



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: The Keystone

Responsible Entity: City of Eugene

Grant Recipient: Homes for Good Housing Agency (PHA) for Project Based Vouchers

State/Local Identifier: OR006 (Project Based Vouchers)

Preparer: Jackie M. Dowell, Environmental Review Analyst

Certifying Officer

Name and Title: Denny Braud, Planning & Development Dept. Director

Consultant (if applicable): N/A

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

Project Location: 13th Avenue and Tyler Street, Eugene, 1180 and 1190 W. 13th Avenue, Lane County, Oregon 97402

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.

The proposed plan for the project includes fifteen two- and three-bedroom units in three two-story residential buildings. The residential portion of the site will total approximately 15,000 square feet with two fully ADA-compliant units. The complex would also include a community room with a kitchen, on-site laundry, active and passive outdoor space, bike accommodations, and parking spaces. The site is currently vacant and consists of four tax lots totaling 0.74 acre parcel of land in Eugene, Oregon.

Map/Taxlot	Acres
17-04-36-41-10200	0.17
17-04-36-41-10300	0.18
17-04-36-41-10400	0.23
17-04-36-41-10500	0.16
Total Acres	0.74

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

The 2018 Lane County Point-In-Time (PIT) count of the unsheltered and sheltered population of people experiencing homelessness had a total of 1,642 people. Of that total, 1,135 were unsheltered. This represented a 7% increase from the previous year and a 13% increase over the past two years. Compared to similar size populations, Lane County has the second highest unsheltered count in the nation. Populations with serious and persistent mental illness, substance use disorder, or both experience heightened risk of housing instability, high use of emergency rooms and crisis service systems, and involvement with the criminal justice system. The 2018 PIT count reported that 33% of the Lane County homeless population identified a mental illness, and 25% of homeless individuals identified substance abuse issues as barriers to stable housing.

The proposed project will identify, engage, house and support families with children in Eugene. The proposed project would provide permanent, stable housing for families experiencing homelessness and would offer support services necessary to provide the maximum opportunity to overcome homelessness. Supportive services would be offered to maximize housing stability and prevent a return to homelessness. Lane County currently prioritizes chronically homeless households for all Permanent Supportive Housing.

Permanent supportive housing is an intervention that combines affordable housing assistance with voluntary support services to address the needs of chronically homeless people. The services are designed to build independent living and tenancy skills and connect people with community-based health care, treatment and employment services. Permanent supportive housing offers a solution to homelessness for the most vulnerable chronically homeless people and pairs housing with case management and supportive services.

Placement of permanent supportive housing near the downtown area allows people to live near goods and services with increased opportunities for alternative modes of transportation and a safe, attractive, functional pedestrian circulation system.

According to the National Alliance to End Homelessness, investment in permanent supportive housing has helped decrease the number of chronically homeless individuals by 20 percent since 2007. In addition to ending homelessness for people who are chronically homeless, research has demonstrated that permanent supportive housing can also increase housing stability and improve health. Permanent supportive housing has been shown to lower public costs associated with the use of crisis services such as shelters, hospitals, jails and prisons while improving the lives of homeless people.

https://endhomelessness.org/ending-homelessness/solutions/permanent-supportive-housing/?emailsignup&gclid=EAIaIQobChMIgOjAwuex7AIVRT2tBh2Q5AAwEAAAYASAAEgKRbvD_BwE

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 0.74-acre parcel of bare land is at the SE corner of 13th and Tyler. This site is vacant grass field owned by Lane County.

The property is bounded by residential properties and Lane County public land. The housing types in the surrounding neighborhood to the west, north and south are primarily one- and two-story single-family dwellings that are primarily rentals in the Jefferson Westside neighborhood. Renters are the dominate household type in this area with 77.5% of the occupied units being used by renters and 22.5% being used by owners. The proposed project site is publicly owned and is zoned R-1, Low-Density Residential.

The proposed development is located in the Jefferson Westside Neighborhood on the south side of 13th Avenue, east of Polk Street. The subject site has major streets to the north and to the west that are within 1000 feet. There are multiple parks, a community center, a public swimming pools, supermarkets, a public library, full range of public schools, a fire station and other amenities near the site. The subject site is in an established residential neighborhood.

In the absence of the proposed project, this site would remain an under utilized vacant property during a time when homelessness in on the increase leading to loss of opportunity to improve the lives of the target population as well as improve conditions in the community.

