



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

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

Project Information

Project Name: Samuel-Madden-Homes

HEROS Number: 900000010268761

Project Location: 999 N Henry St, Alexandria, VA 22314

Additional Location Information:

The subject property is located at 899 and 999 North Henry Street in the City of Alexandria, Virginia. For the exact property location, please see the attached Site Maps. The subject property is bounded by First Street, McDonald's, and multi-family residential to the north; Montgomery Street, North Patrick Street, and multi-family residential to the east; Madison Street, Mason Social, Grateful Kitchen Co./Zweet Sport, Avanti Holdings Group, Chop Shop Taco, Community Market, Another Level Hair Studio and Barber Shop, and Charles Houston Recreation Center to the south; and North Henry Street, Carpenter's Shelter/The Bloom at Braddock, Commercial Retail/Multi-family residential, Commercial retail/Multi-family residential/ parking garage, and Belle Pre Way to the west. The subject property is located in an area of residential and commercial development. For the exact property location, please see the attached Site Maps.

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

The Sponsor is submitting this project to the HUD SAC, consisting of the demolition of the existing multi-family apartment complex and the new construction of a 2 building, 532 unit multifamily apartment complex. The current property, known as Samuel Madden Apartments (VA004000003), is owned and managed by the ARHA. As more fully described in the attached site map, the property consists of two contiguous city parcels improved with 13 two-story buildings for a total of 66 units subject to an Annual Contributions Contract. The buildings are two-story walkup town homes with separate entrances, and interior courtyards and off-street parking. There are currently 46 two bedroom apartments and 20 three bedroom units. Existing public housing residents have a right to return to the redeveloped property. The 13 current buildings will be demolished and replaced with two multifamily buildings - one building each on the North parcel and the South parcel. The sixty-six replacement units on the redeveloped property will be in the North building. Both buildings will have elevators, underground parking, internal courtyards, pool, playgrounds, community meeting rooms, service and retail space, as well as other amenities for residents. Planned and constructed as one development project, building amenities will be open for use by residents of either building. The North parcel will be improved with an all- affordable building consisting of 207 total units. The construction will be funded in part with Low-Income Housing Tax Credits and debt. The North building will consist of 77 units reserved for extremely low-income households (0-30% AMI), 79 units for very low-income households (50-

60% AMI), and fifty-one (51) units for lower income households at 80% of AMI. The operating subsidy for a portion of the units will be RAD, with a possibility of project-based vouchers. The rents will be established by consistent with local tax credit rents. All units will be available for lease by income qualified households subject to local Area Median Income standards. The North building will contain 53 one bedroom units, 111 two-bedroom units, forty-two (42) three-bedroom units, and one (1) four-bedroom unit. The building on the South parcel will consist of a total 325 units. Eighty-four (84) units will be reserved for extremely low-income households (0-30% AMI), thirty-five (35) units for lower income households (80% AMI) and 206 market rate rentals. The South building will contain sixteen (16) studio units, 168 one bedroom units, 116 two-bedroom units, and twenty-five (25) three-bedroom units. Both buildings will contain extensive amenities for the residents. All residents will share in the amenities of either building. The affordable units will be designed consistent with Universal Design Standards and all common areas and service/retail space will be ADA compliant. The properties will contain a food hub for distribution of fresh/quality produce for families in need, an on-site daycare facility, enhanced green space with new public infrastructure, and over 13,000 sf of ground floor commercial space. In addition, the redeveloped property will include new wet and dry utility conduits, with a new storm water management system. Both buildings will be designed to meet LEED and other sustainability standards. The project is within five city blocks of two major train and bus routes, and adjacent to a number of bus stops. The underground parking will designate spaces for daycare drop-off and pick up, for retail customers, and meet the city parking requirements for the buildings that have been proposed. Garage spaces will also be designated for electric charging stations, handicap parking, and spaces for alternative transportation such as bicycles.

Funding Information

Grant Number	HUD Program	Program Name	
VA004000003	Other	HUD SAC	\$0.00
VA004000003	Public Housing	Project-Based Voucher Program	\$13,064,640.00

Estimated Total HUD Funded Amount: \$13,064,640.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$266,113,918.00

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

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

Law, Authority, or Factor	Mitigation Measure or Condition
Endangered Species Act	A time of year clearing restriction must be observed, wherein all tree-clearing activities can only occur between October 15th - March 15th.
Historic Preservation	EHT Tracerics was engaged to assess the proposed undertaking and consult with the State Historic Preservation Officer (SHPO). Initial consultation efforts yielded a finding that the proposed undertaking would have an adverse effect on historic

	<p>properties. The Virginia SHPO requested additional information and consultation efforts, along with a Phase I Cultural Resources Survey for both architectural and archaeological resources. EHT Traceries worked with the SHPO and other consulting parties and completed the requested Cultural Resources Survey.</p> <p>The adverse impacts will be mitigated through the measures laid out in the Memorandum of Agreement (MOA) between the SHPO, the City of Alexandria, and the project developer. The major stipulations of the agreement are below, with additional detail provided in the MoA. The executed MOA is attached to this environmental assessment. All stipulations must be completed within five years of the execution of the agreement, except for those with earlier required completion dates.</p> <ol style="list-style-type: none">1. Up to two interpretative signs will be installed describing the history of the project site.2. A brochure and/or website about the archaeological, historical, and architectural research on the project site and public housing in Alexandria, to be completed within two years of the execution of the MoA.3. A fact sheet with narrative to encourage the incorporation of the project site into walking tours.4. Three Alexandria Archaeology outreach lessons to pre-school and elementary school children.5. All information related to fulfilling the stipulations in the MoA will be posted on ARHA's website.6. An oral history of the project site and surrounding area, to be collected under the supervision of the City Oral Historian.7. A public summary of the documentary study of the project site suitable for posting on the City's website.8. A Historic American Buildings Survey (HABS) recordation prior to demolition that meets the National Park Service's "Heritage Documentation Programs HABS/HAER/HALS Photography
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	<p>Guidelines."</p> <p>9. An architectural and historic context study of public housing in Alexandria incorporating the documentation gathered for the history of the project site.</p> <p>10. A scholarship fund of \$20,000 to benefit ARHA residents pursuing careers that impact the built environment.</p>
<p>Contamination and Toxic Substances</p>	<p>Engineering controls will be used to achieve compliance. Further asbestos testing will occur prior to demolition of the existing buildings and if any asbestos is detected it will be remediated in accordance with state and federal regulations prior to the demolition of the current buildings. Soils at the site will be handled in accordance with the attached media management and health and safety plans. As detailed in the Phase II Environmental Site assessment by Dominion Due Diligence Group, a vapor barrier system will be used to prevent the intrusion of vapors and radon into the site and a ventilation system will remove any possible build up of radon in the parking garage below the project.</p>
<p>Noise Abatement and Control</p>	<p>The mitigation recommendations in the attached noise analysis will be implemented to reduce interior noise levels to below 45 dBs. The public open space at the north end of the property will have no active or passive uses to discourage lingering in any area with high noise levels.</p>
<p>Permits, reviews, and approvals</p>	<p>The City of Alexandria has approved the demolition of the structures, the development special use permit (DSUP), transportation management plan SUP, restaurant with outdoor dining SUP, medical care facility SUP, and athletic club/fitness facility SUP. All of the permits are included within the provided Staff Report, produced by the City of Alexandria. The City's Board of Architectural Review has approved the demolition and provided a Certificate of Appropriateness of the building's design. The project is also required to obtain a General Virginia Pollutant Discharge Elimination System for Discharges of Stormwater from Construction Activities and file a Stormwater Pollution Prevention Plan. It also needs a Virginia Department of Environmental Quality Coastal Zone Management Concurrence Letter. As part of the Section 106 process, a Memorandum of Agreement</p>

	between ARHA and consulting parties was required.
Asbestos-Containing Materials	Prior to demolition activities, a comprehensive asbestos survey is required to be conducted per EPA and state requirements in accordance with 40 CFR 61 Subpart M and the ASTM E 2356-18 standard. Identified ACMs should be removed from the facility prior to demolition activities.
Radon Gas	For any future construction, radon mitigation measures are required to be implemented in the project design in accordance with HUD guidelines if HUD financing is utilized. D3G recommends mitigating potential radon contamination by constructing the proposed structures to meet all of the requirements of the ANSI/AARST CC-1000 2018 Soil Gas Control Systems in New Construction of Buildings (CC-1000 2018) standard for the installation of passive systems. A Radon Report documenting the post-construction testing by an AARST/NRPP certified Radon Professional is required prior to final completion inspection.

Project Mitigation Plan

Mitigation measures and conditions will be followed and implemented as outlined.

Determination:

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

Preparer Signature: Kimberly Cadena Date: 2/22/2024

Name / Title/ Organization: Kimberly Cadena / / ALEXANDRIA

Certifying Officer Signature: James F. Parajon Date: 2.16.24
Name/ Title: James F. Parajon, City Manager

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

Christina Brown
Deputy City Attorney
Approved as to Form

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

Project Information

Project Name: Samuel-Madden-Homes

HEROS Number: 900000010268761

Responsible Entity (RE): ALEXANDRIA, CITY HALL ALEXANDRIA VA, 22314

RE Preparer: Kimberly Cadena

State / Local Identifier:

Certifying Officer: James F. Parajon

Grant Recipient (if different than Responsible Entity): Alexandria Redevelopment & Housing Authority

Point of Contact: Rickie Maddox

Consultant (if applicable): D3G

Point of Contact: Brandon Vidra

Project Location: 999 N Henry St, Alexandria, VA 22314

Additional Location Information:

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residential to the east; Madison Street, Mason Social, Grateful Kitchen Co./Zweet Sport, Avanti Holdings Group, Chop Shop Taco, Community Market, Another Level Hair Studio and Barber Shop, and Charles Houston Recreation Center to the south; and North Henry Street, Carpenter's Shelter/The Bloom at Braddock, Commercial Retail/Multi-family residential, Commercial retail/Multi-family residential/ parking garage, and Belle Pre Way to the west. The subject property is located in an area of residential and commercial development. For the exact property location, please see the attached Site Maps.

AMP or AMPs, if any, covered in this review:

AMP 1	AMP 2	AMP 3	AMP 4	AMP 5
VA004000003				

Does this review cover a full or partial AMP?

Full AMP.

✓ Partial AMP.

