



**U.S. Department of Housing and Urban
Development**

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

**This is a suggested format that may be used by Responsible Entities to document completion of an
Environmental Assessment.**

Project Information

Project Name: Gravelly Lake Commons

Responsible Entity: City of Lakewood & City of Tacoma

Grant Recipient (if different than Responsible Entity): Living Access Support Alliance (LASA)

State/Local Identifier: Washington

Preparer: Landau Associates, Inc.

Certifying Officer Name and Title: Jeff Rimack, Director Planning & Public Works, City of Lakewood and Patricia Beard, Interim Director, Community and Economic Development

Consultant (if applicable): Landau Associates, Inc.

Direct Comments to: Jeff Gumm, City of Lakewood
253-983-7773
JGumm@cityoflakewood.us
&
Felicia Medlen, City of Tacoma
253-591-5238
fmedlen@cityoftacoma.org

Project Location:

The project is located at 5516 and 5520 Fairlawn Drive SW, in Lakewood, Pierce County, WA. The project site consists of Pierce County parcels 5130001640 and 5130001650.

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

The Gravelly Lake Commons project will remove two single family residences currently located on the properties and will construct a 25-unit affordable rental-housing development. Construction will include foundation and utilities excavation and installation, construction of four separate two- and three-story apartment buildings, parking lots and driveways, and general site work and landscaping typical of multifamily construction.

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

The Gravelly Lake Commons project’s purpose is to help alleviate homelessness for families in Pierce County. The project will provide housing to those who earn 30 to 50 percent of the average median income in Pierce County.

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

The project location is in a residential area zoned Neighborhood Commercial (NC2) that is intended for a concentrated mix of activities, including residential, retail, office, and local services. The project is located within walking distance of Lakewood Town Center, Seeley Lake Park, schools, and other services. Without the project, competition for housing would likely continue to increase, resulting in low-income residents being forced to move or live without shelter, as well as resulting in driving up the price of services and labor costs for higher income residents and businesses.

Funding Information

Grant Number	HUD Program	Funding Amount
CFDA #14.239	HOME	\$1,000,000
CFDA #14.239	HOME-ARP	\$1,175,489
B-24-CP-WA-2303	Public Law 118-42 and PL 118.47	\$1,000,000

Estimated Total HUD Funded Amount: \$3,175,489

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$13,175,489

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

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Airport McChord Field is located within 15,000 feet of the project site but is not in an Accident Potential Zone (APZ) or Runway Protection Zone/Clear Zone (RPZ/CZ). The project site is located to the west of the airport. The runway for the airport is positioned in a North-South orientation. The City of Lakewood denotes zoning areas to ensure that the APZ and RPZ/CZ are not developed inappropriately. A map of the zoning shows that the project site is not located in any of the City designated airport clear zones (AC1, AC2, CZ). Refer to Appendix A – Airport Hazards.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	This project is located in a state that does not contain Coastal Barrier Resources System (CBRS) units. Therefore, this project is in compliance with the Coastal Barrier Resources Act. Refer to Appendix B – Coastal Barrier Resources.
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 <input type="checkbox"/> <input checked="" type="checkbox"/>	The project area is not located within a special flood hazard area. Refer to Appendix C – Flood Insurance.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		

<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project is in a maintenance designation area for fine particles. Maintenance designations for carbon monoxide (CO), and ozone encompassing the project vicinity ended in 2016 and 2021. Even so, ozone, CO, and fine particle emissions from construction are expected to be <i>de minimis</i>. Refer to Appendix D – Clean Air.</p>
<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project does not require state review at this stage. Concurrence from the Washington State Department of Ecology (Ecology) for Coastal Zone Management (CZM) is no longer required under a Part 58 or Part 50 Environmental Review in Washington State (HUD; accessed January 21, 2021). However, at the time of project development, the activity may trigger review if it falls under other parts of the Coastal Zone Management Act (CZMA) regulations for federal agency activities (Title 15 CFR Part 930, Subpart C), or consistency for activities requiring a federal license or permit (Title 15 CFR Part 930, Subpart D) and will be subject to all enforceable policies of the Coastal Zone Management Program. It is during the local permitting process that a project might be subject to CZM and further review by Ecology. Refer to Appendix E – Coastal Zone Management Act.</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>A Phase I environmental site assessment (ESA) conducted for the property lists an abandoned heating oil underground storage tank (UST) and the potential for a second UST as recognized environmental conditions (RECs) for the site. No contamination was found during an assessment of the abandoned tank, and no evidence was observed of another UST; therefore, no additional investigation is warranted prior to groundbreaking activities. Under WAC 173-360A-0110(d), UST systems used solely for heating structures on the property where the system is located are exempt from closure requirements listed under WAC 173-360A-</p>

