

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

Project Information

Update Date	Updated By	Start Date	Deadline Date	End Date	Justification
07/27/2026	Kimberly Daragan-Cadena			07/22/2026	Actual End Date set to Signed Date on Signature and Posting (6320) screen.

Project Name: The-Ladrey

HEROS Number: 900000010444400

Start Date: 12/19/2024

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

RE Preparer: Kimberly V Cadena

State / Local Identifier:

Certifying Officer: James F Parajon

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

Point of Contact: Sarra Mohamed

Consultant (if applicable): Geo-Technology Associates, Inc.

Point of Contact: Samuel J. Stevenson

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

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

Project Location: 300 Wythe St, Alexandria, VA 22314

Additional Location Information:

The subject property is located at 300 Wythe Street & 600 N Fairfax Street in Alexandria, City of Alexandria, Virginia. The subject property is bounded by Wythe Street, Alexandria House, Simpson Office, and United Way Worldwide to the north; North Fairfax Street and The Oronoco Waterfront Residences to the east; Pendleton Street, Tobacco Quay Townhomes, multi-family residential buildings, and the Annie B. Rose House to the south; and North Royal Street and the Alexan Florence Apartments 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.

Direct Comments to: kimberly.cadena@alexandriava.gov

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

The subject property consists of one eleven-story, age-restricted apartment building constructed in 1977. The building contains 170 residential dwelling units and is situated on approximately 0.89 acres of land. Located within the apartment structure are laundry facilities, offices, a maintenance shop, social services offices, a craft room, a game room, mechanical areas, and a community room and kitchen. Exterior property improvements include patio areas, landscaped regions, and asphalt parking areas. The subject property is proposed for rehabilitation of the existing structure for continued residential use. The project scope will include 159 one- and two-bedroom units, along with new amenity spaces on the ground floor and 11th floor. The project scope includes the replacement of major mechanical, electrical, plumbing systems and equipment; renovation of all dwelling units; elevator modernization; and upgrading the facility to meet current accessibility and energy code requirements. The existing concrete structure will be maintained. Additional improvements include installation of new Packaged Terminal Heat Pumps (PTHP) in every unit, new security system with intercom system, fobbed doors to all common areas, and cameras throughout, as well as roof replacement. Limited ground disturbance will occur related to utility work and landscaping. The subject property is serviced by electricity, natural gas, and municipally supplied water and sewer.

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

The redevelopment plan includes the rehabilitation of the existing Ladrey Apartments, a vacant, 11-story high-rise building, and will result in 159 one- and two-bedroom units affordable to households earning 50%, 60%, and 80% of the Area Median Income (AMI). The units will serve households aged 55 and above and those living with a disability. The proposed project responds to a well-documented need for affordable housing in the City of Alexandria and the broader Northern Virginia region, particularly for older adult populations. Housing affordability challenges disproportionately affect low- and moderate-income households, especially seniors living on fixed incomes. Preserving and rehabilitating existing affordable, age-restricted housing is critical to maintaining housing stability and supporting the ability of seniors and those with a disability to thrive and age in place within the community. Without continued investment in properties such as Ladrey Apartments, vulnerable populations may face increased risk of displacement, housing instability, and reduced access to essential services.

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

The subject property currently consists of one eleven-story 170-unit age-restricted apartment structure situated on approximately 0.89 acres of land. 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. Without action to rehabilitate the structure, a lack of affordable housing for sensitive populations will be present in the area; Alexandria has experienced sustained population growth while housing production has not kept pace, especially for low- and moderate-income households (including seniors living on fixed incomes).

