



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

Project Information

Project Name: Polk 2.0

Responsible Entity: City of Eugene

Grant Recipient: Corvallis Neighborhood Housing Services Inc., DBA: DevNW

State/Local Identifier: M-21-DC-41-0200 (HOME)

Preparer: Jackie M. Dowell, Environmental Review Analyst

Certifying Officer

Name and Title: Denny Braud, Planning & Development Department Director

Consultant (if applicable): N/A

Direct Comments to: Jackie M. Dowell, (541) 682-5447

Project Location: 89 N. Polk Street – Map: 17 04 25 41 Taxlot: 4900 (new address pending)

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]: Include all contemplated actions which logically are either geographically or functionally a composite part of the project, regardless of the source of funding.

DevNW proposes to construct a new, two-story apartment building with 12 Single Room Occupancy (SRO) units (including six permanent supportive housing units), one on-site manager unit and common area, to provide housing for youth entering independence from foster care and system-engaged youth experiencing homelessness and at risk of homelessness.

Funding Information

Grant Number	HUD Program	Funding Amount
M-21-DC-41-0200	HOME	\$550,000

Estimated Total HUD Funded Amount:

\$550,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

\$3,600,000

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

The existing 12-unit apartment building at this site, Polk Street Apartments, serves youth transitioning into independence from the foster care system. The target population of the new apartment building called Polk 2.0 will be an expansion of the current program to focus on youth entering independence from foster care and other system-engaged youth including youth experiencing homelessness and at risk of homelessness. The proposed project will serve youth below 60% Area Median Income (AMI), with 5 units at 30% AMI.

Continued need and demand for young adult housing far outpaces available units. Youth aging out of foster care who have been otherwise system-engaged, and/or are homeless are at higher risk of adult homelessness, substance abuse, unemployment, involvement in the criminal justice system, and a variety of other psychosocial challenges. Much of their ability to succeed is rooted in access to stable, affordable housing during the crucial transition to independence but they are forced into a housing market in crisis, seeking unaffordable housing without the benefit of a rental history, cosigners, credit history, or sufficient income. Additionally, traditional affordable housing units have a 3-5 year waiting list. Without low-barrier units dedicated to this population they are often left in unstable, unsafe housing or are homeless. Each year in Lane County more than 100 youth age out of foster care and more than 100 young adults are identified as homeless in the Point In Time Count. There are only 12 housing units dedicated to young adults in Eugene. The proposed project would double that number to 24 units.

The Consolidated Plan lists youth aging out of foster care as a high needs population under the housing plan. The proposed project will add an additional 12 units for transitional youth in an environment where Polk Street Apartments is the only other apartment complex of its kind in Lane County. At present, emergency shelters for unaccompanied youth in Lane county only meets 11% of the demand. By adding an additional 12 SRO's to the housing stock, the developer would double the supply for this at risk population.

Existing Conditions and Trends [24 CFR 58.40(a)]: Describe the existing conditions of the project area and its surroundings, and trends likely to continue in the absence of the project.

The site is located in the Whitaker Neighborhood. The subject site is an ideal location for this population given that it is a diverse community with a mix of residential and commercial uses close to downtown Eugene, public transit, the river trail system, schools, healthcare, social service agencies, parks, and other vital amenities in a neighborhood that is supportive of the project.

The subject property is comprised of one 0.54 acre tax lot and is currently occupied by a 12-unit apartment building and a vacant grass lot. The existing Polk Street Apartment building was built in 1968 and is 54 years old.

The site is zoned R-2 Medium Density Residential. The subject site is located to the northwest of downtown Eugene. Surrounding sites include a mix of residential and commercial use. This neighborhood has served as an agricultural and commercial district in the past but has become a primarily residential area. It is a densely populated neighborhood with many older homes, apartment buildings and businesses.