N/A

Direct Comments to:

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

The Sponsor is submitting this project to the HUD SAC, consisting of the demolition of the existing multi-family apartment complex and the new construction of a 2 building, 532 unit multifamily apartment complex. The current property, known as Samuel Madden Apartments (VA004000003), is owned and managed by the ARHA. As more fully described in the attached site map, the property consists of two contiguous city parcels improved with 13 two-story buildings for a total of 66 units subject to an Annual Contributions Contract. The buildings are two-story walkup town homes with separate entrances, and interior courtyards and off-street parking. There are currently 46 two bedroom apartments and 20 three bedroom units. Existing public housing residents have a right to return to the redeveloped property. The 13 current buildings will be demolished and replaced with two multifamily buildings - one building each on the North parcel and the South parcel. The sixty-six replacement units on the redeveloped property will be in the North building. Both buildings will have elevators, underground parking, internal courtyards, pool, playgrounds, community meeting rooms, service and retail space, as well as other amenities for residents. Planned and constructed as one development project, building amenities will be open for use by residents of either building. The North parcel will be improved with an all- affordable building consisting of 207 total units. The construction will be funded in part with Low-Income Housing Tax Credits and

debt. The North building will consist of 77 units reserved for extremely low-income households (0-30% AMI), 79 units for very low-income households (50-60% AMI), and fifty-one (51) units for lower income households at 80% of AMI. The operating subsidy for a portion of the units will be RAD, with a possibility of project-based vouchers. The rents will be established by consistent with local tax credit rents. All units will be available for lease by income qualified households subject to local Area Median Income standards. The North building will contain 53 one bedroom units, 111 two-bedroom units, forty-two (42) three-bedroom units, and one (1) four-bedroom unit. The building on the South parcel will consist of a total 325 units. Eighty-four (84) units will be reserved for extremely low-income households (0-30% AMI), thirty-five (35) units for lower income households (80% AMI) and 206 market rate rentals. The South building will contain sixteen (16) studio units, 168 one bedroom units, 116 two-bedroom units, and twenty-five (25) three-bedroom units. Both buildings will contain extensive amenities for the residents. All residents will share in the amenities of either building. The affordable units will be designed consistent with Universal Design Standards and all common areas and service/retail space will be ADA compliant. The properties will contain a food hub for distribution of fresh/quality produce for families in need, an on-site daycare facility, enhanced green space with new public infrastructure, and over 13,000 sf of ground floor commercial space. In addition, the redeveloped property will include new wet and dry utility conduits, with a new storm water management system. Both buildings will be designed to meet LEED and other sustainability standards. The project is within five city blocks of two major train and bus routes, and adjacent to a number of bus stops. The underground parking will designate spaces for daycare drop-off and pick up, for retail customers, and meet the city parking requirements for the buildings that have been proposed. Garage spaces will also be designated for electric charging stations, handicap parking, and spaces for alternative transportation such as bicycles.

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

The project is a public housing property that is being demolished through Section 18 Demolition and with subsequent site cleanup. The project will include the construction of two (2) buildings with a total of five-hundred and thirty-two (532) units in a multifamily apartment complex. Over sixty-one percent of the units (326 total units) to be constructed on this site will be affordable to extremely low-, very low-, and low-income households with incomes between 0% AMI and 80% AMI. The project will be funded in part with debt financing, owner equity, and Low-Income Housing Tax Credits. The operating subsidies for some of the very low-income units will be subsidized through Project-Based Vouchers or RAD rents. The operating subsidy for replacement of the existing sixty-six (66) public housing units will be repositioned through a Section 18 obsolescence application or in the alternative through RAD. The property will also include ground floor service and retail space as well as an extensive selection of residential amenities, underground parking, outdoor and indoor gathering spaces, and improvements in the public space. Currently, there is are thirteen (13) multi-family apartment structures on the project site containing 66 residential units; the new development will consist of 532 units. As there is a chronic need for deeply affordable housing in Alexandria, the development will help fill an existing gap and replace older, aging housing from the area. The project also supports

the priority needs and goals established in Alexandria's 2022-2026 Consolidated Plan. One of the priority needs identified was equitable access to housing, with an associated goal of increasing housing affordability at all levels. The project is also in line with Alexandria's Housing Master Plan and the Metropolitan Washington Council of Governments' regional housing goals. Project alternatives such as decreasing the size of the project or no-action will reduce or stop the project's ability to address the housing needs stated above. The project also addresses community needs by providing space for a sliding-scale day-care facility on site and a food hub for a local charity. These resources will be available to both the residents of the property and the wider community. As there is a need for low-cost day-care across the entire city of Alexandria, removing it from the project or not completing the project will exacerbate an existing problem. Removing or not constructing the food hub will deprive the neighborhood of a needed resource and force residents to travel farther to visit other food hubs in the city.

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

The subject property consists of thirteen (13) two-story multi-family apartment structures, with individual entries, constructed in 1945 and circa 1970. The subject property structures contain a total of sixty-six (66) residential dwelling units and are situated on approximately 3.45 acres of land. The subject property contains a gross building area of approximately 55,296 square feet. Located within each of the townhome structures are basements. Exterior property improvements include playground, landscaped regions and asphalt parking areas. The subject property is serviced by electricity, natural gas, and municipally supplied water and sewer. The subject property is bounded by First Street, a McDonald's, and multi-family residential to the north; Montgomery Street, North Patrick Street, and multi-family residential to the east; Madison Street, Mason Social, Grateful Kitchen Co./Zweet Sport, Avanti Holdings Group, Chop Shop Taco, Community Market, Another Level Hair Studio and Barber Shop, and Charles Houston Recreation Center to the south; and North Henry Street, Carpenter's Shelter/The Bloom at Braddock, Commercial Retail/Multi-family residential, Commercial retail/Multi-family residential/ parking garage, and Belle Pre Way to the west. The subject property is located in an area of residential and commercial development. In the absence of this project, the existing, aging apartment complex will continue to deteriorate. In the project's absence, prices for apartments will continue to rise as demand for housing increases in an area with a limited supply and high growth rate. This will make it difficult for low- and moderate-income households to afford housing. With the need for the demolition of this property, the current residents would be displaced to other parts of the Washington DC metropolitan area or even forced to move out of the metropolitan area completely if the planned redevelopment was not followed through. Residents of the apartment complex will remain in housing that does not meet current standard best practices if

the existing complex is not demolished and replaced. Traffic on the arterial road will either increase or remain the same.

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

[Site Maps.pdf](#)

[Site Photographs.pdf](#)

Determination:

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

Approval Documents:

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
VA004000003	Other	HUD SAC	\$0.00
VA004000003	Public Housing	Project-Based Voucher Program	\$13,064,640.00

Estimated Total HUD Funded, Assisted or Insured Amount: \$13,064,640.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$266,113,918.00

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

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determination (See Appendix A for source determinations)</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6</p>		
<p>Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to Federal Aviation Administration (FAA) information accessed at https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=showCircleSearchAirportsForm and http://nepassisttool.epa.gov/nepassist/entry.aspx, there are no military airports within 15,000 feet of the subject property or civil airport runways within 2,500 feet of the subject property. As such, the proposed action is in compliance with Airport Hazard regulations and no mitigation measures nor further investigations are warranted. The project is in compliance with Airport Hazards requirements.</p>
<p>Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to the Coastal Barrier Resource System Mapper accessed at https://www.fws.gov/CBRA/Maps/Mapper.html, the subject property is not located within an existing Coastal Barrier Resource System or draft Coastal Barrier Resource System. Therefore, the project is in compliance with Coastal Barrier Resource Systems regulations and no mitigation measures nor further investigations are warranted. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.</p>
<p>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to FEMA Flood Insurance Rate Map (FIRM) #515519-0033E, dated June 16, 2011, the subject property is located in Unshaded Zone X, designated as an area outside the 100 and 500-year flood zones and the flood potential for the subject property is minimal. According to the FEMA Flood Map Service Center accessed at</p>

		<p>https://msc.fema.gov/portal/home, there is a preliminary FIRM for the subject property. According to Preliminary FIRM #515519003F, with a revised preliminary date of September 30, 2020, the subject property will remain within Unshaded Zone X, designated as an area outside of the 100 and 500-year flood zones. According to the National Flood Insurance Program (NFIP) Community Status Book accessed at https://www.fema.gov/national-flood-insurance-program-community-status-book, the subject property is located in Community ID #515519 which is a participating community in the NFIP. However, as no structures or insurable property are located within a Special Flood Hazard Area (100-year flood zone), flood insurance is not required under the NFIP. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5</p>		
<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to http://www.epa.gov/airquality/greenbk/ancl.html and the EPA NEPAAssist tool accessed at https://www.epa.gov/nepa/nepassist, the subject property is located within a Non-attainment area for 8-Hour Ozone. The subject property consists of 13 two-story apartment structures proposed for demolition and redevelopment into a 2 building, 532 unit apartment complex with 472 parking spaces. To estimate emissions related to the demolition of the current subject property structures, Emission Factors from the Sacramento Metropolitan Air Quality Road Construction Emission Model ver.8.1</p>

		<p>were utilized to determine NOx emissions from trucks and heavy equipment. Emissions data is provided in grams/hp/hour for different types of equipment. Only the emission factors for the equipment being used during demolition was selected to use in the estimate calculation. The demolition equipment that will be used during demolition are 2 track mounted excavators, 2 tractor trailer trucks and 1 skid steer loader. The Model provided Emission Factor Charts from 2014 through 2025. The most conservative Emission Factor Chart, Chart 2014, had the highest NOx emissions per grams/hp/hour and was used in the calculations to calculate the Demolition Maximum Daily Emission Factors Based on Equipment Per Hour. For a full narrative discussion of the calculations, due to HEROS character limitations, please see the attached Air Quality Narrative. Based on these values, the total project-related NOx emission rates are less than the General Conformity de minimis threshold of 40 tons per year of NOx. As the total projected emissions do not exceed the de minimis thresholds for General Conformity, D3G respectfully submits that the proposed project will not have an "Effect" on air quality; the project will be in compliance with Virginia's SIP; and additional analysis is not required. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to the National Oceanic and Atmospheric Administration (NOAA) Office for Coastal Management (OCM) accessed at https://coast.noaa.gov/czm/mystate/,</p>

		<p>the subject property is located within a Coastal Management Zone. D3G submitted a consultation request to the appropriate State Coastal Zone Management Agency to confirm compliance with the provisions of the State Coastal Management Program. According to a response dated March 17, 2022 and re-confirmed October 11, 2022 to include the new construction portion of the project, the proposed undertaking will be consistent with the Virginia Coastal Management Program, provided that all applicable permits and approvals are obtained. The project is in compliance with the Coastal Zone Management Act.</p>
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA, Remediation or clean-up plan, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. The presence of radon gas was detected and has the possibility of building up in any underground spaces in new construction, such as the parking garage. Soil contamination is possible, as is the presence of asbestos in the current structures. Mitigation plans for all of these conditions exist. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.</p>
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>D3G obtained an Official Species List for the subject property using the USFWS Information for Planning and Consultation (IPaC) website accessed at https://ecos.fws.gov/ipac/. According to the Official Species List, three (3) federally-listed species (Northern Long-eared Bat, Tricolored Bat and Monarch</p>