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

[ENV 31260877 Area of Potential Effect.pdf](#)

[ENV 31260877 2025 Aerial.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:

[CM Signed Ladrey EA Signature Page.pdf](#)

**7015.15 certified by Certifying Officer
on:**

7015.16 certified by Authorizing Officer on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
B-26-CP-VA-2159	Community Planning and Development (CPD)	Community Project Funding (CPF) Grants	\$2,000,000.00
VA004000001	Public Housing	Project-Based Voucher Program	\$3,900,000.00

Estimated Total HUD Funded, Assisted or Insured Amount: \$5,900,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$71,086,797.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	☐ Yes ☒ No	Based on geospatial mapping tools and satellite imagery, including ArcGIS Pro, Google Earth Pro, and aerial photography (map attached), the project site is not within 15,000 feet of a military airport nor within 2,000 feet of a civilian airport. Ronald Reagan Washington National Airport, a civilian airport, is located approximately 11,000 feet to the north of the project site.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	☐ Yes ☒ No	According to the Coastal Barrier Resource System Mapper accessed on April 10, 2026, at https://www.fws.gov/CBRA/Maps/Mapper.html (data last modified December

		19, 2024), the subject property is not located within an existing or proposed Coastal Barrier Resource System. Therefore, the project is in compliance with Coastal Barrier Resources Act regulations. No mitigation measures or further investigations are warranted, and this project has no potential to impact a CBRS Unit.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	☐ Yes ☒ No	According to FEMA Flood Insurance Rate Map (FIRM) #515519-0041F, effective January 11, 2024, the subject property is located in Zone X, outside the 100 and 500-year flood zones. According to the FEMA Flood Map Service Center accessed at https://msc.fema.gov/portal/home , there are no preliminary or pending FIRMs for the subject property. According to the National Flood Insurance Program (NFIP) Community Status Book accessed at https://www.fema.gov/flood-insurance/work-with-nfip/community-status-book , the subject property is located in Community ID #515519B which is a participating community in the NFIP. However, as no structures or insurable improvements are located within a Special Flood Hazard Area (Zone A or Zone AE), and flood insurance is not required under the NFIP.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	☐ Yes ☒ No	According to the EPA Green Book 8-Hour Ozone Area Information, the subject property is located within an area designated as non-attainment the 8-Hour ozone standard. The proposed project consists of the rehabilitation of an existing 11-story age-restricted apartment building and is not expected to generate emissions exceeding de minimis thresholds or the screening level established by the state or air

		quality management district for this pollutant. Due to the nature of the project, long-term impacts on air quality are not expected. Short-term impacts may occur from air emissions generated during construction activities associated with the rehabilitation of the property. However, short-term increases in emissions are expected to be below the General Conformity Rule applicability thresholds and would not contribute to a violation of Federal, state, or local air regulations. Overall, the proposed development is expected to result in no more than de minimis impacts to air quality.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	☐ Yes ☒ No	According to the National Oceanic and Atmospheric Administration (NOAA) Office for Coastal Management (OCM) mapper accessed on April 20, 2026, at https://coast.noaa.gov/czm/mystate/ , the subject property is located within a Coastal Management Zone. The Virginia Department of Environmental Quality (VDEQ) indicated that the proposed undertaking was consistent with the previous project submission to the Virginia Coastal Management Program and that no mitigation measures or further consultation was warranted. Additional coordination is not necessary due to the change in project scope. The original determination and current response is attached.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	☒ Yes ☐ No	Site contamination was evaluated as follows: an ASTM Phase I Environmental Site Assessment (ESA), ASTM Phase II ESAs, and Hazardous Material Surveys. According to these studies, the site previously contained a landfill/city dump and a junkyard, and soil and groundwater impacts were found. Based on the nature of the planned building renovations, excavation activities will be limited to some utility

