfields, consistent with Title 24 of the Code of Federal Regulations (CFR), Part 51, Subpart D. According to the U.S. Environmental Protection Agency's (EPA) NEPAssist tool (EPA 2024b), there are no military airports within 15,000 feet of the subject property, or civilian airports within 2,500 feet of the subject property (EPA 2023a). The closest military airport is the Portland International Airport, about 70,423 northwest of the Project Site. The nearest civilian airport is the Portland-Troutdale Airport, approximately 25,248 feet northeast of the Project Site). Therefore, the proposed Project Site is in compliance with the HUD's airport hazards regulations, and no mitigation is warranted (see Attachment 2; see Airport Hazards Worksheet).
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	☐ Yes ☑ No	The Coastal Barrier Resources Act (CBRA) of 1982 designated relatively undeveloped coastal barriers along the Atlantic and Gulf coasts as part of the John H. Chafee Coastal Barrier Resources System (CBRS) and made these areas ineligible for most new federal expenditures and financial assistance. The Coastal Barrier Improvement Act (CBIA) of 1990 reauthorized the CBRA; expanded the CBRS to include undeveloped coastal barriers along the Florida Keys, Great

		Lakes, Puerto Rico, and U.S. Virgin Islands; and added a new category of coastal barriers to the CBRS called ''otherwise protected areas'' (OPAs). OPAs are undeveloped coastal barriers that are within the boundaries of an area established under federal, State, or local law, or held by a qualified organization, primarily for wildlife refuge, sanctuary, recreational, or natural resource conservation purposes. The Project is located in Oregon and is approximately 76 miles inland from the coast. There are no units of the CBRS in Oregon, and the Project Site is not within a CBRS unit (USFWS 2024a). Therefore, the Project is in compliance with the CBRA and CBIA (see Attachment 3).
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	☐ Yes ☑ No	The Flood Disaster Protection Act of 1973 (42 USC 4012a) requires that Projects receiving federal assistance and located in an area identified by the Federal Emergency Management Agency (FEMA) as being within a Special Flood Hazard Area (SFHA) be covered by flood insurance under the National Flood Insurance Program (NFIP). SFHAs are hazard areas that are subject to inundation by the base flood (1%-annual-chance flood) and are labeled on flood maps as zones starting with the letters A or V. Flood insurance is required by federally regulated lenders for properties within SFHAs to protect federal financial investments. Non-Special Flood Hazard Areas are either areas between the limits of the base flood and the 0.2%-annual-chance flood (flood zones labeled Zone X [shaded] or B) or areas which are higher than the elevation of the 0.2%-annual-chance flood (flood zones labeled Zone X [unshaded] or Zone C). Flood insurance is available in participating communities but is not required by regulation in

		these zones. According to FEMA Flood Insurance Rate Map (FIRM) 41051 C0214J (effective February 1, 2019) for the Proposed Project Site, the Project is within Zone X (Unshaded), an area of minimal flood hazard. Therefore, the Project Site is not located within a FEMA-designated SFHA. According to the National Flood Insurance Program's (NFIP) Community Status Book (FEMA 2024a), the Project Site city (Gresham) participates in the NFIP (Community Identification Number 410181B). Therefore, the Project is in compliance with flood insurance requirements (see Attachment 4; see Flood Insurance Worksheet).
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	☐ Yes ☑ No	The project is located in Multnomah County, which is in attainment status for all criteria pollutants. Some criteria show the district in "maintenance" status, but Oregon DEQ has confirmed that the district has completed the maintenance period and is considered in attainment status. Emails from DEQ staff are attached for reference. The project is in compliance with the Clean Air Act.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	☐ Yes ☑ No	The Coastal Zone Management Act (CZMA) of 1972 (16 USC 1451 et seq.) is administered at the federal level by the Coastal Programs Division within the National Oceanic and Atmospheric Administration's Office of Ocean and Coastal Resource Management (NOAA-OCRM). Projects that can affect the coastal zone must be carried out in a manner consistent with the state coastal zone management program under Section 307(c) and (d) of the CZMA. Oregon's watershed-based coastal zone, which was first delineated in 1971 by the Oregon Legislature, includes the state's costal watersheds

		and extends seaward three nautical miles and inland to the crest of the coast range, with a few exceptions. Within this zone, the Oregon Coastal Management Program (OCMP), applies to the land and water areas, except on lands owned by the federal government or held in trust under Indian tribal jurisdiction. The Proposed Project Site is located approximately 76 miles inland, in the City of Gresham. Neither the Project Site nor any portion of the City is located within the coastal zone. Therefore, the Project does not need to comply with the Coastal Zone Management Act (see Attachment 6; see Coastal Zone Management Worksheet).
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	☑ Yes ☐ No	Assessment of asbestos-containing materials (ACMs), lead-based paint (LBP), and mold was not considered within the scope of the site visit due to the lack of structures onsite. A Phase I Environmental Site Assessment (ESA) was conducted by Coles + Betts Environmental Consulting, Inc. (C+BEC) in April 2024 (Attachment 7). The Phase I ESA did not find any controlled recognized environmental conditions (RECs), or historical RECs on the Project Site. The Phase I identified three RECs and recommended further subsurface investigation through preparation of a Phase II ESA. The RECs are as follows: REC #1: The Phase II ESA completed in 2006 identified shallow soil within the western portion of the Project Site that contained lead concentrations exceeding the current Oregon DEQ Clean Fill Criterion. As a result, DEQ requires more recent soils data to determine if soils removed from this area of the Project Site may be disposed of, or reused, as clean fill. REC#2: The potential presence of agricultural containments of concern and currently

		unknown fill characterization onsite constitute a REC. REC #3: Adjacent parcels to the east and southeast were historically used for veneer milling operations. The unknown historical mill practices, and sawdust placement are considered an REC due to the potential presence of petroleum hydrocarbons and methane. Dudek prepared a Phase II ESA for the Project Site in September 2024 to evaluate potential soil impacts related to former agricultural use and potential undocumented fill, and potential soil vapor impacts for methane related to sawdust fill from the former adjoining sawmill (Attachment 8). Phase II ESA field sampling activities were conducted on July 22, 2024 and included identifying sampling locations, verifying subsurface utility clearance, and collecting soil and soil vapor samples. Results of the laboratory soil analysis did not detect OCPs in either composite soil samples and method reporting limits were below DEQ RCBs. All detected concentrations of arsenic and lead were below both minimum regional background concentrations and DEQ Clean Fill Criteria for the Portland Basin. No methane was detected in the soil gas samples. Based on these results, no impacts were identified on the Project Site associated with OCPs, arsenic, or lead in soil, or methane in subsurface soil gas within evaluated areas and no further investigation is required. Radon HUD requires new multifamily construction Projects to follow radon-resistant construction requirements in accordance with standards developed by the American Association of Radon Scientists and Technologists (AARST). HUD also requires post-construction radon testing prior to final completion inspection per

		Section 9.6.3.5 of the MAP Guide (HUD 2021). Radon resistant construction is required for all new construction under Home Forward's Radon policy. Current site plans for the proposed Project include installation of a passive ventilation system beneath the Project's foundation that will route soil gasses to the rooftop of the building. If post-construction radon testing determines that radon levels are still above the EPA action level of 4.0 pCi/L, then the Developer will attach a fan to help pull gasses into the piping system and out of the building through a rooftop exhaust pipe. With implementation of these radon resistant construction measures, indoor radon levels at the Project Site are expected to be reduced to below the EPA action level. In accordance with HUD guidelines, re-testing should occur every 2 years for buildings requiring mitigation and every 5 years for all other areas (MM-TOX-1). This ERR will be updated with the radon evaluation and proof of any required mitigation when complete prior to Project occupancy. Therefore, the proposed Project is in compliance with HUD's requirements related to contamination and toxic substances (see Attachments 7 and 8; see Contamination and Toxic Substances Worksheet).
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	☑ Yes ☐ No	The biological resources analysis for the proposed project determined that the project would not have an impact on any federally protected species. After reviewing project site plans, the stormwater report, and wetlands documentation, the City of Gresham concurred that the proposed project meets regulatory requirements in Executive Order 11990 (Protection of Wetlands), the Endangered Species Act and the Magnuson-Stevens Fishery Conservation and Management Act.

		Therefore, no mitigation is required. Stormwater plans submitted to NMFS during the consultation process must be followed. If proposed, changes to the plans may require additional consultation and review. A project completion report must be submitted to NMFS upon completion of the project.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	☐ Yes ☑ No	Regulations set forth in 24 CFR Part 51 Subpart C require HUD-assisted Projects to be separated from hazardous facilities that store, handle, or process hazardous substances by a distance based on the contents and volume of the facilities' aboveground storage tank (AST), or to implement mitigation measures. The requisite distances are necessary, because Project Sites that are too close to facilities handling, storing, or processing conventional fuels, hazardous gases, or chemicals of an explosive or flammable nature may expose occupants or end-users of a Project to the risk of injury in the event of a fire or an explosion. The regulations apply only to ASTs with a storage capacity of at least 100 gallons. Explosive or flammable hazardous materials would not be present at the Project Site, which would provide 60 affordable housing units. The Phase I ESA conducted by C+BETT did not identify any hazardous materials or petroleum on the Project Site, which is currently vacant. A search of the Oregon State Fire Marshal's (OSFM) Community Right to Know (CR2K) program for facilities storing Extremely Hazardous Substances (EHS) designated by the EPA was conducted to identify aboveground flammable materials storage within a 1-mile radius of the Project Site (OSFM 2024). A list describing all facilities that reported storage of EHS chemicals to the OSFM CR2K program in 2024 was downloaded for review. A total of 10

		facilities within 1-mile of the Project Site reported storing EHS chemicals on site, of which 5 sites contained hazardous chemicals listed in Appendix I of 24 CFR Part 51 Subpart C. Chemicals not listed in s. 51.201 were considered non-hazardous. HUD's Acceptable Separation Distance (ASD) Assessment Tool was used to calculate the minimum separation distance between the Project Site and these 75 CalEPA sites. When calculating the ASD, all ASTs were assumed to be unpressurized and not diked, and the maximum quantity stored was used to calculate the ASD. All sites exceeded HUD's required minimum ASD for the quantities of chemicals present. As a result, the proposed Project would not expose future residents to the risk of injury in the event of a fire or an explosion. Therefore, the Project is in compliance with explosive and flammable hazards requirements (see Attachment 10; see Explosive and Flammable Hazards Worksheet).
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	☐ Yes ☑ No	The importance of farmlands to the national and local economy requires the consideration of the impact of activities on land adjacent to prime or unique farmlands. The purpose of the Farmland Protection Policy Act (7 USC Section 4201 et seq., implementing regulations 7 CFR Part 658, of the Agriculture and Food Act of 1981, as amended) is to minimize the effect of federal programs on the unnecessary and irreversible conversion of farmland to nonagricultural uses. The USDA's Web Soil Survey (WSS) map was used to identify soil types on the proposed Project Site (USDA, 2024b). According to the WSS service, soils onsite are composed Aloha silt loam (0 to 3 percent slopes) and Multnomah silt loam (0 to 3 percent slopes). Aloha silt

		loam is considered prime farmland if drained and Multnomah silt loam is considered prime farmland in all areas where it found (USDA, 2024a). Identification of soils onsite that support agriculture reflects the Project Site's historically use as farming and pastureland. Although some soils onsite could support agriculture, the area proposed for development would not be suitable for farming given the existing use of the proposed Project Site as a parking lot and stormwater swale, as well as surrounding urban land uses. The U.S. Department of Agriculture (USDA)/ National Resources Conservation Service (NRCS) regulations contained at 7 CFR Part 658.2 define ''committed to urban development'' as land with a density of 30 structures per 40-acre area; lands identified as ''urbanized area'' (UA) on the Census Bureau Map or as urban area mapped with a ''tint overprint'' on USGS topographical maps; or as ''urban-built-up'' on the USDA Important Farmland Maps. According to 2020 Census Bureau Data mapping of Urban Areas, the Project Site is located in an urban area and is therefore, ''committed to urban development.'' In addition, because the Proposed Project would be on previously disturbed land, it would not involve the conversion of farmland into non-agricultural uses, nor would it threaten existing farmlands. Therefore, the proposed Project complies with the Farmland Protection Policy Act (see Attachment 11; see Farmlands Protection Worksheet).
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	☐ Yes ☑ No	The provisions of Executive Order (EO) 11988, Floodplain Management, require federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.