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, 2dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or</p>	<p>Compliance determinations</p>
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	mitigation required?	
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"/>	The subject property is not located within 15,000 feet of a military airport, within 2,500 feet of a civilian airport or in an Airport Clear Zone. Please see the attached map in Section B.
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"/>	Eugene is outside of the Coastal Zone. Source: Oregon Department of Land Conservation and Development. Please see the attached checklist and map in Section C.
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 FEMA flood map for the area is number 41039C1136F, effective on 06/02/1999. This map shows that the property is not located within a flood plain. Please see the attached checklist and map in Section D.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	According to Lane Regional Air Protection Agency, the Eugene-Springfield area was designated as "attainment" for PM10 with all National Ambient Air Quality Standards (NAAQS) in June 2013. Please see the consultation letter from the Lane Regional Air Protection Agency (LRAPA) in Section C.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Eugene is outside of the Coastal Zone. Source: Oregon Department of Land Conservation and Development. Please see the attached checklist and map in Section C.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The Phase I Environmental Site Assessment (ESA) was conducted in conformance with the requirements of American Society for Testing and Materials (ASTM) Standard Practice E 1527-13/-21 and the United States Environmental Protection Agency (EPA) All Appropriate Inquiries (AAI) Final Rule (40 Code of Federal Regulation [CFR] 312. The Phase I also considered the Department of Housing and Urban Development (HUD) Standards 24 CFR 58.5(i) (2).</p> <p>Based on the findings and conclusions of the Phase I ESA, no conditions were identified that could affect the health and safety of future occupants. The conclusion is that there is no evidence of recognized environmental conditions (RECs) in connection with the property; however, a historical aerial photo indicates that a small hobby orchard of approximately 12 trees was developed by 1944 (most now removed) and couldn't eliminate possible contamination from the orchard without soil testing. As a result, a Phase II ESA was conducted.</p> <p>The Phase II was conducted to assess near-surface soils for the presence of residual agricultural chemicals related to previous land use. Field observation and chemical data do not indicate the</p>

		<p>presence of a chemical release and therefore do not represent a risk to human health or urban residential receptors.</p> <p>Laboratory analysis of soil samples reflects that none of the detected concentrations exceeded applicable Oregon Department of Environmental Quality (DEQ) human health Risk-Based Concentrations (RBCs) and/or United States Environmental Protection Agency (EPA) Regional Screening Levels (RSLs), except for arsenic, but arsenic concentrations were below published DEQ background concentrations and does not exceed the DEQ Background Screening Value (BSV) for metals in the Southern Willamette Valley.</p> <p>According to the Phase II report, there is a Large Quantity Generator (LQG) 300 feet west of the proposed project site that contains hazardous waste. Research of the LQG do not indicate that a release has occurred, but in the event of a release, the site is cross-gradient from the subject property indicating it is not likely to impact the subject property and is not considered a REC or a Vapor Encroachment Condition (VEC). No mitigation is required.</p> <p>Section E.</p>
<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 vegetation and wildlife at the subject site is consistent with an urban environment.</p> <p>The project proposal would overlap with Endangered Species Act (ESA)-listed species or designated critical habitat covered by Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) also referred to as the National Marine Fisheries Service (NMFS). The proposed project is not limited to activities in Table A of the ESA Guidance for Oregon, and therefore consultation with NOAA Fisheries was required. A Section 7 consultation was submitted to NOAA Fisheries on November 17, 2020.</p> <p>The subject property is comprised of one tax lot and is currently a vacant grass lot with one structure. The site is approximately 0.54 acres and is currently occupied by a two-story, 12-unit apartment building.</p> <p>This site consists of Type C Malabon soil. Infiltration testing conducted by an on-site geotechnical engineer observed no infiltration. No stormwater runoff will be infiltrated on the subject site. All new impervious areas will be treated with vegetated facilities and conveyed to an existing 90-inch City of Eugene main in Polk Street after being treated through a filtration planter.</p> <p>Flow is not proposed for the site, but runoff will be slowed through filtration in a new planter; however, flow is not proposed to be detained with flow control structures. As determined during the pre-construction conference consultation between NMFS/HUD/COE it was concluded that because the site is relatively small detention would not be required and that discharge could go to the 90 inch pipe that discharges into the Willamette River after flowing through a proposed filtration planter. The City of Eugene does not require detention for the proposed stormwater plan.</p> <p>There are trash areas located throughout the development site that will require source control measures. To meet these requirements,</p>