Funding Information

Grant Number	HUD Program	Funding Amount
OR 006	Project Based Vouchers	\$5,700,000.00

Estimated Total HUD Funded Amount:

\$5,700,000.00

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

\$11,095,812.00

Project Based Vouchers	\$5,700,000.00
Commercial Loan	\$900,000.00
OHCS PSH Capital	\$3,750,000.00
Lane County Land Donation	\$113,150.00
Deferred Developer Fee	\$382,662.00
Meyer Memorial Trust	\$250,000.00

\$11,095,812.00

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.

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"/>	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 B.
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 C.
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 B.
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 B.
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 was conducted in conformance with the requirements of American Society for Testing and Materials (ASTM) Standard Practice E 1527-13 and all Appropriate Inquiries (AAI) rule, Federal Register, Vol. 70, No. 210 and 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 No past or present conditions identified during the Phase I investigation should be considered RECs, HREC, or CRECs.</p> <p>The Phase I Environmental Site Assessment (ESA) was performed by BB&A Environmental for the proposed project site. The subject property was undeveloped field prior to the 1940’s but was developed with four (4) residential dwellings in the late to mid 1950s. By 2014, all of the dwellings had been removed.</p> <p>There are no Leaking Underground Storage Tank (LUST) sites or hazardous waste sites on or adjacent to the subject property. The Department of Environmental Quality (DEQ) reported 5 records of LUSTs within a quarter mile of the subject property. All but one have been cleaned up, and the other one is a heating oil tank that has been reported and will be addressed according to DEQ regulations. The reported tank is not on or adjacent to the subject site.</p> <p>Section D.</p>
Endangered Species	Yes No	The development site is currently a vacant grassy field.

Endangered Species Act of 1973,
particularly section 7; 50 CFR Part
402



Staff participated in a conference call with HUD and National Oceanic and Atmospheric Administration Fisheries Service (NOAA Fisheries) coordinated by the Portland HUD field office on June 23, 2020. The proposed project is not limited to activities in Table A of the ESA Guidance for Oregon, and therefore a consultation with NOAA Fisheries was required. A Section 7 consultation was submitted to NOAA Fisheries July 9, 2020, but the email was returned as undeliverable. The City IT staff researched the issue and responded to staff on July 21, 2020 stating that the file size may have been too large. On July 21, 2020 the RE successfully submitted Section 7 Consultation Initiation with NOAA.

On October 9, 2020, NOAA Fisheries approved the post-construction stormwater management plan for the action named above as consistent with the biological opinion issued to the HUD on Jul 25, 2016 (HUD Stormwater Programmatic) 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.

The NOAA approval statement further stated that the proposed action is consistent with the HUD Stormwater Programmatic Biological Opinion for:

- Project Design
- Stormwater Treatment Quality
- Stormwater Quantity Management
- Stormwater Facilities' Operations & Maintenance
- All other relevant project design criteria for construction practices

Inspection, monitoring, and maintenance of stormwater facilities must occur in accordance with the submitted operation and maintenance plan.

The NOAA opinion requires the Responsible Entity to submit a project completion report for this project within 60-days of end of construction.

The soils and size of the site do not allow for total infiltration of storm water. The site topography is relatively flat with a slight southward slope. The soil types are 58.5% Coburg-Urban land complex with C rating and 41.5% Natroy-Urban land complex with D rating. Coburg-Urban land complex is soil that has a slow rate of water transmission. Natroy-Urban land complex is soil that has a very slow rate of water transmission. A stormwater system has been designed to meet the requirements of the HUD-NMFS-FWS Programmatic Agreement through Section 7.

The City completed a biological survey of the site in March 2020. This report determined that due to a lack of any native habitat and the property development history that the subject site does not support federal or state listed, proposed, or candidate species or their habitat.

The proposed plan was determined to be consistent with the Endangered Species Act Guidance for Oregon. Section E.