		<p>Butterfly) have the potential to be present within the project area. Based on an analysis of the habitat requirements of the identified species and the physical characteristics of the subject property, no suitable habitat is believed to be present for one (1) of the identified species, as detailed in the attached Species Conclusion Table. In addition, no critical habitats were identified within the project area. While the subject property is currently developed, there are trees on-site that may represent suitable habitat for the Northern Long-eared Bat and Tricolored Bat. As such, a time of year clearing restriction must be observed, wherein all tree-clearing activities can only occur between October 15th - March 15th. With observance of the time of year clearing restriction, the proposed undertaking May Affect, but is Not Likely to Adversely Affect, the Northern Long-eared Bat and Tricolored Bat. Based on the foregoing information, D3G proposes a finding of "May Affect, Not Likely to Adversely Affect" for federally listed species. D3G recommends that the City of Alexandria, as the Responsible Entity, utilize this package of findings and documentation in completing their determination of effects and consulting with the USFWS. In addition, D3G recommends that the tree-clearing restriction be observed. This project May Affect, but is Not Likely to Adversely Affect, listed species, and informal consultation was conducted. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act.</p>
<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to According to 24 CFR Part 51, Subpart C - Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or</p>

		<p>Chemicals of an Explosive or Flammable Nature, a HUD-assisted project involves the development, construction, rehabilitation or modernization involving an increase in residential unit densities, or conversion of any project that is intended for residential, institutional, recreational, commercial, or industrial uses. Based on the activities involved in the proposed undertaking (demolition and new construction under the Special Application Center (SAC)), the project is considered a HUD-assisted project and compliance with 24 CFR Part 51, Subpart C must be demonstrated. To assist HUD with their evaluation of risk associated with proximity to hazardous facilities per the HUD MAP Guide and 24 CFR Part 51, Subpart C, D3G conducted a site visit on January 13, 2022, where no hazards as defined by 24 CFR 51.201 (any stationary container which stores, handles, or processes hazardous substances of an explosive or fire prone nature) were located on-site, adjacent to, or visible from the subject property. D3G additionally reviewed the state-regulated Aboveground Storage Tank (AST) database, compiled by EDR, for regulated ASTs within one (1) mile of the subject property. In addition, there were no extraordinary unregulated ASTs observed via EDR Lightbox within one (1) mile of the subject property. D3G additionally submitted a request to the City of Alexandria (alexandriava@mycusthelp.net) for any current or recent (w/in the past year) permits issued for thermal/explosive hazards (ASTs > 100 gallons) located within a one (1) mile radius of the subject property. According to Mr. David Lanier with the City Attorney's Office, there are no permits available. D3G evaluated all in-service ASTs,</p>
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		<p>utilizing the HUD ASD Electronic Assessment Tool accessed at https://www.hudexchange.info/environmental-review/asd-calculator/. As detailed in the attached Table 1, all ASTs are located at acceptable separation distances from the subject property. According to the AST EDR Report, one (1) 1,000-gallon used oil AST is located approximately 639 feet north of the subject property at Enterprise Rent A Car. However, based on visual observations, the site is currently under construction of the Grayson Apartments. Therefore, the AST has been removed and does not present a concern to the subject property. Located approximately 0.5 miles north northeast of the subject property at the Potomac River Generating Station are two (2) approximately one million (1,000,000) gallon ASTs. According to a Conceptual Map produced by Christopher Consultants dated April 7, 2022 created for the redevelopment of the site, the ASTs in question are former coal/ash storage ASTs. In addition, the site has not been in operation since 2012. Based on the contents of the ASTs, they are not suspected to present a concern to the subject property. It should be noted that worst-case ASTs' sizes, contents, statuses, facility locations, and worst-case scenario ASD calculations are provided within Table 1. Facility locations provided in the "DIST (ft)" column of Table 1 are actual distances from the nearest edge of the subject property to nearest edge of the vicinity property, based on measurements obtained utilizing EDR Lightbox. Field verification of ASTs' sizes, contents, and locations were conducted, as necessary. In the event that any worst-case scenario ASD exceeds the actual distance listed in the</p>
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		"DIST (ft)" column, further evaluation and documentation would be provided. In addition, applicable ASD calculation worksheets are provided immediately following Table 1. Therefore, the project is in compliance with HUD's Explosive and Flammable Hazards requirements. The project is in compliance with explosive and flammable hazard requirements.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is entirely within the City of Alexandria, which is in a Census-designated Urban Area as shown on the attached map. The project is in compliance with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	According to FEMA Flood Insurance Rate Map (FIRM) #5155190033E, dated June 16, 2011, the subject property is located in Unshaded Zone X, designated as an area outside the 100- and 500-year flood zones, and the potential for flooding at the subject property is minimal. According to the FEMA Flood Map Service Center accessed at https://msc.fema.gov/portal/home , there is a preliminary FIRM for the subject property. According to Preliminary FIRM #515519003F, with a revised preliminary date of September 30, 2020, the subject property will remain within Unshaded Zone X, designated as an area outside of the 100 and 500-year flood zones. As no structures are located within a Special Flood Hazard Area (100-year flood zone), the potential for flooding at the subject property is minimal. The project is in compliance with Executive Order 11988.
Historic Preservation National Historic Preservation Act of	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	The subject property consists of thirteen (13) two-story townhomes structures constructed in 1945 which will be

<p>1966, particularly sections 106 and 110; 36 CFR Part 800</p>		<p>demolished and redeveloped into a new multi-family residential complex. The subject property is located within the Parker-Gray Historic District (DHR ID #100-0133, National Register Listing #9001232) with the subject property structures identified as contributing resources within this district. EHT Traceries was engaged to assess the proposed undertaking and consult with the State Historic Preservation Officer (SHPO). Initial consultation efforts yielded a finding that the proposed undertaking would have an adverse effect on historic properties. The Virginia SHPO requested additional information and consultation efforts, along with a Phase I Cultural Resources Survey for both architectural and archaeological resources. EHT provided a documentary study to the SHPO in September 2022. In response, the SHPO concurred with EHT's suggestion that mechanical trenching be used to investigate possible archaeological resources on the site. The developer held four consulting party meetings, two hybrid, one virtual, and one in-person. Information on how to become a consulting party was available at all of them. Possible mitigation measures were suggested and discussed with attendees. Some of these were included in the final Memorandum of Agreement (MOA). The City, the SHPO, and the developer cooperated to create an MOA with stipulations that would mitigate the adverse effects of the proposed demolition. This MOA was signed by all of those entities and the consulting parties. With mitigation, as identified in the MOA, the project will be in compliance with Section 106. Satisfactory implementation of the mitigation should be monitored. The subject property is also located within</p>
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		<p>the City of Alexandria's Parker-Gray Historic District (City District) and is under the purview of the City's Board of Architectural Review (BAR). The BAR must approve any demolitions within the City District. It approved the project with stipulations listed on page 1 of the attached BAR2022 00174B 899 N Henry PG FINAL Part1 report.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>A Noise Assessment was conducted. The noise level was unacceptable: 77.0 db. See noise analysis. The project is new construction. An EIS is required. An EIS waiver has been obtained from the Certifying Officer or the Assistant Secretary for Community Planning and Development per 24 CFR 51.104(b)(2). The project will be required to use the materials and construction techniques identified in the attached acoustical analysis as mitigation in order to come into compliance with HUD's Noise regulation.</p>
<p>Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to the Sole Source Aquifer layer obtained from EPA NEPAassist accessed at http://nepassisttool.epa.gov/nepassist/entry.aspx, the subject property is not serviced or supplied by a protected aquifer system. Therefore, the proposed undertaking has no potential to impact a Sole Source Aquifer and no mitigation measures nor further investigations are warranted. The project is in compliance with Sole Source Aquifer requirements.</p>
<p>Wetlands Protection Executive Order 11990, particularly sections 2 and 5</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to the USFWS National Wetlands Inventory Layer accessed at http://nepassisttool.epa.gov/nepassist/entry.aspx, there are no mapped wetland areas on the subject property. Based on the highly-developed nature of the subject property and visual observations during the site investigation performed by D3G, there are no suspected wetland areas present at the subject property. The Cover Sheet</p>

		<p>submitted by the developer affirms there are no City of Alexandria recognized Resource Protection Areas or other City identified wetland areas affected by the project. Therefore, the proposed undertaking will be in compliance with Executive Order (EO) 11990, Protection of Wetlands, as well as the requirements of Federal Register 24 CFR Parts 50 and 55. The project is in compliance with Executive Order 11990.</p>
<p>Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>According to the National Wild & Scenic Rivers website accessed at www.rivers.gov/wildriverslist.html and the Nationwide Rivers Inventory (NRI) accessed at https://www.nps.gov/subjects/rivers/nationwide-rivers-inventory.htm, there are no Wild and Scenic Rivers or NRI segments within one (1) mile of the subject property. Therefore, the proposed undertaking has no potential to impact these resources and no mitigation measures nor further investigations are warranted. The project is in compliance with the Wild and Scenic Rivers Act.</p>
<p>HUD HOUSING ENVIRONMENTAL STANDARDS</p>		
<p>ENVIRONMENTAL JUSTICE</p>		
<p>Environmental Justice Executive Order 12898</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. According to the NEPAassist website accessed at https://nepassisttool.epa.gov/nepassist/nepamap.aspx, the subject property is not located in a low-income or predominately minority area within the City of Alexandria, as 83.42% of the population in the area surrounding the subject property is above the poverty level, and the percent minority for the subject property and its surrounding area is 26%. Therefore, E.O. 12898 does not apply to the project and no</p>

		consultation nor mitigation measures are required. The project is in compliance with Executive Order 12898.
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Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