		EO 13690, Establishing a Federal Flood Risk Management Standard (FFRMS) and a Process for Further Soliciting and Considering Stakeholder Input, revised EO 11988 and established a new FFRMS to address current and future flood risk and improve resiliency. EO 14030, Climate-Related Financial Risk, subsequently furthered measures to address climate-related financial risk. HUD's regulations in 24 CFR Part 55 outline HUD's procedures for complying with EO 11988, EO 13690, and EO 14030. The regulations define a new floodplain of concern, the FFRMS floodplain, which extends beyond the traditional 100-year floodplain to account for increased flood risk over time. The extent of the FFRMS floodplain can be determined using one of three approaches depending on available data and information: the Climate-Informed Science Approach (CISA), the 0.2-Percent-Annual-Chance Floodplain Approach (0.2PFA), and the Freeboard Value Approach (FVA). For non-critical actions, where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain. Critical actions are activities where even a slight risk of flooding would be too great, because of the potential loss of life, injury to persons, or damage to properties. This applies to hospitals, nursing homes, fire and police stations, and roads providing sole egress from flood-prone areas. Non-critical actions consist of housing, community centers, independent living for the elderly, and commercial activities. Therefore, the Project is a non-critical action. No HUD-approved CISA maps are available for the Project Site; however, FEMA has mapped the

		0.2% annual chance of flood (i.e., 500-year floodplain). Therefore, this analysis uses the 0.2PFA approach. As indicated above, the Project Site is not located within the FEMA-designated 500-year floodplain. As such, based on the Project location and designation as a non-critical action, the proposed action is not in the coastal or riverine FFRMS floodplain. Therefore, the Project is in compliance with 24 CFR Part 55 and EO 11988 (see Attachment 4; see Floodplain Management Worksheet).
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	☑ Yes ☐ No	Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106. The SHPO concurred that no historic properties are affected under this project, provided an Inadvertent Discovery Plan is used with an archaeological monitor during all ground disturbing activities. The SHPO also recommends an archaeological permit is sought for the monitoring in case artifacts are found.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	☑ Yes ☐ No	A Noise Assessment was conducted. The noise level was normally unacceptable: 69.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation with mitigation. If plans deviate from the proposed wall components included in the current plans and STraCAT, noise must be re-evaluated for the project.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	☐ Yes ☑ No	Aquifers and surface water are drinking water systems that may be impacted by development. The Safe Drinking Water Act of 1974 requires protection of drinking water systems that are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health. The EPA's Map of Sole Source Aquifer (SSA) Locations (EPA 2024d) was

		used to identify sole-source aquifers in the vicinity of the Project Site. The Proposed Project is not located within a sole source aquifer. The Troutdale Aquifer System Area SSA, located approximately 7 miles north of the Project Site, across the Columbia River, is the nearest sole source aquifer. Furthermore, the Project Site is not located within an area designated by the EPA as being supported by a sole source aquifer. As such, no impact on sole source aquifers would occur as a result of the Proposed Project. The proposed Project is in compliance with the Safe Drinking Water Act of 1974 (see Attachment 18; see Sole Source Aquifers Worksheet).
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	☑ Yes ☐ No	Dudek prepared a Biological Resources Memorandum (Memo) in June 2024, which identified one wetland, including a stormwater swale containing an emergent wetland, as well as two potential depressional wetland features. A wetland delineation was needed to determine the precise boundaries of the wetland within the stormwater pond and the jurisdictional status of the wetland to the Oregon Department of State Lands (DSL) and/or the U.S. Army Corps of Engineers (USACE). Dudek completed a Wetland Delineation Report (WDR) for the Project Site in September 2024 to document the presence of wetlands and non-wetland waters within the study area and determine their jurisdictional status (see Attachment 17). Three wetlands and one non-wetland water was identified on the Project Site. Wetland A (0.12 acres) occurs at the western boundary of the study area near the sidewalk along NW Civic Drive, Wetland B (0.15 acres) occurs in the center of the gravel and vegetated western portion of the study area, and Wetland C (0.09 acres)

		occurs between Wetland B and the gravel parking lot. Wetland C is a purpose-built stormwater feature with an overflow channel that outlets to the south. All three wetlands are considered to be depressional and have a Cowardin/HGM or Water (Flow Duration) of Palustrine emergent (PEM). The non-wetland water is a 1-foot-wide, 65-foot-long ephemeral drainage that connects Wetland C (the stormwater pond) to NW 15th Street. Wetlands A, B, and C meet the 3-parameter definition of wetlands, but presumed to be non-jurisdictional to the DSL. Historical photographs of the Project Site show a grove of trees growing west of the current Wetland C location until circa 2002. As the wetlands onsite were created wholly in upland, are under 1-acre in size, and are not part of a mitigation area, they are exempt per OAR 141-085-0515(6a-c). These wetlands are also likely non-jurisdictional to USACE because they are artificial and created in upland as a result of construction activity and is not adjacent to jurisdictional waters (33 CFR 328.3[b][6]). In a letter dated February 4, 2025, USACE determined that there are no waters of the United States within the Project review area, which encompasses the Project Site (see Attachment 18). However, all three wetlands onsite meet the definition of wetlands under EO 11990, and therefore would be under the jurisdiction of HUD, as they meet HUD's definition of a wetland. Construction of the proposed Project would affect (remove) the wetland features previously described. As a result, the Project underwent HUD's 8-Step Process to identify direct and indirect impacts associated with the construction of the proposed Project.

		Construction of the proposed Project would result in the loss of wetland habitat onsite. The City initiated Section 7 consultation with the USFWS on December 10, 2024 to determine potential impacts of habitat loss from construction of the proposed Project and identify mitigation. The USFWS responded in a letter on February 4, 2025 and determined that the wetlands onsite do not provide critical habitat for any federally protected species. Due to the cost of real estate and built-out nature of the surrounding community, there are limited options available for alternative sites that could support the proposed Project outside of the wetland. Furthermore, any alternative Project design that could avoid impacting wetlands onsite would significantly reduce the number of affordable housing units that could be provided by the proposed development, such that Project would no longer fulfill the City's purpose and need. As a result, the proposed Project must be located within the wetlands and any proposed alternatives would be insufficient. Therefore, the proposed Project is in compliance with Executive Order 11990 (see Attachments 19-23; see Wetlands Protection Worksheet).
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	☐ Yes ☑ No	The Wild and Scenic Rivers Act (16 USC 1271-1287) 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). The NWSRS was created by Congress in 1968 to preserve certain rivers with outstanding natural, cultural, and recreational values in a free-flowing condition for the enjoyment of present and future generations. The EPA's NEPAssist interactive map (EPA 2024c) was used

		to determine the location of designated Wild and Scenic Rivers in the vicinity of the Project Site. The Project Site is not located near any NWSRS river, including designated Wild and Scenic Rivers, study rivers, and Nationwide Rivers Inventory (NRI) river segments. The closest protected waterway is Sandy River. The Project Site is approximately 3.86 miles west of the portion of the Sandy River designated as Wild and Scenic by the National Wild and scenic Rivers System. Therefore, the proposed Project is in compliance with the Wild and Scenic Rivers Act (see Attachment 24; see Wild and Scenic Rivers Worksheet).
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	☐ Yes ☑ No	Not applicable per Executive Order 14173.