		work and landscaping. Excavating activities at the site should be performed under a written Environmental Management Plan (EMP). Additionally, according to the Environmental Testing Services report prepared by ECS and dated December 16, 2025, various asbestos-containing materials (ACMs) and lead-based paint (LBP) were identified in association with the building. Recommendations from the ECS report include removal, encapsulation, or enclosure by a Virginia-licensed asbestos abatement contractor prior to disturbance of ACMs; retaining an asbestos project monitor/industrial hygienist as an independent third party to monitor the asbestos abatement contractor for general compliance with applicable asbestos regulations, document completion of work, and perform air monitoring/final clearance air testing as needed; proper management of previously unidentified ACMs if encountered during the work; and implementation of an Operations and Maintenance Plan for any ACMs that remain. LBP should be handled pursuant to the EPA's Renovation, Repair, and Paint (RRP) Rule. Renovation work should comply with 29 CFR 1926.62, the OSHA "Lead Exposure in Construction" Standard. All generated debris containing lead-based paint is to be appropriately disposed of in accordance with applicable EPA RCRA requirements. Short-term radon performed by ECS indicated radon concentrations were below 4.0 pCi/L; therefore, follow-up testing is not required, and no further action is recommended at this time. As stated in ANSI/AARST guidelines, testing should be repeated at least every 5 years and in conjunction with any sale of a building.
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Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	☐ Yes ☒ No	The City of Alexandria obtained an Official Species List for the subject property using the USFWS Information for Planning and Consultation (IPaC) website accessed on July 20, 2026, at https://ecos.fws.gov/ipac/ . According to the Official Species List, three federally-listed species have the potential to be present within the project area (Northern Long-eared Bat, Tricolored Bat, Monarch Butterfly). 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 the identified species. The subject property is currently developed as a high-rise structure with less than an acre of maintained trees and lack of flowering flora. In addition, no critical habitats were identified within the project area. The City of Alexandria has determined that there will be No Effect on federally listed species based on the limited landscaped area on the Ladrey property and the determination letter from USFWS issued July 20, 2026. No consultation with the USFWS is required under Section 7 of the Endangered Species Act. This project is in compliance with the Endangered Species Act without mitigation.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	☐ Yes ☒ No	Project activities include the rehabilitation of the existing eleven-story structure which will not increase residential densities; the proposed rehabilitation includes 159 units, down from the 170 units currently in the building. Based on HUD guidelines, this project does not include development, construction, rehabilitation that will increase residential densities, or conversion; therefore, 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	☐ Yes ☒ No	According to the U.S. Census Bureau Urbanized Area Map accessed on April 15, 2026, at http://tigerweb.geo.census.gov/tigerweb/ (official November 30, 2025), the subject property is located within an urbanized area; therefore, the subject property is already in an area committed to urban development and is exempt from compliance with the Farmland Protection Policy Act per 7 CFR Part 658.2. The project is in compliance with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	☐ Yes ☒ No	This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	☐ Yes ☒ No	The subject property consists of one eleven-story age-restricted apartment building. The Sponsor is submitting this project through the HUD Special Applications Center (SAC) Program with additional funding through a Virginia Housing low-income housing tax credit (LIHTC) application, consisting of the rehabilitation of the existing apartment structure. A review of the National Register of Historic Places and the Virginia Cultural Resources Information System (V-CRIS) Map, accessed on April 20, 2026, at https://vcris.dhr.virginia.gov/VCRIS/Mapviewer/ , does not indicate that the Ladrey High-Rise (DHR ID: 100-5616) is listed on the National Register of Historic Places (NRHP). Additionally, according to a previous submittal of the subject property to the Virginia Department of Historic Resources, the Virginia State Historic Preservation Officer (SHPO) indicated that the subject property and south adjoining structure were not eligible for the NRHP. While the Indirect (Visual) APE for the subject property contains

		numerous evaluated and unevaluated structures, the view-shed of these sites will not be altered by rehabilitation of the existing building. It should be noted that the Mount Vernon Memorial Highway (DHR ID: 029-0228-0131) is identified as being partially located through the subject property. However, this highway was built in 1932, and the subject building was construction 40 years later. Therefore, it is unlikely that any associated historic resources remain on the subject property. Based on the Section 106 tribal consultation requirements, tribal consultation was not required, as documented in Appendix A (attached). During a previous submission consulted for this project, the SHPO approved the project with a "no adverse effect" finding on June 2, 2023, provided that a professional archaeologist oversees the excavation of two mechanical trenches across the filled creek in order to collect stratigraphic data, and that the SHPO be provided a copy of their report. This project is being resubmitted to the SHPO due to a change to the site boundary and scope of work (rehabilitation of the structure rather than the previously proposed demolition). GTA submitted the project to DHR's ePIX Portal on April 20, 2026, and submitted a request to the SHPO on April 22, 2026. On May 20, 2026, DHR determined that no historic properties will be affected by the proposed project.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	☐ Yes ☒ No	The subject property is located approximately 2.1 miles from the Ronald Reagan International Airport, 9.3 miles from Joint Base Andrews, and 9.9 miles from the Davison Army Airfield (AAF). According to the 2021 noise contour map for the Ronald Reagan International Airport (attached), the