Impact Codes: An impact code from the following list has been used to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The City of Alexandria's 2022-2026 Consolidated Plan defined equitable access to housing as a priority need and the creation and preservation of affordable housing as a goal. This project supports this need and goal. The project is also in line with the City's Housing Master Plan and the Metropolitan Washington Council of Governments' regional housing initiative. The subject property consists of thirteen (13) two-story multi-family townhomes structures constructed in 1945, which is proposed for demolition and the subsequent new construction of a two (2) building, five-hundred and thirty-two (532) multifamily apartment complex with additional retail/commercial space. The subject property is currently located in a highly developed area. The replacement of the existing, aging structures with new, affordable housing in this location fits well into the overall context of the immediate area. According to the City of Alexandria zoning maps found at https://www.alexandriava.gov/Planning , the subject property is currently zoned residential/townhouse zone (RB). The RB zone is established to provide land areas for medium density neighborhoods. Non-residential uses of a non-commercial nature that are	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>supportive to the residential neighborhood, such as childcare, places of worship, or public schools are also permitted in the RC zone. According to the development team and the provided Staff Report, as part of the redevelopment, the site is proposed to be re-zoned to a Residential Multifamily (RMF) Zone. The RMF zone is established to provide land areas for multi-family residential structures and to promote housing affordability. Limited neighborhood-serving commercial uses are also permitted in the RMF zone. Therefore, the proposed development will be in accordance with local zoning regulations at the time of redevelopment.</p>	
<p>Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff</p>	<p>1</p>	<p>Based on the Geotechnical Engineering/Limited Environmental Site Investigation Report prepared by Terracon Consultants, Inc. (Terracon) dated February 18, 2022 and visual observations, there is no evidence of soil problems or unstable conditions on the subject property. The report found that the soils on the site were somewhat suitable for redevelopment, but could be made more suitable via engineering techniques. The developer intends to use these techniques prior to beginning construction to ensure the soils are suitable to support the development. According to the USGS Topographic Quadrangle: Alexandria Virginia, DC, Maryland 2019, the topography of the site slopes to the east. According to the Development Preliminary Site Plan produced by Bowman Consulting dated August 2022, all erosion/sediment control measures will conform to the current standards of the City of Alexandria and the Virginia Erosion and Sediment Control Handbook. In addition, all erosion and sediment control measures are to be placed prior to or as the first step of clearing. On-site drainage at the subject property is suspected to consist of flow along the asphalt parking areas to strategically located storm drains and surface percolation in the unpaved areas. Upon demolition of the site and prior to redevelopment of the property, the developer will adhere to all applicable City of Alexandria stormwater</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		regulations. These regulations require stormwater runoff to be below the level of runoff from the property prior to the redevelopment.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	No "nuisances" or "hazards" were observed at the subject property or surrounding properties during the site inspection. The proposed demolition and new construction activities will not result in any significant noise generation levels within the neighborhood, nor will it result in the neighborhood being exposed to noise levels in excess of City Code or HUD determined noise policies. Short-term noise may be generated during construction, but City noise ordinances limit the hours noise-generating construction can occur.	
SOCIOECONOMIC			
Employment and Income Patterns	1	According to U.S. Census Bureau American Community Survey (ACS) 2016-2020 data obtained from the EPA NEPAassist accessed at http://nepassisttool.epa.gov/nepassist/entry.aspx , approximately 76% of population were listed as employed, the per capita income was \$90,415, and 85.09% of the population in the area was above the poverty level. The project will increase income diversity in the area through the provision of additional extremely low-, very low-, and low-income residents. The redevelopment will also provide permanent employment opportunities in the community through the commercial and retail space and possibly allow for increased employment of caregivers who will have access to child-care. These factors are of benefit to the neighborhood.	
Demographic Character Changes / Displacement	2	The site is located in a residentially and commercially developed area. The proposed demolition and redevelopment of the subject property units is compatible with the surrounding neighborhood and there are no demographic character changes anticipated due to the highly developed nature of the surrounding area; however, temporary displacement will occur given that the subject property structures with occupied units are proposed to be demolished. Prior to commencing	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>the actual relocation of residents, Housing Opportunities United (HOU) will work with each household to determine its relocation preferences; provide multiple housing options for the household to choose from; assists with transportation to facilitate resident visits of these housing options; and provides packing and moving supplies and assistance as needed. While the residents are relocated in their temporary housing, HOU will provide case management and remain in touch with the residents, while also ensuring the residents remain closely informed of the development progress and are able to add input throughout the construction process. The owner will determine if there will be relocations out of the City of Alexandria. In accordance with HUD regulations and the joint City of Alexandria-ARHA Resolution 2876, all residents will have the right of return.</p>	
Environmental Justice EA Factor	2	<p>According to the NEPAassist website accessed at https://nepassisttool.epa.gov/nepassist/nepamap.aspx, the subject property is not located in a low-income or predominately minority area within the City of Alexandria, as 85.09% of the population in the area surrounding the subject property is above the poverty level, and the percent minority for the subject property and its surrounding area is 26%. Therefore, E.O. 12898 does not apply to the project and no consultation nor mitigation measures are required.</p>	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	1	<p>Based on knowledge of the subject property and surrounding area, there are sufficient educational and cultural facilities located in the vicinity of the subject property. The property is within the catchment area of George Washington Middle School, Jefferson-Houston PreK-8 IB School, and the Naomi L. Brooks Elementary School. Most if not all of these facilities are accessible by public transportation. According to the Staff Report provided by the City of Alexandria, Alexandria City Public Schools (ACPS) and the City of Alexandria estimate the number of new students expected to</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>join the school system based on historical enrollment and residential property data. Per the current Student Generation Rate jointly developed by ACPS and the City, the proposed development could generate approximately 288 students. The City and ACPS staff continue to monitor and integrate projected student generations numbers in school enrollment projections and ACPS will continue to coordinate with the City to review, plan, and allocate resources for necessary additional capacity to ensure all ACPS students are provided with safe and equitable learning environments. Students would be distributed over all grade levels. Like many schools in the City, the schools serving the proposed redevelopment are at or over capacity. ACPS will need to consider likely student generation and additional operation and capital support needs in future planning that aligns with the City's pipeline of projects. The project will include a day care facility that operates on a sliding fee scale, allowing residents of the new project and members of the surrounding community access to affordable day care in an area where day care is extremely expensive. Public transit additionally provides access to the cultural facilities within Old Town Alexandria, including multiple history museums. In addition, public transit also provides easy access to the cultural facilities of Washington D.C. The addition of the day care facility provides a positive benefit to the community.</p>	
Commercial Facilities (Access and Proximity)	2	<p>As seen the in attached Surrounding Area map, there are two grocery stores within a half-mile of the project, one of which located three bus stops from the project. There is also a bank within walking distance and multiple restaurants. Stores such as Target, Old Navy, and Best Buy are accessible to the residents via either Metro to the the Potomac Yard/VT stop or on the Metroway BRT line. Other commercial facilities in the region are accessible by either public transit or automobile. There is sufficient access to commercial facilities for the residents of the project.</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Health Care / Social Services (Access and Capacity)	1	Based on research of the subject property and surrounding area, there are sufficient health care and social service facilities located in the vicinity of the subject property. Various doctors offices and dental offices are located within walking distance of the proposed development. In addition, Inova Alexandria Hospital and BridgePoint Continuing Care Hospital are located within 2 miles of the subject property. As part of the project, the developer is providing ALIVE!, a local charity, with space for a food hub that will serve the community. The development will also have increased space for resident services, include social services. The project will have a net positive benefit on the community.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The project is required to send all solid waste to the Covanta Energy Waste Facility. The facility has not expressed any concerns about a lack of capacity. The project is also required to submit a Recycling Implementation Plan to the City and abide by its conditions. See Solid Waste attachment.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	1	According to the Development Preliminary Site Plan produced by Bowman Consulting dated August 2022, the project is located within a combined sewer area. The proposed development will discharge stormwater into a separated storm system that ties into a combined sewer system downstream. The proposed development will also discharge sewage into a separated sanitary system. The discharge into a separate sanitary system is in line with the City of Alexandria's state-mandated goal of separating all stormwater and sanitary sewer systems. In addition, according to the Staff Report provided by the City of Alexandria, the project will meet all stormwater requirements of Chapter XIII of the City's Zoning Ordinance, for both stormwater treatment and stormwater quantity. Based on research of the subject property and surrounding area, there are sufficient waste water and sanitary sewer facilities located in the vicinity, of which no impacts are anticipated from the proposed demolition and redevelopment.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Water Supply (Feasibility and Capacity)	2	The project must follow City policies that require the use of water saving fixtures. The developer has also chosen to apply for numerous certifications (2020 Enterprise Green Communities Plus, WELL, EPA's ENERGY STAR Multi-family New Construction (MFnC v1.1, EPA's Indoor airPlus (IAP), DOE's Zero Energy Ready Home (ZERH), and LEED Silver) and will be using water-saving fixtures which conform to those requirements. Green Communities' minimum requirement for indoor water use is a 20% reduction. At the proposed development, indoor water use is expected to be 40% below baseline through the use of highly efficient WaterSense-certified fixtures and appliances. Based on research of the subject property and surrounding area, there are sufficient water services available, of which no impacts are anticipated from the proposed demolition and redevelopment.	
Public Safety - Police, Fire and Emergency Medical	2	Based on research of the subject property and surrounding area, there are sufficient police, fire, and emergency medical services located in the vicinity of the subject property. The proposed development is located within 2 miles of Inova Alexandria Hospital and BridgePoint Continuing Care Hospital, the Alexandria City Police Department, and within walking distance of Alexandria Fire Station 204. Therefore, no impacts are anticipated from the proposed demolition and redevelopment.	
Parks, Open Space and Recreation (Access and Capacity)	2	Based on research of the subject property and surrounding area, there are sufficient parks and recreation facilities located in the vicinity of the subject property. The proposed development is located within walking distance of Powhatan Park, Montgomery Park, Rivergate City Park, and Oronoco Bay Park. In addition, numerous parks and outdoor recreation areas are located within a quarter mile of the proposed development which are available via public transit. In addition, according to the Staff Report provided by the City of Alexandria, the amount of open space at the project site is slightly above the required 25%, with approximately 39,713 square feet (27% of site area) of open space.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Therefore, no impacts are anticipated from the proposed demolition and redevelopment.	
Transportation and Accessibility (Access and Capacity)	2	According to the Multimodal Transportation Study, produced by Gorove Slade Transportation Planners and Engineers dated December 6, 2022, and based on research of the subject property and surrounding area, reasonable accessibility to vicinity public transportation facilities is available in the vicinity of the subject property. The Multimodal Transportation Impact Study evaluated intersection operation for 10 surrounding intersections through several scenarios to determine the impacts to the street network. These scenarios include Montgomery Street and Madison Street operation as the current one-way operation, Montgomery Street and Madison Street operation as a two-way street and closing off the First Street intersection with Route 1. Based on the findings, the analysis for all 10 intersections resulted in acceptable level of service for all scenarios. The project site is well connected via principal arterials such as North Henry Street/North Patrick Street and the George Washington Memorial Parkway. In addition, the subject property has access to the Yellow and Blue lines via the Braddock Road Metro station, located approximately 0.25 miles to the west of the site, which provides connections to areas in Virginia, the District, and Maryland. In addition, the proposed development has access to many bus stops located adjacent to the subject property, as seen in the Bus Stops attachment. Therefore, no impacts are anticipated from the proposed demolition and redevelopment.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	Based on research of the subject property and highly developed nature of the surrounding area, no unique natural features or water resources are located in the vicinity, and no impacts are anticipated from the proposed demolition and development.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The subject property is currently an existing multi-family apartment complex and the surrounding area is heavily developed. While there is green space on the property, it is mostly grass covered, with few other plant species and no native wildlife. There is a mature tree at the north end of the property which will be preserved. In addition, the intention is to plant Native/drought tolerant plants that follow the City of Alexandria's plant list requirements which also targets to have a 10% Biodiversity limit in each species planted.	
Other Factors 1		N/A	
Other Factors 2		N/A	
CLIMATE AND ENERGY			
Climate Change	2	The original submission in HEROS (July 21, 2022) was input prior to HUD releasing the new Climate Change EA Factors being released in HEROS; therefore, compliance with this factor is not warranted at this point.	
Energy Efficiency	2	The project must follow City policies that require the use of water saving fixtures. The developer has also chosen to apply for numerous certifications (2020 Enterprise Green Communities Plus, WELL, EPA's ENERGY STAR Multi-family New Construction (MFnc0 v1.1, EPA's Indoor airPlus (IAP), DOE's Zero Energy Ready Home (ZERH) and LEED Silver). Based on the fact that the proposed demolition and redevelopment will result in decreased energy consumption at the subject property for a limited time, the proposed project would not have unusual energy needs and is not expected to have a negative impact on energy consumption. Standard development conditions require Energy Star certified electric appliances as well as water conserving fixtures and appliances. In addition, energy efficient appliances will to be used as part of the redevelopment, which will help reduce energy consumption upon completion of the redevelopment	