<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>Please see the attached maps and materials in section F.</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 B.</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 C.</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 proposed development site is a flat grassy field located at 13th Avenue and Tyler Street near downtown Eugene.</p> <p>A SHPO Clearance Review request was submitted to the SHPO April 13, 2020 with photos and information about historic uses.</p> <p>The Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians (CTCLUSI) deferred comment to the other tribes as the proposed project is outside of CTCLUSI’s Ancestral Territory.</p> <p>The Coquille Tribe deferred comment to the other tribes but asked to be kept informed of significant archaeological findings, which may include ancestral human remains or funerary items. In the event that ancestral remains are observed or disturbed, follow the State Guidelines. In the event that proposed mitigation measures may be developed for other cultural resources in the Project area, we would like to have the opportunity to comment.</p> <p>The Confederated Tribes of Grand Ronde Community of Oregon stated recommend that a cultural resource inventory be undertaken prior to the project activities, and that said study includes subsurface testing. The tribe also requested that an Inadvertent Discovery Plan (IDP) be in place, and if archaeological and/or cultural resources are discovered during the project, that we be contacted immediately by phone.</p> <p>The IDP for the property identifying the appropriate THPOs is in Section G.</p> <p>The Cultural Resources Inventory report was submitted to SHPO and to City of Eugene. Eugene submitted the archaeological survey to SHPO and the six THPOs on August 4, 2020 with a determination that the proposed project would have No Effect on potential archaeological sites, although the developers would still exercise caution when disturbing the ground and would implement their Inadvertent Discovery Plan if any artifacts were discovered. SHPO submitted their concurrence letter July 29, 2020 confirming that no further archaeological research is necessary, but instructed that work stop immediately and contact an archaeologist to evaluate any discovery. As a result, it is determined that the proposed project would have No Effect on significant archaeological objects or sites. The Cultural Resources Inventory (SHPO Report #31223), maps and materials are in Section G with SHPO and THPO submittals and responses.</p>

		<p>On April 27, 2020, Tracy Schwartz concurred with the City determination that the proposed project poses No Adverse Effect and also concurred with the City determination that the Westside Neighborhood Historic District, 1268/1272 Jackson Street, and 1236 13th Avenue are eligible for listing in the National Register of Historic Places</p> <p>On May 5, 2020, John Pouley, the state assistant archeologist responded to the City clearance review request by stating that Oregon SHPO has no concerns related to the proposed project, but stated that if an archeologic object or feature is found to stop all ground disturbing activity and to contact the SHPO using phone number 503-986-0980.</p> <p>Section G.</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 are three major roadways within 1000 feet of this site. Two are minor arterials and the other is a major collector. Analysis of two 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 – 71 dB NAL 2 – 67 dB NAL 3 – 65 dB</p> <p>There are no railroads within 3000 feet of the site. The site is located 7.5 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 results indicate that noise level at NAL 1 and 2 slightly exceeds 65 dB – considered acceptable – but does not exceed 75 dB – normally considered unacceptable.</p> <p>Mitigation using construction techniques, building placement and/or barriers will be required to achieve interior noise levels of 45dB. Outdoor uses for this project have been place at the southeast corner of the parcel behind proposed buildings and at a location that is 65 dB or less.</p> <p>Section H.</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 B.</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 I.</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 on the NRI in the Eugene area. Source: National Wild and Scenic Rivers Website @https://www.rivers.gov/, Nationwide Rivers Inventory (NRI) Rivers @ https://www.nps.gov/subjects/rivers/nationwide-rivers-inventory.htm, Rivers Currently Under Study @ https://www.rivers.gov/study.php and NRI for river segments believed to possess one or more “outstanding remarkable” values</p>

		@ https://www.nps.gov/maps/full.html?mapId=8adbe798-0d7e-40fb-bd48-225513d64977 . The proposed project is in compliance with the Wild and Scenic Rivers Act. Section B.
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The project involves construction of a new affordable housing complex. 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 J