		<p>heavy-duty sanitary drains in the trash areas will be trapped, auto-primed, vented and connected to the sanitary sewer system and will not be conveyed to the storm drainage system. Trash areas will also be covered and hydraulically isolated from the stormwater system.</p> <p>On July 18, 2022, NOAA approved the post-construction stormwater management plan as consistent with the biological opinion issued to HUD on July 25, 2016 (HUD Stormwater Programmatic Agreement) stating that the proposed project is likely to adversely affect ESA-listed species, designated critical habitat, and essential fish habitat through stormwater runoff generated from new and reconstructed impervious surface area.</p> <p>The NOAA approval statement further stated that the proposed action is consistent with the HUD Stormwater Programmatic Biological Opinion for:</p> <p>Project Design Stormwater Treatment Quality Stormwater Quantity Management Stormwater Facilities' Operations & Maintenance</p> <p>All other relevant project design criteria for construction practices</p> <p>Inspection, monitoring, and maintenance of stormwater facilities must occur in accordance with the submitted operation and maintenance plan.</p> <p>This action meets the conditions of the HUD SWP Biological Opinion issued on July 25, 2016. A copy of all review materials is on file at NMFS' Oregon-Washington Coastal Office.</p> <p>The NOAA opinion requires the Responsible Entity to submit a project completion report for this project within 60-days of end of construction.</p> <p>A biological field survey was conducted on February 28, 2022 that concluded that the property does not support federal or state listed, proposed, or candidate species or their habitat.</p> <p>The proposed plan has been determined to be consistent with the Endangered Species Act Guidance for Oregon.</p> <p>Section F.</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>A search of the Oregon State Fire Marshall's Office database confirmed that the project is located at an Acceptable Separation Distance (ASD) from any above-ground explosive or flammable fuels or chemicals containers according to 24 CFR 51C.</p> <p>A search of the Oregon State Fire Marshall's Office database identified four businesses within a mile radius that used flammable and explosive substances. These businesses are Chef Francisco, Oregon Organics, and Tyree Oil, Industrial Source.</p> <p>Chef Francisco, located at 1400 Cross Street, closed in June 1995 and exited the Hazardous Materials program at that time. Currently there are no active Hazardous Material Permits at this site. (Map ID 1 and 2)</p> <p>Oregon Organics has two hydrogen tanks. One of the tanks is inside of the building and does not need to be considered. The other, a 195 cu ft tank, is on the roof. Nelson Rivera at HUD Headquarters provided the following guidance on April 5, 2022:</p>

		<ul style="list-style-type: none"> • The beveled front portion of concrete area of the building that has a higher area of exposure from where the tank is located (you cannot see this tank from the current proposals location). • The difference in gradient from the current higher assessed tank elevation to where the proposal is on grade. • Nor the heat flux or the blast overpressure would reach levels that would be exceeding the current standards under the HUD regulation 51 Subpart C. • No additional mitigation actions are required. (Map ID 3) <p>Tyree Oil has a tank farm. Under these circumstances, we consider the largest, closest tank. Tyree Oil has provided a diagram and a list of info for the tanks. This information indicates that Tank 18 is the largest, closest tank. It contains 156747 gallons of low sulfur diesel. The HUD ASD calculation reflects that the explosion buffer for this tank does not intersect with the subject site. (Map ID 4 and 5)</p> <p>Industrial Source sold the property at 1574 W 6th street in December 2021. They have not had any acetylene or any other gas stored in the site since April of 2020. The new owners plan to repurpose the building as a restaurant supply company. The new business will have an office, a show room and will sell and deliver commercial grade restaurant equipment. A contractor for the new owner obtained a demolition permit to remove the explosion walls and will repurpose the building for the new use. The new business will not be using flammable/explosive materials and there is no permit at the subject site that allow for flammable or explosive uses. (Map ID 6) No mitigation is required.</p> <p>Please see the attached maps and materials in section G.</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 site is within the City of Eugene Urban Growth Boundary. The US Census Bureau recognizes the area as Urbanized Area, which is not farmland, and does not convert farmland to a non-agricultural use. The Farmland Protection Act does not apply. Please see the checklist and maps in Section C.</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>The FEMA flood map for the area is number 41039C1136F, effective on 06/02/1999. This map shows that the property is not located within a flood plain. Please see the attached maps in Section D.</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>The subject site is consistent with an urban environment.</p> <p>A State Historic Preservation Office (SHPO) Clearance Review request was submitted to the SHPO February 25, 2022.</p> <p>In a letter dated March 25, 2022, SHPO concurred with the RE determination that the proposed project would have no adverse effect to historic properties. SHPO did not respond regarding archaeological resources.</p> <p>The RE notified and invited the following tribes to become a consulting party on February 10, 2022:</p> <ul style="list-style-type: none"> • Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians of Oregon • Coquille Indian Tribe • Cow Creek Band of Umpqua Tribe of Indians • Confederated Tribes of Grand Ronde