		0810. However, during excavation and demolition activities, USTs (and contaminated soil, if encountered) will be removed to facilitate redevelopment. The Phase I ESA also notes a potential for asbestos and lead to be present in building materials. Regulations for proper testing and disposal of building materials will be followed. Radon levels for Pierce County are well below 4.0 picocuries per liter (pCi/L) according to available Centers for Disease Control (CDC) data. Refer to Appendix F – Contamination and Toxic Substances.
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project satisfies conditions for a determination of “no effect” from the US Fish and Wildlife Service (USFWS) and has been determined eligible for coverage under the National Marine Fisheries Service (NMFS) US Department of Housing and Urban Development (HUD) Programmatic Biological Opinion for Projects in Washington State (WCR-2020-00512). Refer to Appendix G – Endangered Species Act.</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>No tanks requiring calculation of acceptable separation distance were identified within 1 mile of the project. Refer to Appendix H – Explosives and Flammable Hazards.</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project is located in a developed urban area and is not in agricultural use. Refer to Appendix I – Farmland Protection.</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Using the freeboard value approach, the project site was evaluated to occur above the Federal Flood Risk Management Standard (FFRMS) floodplain. Refer to Appendix J – Floodplain Management.</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Consultation has been completed with the Department of Archaeology and Historic Preservation (DAHP) and affected Tribes. DAHP has concurred with determination of no historic properties affected. No responses</p>

		were received from the Tribes. Refer to Appendix K – Historic Preservation.
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 <input type="checkbox"/> <input checked="" type="checkbox"/>	Noise levels at the location representative of worst-case potential noise levels was calculated to be 64 decibels (dB), below the acceptable limit of 65 dB. Mitigation will not be necessary. Refer to Appendix L - Noise.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project is on a sole source aquifer, but no design elements will affect the aquifer. Stormwater runoff from the completed project will be conveyed to onsite infiltration trenches designed to mimic pre-disturbance hydrologic processes. Refer to Appendix M – Sole Source Aquifers.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project does not encroach on any wetlands. Refer to Appendix N - Wetlands.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project is not located near a designated Wild and Scenic River. Refer to Appendix O – Wild and Scenic Rivers.
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No adverse environmental impacts were identified. Refer to Appendix P – Environmental Justice.

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list 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
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The project conforms with zoning NC2, which allows for a mix of residential and commercial development. There are several apartment buildings and high density residential developments nearby. The project is consistent with the City of Lakewood Consolidated Plan, which includes housing needs for low-income households. Refer to Appendix Q – Lakewood Zoning Map.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	Geotechnical evaluation has been completed for the site. The investigation found the site to be suitable for the proposed project, with recommendations for site preparation, structural fill, erosion control, drainage/waterproofing, and other aspects of geotechnical design. Refer to Geotechnical Engineering Report from GeoResources, dated August 2, 2024, in Appendix G – Endangered Species Act.
Hazards and Nuisances including Site Safety and Noise	2	The proposed project poses no hazards or nuisances. No site safety concerns were identified.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	The project is not anticipated to significantly impact the existing employment and income patterns of the surrounding area.
Demographic Character Changes, Displacement	2	The project is located in a developed urban residential area. The project removes two single-family residences and replaces them with higher density housing. Several apartments and high-density housing developments are located in the neighborhood, and the project conforms to applicable zoning.
Environmental Justice	2	Nothing was identified in any of the other factors that would create a negative impact on the environment.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	Because the proposed project increases residential housing capacity, a demand for educational and cultural services and facilities may be associated with residents. However, services provided by educational facilities will not be adversely affected because of the size of the project, and it is expected that the incremental increase in demand can be met by the existing capacity.
Commercial Facilities	1	The site is located close to commercial facilities, and new residents may have small but positive impact on local commercial businesses.
Health Care and Social Services	2	Because the proposed project increases residential population, a demand for health care and social services and facilities may be associated with residents. However, health care services will not be adversely affected because of the size of the project, and it is expected that the incremental increase in demand can be met by the existing capacity. The parcels being developed are a part of a larger property owned by LASA that currently houses LASA's client services center.
Solid Waste Disposal / Recycling	2	The site will be provided with onsite garbage pickup. Solid waste services will not be adversely affected. Waste created by construction and by the completed project will be hauled offsite and disposed at permitted facilities. Because the proposed project increases residential population, a demand for recycling services and facilities may be associated with residents. However, recycling services will not be adversely affected because of the size of the project, and it is expected that the incremental increase in demand can be met by the existing capacity.
Waste Water / Sanitary Sewers	2	Access to municipal wastewater/sanitary sewer service will be provided to the proposed project. Wastewater/sanitary sewer services will not be adversely affected, because it is expected that the incremental increase in demand will be met by the existing system capacity.
Water Supply	2	Access to City water supply will be provided to the proposed project. Water supply will not be adversely affected, because it is expected that water needs at the site will be met by the existing water supply capacity.
Public Safety - Police, Fire and Emergency Medical	2	Public safety services, including police, fire, and emergency medical services, will be available to residents. However, public safety services will not be adversely affected because of the size of the project, and it is expected that the