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

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.
(1) Minor beneficial impact
(2) No impact anticipated
(3) Minor Adverse Impact – May require mitigation
(4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The Project Site includes three vacant parcels; two parcels (1S3E04DA-1202 and 1S3E04DA-1203) are owned by Metro while the northwest corner (0.4 acres) of a third parcel (1S3E04DD-01900) is owned by the City of	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Gresham (see Figure 2). The Project Site consists of 2.3 acres total and is located within city's designated Civic Neighborhood, a mixed commercial and residential use area. The Project Site is currently zoned by the City of Gresham as Civic Neighborhood Transit High Density (CNTH). This zone is intended to encourage mixed use developments, higher density multifamily residential, office, and retail and service uses. Detached single family homes and duplexes are not permitted. According to the City's Comprehensive Plan, which was amended by Ordinance No. 1782 in 2018, the design goal for the Civic Neighborhood is to create a distinctively urban mixture of active transportation networks, lively storefronts, and high-quality buildings with convenient places to live, work, and shop. The proposed Project would comply with detailed Design Principles outlined in the City's Comprehensive Plan that guide the development of the built environment within the Civic Neighborhood. The vision for the Civic Neighborhood also ties into the One Gresham initiative, a multi-year economic, urban redevelopment, and social strategy designed to strengthen and link the City's three mixed-use centers. (City of Gresham, 2022). Specific design principles	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		for the Civic Neighborhood are also described in the Civic Neighborhood Plan Design Manual (City of Gresham, 2024a). Therefore, the proposed Project would be in compliance with local land use and zoning designations.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Soil Suitability and Slope The USDA's Web Soil Survey (WSS) map was used to identify soil types on the proposed Project Site (USDA, 2024b). According to the WSS service, soils onsite are composed Aloha silt loam (0 to 3 percent slopes) and Multnomah silt loam (0 to 3 percent slopes). Slope measurements for the Project Site were obtained through review of the 2020 United States Geological Survey (USGS) Quadrangle 7.5- minute series topographic map for Camas, Washington-Oregon included in the Phase I ESA. According to the map, the Project Site is relatively flat and is approximately 303 feet above mean sea level. As required by local and state regulations and policies, a geotechnical report would be prepared for the Project prior to issuance of a building permit to determine soil suitability and provide recommendations for the Project, including recommendations for site grading, foundation construction, and other geotechnical considerations, which the Project would be	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		required to adhere to. Therefore, no impacts related to soil suitability or slope are anticipated. Erosion and Drainage The Project Site currently consists of vacant, undeveloped land. As a result, stormwater is removed from the property primarily through ground infiltration. Following development of the proposed Project, erosion due to stormwater runoff onsite would be minimized by the lack of exposed soils. Stormwater Runoff The ESA is administered jointly by the U.S. Fish and Wildlife Service (USFWS) and the National Marine Fisheries Service (NMFS), while the Magnuson-Stevens Fishery Conservation and Management Act (MSA) is administered solely by the NMFS. The MSA requires federal agencies to evaluate the effect of their actions on habitats used by a range of marine species that are commercially harvested. These habitats are identified as ''essential fish habitat'' (EFH). In many cases, Projects that have the potential to affect critical habitat designated under the ESA have similar effects on EFH, particularly with respect to Chinook and coho salmon, which are regulated species under both the ESA and MSA, and which both occur in the action area for the proposed development. Project concerns for ESA-species under USFWS jurisdiction largely	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		focus on preventing the destruction or loss of sensitive habitats that support ESA-listed species for all or part of their life history. Effects to habitat must be considered, including the Project's effects on roosting, feeding, nesting, spawning and rearing habitat, overwintering sites, and migratory corridors. Stormwater runoff could become contaminated with chemicals typically used during construction. To comply with NMFS requirements for endangered species, stormwater resulting from new imperious surfaces should be managed in accordance with the Programmatic Biological Opinion for HUD Housing Projects in Oregon. Site plans for the proposed development do not currently comply with NMFS criteria for new construction on an undeveloped site, as the Project does not include onsite stormwater capture and treatment. Pursuant to Section 305(b)(2) of the Magnuson-Stevens Fishery Conservation and Management Act, the City initiated Section 7 consultation with USFWS on December 10, 2024 to determine potential impacts of habitat loss from construction of the proposed Project and identify mitigation (Attachment 25). The USFWS responded in a letter on February XXX and determined that stormwater does not need	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		to be retained on the Project Site, as the Project would not impact EFH. Therefore, the project is in compliance with the Magnuson-Stevens Fishery Conservation and Management Act, and no mitigation is necessary. The Project would comply with erosion control measures during the construction phase to minimize erosion and stormwater pollution. Best management practices (BMPs) adopted from the City's 2020 Stormwater Management Manual would be incorporated during and after the construction phase of the Project.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	3	Hazardous Materials. Hazards related to contamination and toxic substances and explosives or flammable hazardous materials are discussed above. The Phase I ESA conducted by Coles + Betts in April 2024 did not identify any CRECs, HRECs, asbestos, or lead based paints on the Project Site. However, three RECs were identified related to the potential addition of new fill material onsite and the previous use of adjacent parcels as a veneer mill. Dudek completed a Phase II ESA for the Project Site in September 2024 to evaluate potential soil impacts related to former agricultural use and potential undocumented fill, and potential soil vapor impacts for methane related to sawdust fill from the former adjoining	The project will follow required Federal, State and City requirements around site safety and noise. Construction noise must adhere to the City's Noise Control Code, which requires that loud activities do not take place between the hours of 10 PM and 7 AM.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		sawmill. Results of the Phase II did not identify any impacts associated with OCPs, arsenic, or lead in soil, or methane in subsurface soil gas within evaluated areas. The City, including the Project Site is located in an area subject to earthquakes produced by the Cascadia Subduction Zone, a fault line that runs from northern California to Vancouver Island in Canada. According to the Oregon Statewide Geohazards Viewer (HazVu), the Project Site would experience very strong shaking in the event of an earthquake produced by the Cascadia Subduction Zone (Oregon HazVu 2025). The Project Site is in an area with low susceptibility to liquefaction. According to geological and fault zone data provided by the Oregon Framework Program, the nearest fault zone (unnamed) is located approximately 330 feet south of the Project Site and intersects the MAX light rail train tracks (Oregon Framework Hazards 2024) (see Attachment 26). The nearest volcano to the proposed Project Site is Mount Hood, located approximately 37 miles to the southeast in Hood River County. According to mapping of wildfire hazards by the College of Forestry at Oregon State University, the Project Site is located just north (outside of) the designated wildland-urban interface, the geographic area	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		where structures and other human development meet or intermingle with forests, rangelands, and other vegetation. The Project Site is in an area designated as having a low risk for wildfire (Oregon Explorer 2025) (see Attachment 27). Site Safety. The proposed Project would not create a risk of explosion, release of hazardous substances, or other dangers to public health. The Project Site is not near any hazardous operations. The Project would provide a safe place for employees and residents. Although no site safety hazards or nuisances are present at the site, it is possible that during construction of the Project, construction traffic, noise and dust could be considered a nuisance to the construction crew or immediate neighbors. As discussed in the Air Quality and Stormwater sections above, BMPs and mitigation measures would be implemented to prevent health and safety risks to construction workers and neighbors. Noise. Construction of the Project would generate noise associated with the operation of heavy construction equipment and construction-related activities in the vicinity of the Project Site. This would result in temporary, intermittent increases in ambient noise levels which would fluctuate depending on the particular	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		construction phase. Construction noise would comply with thresholds outlined in Chapter 7, Article 7.20, Noise Control Code, of the City of Gresham's Revised Code. Furthermore, pursuant to Section 7.20.050, Exceptions, of the City's Revised Code, noise associated with construction is exempt from the provisions of the noise ordinance, provided that activities take place between the hours of 7:00 a.m. and 10:00 p.m. on the same day (City of Gresham, 2024f). The Project would not require nighttime construction or construction on weekends or holidays.	
SOCIOECONOMIC			
Employment and Income Patterns	1	Project construction would generate a limited number of temporary construction jobs, and operation would generate a nominal number of permanent jobs (e.g., management, clerical, and janitorial jobs), which could result in a minor increase in per-capita income. Construction activities could result in direct economic effects related to increased spending on construction materials, equipment, and services. The magnitude of the economic benefits of construction spending to the City's economy would depend on the proportion of employment, goods, and services procured from local residents and businesses, and would likely have a relatively	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		minor benefit on the City's economy.	
Demographic Character Changes / Displacement	1	The proposed Project would have an overall beneficial impact on the City of Gresham by converting the currently vacant Project Site, into affordable housing with access to social services and amenities for residents. Because design of the proposed Project would be consistent with the Civic Neighborhood Design Standards of the Civic Neighborhood Plan District Design Manual (Section 4.1200) of the City's Development Code, this new affordable housing community would not adversely affect community character (City of Gresham, 2024a). Residents of the new affordable housing community would likely be transplants from within the City or from neighboring areas within Gresham or neighboring cities in Multnomah County. The Civic Neighborhood consists of several different uses and includes residential, commercial, and institutional uses, such as Gresham's City Hall. Other mixed-use, transit-oriented developments in the Civic Station include The Crossings which was constructed in 2006, approximately 0.1 miles south of the proposed Project, on the opposite side of Wy'East Way Path. As a result, community demographics for this area of the City would not be impacted by	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		the proposed Project. The proposed Project would increase the availability of affordable housing in the City and avoid displacement of existing businesses or residences in the area since the Project is infill development and the Project Site is currently vacant. According to the City's Comprehensive Plan (2023), about 44% of Gresham's households are cost burdened (paying 30% or more of their household income on housing costs). Of these households, approximately 64% of Gresham's renters and 28% of Gresham's homeowners are cost burdened. Increasing affordable housing units supports the housing priorities detailed in the Gresham Housing Production Strategy (HPS) (2023) by creating accommodations for underserved communities and lower-income individuals/families. Furthermore, adding affordable housing to the City's housing stock supports forecasted demographic changes brought about by the aging of Baby Boomers, the household formation of Millennials and Generation Z, and growing Latinx populations. These demographic changes imply increased demand for affordable housing for families, both for ownership and rent (Gresham Comprehensive Plan, 2023). Overall, the	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		proposed Project would have a positive impact on community character while keeping up with Projected demographic changes and remaining compliant with existing land use designations and design.	
Environmental Justice EA Factor	2	The proposed Project, once complete, would contribute approximately 60 new affordable housing units to the City's housing stock. Units would be a mixture of 2-bedroom (10), 3-bedroom (40), and 4-bedroom (10) apartments geared towards households earning less than 60% of the area median income. Construction of transitional and supportive housing for people exiting homelessness supports objectives discussed in the City's Housing Production Strategy. Furthermore, situating the proposed Project near high-quality public transit (the Project would be constructed near the Civic Drive MAX Station), would support future residents' journey towards independence and self-sufficiency. As a result, the proposed Project would have a long-term beneficial impact to the City's minority and/or lower-income populations by providing affordable housing opportunities to individuals and families.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	Given the availability of educational institutions in the area, adverse impacts to schools are not anticipated. The Project is near multiple	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		educational facilities, as follows: * Center for Advanced Learning, approximately 0.1 miles south of the Project Site * Gresham High School, about 1.2 miles southeast of the Project Site * Gresham Barlow School, approximately 0.6 miles north of the proposed Project Site * North Gresham Elementary School, about 0.6 miles north of the proposed Project Site * Highland Elementary School, approximately 1 mile northeast of the Project Site * Rising Stars Pre-School, about 1 mile east of the proposed Project Site Cultural facilities include publicly accessible buildings, structures, and establishments that are used primarily for the performance, exhibition, or benefit of arts and heritage activities, including, but not limited to, performing arts, visual arts, heritage and cultural endeavors. Numerous cultural facilities would be accessible to Project occupants in the immediate Project area and beyond within the City of Gresham, including cinemas, galleries, libraries, museums and theaters. Cultural facilities near the Project Site include the Curtis Heritage Education Foundation approximately 0.8 miles east of the Project area and the Gresham Historical Society approximately 1.2 miles southeast of the Project Site. The Gresham Little Theater located at 740 SE 182nd Ave, Portland,	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		OR 97233 is about 2.2 miles northwest of the Project Site. The Project would result in an incremental increase in demand for cultural facilities. However, as an affordable housing Project, the Project would be expected to serve existing area residents by addressing existing unmet needs for rental assistance in the Project area, rather than result in an influx of new residents. Furthermore, due to the relatively small Project size, any incremental increase in demand would not exceed the capacity of existing facilities. There are adequate cultural facilities in the City and surrounding areas of the County to accommodate any potential increased usage generated by the Project. Impacts to educational and cultural facilities would be less than significant.	
Commercial Facilities (Access and Proximity)	2	No adverse impacts to nearby commercial facilities are anticipated. The Project is primarily bordered by commercial and residential land uses. Construction of affordable housing could result in an incremental beneficial impact to local businesses since placing residents in more affordable housing provides more disposable income for spending on non-housing related goods and services.	
Health Care / Social Services	2	Adverse impacts to healthcare and social services are not anticipated due to the relatively	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