		<ul style="list-style-type: none"> • Confederated Tribes of Siletz Indians • Confederated Tribes of Warm Springs <p>Only the Coquille Indian Tribe responded stating that they will defer cultural resources comments to the other tribes. The tribe also asked to be kept informed of significant archeological findings, which may include ancestral human remains or funerary items. In the event that ancestral remains are observed or disturbed, the developer must follow the State Guidelines. In the event that proposed mitigation measures may be developed for other cultural resources in the Project area, the tribe would like to have the opportunity to comment by including their contact information in the Inadvertent Discovery Plan (IDP).</p> <p>The developer must submit and comply with an IDP. If any archaeological resources, cultural resources, or human remains are found, the developer must stop work in the vicinity of the find and refer to the IDP. Contact information is available in the IDP.</p> <p>See Section H.</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There is one major roadway within 1000 feet of this site and 5 rail activities within 3000 feet of the subject site. There are railroad grade crossings; however, the City of Eugene has approved a quiet zone that includes the grade crossing nearest the subject site. The quiet zone is not yet implemented but is scheduled to be complete prior to occupancy of the development. As a result, the noise analysis does not include train horns as horns will not be used at this location unless there is an unforeseen emergency. Analysis of three Noise Assessment Locations (NALs) has been completed using the HUD Day/Night Noise Level Electronic Assessment Tool with the following results:</p> <p>NAL 1 – 63 DNL NAL 2 – 63 DNL NAL 3 – 64 DNL</p> <p>The site is located 6.7 miles SE of the Eugene Municipal Airport and is several miles outside of the 55 DNL contour. There are no military airports within 15 miles of the subject site nor are there supersonic aircraft activities.</p> <p>The noise level at this location is acceptable, and no mitigation is required.</p> <p>Section I.</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Eugene is not located near a sole source aquifer. Source: EPA 2013. Please see the attached checklist and map in Section C.</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>According to the National Wetlands Inventory, the project site is not located within or near a wetland area. Section J.</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There are no Wild and Scenic Rivers, Study Rivers or Potentially Eligible Rivers in the Eugene area. The proposed project is in compliance with the Wild and Scenic Rivers Act. Section C.</p>

ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The proposed project involves construction of a new apartment building. There are no unmitigated adverse environmental impacts identified in any other compliance review portion of this project's total review. The proposed site is suitable for its proposed use and will not have a disproportionate environmental impact on low income or minority populations. Section K

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	1	<p>The City of Eugene Zoning Verification shows that the proposed use of the site is consistent with R-2 Medium-Density Residential zoning and the Comprehensive Plan. The proposed project also supports Envision Eugene, the City's long-range vision for the community. Please see the zoning verification in Section K.</p> <p>The site is located at 89 N. Polk Street. The subject site is less than a mile from Downtown Eugene which includes the City Parks Blocks, the Eugene Public Library, the Lane Transit District Downtown Station, a fire station, Lane Community College Downtown Campus, Pacific University and other housing and commercial amenities. Nearby is the Hult Center, Peace Health Sacred Heart Medical Center, the 5th Street Market, three supermarkets, the University of Oregon, NW Christian University, banks, medical offices and a wide variety of restaurants, shops, and commercial businesses.</p> <p>The proposed development will provide needed housing units for the target population. Please see maps and photos in Section A.</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	3	<p>The Phase I report concluded that the subject Property is generally flat.</p> <p>This site consists of Type C Malabon soil. Infiltration testing conducted by an on-site geotechnical engineer observed no infiltration. No stormwater runoff will be infiltrated on the subject site. All new impervious areas will be treated with vegetated facilities and conveyed to an existing 90-inch City of Eugene main in Polk Street after being treated through a filtration planter.</p>

		The surrounding area has a gentle slope downward to the north-northwest towards the Willamette River approximately 0.4 miles to the north. Section M and Section F.
Hazards and Nuisances including Site Safety and Noise	2	This environmental review record reflects that no unusual safety hazards or noise will affect the subject site. Section E, G, I.
Energy Consumption	2	Direct energy consumption (heating, cooling, hot water) associated with the housing are within range of normal residential use.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	The construction will create temporary jobs for contractors, architects, etc. The new development will create some long term employment opportunities associated with multi-family housing for property management and resident services coordinators. There are employment opportunities for new residents throughout the downtown area and within the Metropolitan area and surrounding towns and cities.
Demographic Character Changes, Displacement	2	The site is surrounded by mix of commercial and residential properties in the Whiteaker Neighborhood located northwest of downtown Eugene. The new apartment building would fit well into the demographic character of the area. There is an existing 12-unit apartment building located at the subject site. There will be no displacement as a result of the project.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	The site is within the Eugene 4J School District. The following schools are designated to serve the area: River Road Elementary School is located 1.7 miles away, Kelly Middle School is 3.1 miles away and North Eugene High School approximately 3 miles from the subject site. The Eugene Family YMCA and the Amazon City swimming pool are about 3 miles away. Lane Community College main campus is about 7 miles away and University of Oregon is about 3 miles away. The Eugene Public Library and the Lane Community College downtown campus about 1.7 mile from the proposed site. Also in downtown Eugene is the Hult Center for the performing arts, The Shedd Institute for the Arts located in historic former First Baptist Church and the historic McDonald Theater. There are numerous museums in the Eugene/Springfield area and childcare centers are within two miles of the site. Additionally, this proposed project was awarded funding by the Oregon Health Authority to install a Wireless Network Plan to provide broad band coverage to all residents at no out of pocket expense giving them access to fast, reliable internet and allowing use of multiple devices at once.
Commercial Facilities	2	This site in near Downtown Eugene and commercial facilities are located near the site including supermarkets, convenience stores, retail, ATMs and banking.
Health Care and Social Services	2	There are many medical offices throughout the Eugene and Metropolitan area. Medical services, including an emergency room, are available about 2.5 miles to the east at PeaceHealth Sacred Heart Medical Center in the Eugene University District. An Urgent Care is located near 13 th Street and Patterson near downtown Eugene about 2.4 miles away. Full emergency and medical services are located