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-1 Low-Density Residential 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 the corner of 13th Avenue and Tyler Street adjacent to the Lane County Fair Grounds. 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>The soils and size of the site do not allow for total infiltration of storm water. The site topography is relatively flat with a slight southward slope. The soil types are 58.5% Coburg-Urban land complex with C rating and 41.5% Natroy-Urban land complex with D rating. Coburg-Urban land complex is soil that has a slow rate of water transmission. Natroy-Urban land complex is soil that has a very slow rate of water transmission.</p> <p>The Property is located within the Willamette Valley, a 150 mile long alluvial plain extended from Eugene north to Portland. Surficial geology in the Willamette Valley is dominated by Quaternary Alluvium. In the Eugene area, Quaternary Alluvium (Qfd) is generally underlain by sandstones and siltstones of the Eocene to Oligocene Eugene Formation.</p> <p>Section M and Section E GeoTech Report, Page 11.</p>
Hazards and Nuisances including Site Safety and Noise	2	<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>The Phase I was conducted in conformance with the requirements of American Society for Testing and Materials (ASTM) Standard Practice E 1527-13 and all Appropriate Inquiries (AAI) rule, Federal Register, Vol. 70, No. 210 and HUD Standards (24 CFR 58.5(i) (2).</p> <p>The Phase I Environmental Site Assessment (ESA) was performed by BB&A Environmental for the proposed project site. The subject property was undeveloped field prior to the 1940’s but was developed with four (4) residential dwellings in the late to mid 1950s. By 2014, all of the dwellings had been removed.</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 No past or present conditions identified during the Phase I investigation should be considered RECs, HREC, or CRECs.</p> <p>There are no Leaking Underground Storage Tank (LUST) sites or hazardous waste sites on or adjacent to the subject property. The Department of Environmental Quality (DEQ) reported 5 records of LUSTs within a quarter mile of the subject property. All but one have been cleaned up, and the other one is a heating oil tank that has been reported and will be addressed according to DEQ regulations. The reported tank is not on or adjacent to the subject site. Sections D and F.</p> <p>Noise The residential development will not cause any hazards for the surrounding area. The residential use of the property would not impact noise levels beyond the normal level associated with residential uses. Section H.</p>
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 mostly residential properties but is bounded to the east by the Lane County Fair Ground with a few other public properties. The demographics of the households are expected to be similar to the surrounding properties. The proposed project site is a vacant 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: Chavez Elementary School is located 0.4 miles away, the Arts and Technical Academy is the Middle School for this area and it 1.2 miles away and Churchill High School approximately 3 miles from the subject site. The Eugene Family YMCA and the Amazon City swimming pool are about 2 ½ miles to the northeast. Lane Community College main campus is about 6 miles away and University of Oregon is about 2 to 2 ½ miles away. The Eugene Public Library and the Lane Community College downtown campus about 1 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. Multiple childcare centers are within two miles of the site.
Commercial Facilities	2	This site is 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 less than 2 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 2.3 miles to the east. Full emergency and medical services are located about 7 ½ miles away at McKenzie-Willamette Medical Center and about 7 miles away at River Bend Hospital both of which are located in the City of Springfield. A wide range of social services are offered through Lane County and other public and private agencies in Eugene.
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 7 ½ miles away at McKenzie-Willamette Medical Center and approximately 7 miles away at River Bend Hospital in Springfield. Medical services, including an emergency room, are available approximately 1.7 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 1.5 miles away.
Parks, Open Space and Recreation	2	Near the site are many parks including City Park Blocks is just over 1 ½ miles away where during the spring/summer is the Tuesday Farmers Market and Spring/Fall the Saturday Market. Skinner Butte Park is just over 1 ½ miles away 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 about 3 to 3 ½ miles away. The Washington/Jefferson Park is 1 ½ miles away and connects to the Owen Rose Garden to the north of the Washington/Jefferson Park along the Willamette River. It also has a large 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 1 ½ miles away. Washington Park is also a community center. The Westmoreland City Park is just over ½ a mile to the south and 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	The Lane Transit District (LTD) Downtown Station is located about 1 mile from the subject site. The proposed site is on 13 th Avenue which is a major road with a regular LTD route on 13 th . 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. The League of American Bicyclists certified Eugene/Springfield is a Gold Level Bicycle Friendly Community and has bike lanes, bike boulevards and a off-street trail network.

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	The site is currently a grassy field. The City completed a biological survey of the site in March 2020. This biological survey was conducted by Trevor Griffiths, Botany Assistant, with the City of Eugene and supervised by Diane Steeck, Wetland Ecologist, with the City of Eugene. This report determined that due to a lack of any native habitat and the property development history that the subject site does not support federal or state listed, proposed, or candidate species or their habitat. The site is vacant flat grassy land in an established residential neighborhood.
Other Factors		

Additional Studies Performed:

Phase I Environmental Site Assessment, BB&A Environmental
Stormwater Plan, KPFF
Geotechnical Report, FEI Testing and Inspection Inc.
Biological Assessment, City of Eugene
Cultural Resources Inventory, Logan Simpson

Field Inspection (Date and completed by):

Report dated March 5, 2020 – Phase I Environmental Site Assessment, completed by Jim Kooiman, BB&A Environmental
Report dated June 2020 – Stormwater Plan, completed by Matt Keenan, KPFF
Report dated May 14, 2020 – Geotechnical Report Melvin McCracken, FEI Testing and Inspection Inc.
Report dated March 18, 2020 - Biological Assessment completed by Trevor Griffiths and Diane Steeck, City of Eugene Parks and Open Space
Report dated May 15, 2019 – Archaeological Survey completed by Brennan Bajdek, North Wind

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

Nora Cronin, Project Development Manager, Homes for Good

Sarah Zaleski, Geographical Information Systems Technician

Matt Denberg, City of Eugene Land Use Planning

Jim Kooiman, BB&A Environmental
Department of Environmental Quality
Environmental Protection Agency
Brad Rawls, NOAA Fisheries

Matt Keenan, KPFF Consulting Engineers
Mel McCracken, Geotechnical Engineer, FEI Testing and Inspection, Inc.