(Access and Capacity)		small size of the Project and availability of service providers near the Project Site. The Project Site is near numerous healthcare facilities, including the following: * Adventist Health Primary Care, approximately 0.2 miles north of the Project Site at 831 NW Council Dr #125, Gresham, OR 97030 * Vancouver Clinic Gresham Square, about 0.6 moles east of the Project Site at 340 NW Burnside Rd, Gresham, OR 97030 * Providence Primary Care- Gresham, approximately 0.6 miles southeast of the Project Site at 440 NW Division St, Gresham, OR 97030 * Community Health Center, about 1.2 miles southeast of the Project Site at 600 NE 8th St, Gresham, OR 97030 * Legacy Mount Hood Medical Center approximately 2.5 miles northeast of the Project Site at 600 NE 8th St, Gresham, OR 97030	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	Solid waste disposal and recycling services at the Project Site would be provided by Waste Management Services. The City of Gresham contracts with Waste Management Services to provide weekly and on-call residential, waste, recycling, and yard debris collection services. All waste generated during the construction and operational phases would be properly disposed of and recycled where possible. The amount of solid	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		waste generated by the proposed Project during the construction and operational phases would be a fraction of the throughput taken in by Republic Services daily. Adverse impacts from solid waste disposal associated with the proposed Project are not anticipated.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The City's Wastewater Services branch maintains nearly 300 miles of sewer collection lines in Gresham, Fairview, and Wood Village. Wastewater is monitored and treated at the Gresham Wastewater Treatment Plant, located at 20015 NE Sandy Boulevard, in accordance with federal, state, and local requirements (City of Gresham, 2024b). According to the City's website for the wastewater treatment plant, the facility treats an average of 12 million gallons daily and serves approximately 129,000 customers. In 2015, the treatment plant reached energy net zero and now produces more energy than it uses, saving the City an estimated $500,000 a year in electricity costs (City of Gresham, 2024c). The proposed Project would connect to existing wastewater and sanitary sewer facilities maintained by the City of Gresham. The Project does not include the construction or use of a septic system. The proposed Project would not require construction of additional sewage infrastructure.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Adverse impacts to wastewater systems and sanitary sewers servicing the Project Site are not anticipated.	
Water Supply (Feasibility and Capacity)	2	According to the Phase I ESA, review of Oregon Department of Water Resources, EDR, and DEQ records indicate there are no potable or groundwater monitoring wells on the Project Site. According to the City's website, Gresham's drinking water is obtained from three sources: the Bull Run Watershed, the Columbia South Shore Well Field, and the Cascade Well Field. Water for the City is primarily obtained from the Bull Run Watershed and supplemented by the other two water sources. The Bull Run Watershed is located in a protected area of the Mt. Hood National Forest and is managed by the City of Portland Water Bureau. During Heavy rains, testing may show positive results for cryptosporidium. However, ongoing monitoring has not resulted in any drinking water advisories for Gresham or the greater Portland area. The Portland Water Bureau also manages the Columbia South Shore Well Field, which obtains groundwater from the Blue Lake Aquifer, Troutdale Sandstone aquifer, and Sand and Gravel Aquifer. The Cascade Well Field, managed by Rockwood People's Utility District (PUD) and the City of Gresham, obtains water from the Sand and Gravel Aquifer. In	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		2020, the City of Gresham and Rockwood PUD formed the Cascade Groundwater Alliance to expand Gresham's groundwater system together. The new water system is currently under construction and will be complete in 2026 (City of Gresham, 2024d). The proposed Project would connect to existing water infrastructure and would result in an incremental demand for water. Adverse impacts to the City's water supply are not anticipated.	
Public Safety - Police, Fire and Emergency Medical	2	The Gresham Police Department provides law enforcement services to the City of Gresham. The Gresham Police Department's offices are located within Gresham City Hall, at 1333 NW Eastman Pkwy, Gresham, OR 97030, approximately 0.4 miles southeast of the Project Site. The proposed Project Site is located near three fire stations in the cities of Gresham and Portland in Multnomah County. The Gresham Fire Department is the closest fire station to the Project Site and is located within the same building as Gresham City Hall, at 1333 NW Eastman Pkwy, Gresham, OR 97030, approximately 0.4 miles southeast of the Project Site. Placentia Fire and Life Safety Station 1, approximately 0.5 miles northeast of the Project Site at 110 South Bradford Avenue, Placentia, California 92870, could also provide	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		emergency services. Finally, Fullerton Fire Department Station 3, about 1.9 miles west of the proposed Project Site could administer emergency services if needed. The proposed Project would be required to comply with all applicable codes for fire safety and emergency access. Therefore, the Project would not have adverse impacts on public safety.	
Parks, Open Space and Recreation (Access and Capacity)	2	The City contains 23 parks and maintains 942 acres of open space. Public recreational spaces in proximity to the Project Site include the following: * North Gresham Park, about 0.5 miles north of the Project Site at 1111 SE 217th Ave, Gresham, OR 97030 * Aspen Highlands Park Mini-Patch, about 1 mile northeast of the Project Site at 147 NE 24th St, Gresham, OR 97030 * Cedar Neighborhood Park, approximately 1.3 miles east of the Project Site at 601 NE 8th St, Gresham, OR 97030 * Main City Park, approximately 1.6 miles southeast of the Project Site at 219 S Main Ave, Gresham, OR 97080 * Red Sunset Park, about 2 miles northeast of the Project Site at 2403 NE Red Sunset Dr, Gresham, OR 97030 Additionally, the City maintains numerous greenway trails that allow cyclists to easily and safely travel to different neighborhoods. The nearest greenway is the Wy'East Way	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Trail, located south of the Project Site, on the opposite side of the Center for Advanced Learning. The Wy'East Way Trail is a 2-mile paved trail that runs along the MAX light rail line from the Ruby Junction Station in the Rockwood neighborhood to the Cleveland Station in historic downtown Gresham. This paved path connects with both the Springwater and Gresham-Fairview trails to make a 6-mile loop through the City of Gresham. The Project would result in an incremental increase in demand for public parks that could be absorbed by existing open spaces near the Project Site (City of Gresham, 2024e). Site plans for the proposed Project include a shared outdoor courtyard and sky deck where residents can enjoy the outdoors without visiting surrounding parks. Therefore, the Project would not have adverse impacts on parks, open space, and recreation.	
Transportation and Accessibility (Access and Capacity)	2	Pre-existing urban development and readily available public transit near the Project Site would mitigate transportation and accessibility issues associated with the Project, such as potential parking issues and traffic. The proposed Project Site is situated near the Civic Drive Light Rail station, where residents would have direct MAX light rail service to downtown Portland with connecting service	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		to Portland International Airport. Overall, the MAX is regionally connected to 84 light rail stations throughout Portland, Beaverton, Clackamas, Gresham, Hillsboro, and Milwaukie. The closest bus stop is located at the southwest corner of the Project Site and is serviced by the TriMet287 bus route. Nearby bus and light rail access could take residents to stores, parks, and other amenities in neighboring cities. The Project Site is also located near the Wy'East Way Trail, which runs along the MAX light rail line. According to the City's Parks and Recreation webpage, taking the Wy'East Way Trail around Gresham makes it easier to reach local parks, trails, public transit stops, schools, and businesses (City of Gresham, 2024e). The Project Site would include XX total parking stalls onsite. As a result, the proposed Project is not anticipated to have an adverse impact on traffic and parking in the surrounding community.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	The proposed Project Site includes three wetland features currently protected by federal and state regulations. As described in the Wetlands section above, Dudek completed a Wetland Delineation Report for the Project Site in September 2024 to document the presence of wetlands and non-wetland waters within the study area.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		While the wetlands are non-jurisdictional to USACE and the Oregon DSL, all three wetlands onsite meet the definition of wetlands under EO 11990 and therefore would be under the jurisdiction of HUD (see Attachments 19-23). Other federally protected natural resources, such as rivers, coastal zones, and endangered species, are not present on the Project Site or adjacent properties. Therefore, the proposed Project would not result in the alteration of any waterways, unique features, or critical habitat, nor would in result in the loss of any federally listed species.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	3	Vegetation: The proposed Project Site is currently vacant and can be generally characterized as disturbed land. The three primary vegetation cover types identified in the Biological Resources Memorandum were all categorized as disturbed. The site visit could not confirm the absence of rare plants during the survey and an additional survey may be warranted. As mentioned in the Endangered Species section above, no federal special-status plant species were identified in the IPaC search as being potentially present onsite. Upland plant species onsite included but were not limited to: soft brome (Bromus hordeaceus), sheep sorrel (Rumex acetosella), velvetgrass	The stormwater plans submitted to the City of Gresham and NOAA Fisheries during the Environmental Review process must be followed to ensure impacts of filling the existing on site wetlands are offset. If plans change, the City must be notified and a new consultation may need to be initiated.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		(Holcus lanatus), ribwort plantain (Plantago lanceolata), prickly lettuce (Lactuca serriola), birds-foot trefoil (Lotus corniculatus), vernal sweet grass (Anthoxanthum odoratum), cutleaf geranium (Geranium dissectum), Himalayan blackberry (Rubus armeniacus), ripgut brome (Bromus diandrus), and scotch broom (Cytisus scoparius). There are three black cottonwood trees (Populus balsamifera ssp. Trichocarpa) taller than 25 feet in height on the Project Site. Trees onsite might be used by migratory birds during the breeding season. In compliance with the MTBA, construction work should be conducted during the non-breeding season of August 1st-January 31st. Pre-construction nest surveys are required if clearing work commences during the early or primary nesting seasons of February through July. Compliance with the City and Metro's tree removal code was outside of the scope of the Bio Memo and should be addressed during Project planning. Wildlife: Although the proposed Project is within the ranges of five endangered or threatened species, none are likely to occur on site due to a lack of suitable habitat and the highly urbanized nature of the Project Site and surrounding areas. As mentioned in the Endangered Species Section	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		above, the Northwestern pond turtle has a low likelihood to occur within the Project Site but could potentially use the wetland within the stormwater swale (emergent wetland). The USFWS supported a ''no effect'' determination for Project impacts to the Northwestern pond turtle at the Project Site. NMFS also supported the ''no effect'' determination given that the proposed Project complies with stormwater maintenance requirements onsite. Results from the U.S. Fish and Wildlife Service's IPaC analysis of the area similarly state that the Project Site is situated outside of critical habitat areas for the endangered or threatened species that overlap with the Project area (USFWS 2020a) (see Attachment 8). An additional survey is needed to determine the species of the tadpoles observed in the stormwater swale wetland during the site reconnaissance. Due to their relatively small size and wetland site conditions, the onsite tadpoles are not presumed to belong to the invasive American bullfrog (Lithobates catesbeianus) species or the federally protected Oregon spotted frog (Rana pretiosa) species. The Oregon Department of Fish and Wildlife should be contacted to determine wildlife salvage requirements prior to construction as frogs or toads	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		are present within the stormwater swale wetland.	
Other Factors 1	2	The Project is within the National Marine Fisheries Service's ESA-listed critical habitat for fish species (Columbia River Basin). However, the Project would comply with the Programmatic Biological Opinion for HUD Housing Projects in Oregon (see Attachment 25). Therefore, impacts to critical habitat from stormwater will be avoided (see Oregon ESA & MSA ERR Form).	
Other Factors 2			
CLIMATE AND ENERGY			
Climate Change	2	Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes, and drought; and increased levels of air pollution. As discussed above, the Project Site is not within a flood zone (Attachment 4). The Project Site is also not located within a coastal community or low-lying area and would not be impacted by sea level rise (see Figure 1). The Project Site is in an urbanized area that is not subject to wildfire hazards (Oregon Explorer, 2025) (Attachment 27). As previously	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		discussed, the Project Site is not in an area that relies on a sole source aquifer. According to geology and geohazards data mapped by the Oregon Framework Program, the Project is located north of an active fault zone but in an area with low risk of liquefaction (Attachment 26). In the event of an earthquake caused by movement within the Cascadia Subduction Zone, the Project would experience strong shaking. No substantial issues related to air quality, soil suitability, stormwater, wastewater systems, or water supply have been identified in the preceding analyses. Thus, the Project would not lead to potential climate-change-related impacts that would substantially adversely affect residents. The Climate Mapping for Resilience and Adaptation (CMRA) tool (NOAA 2023) and FEMA's National Risk Index mapping tool (FEMA 2024b) were used to assess exposure to the following five key climate hazards at the Project Site: extreme heat, drought, wildfire, flooding, and coastal inundation from sea-level rise. Based on the results of the CMRA tool analysis, the Project Site is most susceptible to climate change impacts related to extreme heat and wildfire. Currently, the Project area census tract receives approximately 68 inches of precipitation annually and	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		experiences approximately 14 days annually where temperatures are greater than 90 degrees Fahrenheit. There are approximately 167 days where no precipitation is received. At the end of the century, the amount of precipitation received by the census tract would remain constant at approximately 69 inches, but the days reaching temperatures greater than 90 degrees Fahrenheit would increase to 38. The number of days with no precipitation would increase to about 175. The single highest maximum temperature this census tract may experience is currently 98.7 degrees Fahrenheit; though, by the end of this century, the census tract's maximum highest temperature is expected to increase to 105.4 degrees Fahrenheit. The Project Site is located within a census tract that is designated as a Disadvantaged Community according to the Climate and Economic Justice Screening Tool (NOAA 2023) (Attachment 28). Data obtained from FEMA's National Risk Index coincided with the results of the CRMA tool. Index ratings ranging from very low to very high were analyzed at the County level. According to the National Risk Index, the Project Site is at very high risk of experiencing earthquakes, landslides, and volcanic activity, and at moderate risk of experiencing a	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		heat wave and riverine flooding (FEMA 2024b). While the County overall is at moderate risk of experiencing riverine flooding, as discussed above, the Project Site is not located within a flood zone (Attachment 4). As stated in the transportation section above, the Project is situated adjacent to the MAX Light rail to downtown Portland with connecting service to Portland International Airport. The Project's close proximity to multimodal public transit would serve to reduce the GHG emissions associated with motor vehicle travel. Therefore, the proposed Project is not anticipated to contribute substantially to climate change impacts.	
Energy Efficiency	2	According to the Oregon Department of Energy, the average annual residential electricity in Multnomah County was 9,582 kWh in 2020. Electricity to the City of Gresham is provided solely by Portland General Electric (PGE) at 335 NE Roberts Ave., Gresham, OR 97030. PGE sources electricity from a mix of waterpower, wind, solar, natural gas, and a small amount of coal. PGE is working to eliminate coal from their energy source mix by 2035 and plan to reduce their greenhouse gas emissions by 80% by 2030. Electricity is delivered to customers via PGE transmission lines and the regional power	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		grid. Although the proposed Project would contribute to the regional use of energy, the increase is not expected to produce an adverse impact (PGE, 2024). The Project is being designed to meet the energy efficiency standards of the Earth Advantage residential certification criteria.	