		<p>about 8 miles away at McKenzie-Willamette Medical Center and about 7½ miles away at River Bend Hospital both of which are located in the City of Springfield.</p> <p>A wide range of social services are offered through Lane County and other public and private agencies in Eugene.</p>
Solid Waste Disposal / Recycling	2	Curbside pickup of solid waste and recyclables is offered throughout the area.
Waste Water / Sanitary Sewers	2	Sanitary sewer services are provided by the City of Eugene.
Water Supply	2	Water service is provided by Eugene Water and Electric Board.
Public Safety - Police, Fire and Emergency Medical	2	Police protection is provided in the area by the Eugene Police Department. Fire protection is provided in the area by Eugene-Springfield Fire. Emergency medical care is provided by Eugene-Springfield Fire. Full service emergency medical care is located approximately 8 miles away at McKenzie-Willamette Medical Center and approximately 7½ miles away at River Bend Hospital in Springfield. Medical services, including an emergency room, are available approximately 2.5 miles away at PeaceHealth Sacred Heart Medical Center in Eugene. An Urgent Care is located near 13 th Avenue and Patterson Street near downtown Eugene about 2.4 miles away.
Parks, Open Space and Recreation	2	Near the site are many parks in Eugene including City Park Blocks where during the spring/summer is the Tuesday Farmers Market and Spring/Fall the Saturday Market. Skinner Butte Park with hiking, rock climbing, picnicking among its various amenities. It is also the home of the famous University of Oregon Big “O”. Also nearby is the 370 acre Alton Baker Park and home of the Cuthbert Amphitheater located along the Willamette River. The Washington/Jefferson Park is about a ½ mile away and connects to the Owen Rose Garden to the north of the Washington/Jefferson Park along the Willamette River. It also has a skateboard park. Additionally, there is a 4 mile bike path that travels through the Washington/Jefferson Park to the Owen Rose Garden along the Willamette River. Monroe Park, Jefferson Park, Charnel Mulligan Park and Washington Park are all about 1½ miles away. Washington Park is also a community center. The Westmoreland City Park has Kidsports, a boys and girls club and a disc golf course. The subject site is in close proximity to the downtown Eugene Public Library and various downtown art galleries, the Hult Center with free outdoor performances, a number of theaters including the historic McDonald Theater, and Shedd Institute providing performing arts housed in the historic former First Baptist Church.
Transportation and Accessibility	2	<p>The Lane Transit District (LTD) Downtown Station is located about 2 miles from the subject site. The proposed site is located at Railroad Boulevard and North Polk Street. There is a bus route on Railroad Boulevard.</p> <p>The LTD is a public agency that provides public transportation in Lane County. The transit district serves the Eugene and Springfield metropolitan areas, including the neighboring cities of Coburg, Junction City, Creswell, Cottage Grove, Veneta, and Lowell. LTD offers bus service and Bus Rapid Transit.</p> <p>PeaceHealth Rides is a network of low cost bike share stations, where users can pick up and drop off publicly available bicycles for one-way trips across the city. PeaceHealth Rides is a partnership between the City of Eugene, University of Oregon, and Lane Transit District and is sponsored by PeaceHealth.</p> <p>The League of American Bicyclists certified Eugene/Springfield is a Gold Level Bicycle Friendly Community and has bike lanes, bike boulevards and off-street trail networks.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	No groundwater will be used as a drinking water source for the project, nor will septic systems be used.
Vegetation, Wildlife	2	<p>The site consists of one 12-unit, two story apartment building with a 15 car parking lot in a medium density residential neighborhood with a mix of commercial and residential uses. Except for the existing apartment building and parking lot the site is a grassy field with trees and shrubs. A biological survey of the site was conducted by the City of Eugene Public Works, Parks and Open Space Division in February 2022. This report reflects that no threatened or endangered species were found, and the property does not support federal or state listed, proposed or candidate species or their habitat.</p> <p>The site is mostly flat grassy parcel in an established neighborhood consisting of commercial and residential uses.</p>
Other Factors		

Additional Studies Performed:

Phase I Environmental Site Assessment, Stantec
Phase II Environmental Site Assessment, Stantec
Stormwater Plan, KPFF
Biological Assessment, City of Eugene

Field Inspection (Date and completed by):