Supporting documentation

[Surrounding area.png](#)
[Bus Stops.pdf](#)
[Solid Waste.pdf](#)
[Plans Excerpt.pdf](#)
[PDSUP3 Master Plan Amendment 2022 11 18.pdf](#)
[PDSUP3 Application 2022 11 18.pdf](#)
[PDSUP2 South Building Green Narrative2.pdf](#)
[PDSUP2 North Building Green Narrative2.pdf](#)
[Madden redraft Relocation Plan Sept 6 Draft.pdf](#)
[Traffic Study Excerpt.pdf](#)
[Educational Facilities.pdf](#)
[Consolidated Plan Excerpt.pdf](#)
[Alexandria Housing Master Plan Excerpt.pdf](#)
[Geotech Report.pdf](#)
[EA Factors Support Docs.pdf](#)

Additional Studies Performed:

Field Inspection [Optional]: Date and completed
by:

[Site Photographs.pdf](#)

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

[Samuel Madden Sources Consulted.docx](#)

List of Permits Obtained:

The City of Alexandria has approved the demolition of the structures, the development special use permit (DSUP), transportation management plan SUP, restaurant with outdoor dining SUP, medical care facility SUP, and athletic club/fitness facility SUP. All of the permits are included within the provided Staff Report, produced by the City of Alexandria. The City's Board of Architectural Review has approved the demolition and provided a Certificate of Appropriateness of the building's design. The project is also required to obtain a General Virginia Pollutant Discharge Elimination System for Discharges of Stormwater from Construction Activities and file a Stormwater Pollution Prevention Plan. It also needs a Virginia Department of Environmental Quality Coastal Zone Management Concurrence Letter. As part of the

Section 106 process, a Memorandum of Agreement between ARHA and consulting parties was required.

Public Outreach [24 CFR 58.43]:

The Development Team has undergone a robust community engagement process, which has included: three (3) meetings with the general public including residents and interested stakeholders, four (4) public work sessions and meetings with the City of Alexandria Board of Architectural Review, four (4) public Section 106 Consulting Parties Meeting, four (2) advisory group meetings each with the Braddock Implementation Advisory Group and the Alexandria Housing Affordability Advisory Committee, one (1) meeting with the Landlord-Tenant Relations Board and two (2) meetings with civic groups including the Northeast Citizens' Association and the Braddock Metro Citizens' Coalition. Members of the public were also allowed to speak at a City Council Legislative Session and separate Public Hearing about the project. In addition, ARHA meets with residents on a monthly basis to review project updates. See Community Meetings attachment.

[FONSI Dissemination List.docx](#)
[Community Meetings.pdf](#)

Cumulative Impact Analysis [24 CFR 58.32]:

Cumulative impacts were evaluated of the proposed development on the surrounding physical, socioeconomic, and cultural environment. Considering the demand for affordable housing in Alexandria, especially for the lowest income groups, this project will have a positive impact on the housing supply and addressing the needs of the community. The project will also have a positive impact on the child-care and social service needs of the community by providing a sliding-scale day-care on site as well as a food hub provided by ALIVE!, a local charitable organization. These services will have a ripple effect on the community as households can become more food secure, children can be prepared for elementary school, and parents can take more stable employment. In time, this could result in a stronger community. The project is anticipated to generate additional school children. On a city-wide level the number of school children generated could affect school district capacity. However, the school district monitors available capacity and is undertaking capital projects to create more classroom seats. The demolition of the buildings will effect the historic fabric of the surrounding Parker-Gray historic district and will result in the loss of another example of World War II era workforce housing (the redevelopments of James Bland and Chatham Square demolished others). While this project does increase the cumulative loss of physical historic resources, the mitigation measures required by the Section 106 Memorandum of Agreement and the conditions of the Board of Architectural Review's demolition permit will result in a net increase in documented and intangible historic resources, such as HABS site photographs and oral histories of the residents. The Memorandum of Agreement requires ARHA to document the history of public

housing in Alexandria, lessening the potential cumulative impact of the demolition through the documentation of past, and possibly future, redevelopment of public housing projects in Alexandria.

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

A list of project revisions was provided, detailing the changes to the proposed development over the course of its lifetime. These revisions were made either to increase the safety of the residents (relocating traffic flow and entrances) or to improve the aesthetics of the building and its visual relationship to the surrounding neighborhood. None of the changes will have any significant impact on the environment requiring mitigation. - All vehicular access to the garages and loading docks were moved from N. Patrick Street to Montgomery Street. - The childcare facility was relocated from N. Henry Street to corner of N. Patrick and Montgomery. - Active amenity uses and additional South Building entrance were relocated along N. Henry Street. - Retail space was extended north along N. Henry Street across from existing retail at Belle Pre. - Open space was relocated from north tip to Montgomery including the playground for more protected and residential feeling location. - North open space reduced in size and design was adjusted in response to surrounding noise conditions. - Lobbies were relocated to the west end of Montgomery, closer to N. Henry Street, to be still facing each other but with higher visibility from N. Henry Street. - North building massing was extended northward and reduced in width to accentuate Gateway element and create vertical proportion with special curved shape and contemporary design. - "Shoulders" or setbacks were added to N. Patrick in addition to N. Henry to relate to adjacent historic district. - Setbacks vary in height from 3-5 stories instead of being mostly 4 stories to create variety in massing and roof line. - Setbacks continue or "turn into" Montgomery Street to become more integral to the building massing instead of additive on the sides. - South building was reduced in height by approximately 8' and appears as 6 stories from the exterior instead of 7 stories. - North tip "building" as well as both "buildings" across Montgomery became more contemporary in design while infill buildings and south building on Madison remained more contextual, providing variety while being appropriate for the historic district. - Special infill building massing and architecture at the terminus of Belle Pre were included to respond to urban design condition. - Residential terraces were included to increase residential open space. No other sites were considered for this project because while ARHA intends to redevelop other public housing properties over time, each site is unique and will have different project requirements. Alternatives to decrease the size of the project or increase the number of LIHTC or market-rate units were considered, but ultimately rejected for economic reasons.

No Action Alternative [24 CFR 58.40(e)]

In accordance with 24 CFR 58.40(e) and 40 CFR 1502.14, the "no action" alternative was considered. The no-action alternative would not achieve any of the benefits attributed to the proposed activities. In the absence of this project, the existing, aging

apartment complex will continue to deteriorate. In addition, additional affordable housing needs in the area will not be met if the proposed development is not completed. The No-Action alternative would also deprive the community of needed child-care and food hub facilities. Therefore, the No-Action alternative is not considered to be a viable option.

Summary of Findings and Conclusions:

The project is an affordable public housing project property that is being demolished through Section 18 Demolition and with subsequent site cleanup. The new project will include the new construction of a two (2) buildings with a total of, five-hundred and thirty-two (532) units in a multifamily apartment complex. Over sixty-one percent of the units (326 total units) to be constructed on this site will be affordable to extremely low-, very low- and low-income households with incomes between 0% AMI and 80% AMI. The proposed development will result in a decrease in energy consumption through the use of energy efficient building practices and appliances. In the absence of this project, the existing, aging apartment complex will continue to deteriorate. In conclusion, the Environmental Assessment identified three (3) aspects that will require additional compliance steps and/or mitigation: Contamination and Toxic Substances, Historic Preservation, and Noise Abatement and Control. Based on the information contained within and the successful implementation of the selected mitigation measures outlined within, the proposed project as designed will not result in a significant impact on the quality of the human environment.

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Endangered Species Act	A time of year clearing restriction must be observed, wherein all tree-clearing activities can only occur between October 15th - March 15th.	N/A	Mitigation measures and conditions will be followed and implemented as outlined.	