Supporting documentation

Attachment 29- Community Report - Multnomah County_ National Risk Index.pdf
Attachment 28- CRMA Screenshots.pdf
Attachment 27- Oregon_Wildfire_Risk_Explorer_Property_Owners_Report.pdf
Attachment 26- Oregon Framework- Fault Zones.pdf

Additional Studies Performed:

* Civic Station HUD Project- Biological Resources Memorandum. Prepared by Dudek, June 2024. * Cultural Resources Inventory Report for Home Forward Civic Station HUD Project. Prepared by Dudek, September 2024. * Phase I Environmental Site Assessment Report. Prepared by Coles + Betts Environmental Consulting, LLC. * Wetland Delineation Report for Civic Station. Prepared by Dudek, September 2024.

Field Inspection [Optional]: Date and completed by:

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

See attached list of sources.

Commercial New Construction Checklist.pdf
Civic Station List of Sources.docx

List of Permits Obtained:

This project has not yet been submitted to the City of Gresham for planning and building reviews. A full list of permits is not yet available. The project will comply with all local permitting requirements and approvals. A copy of the City of Gresham's new

construction checklist is attached under the "List of Sources" section for reference. Additionally, the SHPO requested that an archeological permit be pulled for the project.

Public Outreach [24 CFR 58.43]:

The Draft Environmental Assessment will be made available for public review and comment beginning on July 14, 2025 and concluding on July 30, 2025. The NOI/FONSI and Wetland Final Notice will be posted on the City of Gresham website on or before July 14th, 2025.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed Project would not contribute to a significant cumulative impact under the National Environmental Policy Act because it consists of an urban development Project, consistent with the city's General Plan land use and zoning designations and all known adverse impacts will be mitigated. The proposed Project Site is located in the city's Civic Neighborhood, which has been identified as one of the city's three core commercial areas for higher density mixed-use, pedestrian oriented development. The Civic Neighborhood is immediately adjacent to the Gresham Station Shopping Center to the south, is less than one mile from Gresham's vibrant, historic downtown to the east, and has direct Metropolitan Area Express (MAX) light rail service to downtown Portland with connecting service to Portland International Airport. State and local planning guidelines encourage the development of urban housing in areas served by transit and near commercial and cultural amenities because this type of development contributes less to cumulative effects on the environment in comparison to development of previously undisturbed sites in more remote locations with fewer transit connections, many of which contain native vegetation and wildlife species.

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

Site identification has proven to be a major obstacle in providing affordable housing units. Residential sites available at reasonable cost are extremely limited, and sites that do not meet cost and land use criteria are generally eliminated as alternatives. Home Forward identifies potential properties for affordable housing based on feasibility, location, affordability, and ownership/site control of a potential Project Site. In addition to the developer's site selection criteria, and physical and social constraints are also considered in identifying and rejecting alternatives. Based on the developer's site selection criteria and constraints that limit identification of alternative affordable housing Project Sites, no other build alternatives are analyzed or included in this environmental document.

No Action Alternative [24 CFR 58.40(e)]

The No Action Alternative would not build any additional housing at the Project Site. There are no benefits to the physical or human environment by not taking the federal action associated with this Project. Physical impacts to the environment would occur in urban areas whether units are subsidized with federal funds or built at market rates. If an affordable Project were not constructed on this site, the social benefits of providing new affordable housing opportunities on an urban infill parcel would not occur. The proposed Project must acquire all required permits and approvals prior to construction; therefore, the proposed Project would be consistent with all land use plans, policies, and regulations for the Project Site. Not building on this site could potentially result in more housing constructed outside of the urban area in agricultural and undeveloped areas, contributing to urban sprawl, regional traffic congestion, and regional air quality issues.

Summary of Findings and Conclusions:

Home Forward is proposing to construct a 60-unit affordable housing community that would encompass 2.3-acres of vacant land in the City of Gresham, OR. The proposed Project Site is located in the City's Civic Neighborhood, which has been identified as one of Gresham's three core commercial areas for higher density mixed-use, pedestrian oriented development. The Civic Neighborhood is immediately adjacent to the Gresham Station Shopping Center to the south, is less than one mile from Gresham's vibrant, historic downtown to the east, and has direct Metropolitan Area Express (MAX) light rail service to downtown Portland with connecting service to Portland International Airport. The Project would provide 60 new affordable housing units reserved for individuals and families earning 60% or less of the Area Mean Income (AMI). Onsite community amenities include a residential courtyard with two play areas for children, outdoor dining area, and lawn where residents could enjoy outdoor picnics and other activities. Pedestrian walkways would connect shared outdoor amenities and the parking lot to the residential building. The proposed Project would contribute to the increased density and availability of low-income housing in an area that would encourage multi-modal activity. The proximity of existing transit options to the Project Site would reduce long-term air emissions and energy use associated with motor vehicle travel. Because the Project Site is within a developed urban area, the Project would be adequately served by utilities and public services. The Project would conform to all applicable federal, state, and regional regulations associated with land use compatibility, air emissions, water quality, geologic hazards, and related environmental resources addressed herein. While portions of the site are in the "normally unacceptable" range for noise level, all noise will be mitigated to acceptable levels by the building itself and the distance from noise sources to any outdoor spaces. The project will also fill three man-made on-site wetlands, however the wetlands do not serve as critical habitat and are used for water retention. The beneficial functions of the on-site wetlands will be offset by the stormwater facilities. Radon testing will be performed to ensure compliance with site

contamination requirements following construction. During construction, an Inadvertent Discovery Plan will be used to ensure proper procedures are followed if artifacts or human remains are uncovered. The stormwater facilities are also in line with the NMFS Programmatic Appendices to ensure no impact on endangered species or critical habitats. Based on the analyses of environmental issues contained in this document, the proposed Project is not expected to have significant environmental impacts.

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	Stormwater plans submitted to NMFS during the consultation process must be followed. If proposed, changes to the plans may require additional consultation and review.	N/A		
Wetlands Protection	Construction of the proposed Project would fill the wetland features on site. As a result, the Project underwent HUD's 8-Step Process to identify direct and indirect impacts associated with the construction of the proposed Project. Construction of the proposed Project would result in the loss of wetland habitat onsite. The City initiated Section 7 consultation with the USFWS on December 10, 2024 to determine potential impacts of habitat loss from construction of the proposed Project and identify mitigation. The USFWS responded in a	N/A		

	letter on February 4, 2025 and determined that the wetlands onsite do not provide critical habitat for any federally protected species. The beneficial functions of the on-site wetlands are currently stormwater detention and infiltration. Impacts caused by increased stormwater runoff will be mitigated through the addition of the vegetated stormwater facilities noted below: 1) An underground detention facility and flow control manhole will meet the water quantity requirements of the City of Gresham Stormwater Manual and the HUD Programmatic Biological Opinion. 2)Two lined rain gardens and two line stormwater planters will provide water quality for the site. Water quality facilities were sized using half of the 2-year storm event to meet the more stringent HUD requirements and exceed the City's requirements.			
Contamination and Toxic Substances	The proposed project site is currently vacant. A Phase I Environmental Site Assessment (ESA) conducted by Coles + Betts Environmental Consulting, Inc. (C+BEC) in April 2024 did not find any recognized controlled	N/A		

	environmental conditions (RECs), or historical RECs on the project site. However, the Phase I ESA identified three RECs related to the potential addition of new fill material onsite and the previous use of adjacent parcels as a veneer mill. A subsequent Phase II ESA conducted by Dudek in July 2024 did not identify any impacts on the project site associated with organochloride pesticides, arsenic, or lead in soil, or methane in subsurface soil gas within evaluated areas. Assessment of asbestos-containing materials (ACMs), lead-based paint (LBP), and mold was not considered within the scope of the site visit due to the lack of structures onsite.			
Noise Abatement and Control	The building construction will mitigate excess noise to ensure indoor noise levels do not exceed 45 dB. Additionally, due to the location of the outdoor space, those spaces are already at or below 64 dB and do not require additional mitigation. Copies of the noise assessments, STraCAT and building construction details are attached to document compliance. If plans deviate from the proposed wall components included in the current plans and STraCAT, noise must be re-evaluated for the project.	N/A		
Hazards and Nuisances	The project will follow required Federal, State and City	N/A	The project will follow	