Report dated January 31, 2022 – Phase I Environmental Site Assessment, completed by Jacqueline Brenner, Stantec
March 15, 2022 – Phase II Environmental Site Assessment, completed by Bob McAlister, Stantec
Report dated April 2022 – Stormwater Plan, completed by Matt Keenan, KPFF
Report dated February 28, 2022 - Biological Assessment completed by Brice Izlar and Diane Steeck, City of Eugene Parks and Open Space

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

Sarah Brooks, Project Development Manager, DevNW

Sarah Zaleski, Geographical Information Systems Technician

Reid Verner, City of Eugene Land Use Planning

Bob McAlister, Stantec
Jacqueline Brenner, Stantec
Department of Environmental Quality
Environmental Protection Agency
Brad Rawls, National Marine Fisheries Service

Matt Keenan, KPFF Consulting Engineers
Nir Pearlson, Aligned Architecture

Oregon State Fire Marshalls Office

Diane Steeck, City of Eugene, Wetland Ecologist
Trevor Griffiths, City of Eugene, Botany Assistant

Jason Allen, State Historic Preservation Office

Stacy Scott, Tribal Historic Preservation Office, Confederated Tribes of the Coos, Lower Umpqua, and Siuslaw Indians of Oregon

Chris Bailey, Tribal Historic Preservation Office, Confederated Tribes of Grand Ronde

Robert Brunoe, Tribal Historic Preservation Office, Confederated Tribes of the Warm Springs Reservation of Oregon

Kassandra Rippee, Tribal Historic Preservation Office, Coquille Tribe of Oregon

Jeremy Johnson, Tribal Historic Preservation Office, Cow Creek Band of Umpqua Tribe of Indians

Robert Kentta, Tribal Historic Preservation Office, Confederated Tribes of Siletz Indians

Kelly Clarke, Lane Council of Governments

Brian Sturdivant, HUD Regional Environmental Officer (REO)

Nelson Rivera, HUD Environmental Engineer

List of Permits Obtained: N/A

Public Outreach [24 CFR 50.23 & 58.43]: N/A

Cumulative Impact Analysis [24 CFR 58.32]:

All activities involved in the proposed project were aggregated into the analysis. The project site is 0.54 acre site located in Eugene, Oregon. The proposed project is near supermarkets, public transit, schools and other services. The proposed project is for development of Single Room Occupancy (SRO) units, including permanent supportive housing units, focusing on youth entering independence from foster care and other system-engaged youth including youth experiencing homelessness and at risk of homelessness, and an on-site manager unit. The site would include a gazebo, a patio, gardening area, bicycle and car parking, transportation access, trash enclosures, and landscaped storm water facilities. A stormwater plan has been designed to treat runoff; however, if there are any changes to the approved plan, an equivalent plan will be submitted through a new Section 7 consultation.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]: (Identify other reasonable courses of action that were considered and not selected, such as other sites, design modifications, or other uses of the subject site. Describe the benefits and adverse impacts to the human environment of each alternative and the reasons for rejecting it.)

DevNW is committed to increasing affordable, decent, safe and sanitary housing for the subject population in Eugene. The developer already owned the subject property for their existing development. The availability of the subject site provided an opportunity to develop affordable housing near the downtown core and in an established residential area. The proposed project would use a currently underutilized portion of the subject site that is suitable for the proposed use. The area is a good location near employment, education, and commercial opportunities and transportation options. The proposed project meets a significant need for more rental housing in Eugene, including for the target population. If federal funds could not be used on the proposed project site, the project may cease to be cost feasible and may not move forward.

No Action Alternative [24 CFR 58.40(e)]: (Identify other reasonable courses of action that were considered and not selected, such as other sites, design modifications, or other uses of the subject site. Describe the benefits and adverse impacts to the human environment of each alternative and the reasons for rejecting it.)

The City of Eugene determined that the no action alternative is not possible. This is due to the need to provide housing for the target population. All of Oregon is experiencing a severe housing crisis.

Homelessness is a complex problem significantly impacting the community. A lack of affordable housing, limited shelter capacity, and scarce mental and behavioral health resources contribute to the more than 3,000 people experiencing homelessness in Eugene, more than 2,000 of which are without shelter every night (<https://www.eugene-or.gov/3470/Homelessness>).

Only 12 permanent beds currently serve the subject population, which represents less than 1% of the unaccompanied homeless youth population in need (Eugene-Springfield 2020 Consolidated Plan).

Over 42 percent of people in Eugene have a household income under \$35,000 according to the US Census Bureau. There is a deficit of units affordable to households in this income range. Additionally, over 45 percent of all households in Eugene are cost burdened, paying more than 30 percent of their income for housing. The Oregon Housing and Community Services Needs vs. Inventory summary showed there is a 2,400 unit shortage for Lane County to be served with affordable units.