<p>Historic Preservation</p>	<p>EHT Tracerics was engaged to assess the proposed undertaking and consult with the State Historic Preservation Officer (SHPO). Initial consultation efforts yielded a finding that the proposed undertaking would have an adverse effect on historic properties. The Virginia SHPO requested additional information and consultation efforts, along with a Phase I Cultural Resources Survey for both architectural and archaeological resources. EHT Tracerics worked with the SHPO and other consulting parties and completed the requested Cultural Resources Survey.</p> <p>The adverse impacts will be mitigated through the measures laid out in the Memorandum of Agreement (MOA) between the SHPO, the City of Alexandria, and the project developer. The major stipulations of the agreement are below, with additional detail provided in the MoA. The executed MOA is attached to this environmental assessment. All stipulations must be completed within five years of the execution of the agreement, except for those with earlier required completion dates.</p> <ol style="list-style-type: none"> 1. Up to two interpretative signs will be installed describing the history of the project site. 2. A brochure and/or website about the archaeological, 	<p>N/A</p>	<p>Mitigation measures and conditions will be followed and implemented as outlined.</p>	
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	<p>historical, and architectural research on the project site and public housing in Alexandria, to be completed within two years of the execution of the MoA.</p> <p>3. A fact sheet with narrative to encourage the incorporation of the project site into walking tours.</p> <p>4. Three Alexandria Archaeology outreach lessons to pre-school and elementary school children.</p> <p>5. All information related to fulfilling the stipulations in the MoA will be posted on ARHA's website.</p> <p>6. An oral history of the project site and surrounding area, to be collected under the supervision of the City Oral Historian.</p> <p>7. A public summary of the documentary study of the project site suitable for posting on the City's website.</p> <p>8. A Historic American Buildings Survey (HABS) recordation prior to demolition that meets the National Park Service's "Heritage Documentation Programs HABS/HAER/HALS Photography Guidelines."</p> <p>9. An architectural and historic context study of public housing in Alexandria incorporating the documentation gathered for the history of the project site.</p> <p>10. A scholarship fund of</p>			
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	\$20,000 to benefit ARHA residents pursuing careers that impact the built environment.			
Contamination and Toxic Substances	Engineering controls will be used to achieve compliance. Further asbestos testing will occur prior to demolition of the existing buildings and if any asbestos is detected it will be remediated in accordance with state and federal regulations prior to the demolition of the current buildings. Soils at the site will be handled in accordance with the attached media management and health and safety plans. As detailed in the Phase II Environmental Site assessment by Dominion Due Diligence Group, a vapor barrier system will be used to prevent the intrusion of vapors and radon into the site and a ventilation system will remove any possible build up of radon in the parking garage below the project.	N/A	Mitigation measures and conditions will be followed and implemented as outlined.	
Noise Abatement and Control	The mitigation recommendations in the attached noise analysis will be implemented to reduce interior noise levels to below 45 dBs. The public open space at the north end of the property will have no active or passive uses to discourage lingering in any area with high noise levels.	N/A	Mitigation measures and conditions will be followed and implemented as outlined.	
Asbestos-Containing Materials	Prior to demolition activities, a comprehensive asbestos survey is required to be conducted per EPA and state requirements in accordance with 40 CFR 61 Subpart M and the ASTM E 2356-18 standard. Identified ACMs should be removed from	N/A	Mitigation measures and conditions will be followed and implemented as outlined.	

	the facility prior to demolition activities.			
Radon Gas	For any future construction, radon mitigation measures are required to be implemented in the project design in accordance with HUD guidelines if HUD financing is utilized. D3G recommends mitigating potential radon contamination by constructing the proposed structures to meet all of the requirements of the ANSI/AARST CC-1000 2018 Soil Gas Control Systems in New Construction of Buildings (CC-1000 2018) standard for the installation of passive systems. A Radon Report documenting the post-construction testing by an AARST/NRPP certified Radon Professional is required prior to final completion inspection.	N/A	Mitigation measures and conditions will be followed and implemented as outlined.	

Project Mitigation Plan

Mitigation measures and conditions will be followed and implemented as outlined.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

✓ No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary

Compliance Determination

According to Federal Aviation Administration (FAA) information accessed at <https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=showCircleSearchAirportsForm> and <http://nepassisttool.epa.gov/nepassist/entry.aspx>, there are no military airports within 15,000 feet of the subject property or civil airport runways within 2,500 feet of the subject property. As such, the proposed action is in compliance with Airport Hazard regulations and no mitigation measures nor further investigations are warranted. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[Airport Hazards.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

1. Is the project located in a CBRS Unit?

No

Document and upload map and documentation below.

Yes

Compliance Determination

According to the Coastal Barrier Resource System Mapper accessed at <https://www.fws.gov/CBRA/Maps/Mapper.html>, the subject property is not located within an existing Coastal Barrier Resource System or draft Coastal Barrier Resource System. Therefore, the project is in compliance with Coastal Barrier Resource Systems regulations and no mitigation measures nor further investigations are warranted. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

[Coastal Barrier Resources.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Flood Insurance

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

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

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

Yes

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

[Preliminary FEMA FIRM.pdf](#)
[FEMA FIRM.pdf](#)

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

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

No

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

Yes

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

Yes

✓ No

Screen Summary

Compliance Determination

According to FEMA Flood Insurance Rate Map (FIRM) #515519-0033E, dated June 16, 2011, the subject property is located in Unshaded Zone X, designated as an area outside the 100 and 500-year flood zones and the flood potential for the subject property is minimal. According to the FEMA Flood Map Service Center accessed at <https://msc.fema.gov/portal/home>, there is a preliminary FIRM for the subject property. According to Preliminary FIRM #515519003F, with a revised preliminary date of September 30, 2020, the subject property will remain within Unshaded Zone X, designated as an area outside of the 100 and 500-year flood zones. According to the National Flood Insurance Program (NFIP) Community Status Book accessed at <https://www.fema.gov/national-flood-insurance-program-community-status-book>, the subject property is located in Community ID #515519 which is a participating community in the NFIP. However, as no structures or insurable property are located within a Special Flood Hazard Area (100-year flood zone), flood insurance is not required under the NFIP. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with flood insurance requirements.

Supporting documentation

[NFIP Community Status Book.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

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

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

Yes

No

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

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

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

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

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

- ✓ Ozone
- Particulate Matter, <2.5 microns
- Particulate Matter, <10 microns

3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above

Ozone ppb (parts per million)

Provide your source used to determine levels here:

EPA's General Conformity Regulations

4. Determine the estimated emissions levels of your project. Will your project exceed any of the *de minimis* or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

- ✓ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

Enter the estimate emission levels:

Ozone ppb (parts per million)

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

Yes, the project exceeds *de minimis* emissions levels or screening levels.

Screen Summary

Compliance Determination

According to <http://www.epa.gov/airquality/greenbk/ancl.html> and the EPA NEPAassist tool accessed at <https://www.epa.gov/nepa/nepassist>, the subject property is located within a Non-attainment area for 8-Hour Ozone. The subject property consists of 13 two-story apartment structures proposed for demolition and redevelopment into a 2 building, 532 unit apartment complex with 472 parking spaces. To estimate emissions related to the demolition of the current subject property structures, Emission Factors from the Sacramento Metropolitan Air Quality

Road Construction Emission Model ver.8.1 were utilized to determine NOx emissions from trucks and heavy equipment. Emissions data is provided in grams/hp/hour for different types of equipment. Only the emission factors for the equipment being used during demolition was selected to use in the estimate calculation. The demolition equipment that will be used during demolition are 2 track mounted excavators, 2 tractor trailer trucks and 1 skid steer loader. The Model provided Emission Factor Charts from 2014 through 2025. The most conservative Emission Factor Chart, Chart 2014, had the highest NOx emissions per grams/hp/hour and was used in the calculations to calculate the Demolition Maximum Daily Emission Factors Based on Equipment Per Hour. For a full narrative discussion of the calculations, due to HEROS character limitations, please see the attached Air Quality Narrative. Based on these values, the total project-related NOx emission rates are less than the General Conformity de minimis threshold of 40 tons per year of NOx. As the total projected emissions do not exceed the de minimis thresholds for General Conformity, D3G respectfully submits that the proposed project will not have an "Effect" on air quality; the project will be in compliance with Virginia's SIP; and additional analysis is not required. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.

Supporting documentation[Air Quality Narrative.pdf](#)[Air Quality.pdf](#)**Are formal compliance steps or mitigation required?**

Yes

✓ No

Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?

- Yes
 No

2. Does this project include new construction, conversion, major rehabilitation, or substantial improvement activities?

- Yes
 No

3. Has this project been determined to be consistent with the State Coastal Management Program?

- Yes, without mitigation

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Yes, with mitigation

No, project must be canceled.

Screen Summary**Compliance Determination**

According to the National Oceanic and Atmospheric Administration (NOAA) Office for Coastal Management (OCM) accessed at <https://coast.noaa.gov/czm/mystate/>, the subject property is located within a Coastal Management Zone. D3G submitted a consultation request to the appropriate State Coastal Zone Management Agency to confirm compliance with the provisions of the State Coastal Management Program. According to a response dated March 17, 2022 and re-confirmed October 11, 2022 to include the new construction portion of the project, the proposed undertaking will be consistent with the Virginia Coastal Management Program, provided that all applicable permits and approvals are obtained. The project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[Updated Consistency Determination Samuel Madden Homes.pdf](#)

[Updated Consistency Confirmation.pdf](#)

[CZM Submittal Package.pdf](#)

[CZM Response.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

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

1. How was site contamination evaluated? Select all that apply. Document and upload documentation and reports and evaluation explanation of site contamination below.

- American Society for Testing and Materials (ASTM) Phase I Environmental Site Assessment (ESA)
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening
- None of the Above

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

No

- Yes

3. Mitigation

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

Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated.

- ✓ Yes, adverse environmental impacts can be eliminated through mitigation. Document and upload all mitigation requirements below.

4. Describe how compliance was achieved in the text box below. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls, or use of institutional controls.

Engineering controls will be used to achieve compliance. Further asbestos testing will occur prior to demolition of the existing buildings and if any asbestos is detected it will be remediated in accordance with state and federal regulations prior to the demolition of the current buildings. Soils at the site will be handled in accordance with the attached media management and health and safety plans. As detailed in the Phase II Environmental Site assessment by Dominion Due Diligence Group, a vapor barrier system will be used to prevent the intrusion of vapors and radon into the site and a ventilation system will remove any possible build up of radon in the parking garage below the project.

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

Complete removal

- ✓ Risk-based corrective action (RBCA)

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA, Remediation or clean-up plan, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. The presence of radon gas was detected and has the possibility of building up in any underground spaces in new construction, such as the parking garage. Soil contamination is possible, as is the presence of asbestos in the current structures. Mitigation plans for all of these conditions exist. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.

Supporting documentation

[DSUP2022 10020 HASP v1.pdf](#)
[DSUP2022 10020 Media Management Plan.pdf](#)
[DSUP2022 10020 Phase II ESA v1.pdf](#)
[Hazardous Materials Narrative.pdf](#)
[Limited Asbestos Survey Report.pdf](#)
[Limited Asbestos Survey Report.pdf](#)
[Samuel Madden Homes ESA.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Endangered Species

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i>); particularly section 7 (16 USC 1536).	50 CFR Part 402

1. Does the project involve any activities that have the potential to affect species or habitats?

No, the project will have No Effect due to the nature of the activities involved in the project.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

- ✓ Yes, the activities involved in the project have the potential to affect species and/or habitats.