		incremental increase in demand can be met by the existing capacity.
Parks, Open Space and Recreation	2	The proposed housing project will be constructed on parcels currently developed with single-family homes. The proposed project includes a playground and improved landscaping. No designated recreation areas or parks will be removed as part of the project. Recreational facilities will not be adversely affected by the project.
Transportation and Accessibility	2	Residents using the completed project may use local roadways. The project area is served by Pierce County Transit Bus Route 2, located 0.2 miles west on Bridgeport Way SW. Many services, such as grocery stores, parks, and a community center, are within walking distance. It is expected that transportation needs at the project will be met by existing transportation capacities. Because of the limited size of the proposed project, no adverse impacts to transportation networks or services are anticipated.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	The project is located in Lakewood in a developed area, and no unique natural features or agricultural lands are in the project vicinity. The proposed project will not discharge or draw from any groundwater. Therefore, no adverse effects on these natural features are anticipated.
Vegetation, Wildlife	2	The site where the proposed project will be constructed was developed as single-family homes, and vegetation consists of grass and residential landscaping and does not contain habitat associated with species of local importance. Therefore, no adverse impacts to significant vegetation or wildlife are anticipated.
Other Factors		None identified.

Environmental Assessment Factor	Impact Code	Impact Evaluation
CLIMATE AND ENERGY		
Climate Change Impacts	2	The project will provide landscaping that will include species of deciduous trees. Mature trees may help regulate temperature at the site, thereby offsetting potential impacts associated with extreme heat/urban heat island effects.

		Geotechnical recommendations will be following to support soil suitability/stability. The project is not located near the coastline and is at an elevation more than 200 feet above sea level. Flooding impacts of climate change are addressed in the floodplain impacts section. The project is not located in an area expected to have extreme weather events, droughts, or wildfires outside the range of what normal construction can withstand.
Energy Efficiency	2	Buildings will comply with 2021 Washington State Energy Code requirements and Evergreen Sustainable Development Standard 4.1. Energy-efficient project elements include continuous insulation on exterior walls; energy-efficient windows; heating, ventilation, and air conditioning (HVAC) equipment; water-heating equipment; and Energy Star-rated appliances.

Additional Studies Performed:

Contour Engineering. 2024. Developed Basin Map, LASA Gravelly Lake Commons, Lakewood, WA. August 1.

Contour Engineering. 2024. Stormwater Operations and Maintenance Manual for LASA Gravelly Lake Commons. August.

Contour Engineering. 2024. Storm Drainage Description for LASA Gravelly Lake Commons. August 2.

GeoResources. 2024. Geotechnical Engineering Report, Gravelly Lake Commons, 5516 & 5520 Fairlawn Drive Southwest, Lakewood, Washington. GeoResources Earth Science and Geotechnical Engineering. August 2.

Geotech. 2023. Phase I Environmental Site Assessment, 5516 and 5520 Fairlawn Drive Southwest, Lakewood, Washington. Geotech Consultants, Inc. September 14.

James Guerrero Architects, Inc. 2024. Phase 3 Design Plan, LASA – Phase 3 Gravelly Lake Commons. May 23.