Summary of Findings and Conclusions:

The subject property meets all environmental standards for federal funding. Compliance with the City of Eugene’s development code and standards is mandatory and will assure compatibility with the surrounding area. The location is appropriate for the proposed population with access to jobs, schools, commercial areas, parks, recreation and services.

Because the site does not have soil that supports stormwater infiltration, an approved stormwater plan was required. In addition to the City of Eugene’s stormwater standards, the proposed project will be required to implement the storm water plan approved by the NFMS/NOAA in the Section 7 consultation.

The development will be required to submit an IDP and follow the procedures if any archaeological resources, cultural resources, or human remains are discovered.

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 or Condition
Conformance with Plans	Project must comply with all City of Eugene, State of Oregon and Federal requirements.
Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<p>NOAA Fisheries requires that the developers follow the approved storm water plan, including the reporting form after construction is complete.</p> <p>The developer will not use the following prohibited materials:</p> <ul style="list-style-type: none"> • Galvanized metal, including galvanized aluminum, zinc, iron, or steel • Copper • Zinc • Sheet metal • Built-up commercial & industrial roofs (BUR), or any similar product that is comprised primarily of layered asphalt, tar, or other bituminous products <p>Composite or asphalt roofing shingles are allowed. Galvanized metals may be used for elements of roofing and siding (e.g., flashing, screws or fasteners, gutters), but does not allow galvanized roofing panels or siding. Galvanized roofing components, such as gutters and flashing, must be sealed, coated, or painted so that metal contaminants will not leach into runoff.</p> <p>If there are significant changes to the approved stormwater plan, a revised plan will be submitted through a new Section 7 consultation.</p> <p>Inspection, monitoring, and maintenance of stormwater facilities will occur in accordance with the submitted operation and maintenance plan.</p>

	<p>The NOAA opinion requires the RE to submit a project completion report for this project within 60-days of end of construction.</p> <p>All waste materials must be recycled or otherwise disposed of in an EPA approved sanitary or hazardous waste disposal site.</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>The Developer must submit and comply with an Inadvertent Discovery Plan. If any archaeological resources, cultural resources, or human remains are found, developer is required to follow the IDP and contact all listed entities including the Coquille Tribal Historic Preservation Office.”</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: *Jackie Dowell* Date: 07/25/2022
Jackie Dowell (Jul 25, 2022 14:21 PDT)
Name/Title/Organization: **Jackie M. Dowell, Environmental Review Analyst, City of Eugene**

Certifying Officer Signature: *Denny Braud* Date: 07/25/2022
Name/Title: **Denny Braud, Planning & Development Department Director, City of Eugene**

EM *GM* *ANE* *WD*
EM GM ANE WD

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).

For HUD funded projects that are categorically excluded per 24 CFR §58.35(a), the Responsible Entity (**RE**) must determine whether the proposal achieves compliance with each applicable statute, Executive Order or regulation with or without requiring formal consultation, mitigation, permits or having adverse effects on the resources protected by the statute. These instructions are a brief description of the essential findings needed to establish compliance. Please see Northwest Region Checklist Tools for further guidance on these laws and authorities. These instructions are not intended to replace the applicable regulations and applicable regulations take precedence.

The Preparer of the Statutory Worksheet must DOCUMENT AND ATTACH THE SOURCES OF THE DETERMINATION.

Record the finding status on the STATUTORY WORKSHEET for each listed Federal statute, regulation, authority as follows:

Status “No” applies when compliance with the authority is achieved without adverse effects on the protected resource, without necessary mitigation or attenuation AND when no formal consultation, permit or agreement is required to establish compliance. In these situations, enter “**A**” in the STATUTORY WORKSHEET status column.

Status “Yes” applies when project compliance with the authority requires formal consultation, a permit or agreement, OR when the proposal may have an adverse effect on the protected resources. Part B summarizes what additional steps or formal procedures must be completed prior to submitting a Request for Release of Funds (RROF) to HUD or to the State. Evidence of completion and implementation of the required procedures or mitigation must be retained in the project Environmental Review Record (ERR).

Historic Properties (including archeology): No The RE and SHPO agree that there are No Historic Properties Affected per 36 CFR 800.4(d)(1) **OR** SHPO has not objected within 30 days to such a fully documented determination. **Yes**) The proposal will have an affect on historic properties per §800.4(d)(2) This includes no adverse effect on historic properties §800.5.

Floodplain Management: No The project does not require compliance with 8-step decision-making at 24 CFR Part 55. **Yes**) The project requires compliance with the 8-step decision-making process at 24 CFR Part 55.20.

Wetlands Protection: No The project does not require compliance with the 8-step decision-making process in Executive Order 11990. **Yes**) The project requires compliance with the 8-step decision-making process in Executive Order 11990.