including Site Safety and Site-Generated Noise	requirements around site safety and noise. Construction noise must adhere to the City's Noise Control Code, which requires that loud activities do not take place between the hours of 10 PM and 7 AM.		required Federal, State and City requirements around site safety and noise.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	The stormwater plans submitted to the City of Gresham and NOAA Fisheries during the Environmental Review process must be followed to ensure impacts of filling the existing on site wetlands are offset. If plans change, the City must be notified and a new consultation may need to be initiated.	N/A	Stormwater plans submitted and reviewed must be followed. Consultations may need to be reinitiated if stormwater plans change from what has been reviewed. A project completion report must be submitted to NMFS following completion of construction.	
Historic Preservation	MM-CUL-1: Unanticipated Discovery of Archaeological Resources. An inadvertent discovery plan has been prepared for the Project and provided to the construction crew for use during ground-disturbing activities within the APE (see Attachment 13). Should Home Forward or their construction contractor encounter unanticipated archaeological resources during the Project, all ground-disturbing activity near the find shall be halted, and a professional archaeologist	N/A	MM-CUL-1: Unanticipated Discovery of Archaeological Resources. An inadvertent discovery plan has been prepared for the Project and provided to the construction crew for use during ground-disturbing	

	should be notified, who will ensure compliance with relevant state and federal laws and regulations. If evidence of human burials is encountered, all ground-disturbing activity in the vicinity shall be halted immediately, Home Forward will be responsible for notifying the SHPO, the Multnomah County Sheriff's Office, and the appropriate Tribes.		activities within the APE (see Attachment 13). Should Home Forward or their construction contractor encounter unanticipated archaeological resources during the Project, all ground-disturbing activity near the find shall be halted, and a professional archaeologist should be notified, who will ensure compliance with relevant state and federal laws and regulations. If evidence of human burials is encountered, all ground-disturbing activity in the vicinity shall be halted immediately, Home Forward will be responsible for notifying	

			the SHPO, the Multnomah County Sheriff's Office, and the appropriate Tribes.	

Project Mitigation Plan

See attached Civic Station Mitigation Table for measures related to Contamination and Toxic Substances- Radon, Endangered Species, and Historic Preservation.

Civic Station Mitigation Table.docx

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

HUD's policy is to apply standards to prevent incompatible development around civil airports or military airfields, consistent with Title 24 of the Code of Federal Regulations (CFR), Part 51, Subpart D. According to the U.S. Environmental Protection Agency's (EPA) NEPAssist tool (EPA 2024b), there are no military airports within 15,000 feet of the subject property, or civilian airports within 2,500 feet of the subject property (EPA 2023a). The closest military airport is the Portland International Airport, about 70,423 northwest of the Project Site. The nearest civilian airport is the Portland- Troutdale Airport, approximately 25,248 feet northeast of the Project Site). Therefore, the proposed Project Site is in compliance with the HUD's airport hazards regulations, and no mitigation is warranted (see Attachment 2; see Airport Hazards Worksheet).

Supporting documentation

Attachment 2- Airport Distances.pdf

Are formal compliance steps or mitigation required?

Home-Forward-Civic-Station	Gresham, OR	900000010447737

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

The Coastal Barrier Resources Act (CBRA) of 1982 designated relatively undeveloped coastal barriers along the Atlantic and Gulf coasts as part of the John H. Chafee Coastal Barrier Resources System (CBRS) and made these areas ineligible for most new federal expenditures and financial assistance. The Coastal Barrier Improvement Act (CBIA) of 1990 reauthorized the CBRA; expanded the CBRS to include undeveloped coastal barriers along the Florida Keys, Great Lakes, Puerto Rico, and U.S. Virgin Islands; and added a new category of coastal barriers to the CBRS called ''otherwise protected areas'' (OPAs). OPAs are undeveloped coastal barriers that are within the boundaries of an area established under federal, State, or local law, or held by a qualified organization, primarily for wildlife refuge, sanctuary, recreational, or natural resource conservation purposes. The Project is located in Oregon and is approximately 76 miles inland from the coast. There are no units of the CBRS in Oregon, and the Project Site is not within a CBRS unit (USFWS 2024a). Therefore, the Project is in compliance with the CBRA and CBIA (see Attachment 3).

Supporting documentation

Attachment 3- Coastal Barrier Resources Map Screenshot.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:

Attachment 4- 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?

Home-Forward-Civic-Station	Gresham, OR	900000010447737

Yes

✓ No

Screen Summary

Compliance Determination

The Flood Disaster Protection Act of 1973 (42 USC 4012a) requires that Projects receiving federal assistance and located in an area identified by the Federal Emergency Management Agency (FEMA) as being within a Special Flood Hazard Area (SFHA) be covered by flood insurance under the National Flood Insurance Program (NFIP). SFHAs are hazard areas that are subject to inundation by the base flood (1%-annual-chance flood) and are labeled on flood maps as zones starting with the letters A or V. Flood insurance is required by federally regulated lenders for properties within SFHAs to protect federal financial investments. Non-Special Flood Hazard Areas are either areas between the limits of the base flood and the 0.2%-annual-chance flood (flood zones labeled Zone X [shaded] or B) or areas which are higher than the elevation of the 0.2%-annual-chance flood (flood zones labeled Zone X [unshaded] or Zone C). Flood insurance is available in participating communities but is not required by regulation in these zones. According to FEMA Flood Insurance Rate Map (FIRM) 41051 C0214J (effective February 1, 2019) for the Proposed Project Site, the Project is within Zone X (Unshaded), an area of minimal flood hazard. Therefore, the Project Site is not located within a FEMA-designated SFHA. According to the National Flood Insurance Program's (NFIP) Community Status Book (FEMA 2024a), the Project Site city (Gresham) participates in the NFIP (Community Identification Number 410181B). Therefore, the Project is in compliance with flood insurance requirements (see Attachment 4; see Flood Insurance Worksheet).

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

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

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

✓ Yes

No

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

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

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

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

Screen Summary

Compliance Determination

The project is located in Multnomah County, which is in attainment status for all criteria pollutants. Some criteria show the district in "maintenance" status, but Oregon DEQ has confirmed that the district has completed the maintenance period and is considered in attainment status. Emails from DEQ staff are attached for reference. The project is in compliance with the Clean Air Act.

Home-Forward-Civic-Station	Gresham, OR	900000010447737

Supporting documentation
Attachment 5- DEQ Air Quality Status Email.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

The Coastal Zone Management Act (CZMA) of 1972 (16 USC 1451 et seq.) is administered at the federal level by the Coastal Programs Division within the National Oceanic and Atmospheric Administration's Office of Ocean and Coastal Resource Management (NOAA-OCRM). Projects that can affect the coastal zone must be carried out in a manner consistent with the state coastal zone management program under Section 307(c) and (d) of the CZMA. Oregon's watershed-based coastal zone, which was first delineated in 1971 by the Oregon Legislature, includes the state's costal watersheds and extends seaward three nautical miles and inland to the crest of the coast range, with a few exceptions. Within this zone, the Oregon Coastal Management Program (OCMP), applies to the land and water areas, except on lands owned by the federal government or held in trust under Indian tribal jurisdiction. The Proposed Project Site is located approximately 76 miles inland, in the City of Gresham. Neither the Project Site nor any portion of the City is located within the coastal zone. Therefore, the Project does not need to comply with the Coastal Zone Management Act (see Attachment 6; see Coastal Zone Management Worksheet).

Home-Forward-Civic-Station	Gresham, OR	900000010447737

Supporting documentation

Attachment 6- Coastal Zone Management Map Screenshot.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

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

1. How was site contamination evaluated?* Select all that apply.

✓ ASTM Phase I ESA

✓ ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

None of the above

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.
For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

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

No

Explain:

✓ Yes

3. Mitigation

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

Can adverse environmental impacts be mitigated?

No, adverse environmental impacts cannot feasibly be mitigated. Project cannot proceed at this location.

✓ Yes, adverse environmental impacts can be eliminated through mitigation.

4. Describe how compliance was achieved. 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.**

The proposed project site is currently vacant. A Phase I Environmental Site Assessment (ESA) conducted by Coles + Betts Environmental Consulting, Inc. (C+BEC) in April 2024 did not find any recognized controlled environmental conditions (RECs), or historical RECs on the project site. However, the Phase I ESA identified three RECs related to the potential addition of new fill material onsite and the previous use of adjacent parcels as a veneer mill. A subsequent Phase II ESA conducted by Dudek in July 2024 did not identify any impacts on the project site associated with organochloride pesticides, arsenic, or lead in soil, or methane in subsurface soil gas within evaluated areas. Assessment of asbestos-containing materials (ACMs), lead-based paint (LBP), and mold was not considered within the scope of the site visit due to the lack of structures onsite.

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

Complete removal

Risk-based corrective action (RBCA)

* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical

access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

** Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

Screen Summary

Compliance Determination

Assessment of asbestos-containing materials (ACMs), lead-based paint (LBP), and mold was not considered within the scope of the site visit due to the lack of structures onsite. A Phase I Environmental Site Assessment (ESA) was conducted by Coles + Betts Environmental Consulting, Inc. (C+BEC) in April 2024 (Attachment 7). The Phase I ESA did not find any controlled recognized environmental conditions (RECs), or historical RECs on the Project Site. The Phase I identified three RECs and recommended further subsurface investigation through preparation of a Phase II ESA. The RECs are as follows: REC #1: The Phase II ESA completed in 2006 identified shallow soil within the western portion of the Project Site that contained lead concentrations exceeding the current Oregon DEQ Clean Fill Criterion. As a result, DEQ requires more recent soils data to determine if soils removed from this area of the Project Site may be disposed of, or reused, as clean fill. REC#2: The potential presence of agricultural containments of concern and currently unknown fill characterization onsite constitute a REC. REC #3: Adjacent parcels to the east and southeast were historically used for veneer milling operations. The unknown historical mill practices, and sawdust placement are considered an REC due to the potential presence of petroleum hydrocarbons and methane. Dudek prepared a Phase II ESA for the Project Site in September 2024 to evaluate potential soil impacts related to former agricultural use and potential undocumented fill, and potential soil vapor impacts for methane related to sawdust fill from the former adjoining sawmill (Attachment 8). Phase II ESA field sampling activities were conducted on July 22, 2024 and included identifying sampling locations, verifying subsurface utility clearance, and collecting soil and soil vapor samples. Results of the laboratory soil analysis did not detect OCPs in either composite soil samples and method reporting limits were below DEQ RCBs. All detected concentrations of arsenic and lead were below both minimum regional background concentrations and DEQ Clean Fill Criteria for the Portland Basin. No methane was detected in the soil gas samples. Based on these results, no impacts were identified on the Project Site associated with OCPs, arsenic, or lead in soil, or methane in subsurface soil gas within evaluated areas and no further investigation is required. Radon HUD requires new multifamily construction Projects to follow radon-resistant construction requirements in accordance with standards developed

by the American Association of Radon Scientists and Technologists (AARST). HUD also requires post-construction radon testing prior to final completion inspection per Section 9.6.3.5 of the MAP Guide (HUD 2021). Radon resistant construction is required for all new construction under Home Forward's Radon policy. Current site plans for the proposed Project include installation of a passive ventilation system beneath the Project's foundation that will route soil gasses to the rooftop of the building. If post-construction radon testing determines that radon levels are still above the EPA action level of 4.0 pCi/L, then the Developer will attach a fan to help pull gasses into the piping system and out of the building through a rooftop exhaust pipe. With implementation of these radon resistant construction measures, indoor radon levels at the Project Site are expected to be reduced to below the EPA action level. In accordance with HUD guidelines, re-testing should occur every 2 years for buildings requiring mitigation and every 5 years for all other areas (MM-TOX-1). This ERR will be updated with the radon evaluation and proof of any required mitigation when complete prior to Project occupancy. Therefore, the proposed Project is in compliance with HUD's requirements related to contamination and toxic substances (see Attachments 7 and 8; see Contamination and Toxic Substances Worksheet).