Oregon State Fire Marshalls Office

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

Tracy Schwartz, State Historic Preservation Office
Shane James, 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

Lane Council of Governments

MWA Architects

List of Permits Obtained: State of Oregon Archaeological Permit AP-2888

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 0.74 acre site located in Eugene, Oregon. The proposed project is for development of permanent supportive housing for homeless families near supermarkets, public transit, schools and other services. The site would include an outdoor courtyard, 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.)

Homes for Good is committed to increasing affordable, decent, safe and sanitary housing in Eugene. The availability of the subject site provided an opportunity to develop affordable housing near the downtown core and in an established residential area. The subject property is currently underutilized vacant land that is suitable for the proposed use. The area is a good location near employment, education, and commercial opportunities and for transportation options. The proposed project meets a significant need for more affordable rental housing in Eugene, including for people and families experiencing homelessness. 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 permanent supportive housing to serve the homeless population. 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.

The subject site near downtown Eugene with the goal to transform the site into an active use that will provide housing and stability to the target population. The area is a good location near employment, education and commercial opportunities with transportation options.

Summary of Findings and Conclusions:

Permanent supportive housing is a solution to homelessness for the most vulnerable chronically homeless people. It pairs housing with case management and supportive services.

Investments in permanent supportive housing have helped decrease the number of chronically homeless individuals by 20 percent since 2007. In addition to ending homelessness for people who are chronically homeless, research has demonstrated that permanent supportive housing can also increase housing stability and improve health.

Permanent supportive housing has been shown to lower public costs associated with the use of crisis services such as shelters, hospitals, jails and prisons.

The site is ideally located for the target population and is in compliance with the Comprehensive Plan. The construction of permanent supportive housing will greatly benefit this population and would implement the housing goals of the Eugene Springfield Consolidated Plan.

Compliance with the City of Eugene's development code and standards is mandatory and will assure compatibility with the surrounding area. In addition to the City of Eugene's stormwater standards, the proposed project would be required to implement the storm water plan approved by NFMS in the Section 7 consultation.

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>Inspection, monitoring, and maintenance of stormwater facilities will occur in accordance with the submitted operation and maintenance plan. 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>
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<p>If archaeological and/or cultural resources are discovered during the project Chris Bailey of the Confederated Tribes of Grand Ronde must be contacted immediately by phone at 503-879-1675.</p> <p>The Coquille Tribe of Oregon must be kept informed of significant archaeological findings, which may include ancestral human remains or funerary items. In the event that ancestral remains are observed or disturbed, follow the State Guidelines. In the event that proposed mitigation measures may be developed for other cultural resources in the Project area, the Coquille Tribe must be given the opportunity to comment.</p> <p>John Pouley, the SHPO state assistant archeologist must be contacted if any archeologic object or feature is found and all ground disturbing activity must stop. In such event, contact SHPO the using phone number 503-986-0980.</p> <p>The Inadvertent Discovery Plan (IDP) of record must be followed if archaeological objects are encountered during construction.</p>
Noise Attenuation and Control 24 CFR 51 Subpart B	Construction techniques, building placement and/or barriers will be required to achieve interior noise levels of 45dB. Outdoor uses for this project have been

	place at the southeast corner of the parcel behind proposed buildings and at a location that is 65 dB or less.
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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: 10/14/2020
Jackie Dowell (Oct 14, 2020 11:56 PDT)
 Name/Title/Organization: **Jackie M. Dowell, Environmental Review Analyst, City of Eugene**

Reviewer Signature: *Nicole Stehlar* Date: 10/14/2020
 Name/Title/Organization: **Nicole Stehlar, Grants Manager, AIC, City of Eugene**

Certifying Officer Signature: *Denny Braud* Date: 10/14/2020
 Name/Title: **Denny Braud, Planning & Development Department Director, City of Eugene** 

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.