Coastal Zone Management: No The project is not located in the coastal zone, **OR** the project does not include new construction or major rehabilitation of existing structures, **OR** the State Department of Ecology has accepted the RE’s certification that the project is consistent with the Coastal Zone Management Program. **Yes**) State Department of Ecology does not accept consistency determination and/or requires mitigation.

Sole Source Aquifers (Safe Drinking Water Act): No The project is not located within a U.S. EPA-designated sole source aquifer watershed area (including stream flow source areas), **OR** the project need not be referred to EPA for evaluation according to an EPA approved MOU or checklist, **OR** EPA has concurred that the project is “not likely to affect Sole Source Aquifer quality” in an informal consultation. **Yes**) EPA does not concur with “not likely to affect Sole Source Aquifer quality” determination and/or requires mitigation.

Endangered Species: No The RE determines that the proposal will have “no effect” on federally protected (listed or proposed) Threatened or Endangered Species **Yes**) US Fish and Wildlife Service (USFWS) and/or National Marine Fisheries Service (NMFS) concur the project “is not likely to adversely affect” any federally protected (listed or proposed) Threatened or Endangered Species (i.e., plants or animals, fish, or invertebrates), nor adversely modify critical habitats **OR** USFWS and/or NMFS do not concur the project “is not likely to adversely affect” federally protected species or adversely modify critical habitats **OR** the proposal is “likely to adversely affect” any federally protected (listed or proposed) Threatened or Endangered Species.

Wild and Scenic Rivers: No The project is not located within one mile of a listed Wild and Scenic River, **OR** the project will have no effects on the natural, free flowing or scenic qualities of a river in the National Wild and Scenic Rivers system. **Yes**) Impact resolution and/or mitigation required.

Air Quality: No The project is located within an “attainment” area, **OR**, if within a “non-attainment” area, conforms with the EPA-approved State Implementation Plan (SIP), per contact with a regional Clean Air Agency, **AND** the project requires no individual NESHAP permit or notification; **Yes**) Negotiate suitable mitigation measures with the relevant regional Clean Air Agency, obtain necessary permits, issue required notices. (For example, 40 CFR §61.145 requires 10-day prior notification to the Air Quality District Administrator whenever either 260 linear ft., 160 sq. ft., or 35 cubic ft., of asbestos containing material is to be disturbed).

Farmland Protection: No The project site does not include prime or unique farmland, or other farmland of statewide or local importance as identified by the U.S. Department of Agriculture, Natural Resources Conservation Service NRCS

(formerly the Soil Conservation Service), **OR** the project site includes prime or unique farmland, but is located in an area committed to urban uses; **Yes**) Project site includes prime or unique farmland as identified by NRCS.

Noise Abatement and Control: No) The project does not involve development of noise sensitive uses, **OR** the project is not within 15 miles of a civil airport or military airfield, within 1000 feet of major highways or busy roads, or with 3000 feet of a railroad, **OR** ambient noise level is documented to be 65 LDN (CNEL) or less, based upon the HUD Noise Assessment Guidelines (NAG); **Yes**) Development project requires mitigation to meet HUD's noise standards at 24 CFR 51B.

Explosive or Flammable Operations: No) The project is located at an Acceptable Separation Distance (ASD) from any above-ground explosive or flammable fuels or chemicals containers according to 24 CFR 51C, **OR** the project will expose neither people nor buildings to such hazards; **Yes**) Project requires mitigation to meet Acceptable Separation Distance.

Toxic Chemicals and Radioactive Materials: No) The subject and adjacent properties are free of hazardous materials, contamination, toxic chemicals, gasses and radioactive substances which could affect the health or safety of occupants or conflict with the intended use of the subject property. **Yes**) Project requires mitigation to meet HUD's toxic standards.

Environmental Justice: No) The proposed site is suitable for its proposed use and will NOT have a disproportionate environmental impact on low income or minority populations; **Yes**) Site suitability is a concern; the proposal is adversely affected by environmental conditions disproportionately impacting low income or minority populations.

Airport Clear Zones and Accident Potential Zones: No) The project is not located within an FAA-designated civilian airport Runway Clear Zone (RCA) or Runway Protection Zone, or within the military Airfield Clear Zone (CZ) or Accident Potential Zone/Approach Protection Zone (APZ), based upon information from the airport or military airfield administrator identifying the boundaries of such zones, **OR** the project involves only minor rehabilitation, **OR** the project involves only the sale or purchase of an existing property in the RCZ or CZ; **Yes**) It is HUD policy not to provide any development assistance, subsidy or insurance in RCZs or CZs unless the project will not be frequently used or occupied by people and the airport operator provides written assurances that there are no plans to purchase the project site.