2. Are federally listed species or designated critical habitats present in the action area?

No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

- ✓ Yes, there are federally listed species or designated critical habitats present in the action area.

3. What effects, if any, will your project have on federally listed species or designated critical habitat?

No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat. in the action area.

- ✓ May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

4. Informal Consultation is required

Section 7 of ESA (16 USC. 1536) mandates consultation to resolve potential impacts to endangered and threatened species and critical habitats. If a HUD-assisted project may affect any federally listed endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

Did the Service(s) concur with the finding that the project is Not Likely to Adversely Affect?

- ✓ Yes, the Service(s) concurred with the finding.

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

- (1) A biological evaluation or equivalent document
- (2) Concurrence(s) from FWS and/or NMFS
- (3) Any other documentation of informal consultation

Exception: If finding was made based on procedures provided by a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office, provide whatever documentation is mandated by that agreement.

No, the Service(s) did not concur with the finding.

6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen.

✓ Mitigation as follows will be implemented:

A time of year clearing restriction must be observed, wherein all tree-clearing activities can only occur between October 15th - March 15th.

No mitigation is necessary.

Screen Summary

Compliance Determination

D3G obtained an Official Species List for the subject property using the USFWS Information for Planning and Consultation (IPaC) website accessed at <https://ecos.fws.gov/ipac/>. According to the Official Species List, three (3)) federally-listed species (Northern Long-eared Bat, Tricolored Bat and Monarch Butterfly) have the potential to be present within the project area. Based on an analysis of the habitat requirements of the identified species and the physical characteristics of the subject property, no suitable habitat is believed to be present for one (1) of the identified species, as detailed in the attached Species Conclusion Table. In addition, no critical habitats were identified within the project area. While the subject property is currently developed, there are trees on-site that may represent suitable habitat for the Northern Long-eared Bat and Tricolored Bat. As such, a time of year clearing restriction must be observed, wherein all tree-clearing activities can only occur between October 15th - March 15th. With observance of the time of year clearing restriction, the proposed undertaking May Affect, but is Not Likely to Adversely Affect, the Northern Long-eared Bat and Tricolored Bat. Based on the foregoing information, D3G proposes a finding of "May Affect, Not Likely to Adversely Affect" for federally listed species. D3G recommends that the City of Alexandria, as the Responsible Entity, utilize this package of findings and documentation in completing their determination of effects and consulting with the USFWS. In addition, D3G recommends that the tree-clearing restriction be observed. This project May Affect, but is Not Likely to Adversely Affect, listed species, and informal consultation was

conducted. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act.

Supporting documentation

[Species List Virginia Ecological Services Field Office 02142024.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

Yes

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

Yes

3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR
- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer “No.” For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer “Yes.”

No

Yes

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

✓ Yes

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

No

Screen Summary

Compliance Determination

According to According to 24 CFR Part 51, Subpart C - Siting of HUD-Assisted Projects Near Hazardous Operations Handling Conventional Fuels or Chemicals of an Explosive or Flammable Nature, a HUD-assisted project involves the development, construction, rehabilitation or modernization involving an increase in residential unit densities, or conversion of any project that is intended for residential, institutional, recreational, commercial, or industrial uses. Based on the activities involved in the proposed undertaking (demolition and new construction under the Special Application Center (SAC)), the project is considered a HUD-assisted project and compliance with 24 CFR Part 51, Subpart C must be demonstrated. To assist HUD with their evaluation of risk associated with proximity to hazardous facilities per the HUD MAP Guide and 24 CFR Part 51, Subpart C, D3G conducted a site visit on January 13, 2022, where no hazards as defined by 24 CFR 51.201 (any stationary container which stores, handles, or processes hazardous substances of an explosive or fire prone nature) were located on-site, adjacent to, or visible from the subject property. D3G additionally reviewed the state-regulated Aboveground Storage Tank (AST) database, compiled by EDR, for regulated ASTs within one (1) mile of the subject property. In addition, there were no extraordinary unregulated ASTs observed via EDR Lightbox within one (1) mile of the subject property. D3G additionally submitted a request to the City of Alexandria (alexandriava@mycusthelp.net) for any current or recent (w/in the past year) permits issued for thermal/explosive hazards (ASTs > 100 gallons) located within a one (1) mile radius of the subject property. According to Mr. David Lanier with the City Attorney's Office, there are no permits available. D3G evaluated all in-service ASTs, utilizing the HUD ASD Electronic Assessment Tool accessed at <https://www.hudexchange.info/environmental-review/asd-calculator/>. As detailed in the attached Table 1, all ASTs are located at acceptable separation distances from the subject property. According to the AST EDR Report, one (1) 1,000-gallon used oil AST is located approximately 639 feet north of the subject property at Enterprise Rent A Car. However, based on visual observations, the site is currently under construction

of the Grayson Apartments. Therefore, the AST has been removed and does not present a concern to the subject property. Located approximately 0.5 miles north northeast of the subject property at the Potomac River Generating Station are two (2) approximately one million (1,000,000) gallon ASTs. According to a Conceptual Map produced by Christopher Consultants dated April 7, 2022 created for the redevelopment of the site, the ASTs in question are former coal/ash storage ASTs. In addition, the site has not been in operation since 2012. Based on the contents of the ASTs, they are not suspected to present a concern to the subject property. It should be noted that worst-case ASTs' sizes, contents, statuses, facility locations, and worst-case scenario ASD calculations are provided within Table 1. Facility locations provided in the "DIST (ft)" column of Table 1 are actual distances from the nearest edge of the subject property to nearest edge of the vicinity property, based on measurements obtained utilizing EDR Lightbox. Field verification of ASTs' sizes, contents, and locations were conducted, as necessary. In the event that any worst-case scenario ASD exceeds the actual distance listed in the "DIST (ft)" column, further evaluation and documentation would be provided. In addition, applicable ASD calculation worksheets are provided immediately following Table 1. Therefore, the project is in compliance with HUD's Explosive and Flammable Hazards requirements. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

[Explosive and Flammable Hazards.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

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

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

Yes

No

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

The proposed transaction includes the demolition of an existing multi-family residential apartment complex.

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

Screen Summary

Compliance Determination

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is entirely within the City of Alexandria, which is in a Census-designated Urban Area as shown on the attached map. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[Census Urban Area Map Farmland.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	24 CFR 55

1. Do any of the following exemptions apply? Select the applicable citation? [only one selection possible]

55.12(c)(3)

55.12(c)(4)

55.12(c)(5)

55.12(c)(6)

55.12(c)(7)

55.12(c)(8)

55.12(c)(9)

55.12(c)(10)

55.12(c)(11)

None of the above

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

[Preliminary FEMA FIRM.pdf](#)
[FEMA FIRM.pdf](#)

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

Does your project occur in a floodplain?

No

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

Yes

Screen Summary**Compliance Determination**

According to FEMA Flood Insurance Rate Map (FIRM) #5155190033E, dated June 16, 2011, the subject property is located in Unshaded Zone X, designated as an area outside the 100- and 500-year flood zones, and the potential for flooding at the subject property is minimal. According to the FEMA Flood Map Service Center accessed at <https://msc.fema.gov/portal/home>, there is a preliminary FIRM for the subject property. According to Preliminary FIRM #515519003F, with a revised preliminary date of September 30, 2020, the subject property will remain within Unshaded Zone X, designated as an area outside of the 100 and 500-year flood zones. As no structures are located within a Special Flood Hazard Area (100-year flood zone), the potential for flooding at the subject property is minimal. The project is in compliance with Executive Order 11988.

Supporting documentation**Are formal compliance steps or mitigation required?**

Yes

✓ No

Historic Preservation

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

Threshold

Is Section 106 review required for your project?

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

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

Step 1 – Initiate Consultation

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

- ✓ State Historic Preservation Offer (SHPO) Completed
- ✓ Advisory Council on Historic Preservation Completed
- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)
 - ✓ Catawba Indian Nation Completed

- ✓ Delaware Nation, Oklahoma Completed
- ✓ Pamunkey Indian Tribe Response Period Elapsed

✓ Other Consulting Parties

- ✓ Alexandria Archaeological Committee Completed

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

For projects involving demolition of a building over 50 years old; new construction within or adjacent to a historic district; or substantial ground-disturbing activities or exterior rehabilitations at properties over 50 years old, a qualified Historic Preservation Professional must evaluate the project and prepare the requisite State Historic Preservation Officer (SHPO) submission materials. EHT Traceries (EHT) was engaged to perform the assessment and consult with the SHPO. In addition, EHT contacted the City of Alexandria and consulted with the Office of Historic Alexandria (OHA) and Alexandria Archaeology. The Office of Historic Alexandria provided EHT with the names of other potential interested parties. Letters inviting consultation were sent to interested parties and adjoining property owners (see attached list). The City Of Alexandria Office of Housing sent invitations to consult to the three tribal nations identified as having a historic interest in Alexandria in HUD's Tribal Directory Assessment Tool. The Consulting Parties meetings were advertised on the project website and announced via the subscription email list about the project. All Consulting Parties meetings were open to the public and provided information on how a member of the public could become a consulting party.

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

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

- Yes
- No

Step 2 – Identify and Evaluate Historic Properties

1. Define the Area of Potential Effect (APE), either by entering the address(es) or

uploading a map depicting the APE below:

The Direct Area of Potential Effect (APE) is limited to the subject property, as no off-site work is proposed. The Indirect (Visual) APE includes surrounding properties visible from the subject property, as determined by EHT Traceries and the SHPO.

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

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

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
899 N Henry St, Alexandria, VA 22314	Eligible	Yes	✓ Not Sensitive
999 N Henry St, Alexandria, VA 22314	Eligible	Yes	✓ Not Sensitive

Additional Notes:

The subject property is located within the Parker-Gray Historic District (DHR ID #100-0133, National Register Listing #9001232) with the subject property structures identified as contributing resources within this district. The subject property is also located in the City of Alexandria's Parker-Gray Historic District and under the jurisdiction of the City's Board of Architectural Review.

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

✓ Yes

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

Additional Notes:

No

Step 3 – Assess Effects of the Project on Historic Properties

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

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

No Historic Properties Affected

No Adverse Effect

✓ Adverse Effect

**Document reason for finding; upload the criteria with summary and justification.
Criteria of Adverse Effect 36 CFR 800.5.**

36 CFR 800.5(a)(2)(i) Physical destruction of or damage to all or part of the property; The subject buildings will be demolished to allow for the construction of two larger mixed-use buildings which will contain both replacement units for the demolished units and an additional 260 units of affordable housing.

Step 4 – Resolve Adverse Effects

Work with consulting parties to try to avoid, minimize or mitigate adverse effects. Refer to HUD Exchange guidance and 36 CFR 800.6 and 800.7.