Supporting documentation

Attachment 7- Final-Phase I ESA Report_Civic Development_opt.pdf
Attachment 8- Phase II ESA Report.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 *et seq*.); particularly section 7 (16 USC 1536).	50 CFR Part 402

1. Does the project involve any activities that have the potential to affect specifies 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:

Stormwater plans submitted to NMFS during the consultation process must be followed. If proposed, changes to the plans may require additional consultation and review.

No mitigation is necessary.

Screen Summary
Compliance Determination

The biological resources analysis for the proposed project determined that the project would not have an impact on any federally protected species. After reviewing project site plans, the stormwater report, and wetlands documentation, the City of Gresham concurred that the proposed project meets regulatory requirements in Executive Order 11990 (Protection of Wetlands), the Endangered Species Act and the Magnuson-Stevens Fishery Conservation and Management Act. Therefore, no mitigation is required. Stormwater plans submitted to NMFS during the consultation process must be followed. If proposed, changes to the plans may require additional consultation and review. A project completion report must be submitted to NMFS upon completion of the project.

Supporting documentation

Attachment 9- Bio Memo and USFWS and NMFS Consultation_20250620.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

✓ Yes

4. Based on the analysis, is the proposed HUD-assisted project located at or beyond the required separation distance from all covered tanks?

✓ Yes

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

No

Screen Summary

Compliance Determination

Regulations set forth in 24 CFR Part 51 Subpart C require HUD-assisted Projects to be separated from hazardous facilities that store, handle, or process hazardous substances by a distance based on the contents and volume of the facilities' aboveground storage tank (AST), or to implement mitigation measures. The requisite distances are necessary, because Project Sites that are too close to facilities handling, storing, or processing conventional fuels, hazardous gases, or chemicals of an explosive or flammable nature may expose occupants or end-users of a Project to the risk of injury in the event of a fire or an explosion. The regulations apply only to ASTs with a storage capacity of at least 100 gallons. Explosive or flammable hazardous materials would not be present at the Project Site, which would provide 60 affordable housing units. The Phase I ESA conducted by C+BETT did not identify any hazardous materials or petroleum on the Project Site, which is currently vacant. A search of the Oregon State Fire Marshal's (OSFM) Community Right to Know (CR2K) program for facilities storing Extremely Hazardous Substances (EHS) designated by the EPA was conducted to identify aboveground flammable materials storage within a 1-mile radius of the Project Site (OSFM 2024). A list describing all facilities that reported storage of EHS chemicals to the OSFM CR2K program in 2024 was downloaded for review. A total of 10 facilities within 1-mile of the Project Site reported storing EHS chemicals on site, of which 5 sites contained hazardous chemicals listed in Appendix I of 24 CFR Part 51 Subpart C. Chemicals not listed in s. 51.201 were considered non-hazardous. HUD's Acceptable Separation Distance (ASD) Assessment Tool was used to calculate the minimum separation distance between the Project Site and these 75 CalEPA sites. When calculating the ASD, all ASTs were assumed to be unpressurized and not diked, and the maximum quantity stored was used to calculate the ASD. All sites exceeded HUD's required minimum ASD for the quantities of chemicals present. As a result, the proposed Project would not expose future residents to the risk of injury in the event of a fire or an explosion. Therefore, the Project is in compliance

with explosive and flammable hazards requirements (see Attachment 10; see Explosive and Flammable Hazards Worksheet).

Supporting documentation

Attachment 10- OSFM Explosive and Flammable Hazards.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

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

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

Yes

✓ No

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

The U.S. Department of Agriculture (USDA)/ National Resources Conservation Service (NRCS) regulations contained at 7 CFR Part 658.2 define ''committed to urban development'' as land with a density of 30 structures per 40-acre area; lands identified as ''urbanized area'' (UA) on the Census Bureau Map or as urban area mapped with a ''tint overprint'' on USGS topographical maps; or as ''urban-built-up'' on the USDA Important Farmland Maps. According to 2020 Census Bureau Data mapping of Urban Areas on TIGERweb (a web-based system that allows users to visualize Topographically Integrated Geographic Encoding and Referencing database information), the Project Site is located in an urban area and is therefore, ''committed to urban development.''

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

The importance of farmlands to the national and local economy requires the consideration of the impact of activities on land adjacent to prime or unique farmlands. The purpose of the Farmland Protection Policy Act (7 USC Section 4201 et seq., implementing regulations 7 CFR Part 658, of the Agriculture and Food Act of 1981, as amended) is to minimize the effect of federal programs on the unnecessary

and irreversible conversion of farmland to nonagricultural uses. The USDA's Web Soil Survey (WSS) map was used to identify soil types on the proposed Project Site (USDA, 2024b). According to the WSS service, soils onsite are composed Aloha silt loam (0 to 3 percent slopes) and Multnomah silt loam (0 to 3 percent slopes). Aloha silt loam is considered prime farmland if drained and Multnomah silt loam is considered prime farmland in all areas where it found (USDA, 2024a). Identification of soils onsite that support agriculture reflects the Project Site's historically use as farming and pastureland. Although some soils onsite could support agriculture, the area proposed for development would not be suitable for farming given the existing use of the proposed Project Site as a parking lot and stormwater swale, as well as surrounding urban land uses. The U.S. Department of Agriculture (USDA)/ National Resources Conservation Service (NRCS) regulations contained at 7 CFR Part 658.2 define ''committed to urban development'' as land with a density of 30 structures per 40-acre area; lands identified as ''urbanized area'' (UA) on the Census Bureau Map or as urban area mapped with a ''tint overprint'' on USGS topographical maps; or as ''urban-built-up'' on the USDA Important Farmland Maps. According to 2020 Census Bureau Data mapping of Urban Areas, the Project Site is located in an urban area and is therefore, ''committed to urban development.'' In addition, because the Proposed Project would be on previously disturbed land, it would not involve the conversion of farmland into non-agricultural uses, nor would it threaten existing farmlands. Therefore, the proposed Project complies with the Farmland Protection Policy Act (see Attachment 11; see Farmlands Protection Worksheet).

Supporting documentation

Attachment 11- Farmlands.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

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Floodplain Management

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

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

Yes

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

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

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:
(1) The property is cleared of all existing buildings and walled structures; and
(2) The property is cleared of related improvements except those which:
(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);
(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and
(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

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

or other HUD assistance.

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

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

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

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

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

Describe:

✓ No

2. Does the project include a Critical Action? Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants.

Yes

Describe:

✓ No

3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information[1] to determine flood elevation. Include documentation and an explanation of why this is the best available information[2] for the site. Note that newly constructed and substantially improved[3] structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

CISA for non-critical actions. If using a local tool , data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

✓ 0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or — if available — a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

[1] Sources which merit investigation include the files and studies of other federal agencies, such as the U. S. Army Corps of Engineers, the Tennessee Valley Authority, the Soil Conservation Service and the U. S. Geological Survey. These agencies have prepared flood hazard studies for several thousand localities and, through their technical assistance programs, hydrologic studies, soil surveys, and other investigations have collected or developed other floodplain information for numerous sites and areas. States and communities are also sources of information on past flood 'experiences within their boundaries and are particularly knowledgeable about areas subject to high-risk flood hazards such as alluvial fans, high velocity flows, mudflows and mudslides, ice jams, subsidence and liquefaction.

[2] If you are using best available information, select the FVA option below and provide supporting documentation in the screen summary. Contact your local environmental officer with additional compliance questions.

[3] Substantial improvement means any repair or improvement of a structure which costs at least 50 percent of the market value of the structure before repair or improvement or results in an increase of more than 20 percent of the number of dwelling units. The full definition can be found at 24 CFR 55.2(b)(12).

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary

Compliance Determination

The provisions of Executive Order (EO) 11988, Floodplain Management, require federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable. EO 13690, Establishing a Federal Flood Risk Management Standard (FFRMS) and a Process for Further Soliciting and Considering Stakeholder Input, revised EO 11988 and established a new FFRMS to address current and future flood risk and improve resiliency. EO 14030, Climate-Related Financial Risk, subsequently furthered measures to address climate-related financial risk. HUD's regulations in 24 CFR Part 55 outline HUD's procedures for complying with EO 11988, EO 13690, and EO 14030. The regulations define a new floodplain of concern, the FFRMS floodplain, which extends beyond the traditional 100-year floodplain to account for increased flood risk over time. The extent of the FFRMS floodplain can be determined using one of three approaches depending on available data and information: the Climate-Informed Science Approach (CISA), the 0.2-Percent-Annual-Chance Floodplain Approach (0.2PFA), and the Freeboard Value Approach (FVA). For non-critical actions, where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain. Critical actions are activities where even a slight risk of flooding would be too great, because of the potential loss of life, injury to persons, or damage to properties. This applies to hospitals, nursing homes, fire and police stations, and roads providing sole egress from flood-prone areas. Non-critical actions consist of housing, community centers, independent living for the elderly, and commercial activities. Therefore, the Project is a non-critical action. No HUD-approved CISA maps are available for the Project Site; however, FEMA has mapped the 0.2% annual chance of flood (i.e., 500-year floodplain). Therefore, this analysis uses the 0.2PFA approach. As indicated above, the Project Site is not located within the FEMA-designated 500-year floodplain. As such, based on the Project location and designation as a non-critical action, the proposed action is not in the coastal or riverine FFRMS floodplain. Therefore, the Project is in compliance with 24 CFR Part 55 and EO 11988 (see Attachment 4; see Floodplain Management Worksheet).

Supporting documentation

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Attachment 4- FEMA FIRM Map(1).pdf

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

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

Threshold

Is Section 106 review required for your project?