James Guerrero Architects, Inc. 2024. Landscaping Plan, LASA – Phase 3 Gravelly Lake Commons. August 08.

Langseth. 2020. Re: Underground Heating Oil Storage Tank Abandonment Project. Site Assessment Report, 5516 Fairlawn Dr. SW, Parcel 0320354030. Langseth Environmental Services, Inc. September 11.

LASA. 2024. Inadvertent Discovery Protocol. May.

Field Inspection (Date and completed by):

An Environmental Geologist with Geotech Consultants visited the site on September 8, 2023 to observe site conditions as part of a Phase I ESA.

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

CDC. 2024. National Environmental Public Health Tracking Network. Radon Data. <https://ephtracking.cdc.gov/DataExplorer/?c=31>. Centers for Disease Control. Accessed August 9, 2024.

Clover Park School District, Ms. Leanna Albrecht, 10903 Gravelly Lake Dr. SW, Lakewood WA 98499. July 10, 2024.

DAHP. 2024. Re: Not Eligible for National Register of Historic Places. Department of Archaeology & Historic Places. March 15.

DAHP. 2024. Re: No Historic Properties Affected, Gravelly Lake Commons. Department of Archaeology & Historic Places. April 19.

Ecology. 2024. Maintenance State Implementation Plans (SIPs). <https://ecology.wa.gov/Regulations-Permits/Plans-policies/State-implementation-plans/Maintenance-SIPs>. Washington State Department of Ecology. Accessed July 8, 2024.

Ecology. Underground Storage Tank Closures, Guidance and Technical Assistance. <https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/UST-owner-and-operator-resources/Underground-Storage-Tank-closures>. Washington State Department of Ecology. Accessed August 15, 2024.

EPA. NEPAAssist. <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>. US Environmental Protection Agency. Accessed July 8, 2024.

EPA. 2024. NEPAAssist. <https://www.epa.gov/nepa/nepassist>. US Environmental Protection Agency. Accessed August 9, 2024.

FEMA. FEMA Flood Map Service Center. <https://msc.fema.gov/portal/home>. Federal Emergency Management Agency. Accessed July 8, 2024.

Google, Inc. Google Earth Pro. Imagery Date April 13, 2024. Accessed July 11, 2024.

HUD. Acceptable Separation Distance Electronic Assessment Tool. <https://www.hudexchange.info/programs/environmental-review/asd-calculator/>. US Department of Housing and Urban Development. Accessed July 11, 2024.

HUD. 2024. Day Night Noise Calculator. <https://www.hudexchange.info/environmental-review/dnl-calculator/>. US Department of Housing and Urban Development. Accessed August 9, 2024.

HUD. Environmental Guidance. <https://www.hud.gov/states/shared/working/r10/environment>. US Department of Housing and Urban Development. Accessed January 21, 2021.

Lakewood, City of. 2023. City of Lakewood Zoning Map. https://cityoflakewood.us/wp-content/uploads/2023/08/Zoning_11x17-scaled.jpg. July 14.

Lakewood, City of. 2024. The Lakewood Municipal Code, 18A.40.130 Air corridor and clear zone. <https://lakewood.municipal.codes/LMC/18A.40.130>. May 20.

Lakewood, City of. 2021. Traffic Volume Report. <https://cityoflakewood.us/wp-content/uploads/2021/10/202110-Traffic-Volume-Report.pdf>. Accessed August 9, 2024.

Lakewood, City of. City of Lakewood Public Notices: <https://cityoflakewood.us/category/rfp-rfq-bids/>. Accessed July 11, 2024.

Lakewood, City of, Public Works/Engineering Services, Mr. Weston Ott, 6000 Main St. SW, Lakewood WA 98499. July 10, 2024.

Lakewood, City of, Police Department, Chief Patrick D. Smith, 6000 Main St. SW, Lakewood WA 98499. July 10, 2024.

Lakewood Water District, Mr. Randy Black, 11900 Gravelly Lake Dr. SW, Lakewood WA 98499. July 10, 2024.

Langseth. 2020. Site Assessment Report, 5516 Fairlawn Dr. SW, Underground Heating Oil Storage Tank Abandonment Project. Langseth Environmental Services, Inc. September 11.

National Park Service. Wild and Scenic Rivers Program. <https://nps.maps.arcgis.com/apps/View/index.html?appid=ff42a57d0aae43c49a88dae0e353142>. Accessed August 13, 2024.