Were the Adverse Effects resolved?

✓ Yes

Describe the resolution of Adverse Effects, including consultation efforts and participation by the Advisory Council on Historic Preservation:

The project developer proposed a number of mitigation measures to resolve the adverse effects, including an educational archaeological dig for the children at the subject property; a scholarship for a student

intending to go into historic preservation, architecture, or a building trade; and an oral history of the subject property and the surrounding area, all of which would be managed by the developer. These measures were evaluated by the City, the SHPO, and the consulting parties, who determined they were inadequate to fully mitigate the adverse effects, but that they should be integrated into the final mitigation. Further discussion resulted in the City supervising the developer's archaeological educational activities and oral history project in order to ensure the activities were in compliance with City standards. The scholarship was narrowed to only ARHA residents and it was mandated that it be administered by a third-party. Additional stipulations such as documentary report on public housing in Alexandria and a website to share the history of the subject property with the public were added. Some of the stipulations mirror the conditions required for a demolition permit issued by the City's Board of Architectural Review. Once the SHPO, the City, and the developer were in agreement about the stipulations in the MoA, it was sent out for execution by all consulting parties. The Advisory Council on Historic Preservation was invited to consult and declined; however, they requested a copy of the Memorandum of Agreement to be filed with them.

For
the

project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation.

EHT Traceries was engaged to assess the proposed undertaking and consult with the State Historic Preservation Officer (SHPO). Initial consultation efforts yielded a finding that the proposed undertaking would have an adverse effect on historic properties. The Virginia SHPO requested additional information and consultation efforts, along with a Phase I Cultural Resources Survey for both architectural and archaeological resources. EHT Traceries worked with the SHPO and other consulting parties and completed the requested Cultural Resources Survey.

The adverse impacts will be mitigated through the measures laid out in the Memorandum of Agreement (MOA) between the SHPO, the City of Alexandria, and the project developer. The major stipulations of the agreement are below, with additional detail provided in the MoA. The executed MOA is attached to this environmental assessment. All stipulations must be completed within five years of the execution of the agreement, except for those with earlier required completion dates.

1. Up to two interpretative signs will be installed describing the history of

the project site.

2. A brochure and/or website about the archaeological, historical, and architectural research on the project site and public housing in Alexandria, to be completed within two years of the execution of the MoA.
 3. A fact sheet with narrative to encourage the incorporation of the project site into walking tours.
 4. Three Alexandria Archaeology outreach lessons to pre-school and elementary school children.
 5. All information related to fulfilling the stipulations in the MoA will be posted on ARHA's website.
 6. An oral history of the project site and surrounding area, to be collected under the supervision of the City Oral Historian.
 7. A public summary of the documentary study of the project site suitable for posting on the City's website.
 8. A Historic American Buildings Survey (HABS) recordation prior to demolition that meets the National Park Service's "Heritage Documentation Programs HABS/HAER/HALS Photography Guidelines."
 9. An architectural and historic context study of public housing in Alexandria incorporating the documentation gathered for the history of the project site.
 10. A scholarship fund of \$20,000 to benefit ARHA residents pursuing careers that impact the built environment.
- Based on the response, the review is in compliance with this section. Document and upload the signed Memorandum of Agreement (MOA) or Standard Mitigation Measures Agreement (SMMA) below.

No

Screen Summary

Compliance Determination

The subject property consists of thirteen (13) two-story townhomes structures constructed in 1945 which will be demolished and redeveloped into a new multi-family residential complex. The subject property is located within the Parker-Gray

Historic District (DHR ID #100-0133, National Register Listing #9001232) with the subject property structures identified as contributing resources within this district. EHT Tracerics was engaged to assess the proposed undertaking and consult with the State Historic Preservation Officer (SHPO). Initial consultation efforts yielded a finding that the proposed undertaking would have an adverse effect on historic properties. The Virginia SHPO requested additional information and consultation efforts, along with a Phase I Cultural Resources Survey for both architectural and archaeological resources. EHT provided a documentary study to the SHPO in September 2022. In response, the SHPO concurred with EHT's suggestion that mechanical trenching be used to investigate possible archaeological resources on the site. The developer held four consulting party meetings, two hybrid, one virtual, and one in-person. Information on how to become a consulting party was available at all of them. Possible mitigation measures were suggested and discussed with attendees. Some of these were included in the final Memorandum of Agreement (MOA). The City, the SHPO, and the developer cooperated to create an MOA with stipulations that would mitigate the adverse effects of the proposed demolition. This MOA was signed by all of those entities and the consulting parties. With mitigation, as identified in the MOA, the project will be in compliance with Section 106. Satisfactory implementation of the mitigation should be monitored. The subject property is also located within the City of Alexandria's Parker-Gray Historic District (City District) and is under the purview of the City's Board of Architectural Review (BAR). The BAR must approve any demolitions within the City District. It approved the project with stipulations listed on page 1 of the attached BAR2022 00174B 899 N Henry PG FINAL Part1 report.

Supporting documentation

[20220420 Samuel Madden Homes Initiation Letter.pdf](#)
[Re Samuel Madden Homes Consulting Parties Meet.pdf](#)
[FW Samuel Madden Homes Consulting Parties Meeting.pdf](#)
[SM CP List 2022 04 27.pdf](#)
[ACHP Letter.pdf](#)
[BAR2022 00174B 899 N Henry PG FINAL Part2.pdf](#)
[BAR2022 00174B 899 N Henry PG FINAL Part1.pdf](#)
[Samuel Madden MOA Appendices.pdf](#)
[20240207 Samuel Madden Homes MOA Executed.pdf](#)
[Madden DocumentaryStudy 11012022 AA edit.pdf](#)
[Tribal Consultation Letters.pdf](#)
[Consultation Checklist.pdf](#)
[VHDR Responses.pdf](#)
[SHPO Response.pdf](#)
[Historic Preservation.pdf](#)

Are formal compliance steps or mitigation required?

✓ Yes

No

Noise Abatement and Control

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

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

- New construction for residential use

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

Rehabilitation of an existing residential property

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

An interstate land sales registration

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

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

Indicate the findings of the Preliminary Screening below:

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

✓ Noise generators were found within the threshold distances.

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

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

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

✓ Unacceptable: (Above 75 decibels)

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

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

Indicate noise level here: 77

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

This project requires completion of an Environmental Impact Statement pursuant to 24 CFR §51.104(b)(1)(i). You may either complete an EIS or provide a waiver signed by the appropriate authority.

Convert to an EIS

✓ Upload Waiver

Indicate noise level here: 77

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

Document and upload an Environmental Impact Statement waiver from the Certifying Officer or the Assistant Secretary for Community Planning and Development per 24 CFR 51.104(b)(2) below.

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

✓ Mitigation as follows will be implemented:

The mitigation recommendations in the attached noise analysis will be implemented to reduce interior noise levels to below 45 dBs. The public open space at the north end of the property will have no active or passive uses to discourage lingering in any area with high noise levels.

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

No mitigation is necessary.

Screen Summary

Compliance Determination

A Noise Assessment was conducted. The noise level was unacceptable: 77.0 db. See noise analysis. The project is new construction. An EIS is required. An EIS waiver has been obtained from the Certifying Officer or the Assistant Secretary for Community Planning and Development per 24 CFR 51.104(b)(2). The project will be required to use the materials and construction techniques identified in the attached acoustical analysis as mitigation in order to come into compliance with HUD's Noise regulation.

Supporting documentation

[CM signed Noise Waiver for Samuel Madden.pdf](#)

[Exterior Noise and Exterior Facade Acoustical Analysis for HUD Modera Old Town South Building 121823.pdf](#)

[Exterior Noise and Exterior Facade Acoustical Analysis for HUD Modera Old Town North Building 121823.pdf](#)

[DSUP2022 10020 Noise Compliance Letter.pdf](#)

Are formal compliance steps or mitigation required?

✓ Yes

No

Sole Source Aquifers

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

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

- Yes
- ✓ No

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

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

- ✓ No

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

Yes

Screen Summary

Compliance Determination

According to the Sole Source Aquifer layer obtained from EPA NEPAassist accessed at <http://nepassisttool.epa.gov/nepassist/entry.aspx>, the subject property is not serviced or supplied by a protected aquifer system. Therefore, the proposed undertaking has no potential to impact a Sole Source Aquifer and no mitigation

measures nor further investigations are warranted. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[Sole Source Aquifers.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Wetlands Protection

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

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

✓ No

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

Yes

Screen Summary

Compliance Determination

According to the USFWS National Wetlands Inventory Layer accessed at <http://nepassisttool.epa.gov/nepassist/entry.aspx>, there are no mapped wetland areas on the subject property. Based on the highly-developed nature of the subject property and visual observations during the site investigation performed by D3G, there are no suspected wetland areas present at the subject property. The Cover Sheet submitted by the developer affirms there are no City of Alexandria recognized Resource Protection Areas or other City identified wetland areas affected by the project. Therefore, the proposed undertaking will be in compliance with Executive Order (EO) 11990, Protection of Wetlands, as well as the requirements of Federal Register 24 CFR Parts 50 and 55. The project is in compliance with Executive Order 11990.

Supporting documentation

- [Cover Sheet.pdf](#)
- [Wetlands Protection.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

1. Is your project within proximity of a NWSRS river?

No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

Screen Summary

Compliance Determination

According to the National Wild & Scenic Rivers website accessed at www.rivers.gov/wildriverslist.html and the Nationwide Rivers Inventory (NRI) accessed at <https://www.nps.gov/subjects/rivers/nationwide-rivers-inventory.htm>, there are no Wild and Scenic Rivers or NRI segments within one (1) mile of the subject property. Therefore, the proposed undertaking has no potential to impact these resources and no mitigation measures nor further investigations are warranted. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Wild and Scenic Rivers.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

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

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

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

Yes

No

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

Yes

No

Explain:

According to the NEPAassist website accessed at <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, the subject property is not located in a low-income or predominately minority area within the City of Alexandria, as 83.42% of the population in the area surrounding the subject property is above the poverty level, and the percent minority for the subject property and its surrounding area is 43%.

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

**Screen Summary
Compliance Determination**

Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. According to the NEPAAssist website accessed at <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, the subject property is not located in a low-income or predominately minority area within the City of Alexandria, as 83.42% of the population in the area surrounding the subject property is above the poverty level, and the percent minority for the subject property and its surrounding area is 26%. Therefore, E.O. 12898 does not apply to the project and no consultation nor mitigation measures are required. The project is in compliance with Executive Order 12898.

Supporting documentation

[Environmental Justice.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No