		subject property is located well outside of the outermost (65 dB) contour line for the airport. Based on the interpolation between the contours for the Ronald Reagan International Airport and the subject property, the noise level for this facility is estimated to be roughly 57 dB at the subject property. According to the 2017 noise contour map for Joint Base Andrews (sourced from Air Installations Compatible Use Zones (AICUZ), the subject property is located well outside of the outermost (65 dB) contour line for the facility and it is not suspected to impact the noise characteristics of the subject property. According to the 2010 noise contour map for the Davison AAF (produced by the US Army Public Health Command), the subject property is located well outside of the outermost (60 dB) contour line for the facility and it is not suspected to impact the noise characteristics of the subject property. There are no other military airfields or other civil airports within 15 miles of the subject property that would be considered a noise source. The subject property is located within 1,000 feet of Wythe Street, North Fairfax Street, Pendleton Street, and North Washington Street. Traffic count information from the City of Alexandria for the year 2022 was obtained from the Virginia Department of Transportation (VDOT) website accessed at https://data.virginia.gov/dataset/aadt-2022-city-of-alexandria. Vehicle classification information was obtained from the aforementioned websites and the following vehicle percentages were utilized in the calculations: 98% cars, 1% medium trucks and 1% heavy trucks for Wythe Street; 93% cars, 3% medium trucks and 2% heavy trucks for North Fairfax Street; 92% cars, 2% medium
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		trucks and 4% heavy trucks for Pendleton Street; and 97% cars, 0% medium trucks and 1% heavy trucks for North Washington Street. The subject property is not located within 3,000 feet of a railway. Noise from Ronald Reagan International Airport and these four roads were used in the Day/Night Noise Level (DNL) Calculator. The Noise Assessment Location (NAL) is located near the northern boundary of the property along Wythe Street; the effective distance is measured from the building facade to the center of the street. The NAL was chosen near the northern boundary of the subject property where the two closest streets (Wythe Street and N Fairfax Street) with available traffic data are present. The DNL output for Wythe Street and N Fairfax Street are both 58 dB. The results of the noise assessment (attached) indicate an acceptable noise level of 63 dB. This project is in compliance with HUD's noise regulations.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	☐ Yes ☒ No	Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements. According to the Sole Source Aquifer layer obtained from Sole Source Aquifer Locations Map, accessed on April 17, 2026, at https://www.epa.gov/dwssa/map-sole-source-aquifer-locations , the subject property is not located within the boundaries of a Sole Source Aquifer. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	☐ Yes ☒ No	According to the USFWS National Wetlands Inventory accessed on April 17, 2026, at https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper ,

		there are no mapped wetland areas on the subject property. The subject property currently consists of an eleven-story apartment structure with a parking lot and landscaped areas. Therefore, the project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	☐ Yes ☒ No	According to the National Wild and Scenic Rivers website accessed on April 20, 2026, at https://www.rivers.gov/map , there are no Wild and Scenic Rivers in the vicinity of the subject property. In addition, according to the Nationwide Rivers Inventory list accessed on April 20, 2026, at https://www.nps.gov/subjects/rivers/nationwide-rivers-inventory.htm , there are no Virginia Rivers listed that are upstream or downstream of the subject property within one mile. Therefore, the proposed undertaking has no potential to impact these resources, and no mitigation measures or further investigations are warranted. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		