Pierce County Online Records: <https://www.piercecountywa.gov/5554/Records-Available-Online>. Pierce County, Washington. Accessed July 11, 2024.

Pierce County. 2016. Tacoma Narrows Master Plan Update, Final Report. <https://www.piercecountywa.gov/7216/Tacoma-Narrows-Airport-Master-Plan>. Accessed August 9, 2024.

Pierce County. 2024. Pierce County Airport – Thun Field – Airport Improvement Projects Environmental Assessment. January. <https://www.piercecountywa.gov/8173/Pierce-County-Airport---Thun-Field-Maste>. Accessed August 9, 2024.

Pierce County Planning & Public Works, 9850 64th St. W, University Place WA 98467. July 10, 2024.

PSCAA. 1998. Article 4: Asbestos Control Standards. Puget Sound Clean Air Agency. February 12.

South Sound Military & Communities Partnership. 2019. Military Influence Areas Overlay Report & Recommendations for Joint Base Lewis-McChord & Surrounding Communities. May 15.

St. Clare Hospital, Mr. Matthew Metsker, 11315 Bridgeport Way SW, Lakewood WA 98499. July 10, 2024.

USFS. 2024. <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/>. US Forest Service. Accessed June 27, 2024.

USGS National Map Viewer. <https://apps.nationalmap.gov/viewer/>. US Geological Survey. Accessed August 14, 2024.

Waste Connections/LeMay Inc., Ms. Destini Wilson, 4111 192nd St. E., Tacoma, WA 98466. July 10, 2024.

West Pierce Fire & Rescue, Ms. Hallie McCurdy, 3631 Dexter Dr. W, University Place WA 98466. July 10, 2024.

WSDOT. 2023. Biological Assessment Preparation for Transportation Projects - Advanced Training Manual. Version 2023. Washington State Department of Transportation. June.

List of Permits Obtained:

No permits have been issued at this time.

Public Outreach [24 CFR 50.23 & 58.43]:

LASA has had a presence in the Lakewood community for several years and has offered programs designed to help prevent homelessness and recurring homelessness. LASA has worked directly with citizens of the city to assess their needs and what could be improved in LASA's projects and programs. LASA uses past experiences to assess citizen needs with the current housing landscape and has obtained more than 30 letters of support from community stakeholders in support of the project.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project does not cause any adverse environmental impacts and will not result in a significant impact on the quality of the environment.

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

An initial site plan was conceptualized to determine the feasibility of the project for the funding application. Subsequent site plans were developed as a result of an iterative design process among the project's experts, project partners, and community involvement to accurately assess and determine the needs of the project-specific demographic eligible to reside at the project. A lack of development, or any development option that provides only market-value housing, would

mean that the community will remain in short supply of affordable housing. As noted in the Public Outreach description, LASA has obtained more than 30 letters of support from community stakeholders in support of the project. The site plan has been refined based on stakeholder and design limitation feedback, and modifications may occur until the final site plan is complete and approved for permitting.

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

If no action is taken at the site, the parcels may eventually be developed with uses compatible with current zoning, or may remain as single family residences. There would continue to be a demand for affordable housing in this area in the absence of the proposed project.

Summary of Findings and Conclusions:

The proposed project does not cause any adverse environmental impacts and will not result in a significant impact on the quality of the environment.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below 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
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<p>Under WAC 173-360A-0110(d), UST systems used solely for heating structures on the property where the system is located are exempt from closure requirements listed under WAC 173-360A-0810. However, during excavation and demolition activities, USTs (and contaminated soil, if encountered) will be removed to facilitate redevelopment. Applicable regulations will be followed to prevent a release of potential asbestos-containing materials and lead-based paint that could potentially be present in the residential structures that will be demolished as part of the project.</p>
<p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Project designs will conform as described in storm design, stormwater operations, and maintenance.</p>
<p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>During ground-breaking activities, the unanticipated discovery protocol will be followed.</p>

Determination:

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

Preparer Signature: *Felicia Medlen* Date: 10/4/2024

Name/Title/Organization: Felicia Medlen, Division Manager, City of Tacoma Community and Economic Development

Certifying Officer Signature:  Date: 10/4/2024

Name/Title: Patricia Beard, Interim Director, City of Tacoma Community and Economic Development

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