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

Step 1 – Initiate Consultation

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

✓ State Historic Preservation Offer (SHPO) Completed

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

✓ Cowlitz	Response Period Elapsed
✓ Grand Ronde	Completed
✓ Nez Perce	Response Period Elapsed

- ✓ Siletz — Response Period Elapsed
- ✓ Umatilla — Response Period Elapsed
- ✓ Warm Springs — Response Period Elapsed

Other Consulting Parties

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

The State Historic Preservation Office (SHPO) was consulted in compliance with the National Historic Preservation Act (NHPA) (16 USC 470 et seq.) directs each federal agency, and those tribal, State, and local governments that assume federal agency responsibilities, to protect historic properties and to avoid, minimize, or mitigate possible harm that may result from agency actions. The review process, known as Section 106 review, is detailed in 36 CFR Part 800. Based on a search of HUD's Tribal Directory Assessment Tool (TDAT), six tribes were identified and invited to consult.

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:**
   The APE includes the Project Site (Tax Lots. 1S3E04DA-1202, 1S3E04DA-1203, and 1S3E04DD-01900) and adjacent parcels (Tax Lots. 1S3E04DC-00100, 1S3E04DA-00700, 1S3E04DA-00800, 1S3E04DD-01901, and 1S3E04DD-01700)

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

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

below.

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

Additional Notes:

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

✓ Yes

Document and upload surveys and report(s) below.
For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

Additional Notes:

No

Step 3 –Assess Effects of the Project on Historic Properties

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

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

✓ No Historic Properties Affected

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

concurrence(s) or objection(s) below.

Document reason for finding:

- ✓ No historic properties present.

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

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106. The SHPO concurred that no historic properties are affected under this project, provided an Inadvertent Discovery Plan is used with an archaeological monitor during all ground disturbing activities. The SHPO also recommends an archaeological permit is sought for the monitoring in case artifacts are found.

Supporting documentation

Attachment 13- Civic Station IDP.pdf
Attachment 16- SHPO Consultation Submittal Forms Update.pdf
Attachment 15- Tribal Notifications.pdf
Attachment 14- SHPO Response Letters.pdf
Attachment 12- Cultural Report Final NOV2024.pdf

Are formal compliance steps or mitigation required?

- ✓ Yes

  No

Noise Abatement and Control

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

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

✓ New construction for residential use

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

Rehabilitation of an existing residential property

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

An interstate land sales registration

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

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

Indicate the findings of the Preliminary Screening below:

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

✓ Noise generators were found within the threshold distances.

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

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

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

Is your project in a largely undeveloped area?

✓ No

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

Yes

Unacceptable: (Above 75 decibels)

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

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

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

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

✓ Mitigation as follows will be implemented:

The building construction will mitigate excess noise to ensure indoor noise levels do not exceed 45 dB. Additionally, due to the location of the outdoor space, those spaces are already at or below 64 dB and do not require additional mitigation. Copies of the noise assessments, STraCAT and building construction details are attached to document compliance. If plans deviate from the proposed wall components included in the current plans and STraCAT, noise must be re-evaluated for the project.

Based on the response, the review is in compliance with this section. Document and upload drawings, specifications, and other materials as needed to describe the project's noise mitigation measures below.

No mitigation is necessary.

Screen Summary

Compliance Determination

A Noise Assessment was conducted. The noise level was normally unacceptable: 69.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation with mitigation. If plans deviate from the proposed wall components included in the current plans and STraCAT, noise must be re-evaluated for the project.

Supporting documentation

Attachment 17- June 2025 Home Forward Civic Station HUD Noise Memo_FINAL.pdf

Are formal compliance steps or mitigation required?

✓ Yes

No

Sole Source Aquifers

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

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

Yes

✓ No

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

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

✓ No

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

Yes

Screen Summary

Compliance Determination

Aquifers and surface water are drinking water systems that may be impacted by development. The Safe Drinking Water Act of 1974 requires protection of drinking water systems that are the sole or principal drinking water source for an area and

which, if contaminated, would create a significant hazard to public health. The EPA's Map of Sole Source Aquifer (SSA) Locations (EPA 2024d) was used to identify sole-source aquifers in the vicinity of the Project Site. The Proposed Project is not located within a sole source aquifer. The Troutdale Aquifer System Area SSA, located approximately 7 miles north of the Project Site, across the Columbia River, is the nearest sole source aquifer. Furthermore, the Project Site is not located within an area designated by the EPA as being supported by a sole source aquifer. As such, no impact on sole source aquifers would occur as a result of the Proposed Project. The proposed Project is in compliance with the Safe Drinking Water Act of 1974 (see Attachment 18; see Sole Source Aquifers Worksheet).

Supporting documentation

Attachment 18- Sole Source Aquifer Map Screenshot.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.

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

<u>You must determine that there are no practicable alternatives to wetlands development by completing the 8-Step Process.</u>

Document and upload the completed 8-Step Process as well as all documents used to make your determination, including a map below. Be sure it includes the early public

notice and the final notice with your documentation.

3. 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.

Construction of the proposed Project would fill the wetland features on site. As a result, the Project underwent HUD's 8-Step Process to identify direct and indirect impacts associated with the construction of the proposed Project. Construction of the proposed Project would result in the loss of wetland habitat onsite. The City initiated Section 7 consultation with the USFWS on December 10, 2024 to determine potential impacts of habitat loss from construction of the proposed Project and identify mitigation. The USFWS responded in a letter on February 4, 2025 and determined that the wetlands onsite do not provide critical habitat for any federally protected species.

The beneficial functions of the on-site wetlands are currently stormwater detention and infiltration. Impacts caused by increased stormwater runoff will be mitigated through the addition of the vegetated stormwater facilities noted below:

1) An underground detention facility and flow control manhole will meet the water quantity requirements of the City of Gresham Stormwater Manual and the HUD Programmatic Biological Opinion.

2)Two lined rain gardens and two line stormwater planters will provide water quality for the site. Water quality facilities were sized using half of the 2-year storm event to meet the more stringent HUD requirements and exceed the City's requirements.

Which of the following mitigation actions have been or will be taken? Select all that apply:

Permeable surfaces

Natural landscape enhancements that maintain or restore natural hydrology through infilitraion
Native plant species

Bioswales

Evapotranspiration

Stormwater capture and reuse

Green or vegetative roofs with drainage provisions

Natural Resources Conservation Service conservation easements

Compensatory mitigation

Other

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

Screen Summary

Compliance Determination

Dudek prepared a Biological Resources Memorandum (Memo) in June 2024, which identified one wetland, including a stormwater swale containing an emergent wetland, as well as two potential depressional wetland features. A wetland delineation was needed to determine the precise boundaries of the wetland within the stormwater pond and the jurisdictional status of the wetland to the Oregon Department of State Lands (DSL) and/or the U.S. Army Corps of Engineers (USACE). Dudek completed a Wetland Delineation Report (WDR) for the Project Site in September 2024 to document the presence of wetlands and non-wetland waters within the study area and determine their jurisdictional status (see Attachment 17). Three wetlands and one non-wetland water was identified on the Project Site. Wetland A (0.12 acres) occurs at the western boundary of the study area near the sidewalk along NW Civic Drive, Wetland B (0.15 acres) occurs in the center of the gravel and vegetated western portion of the study area, and Wetland C (0.09 acres) occurs between Wetland B and the gravel parking lot. Wetland C is a purpose-built stormwater feature with an overflow channel that outlets to the south. All three wetlands are considered to be depressional and have a Cowardin/HGM or Water (Flow Duration) of Palustrine emergent (PEM). The non-wetland water is a 1-foot-wide, 65-foot-long ephemeral drainage that connects Wetland C (the stormwater pond) to NW 15th Street. Wetlands A, B, and C meet the 3-parameter definition of wetlands, but presumed to be non-jurisdictional to the DSL. Historical photographs of the Project Site show a grove of trees growing west of the current Wetland C location until circa 2002. As the wetlands onsite were created wholly in upland, are under 1-acre in size, and are not part of a mitigation area, they are exempt per OAR 141-085-0515(6a-c). These wetlands are also likely non-jurisdictional to USACE because they are artificial and created in upland as a result of construction activity and is not adjacent to jurisdictional waters (33 CFR 328.3[b][6]). In a letter dated February 4,

2025, USACE determined that there are no waters of the United States within the Project review area, which encompasses the Project Site (see Attachment 18). However, all three wetlands onsite meet the definition of wetlands under EO 11990, and therefore would be under the jurisdiction of HUD, as they meet HUD's definition of a wetland. Construction of the proposed Project would affect (remove) the wetland features previously described. As a result, the Project underwent HUD's 8-Step Process to identify direct and indirect impacts associated with the construction of the proposed Project. Construction of the proposed Project would result in the loss of wetland habitat onsite. The City initiated Section 7 consultation with the USFWS on December 10, 2024 to determine potential impacts of habitat loss from construction of the proposed Project and identify mitigation. The USFWS responded in a letter on February 4, 2025 and determined that the wetlands onsite do not provide critical habitat for any federally protected species. Due to the cost of real estate and built-out nature of the surrounding community, there are limited options available for alternative sites that could support the proposed Project outside of the wetland. Furthermore, any alternative Project design that could avoid impacting wetlands onsite would significantly reduce the number of affordable housing units that could be provided by the proposed development, such that Project would no longer fulfill the City's purpose and need. As a result, the proposed Project must be located within the wetlands and any proposed alternatives would be insufficient. Therefore, the proposed Project is in compliance with Executive Order 11990 (see Attachments 19-23; see Wetlands Protection Worksheet).

Supporting documentation

Attachment 22- Wetland 8-Step Summary and Documentation.pdf
Attachment 23- Gresham ESA_ Wetlands Protection Documentation- Home Forward Civic-Signed.pdf
Attachment 21- USACE AJD.pdf
Attachment 20- Wetland Delineation Report.pdf
Attachment 19- WD20240498 AgencyDecision.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

The Wild and Scenic Rivers Act (16 USC 1271-1287) 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). The NWSRS was created by Congress in 1968 to preserve certain rivers with outstanding natural, cultural, and recreational values in a free-flowing condition for the enjoyment of present and future generations. The EPA's NEPAssist interactive map (EPA 2024c) was used to determine the location of designated Wild and Scenic Rivers in the vicinity of the Project Site. The Project Site is not located near any NWSRS river, including designated Wild and Scenic Rivers, study rivers, and Nationwide Rivers Inventory (NRI) river segments. The closest protected waterway is Sandy River. The Project Site is approximately 3.86 miles west of the portion of the Sandy River designated as Wild and Scenic by the National Wild and scenic Rivers System. Therefore, the proposed Project is in compliance with the Wild and Scenic Rivers Act (see Attachment 24; see Wild and Scenic Rivers Worksheet).

Supporting documentation

Attachment 24- NEPAssist Wild and Scenic Rivers Screenshot.pdf

Are formal compliance steps or mitigation required?

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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:

Adverse environmental impacts related to migratory birds (Endangered Species section) were identified in the EA. Potential adverse impacts related to the inadvertent discovery of archaeological resources during construction and post-construction radon testing were also identified within the EA. With mitigation, all adverse impacts associated with the proposed development can be reduced to less than significant levels. As discussed in the EA, the project would not have any disproportionately high or adverse impacts to low-income or minority communities.

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

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Screen Summary

Compliance Determination

Not applicable per Executive Order 14173.

Supporting documentation

EO 14173.pdf

Are formal compliance steps or mitigation required?

Yes

✓ No