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 subject property currently consists of one eleven-story, 170-unit, age-restricted apartment structure, which will be rehabilitated into 159-unit structure. According to the City of Alexandria 2020 Zoning Map accessed at https://media.alexandriava.gov/docs-archives/gis/info/zoningmap2020.pdf?bcs-agent-scanner=de980060-a8ef-c748-affb-15 , the subject property is currently zoned RC (High Density Apartment) and the proposed development is in compliance with local zoning ordinances.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Based on visual observations, there is no evidence of soil problems, unstable conditions, or excessive erosion on the subject property. According to the USGS Topographic Quadrangle: Alexandria, Virginia 2022, the topography of the site slopes to the east. On-site drainage at the subject property is directed into proximate stormwater inlets or percolates into unpaved areas.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	The proposed rehabilitation 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 General Plan policies. Construction phase noise will be mitigated by standard procedures.	
SOCIOECONOMIC			
Employment and Income Patterns	2	Based on the fact that the proposed subject property development will enhance the infrastructure of the surrounding area, provide employment opportunities in the community,	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		and provide low-income housing, no impact is anticipated.	
Demographic Character Changes / Displacement	2	The site is located in a residentially developed area. The proposed development of the site is compatible with the surrounding neighborhood; no demographic character changes or displacement are anticipated with the proposed project.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	Based on research of the subject property and surrounding area, there are sufficient educational and cultural facilities located in the vicinity, to which no impacts are anticipated from the proposed development. The proposed project consists of a residential structure restricted to seniors (55 and above) and households living with a disability.	
Commercial Facilities (Access and Proximity)	2	The project site is located at 300 Wythe Street in the Old Town North area of Alexandria, Virginia, which is a well-developed urban neighborhood with a wide range of commercial services. Nearby commercial facilities include grocery stores, pharmacies, restaurants, banks, medical offices, and other retail services located within walking distance or a short transit trip of the site. The surrounding area provides convenient access to essential goods and services that support daily living needs, particularly for senior residents and those living with a disability. Given the urban setting and availability of nearby commercial amenities, the proposed rehabilitation is not anticipated to adversely impact existing commercial facilities.	
Health Care / Social Services (Access and Capacity)	2	Based on research of the subject property and surrounding area, there are sufficient health care and social service facilities located in the vicinity, to which no impacts are anticipated from the proposed development. The subject property will be serviced by the Inova Alexandria Hospital, located 4.1 miles away, and Inova Mount Vernon Hospital, located 6.6 miles away.	
Solid Waste Disposal and	2	Based on research of the subject property and surrounding area, there are sufficient solid	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Recycling (Feasibility and Capacity)		waste/recycling facilities located in the vicinity, to which no impacts are anticipated from the proposed development.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	Based on research of the subject property and surrounding area, there are sufficient wastewater/sanitary sewer services available, to which no impacts are anticipated from the proposed development.	
Water Supply (Feasibility and Capacity)	2	Based on research of the subject property and surrounding area, there are sufficient water services available, to which no impacts are anticipated from the proposed development.	
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, to which no impacts are anticipated from the proposed development. The subject property will be supported by the Alexandria City Police Department, located 3.2 miles to the west-southwest and approximately 14 minutes, and the Alexandria Fire Station 204, located 0.6 miles to the northwest and approximately 3 minutes. It should be noted that response times from the police department would be shorter than the 14 minute estimate, based on typical police patrolling.	
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, to which no impacts are anticipated from the proposed development. The proposed development will be supported by City of Alexandria Parks (https://www.alexandriava.gov/Parks). The subject property is located 0.2 miles from Montgomery Park, 0.3 miles from Oronoco Bay Park, 0.3 miles from Rivergate City Park, and 0.5 miles from Founders Park.	
Transportation and Accessibility (Access and Capacity)	2	Based on a review of the subject property and surrounding area, the site has strong access to public transportation and pedestrian infrastructure. The property is located approximately 400 feet from the Madison Street	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		& North Royal Street bus stop and approximately 500 feet from the North Fairfax Street & Madison Street bus stop, both of which provide local and regional transit connections. Additionally, the site is located approximately 1.1 miles from the King Street-Old Town Metrorail Station and Alexandria Union Station, which provide access to Metrorail, Amtrak, and Virginia Railway Express (VRE) services. The walkable urban setting, availability of transit options, and proximity to regional transportation corridors support accessibility for residents, including those who may not rely on personal vehicles. The rehabilitation will also include accessibility upgrades to better accommodate the building's vulnerable population. No adverse impacts to transportation or accessibility are anticipated as a result of the proposed project.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	Based on research of the subject property and surrounding area, no unique natural features or water resources are located in the vicinity, and no impacts are anticipated from the proposed development.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	Based on research of the subject property and surrounding area, no impacts to unique vegetation or wildlife are anticipated from the proposed development. For Section 7 consultation, please see the Endangered Species portion of this EA.	
Other Factors 1		No other factors have been identified.	
Other Factors 2		No other factors have been identified.	
ENERGY			
Energy Efficiency	1	The project involves the rehabilitation of an existing building and a reduction in the number of residential units. The building will utilize energy-efficient appliances and light fixtures. Therefore, the proposed project would not have unusual energy needs and is not expected to have a negative impact on energy consumption.	

Supporting documentation

Additional Studies Performed:

Field Inspection [Optional]: Date and completed by:

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

U.S. EPA Green Book County-Level Multi-Pollutant Information:
<https://www.epa.gov/green-book> CBRA information:
<https://www.fws.gov/program/coastal-barrier-resources-act/maps-and-data>
National Oceanic and Atmospheric Administration - Ocean and Coastal Resource Management: <https://coast.noaa.gov/czm/mystate/> U.S. Fish and Wildlife Service (USFWS) Information, Planning, and Conservation (IPaC) System:
<http://ecos.fws.gov/ipac/> U.S. Census Bureau TIGERweb Geography Division website:
<http://tigerweb.geo.census.gov/tigerweb/> Web Soil Survey:
<http://websoilsurvey.nrcs.usda.gov/app/> FEMA FIRM #515519-0041F, effective January 11, 2024 FEMA NFIP Community Status Book: <https://www.fema.gov/flood-insurance/work-with-nfip/community-status-book> Federal Aviation Administration website:
<https://oeaaa.faa.gov/oeaaa/external/searchAction.jsp?action=showCircleSearchAirportsForm> U.S. EPA NEPAassist: <http://nepassisttool.epa.gov/nepassist/entry.aspx>
The National Register of Historic Places:
<https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466> The Sole Source Aquifer Map: <https://www.epa.gov/dwssa/map-sole-source-aquifer-locations> USFWS National Wetlands Inventory map:
<http://www.fws.gov/wetlands/Data/Mapper.html> National Wild and Scenic Rivers System: <https://rivers.gov/> National Park Service National Rivers:
<https://www.nps.gov/subjects/rivers/nationwide-rivers-inventory.htm> National Pipeline Mapping System (NPMS) Public Viewer:
<https://pvnpm.phmsa.dot.gov/PublicViewer> FEMA's NRI:
<https://hazards.fema.gov/nri/map> Virginia Department of Emergency Management's Hazard Mitigation Plan: <https://www.vaemergency.gov/attachments/cova-hazard-mitigation-plan> Ladrey Apartments 50% Construction Documents, prepared by Bowman Consulting Group, Ltd. dated April 2026 Ladrey Senior Highrise Apartments Hazardous Materials Survey, prepared by ECS dated February 4, 2021 The Ladrey Phase I Environmental Site Assessment, prepared by ECS dated October 31, 2025 Ladrey Senior Housing Environmental Testing Services, prepared by ECS dated December 16, 2025

List of Permits Obtained:

Determination of No Historic Properties Affected, VA Department of Historic Resources Costal Zone Management Review, VA Department of Environmental Quality Minor Site Plan Amendment, City of Alexandria Building permits, City of Alexandria

Public Outreach [24 CFR 58.43]:

Between September 2025 and April 2026, ARHA conducted ten outreach meetings with Ladrey residents, community groups, and the general public to inform them about the Ladrey rehabilitation project. Between September 2025 and July 2026, ARHA also met with governmental bodies ten times to brief them about the progress of the project. These meetings were open to the public. In addition, information about the environmental review process and possible impacts on the community were discussed with the public during the outreach related to the proposed Ladrey redevelopment. FONSI list: North Old Town Independent Citizens' Association City of Alexandria Commission on Aging ARHA Redevelopment Work Group Ladrey Resident Council EPA Region III Administrator Owner, Annie B. Rose House Director, City of Alexandria Department of Transportation & Environmental Services Director, City of Alexandria Department of Planning & Zoning

[Community Engagement Outreach.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 the primary market area, and the lack of identified environmental impacts directly related to the proposed development, any incremental impacts from the proposed development will only be positive in nature. No additional resources were identified that would be impacted due to the cumulative effects of the projects.

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

No feasible alternatives for the proposed project were identified that would result in less impacts. All aspects of the project were evaluated to ensure that potential impacts to the environment and human health would be avoided or minimized through the implementation of mitigation measures. These measures are described for all laws and authorities potentially impacted under the Mitigation Measures and Conditions section of this EA.

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 has been considered. Under this alternative, the proposed rehabilitation of the Ladrey Apartments would not occur. The existing 11-story, formerly 170-unit high-rise building, which is currently vacant, would remain in its present condition and continue to deteriorate over time, potentially necessitating eventual demolition. Additionally, the proposed 159 units of affordable, age-restricted housing would not be delivered, resulting in a missed opportunity to address the documented need for affordable housing for seniors and disabled persons in Alexandria. The No Action Alternative would therefore fail to meet the project's purpose and need and would not support local and regional housing goals.

Summary of Findings and Conclusions:

In conclusion, the Environmental Assessment identified one aspect that will require additional compliance steps and/or mitigation: Contamination and Toxic Substances. 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 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
Contamination and Toxic Substances	Prior Phase II ESAs of the subject property identified soil and groundwater impacts likely resulting from the past use of the site as a dumping ground and junkyard. Based on these findings, the Virginia Department of Environmental Quality (VDEQ) was notified and issued a No Further Action letter, dated December 6, 2023. VDEQ noted that future redevelopment of the site could result in encountering contaminated soil and	N/A		

	groundwater. To address this possibility, any excavating work will adhere to a site-specific Environmental Management Plan (EMP).			
Asbestos-Containing Materials	ACMs were identified in some building materials. ACMs will be removed, encapsulated, or enclosed by a Virginia-licensed asbestos abatement contractor prior to disturbance of ACMs; an asbestos project monitor/industrial hygienist will be retained as an independent third party to monitor the asbestos abatement contractor for general compliance with applicable asbestos regulations, document completion of work, and perform air monitoring/final clearance air testing as needed; maintain proper management of previously unidentified ACMs if encountered during the work; and the implementation of an Operations and Maintenance Plan for any ACMs that remain.	N/A	Mitigation measures and conditions will be followed and implemented as outlined.	
Lead-Based Paint	LBP will be handled pursuant to the EPA's Renovation, Repair, and Paint (RRP) Rule. Renovation work will comply with 29 CFR 1926.62, the OSHA "Lead Exposure in Construction" Standard. All generated debris containing lead-based paint will be appropriately disposed in accordance with applicable EPA RCRA requirements.	N/A	Mitigation measures and conditions will be followed and implemented as outlined.	
Polychlorinated Biphenyls (PCBs)	Any materials containing polychlorinated biphenyls (PCBs), if encountered, will be properly handled, removed, and disposed of by licensed	N/A	Mitigation measures and conditions will be	

	contractors in accordance with EPA regulations.		followed and implemented as outlined.	
Universal Wastes	Universal wastes (e.g., fluorescent lamps, batteries) encountered during rehabilitation activities will be managed and disposed of in accordance with applicable federal and state regulations.	N/A	Mitigation measures and conditions will be followed and implemented as outlined.	

Project Mitigation Plan

The contractors involved with excavation activities will follow a site-specific Environmental Management Plan (EMP), which will specify the procedures used to identify and properly managed contamination in soil and groundwater, if encountered. The EMP will also describe the management and disposal of universal wastes and PCBs, in accordance with applicable federal and state regulations. ACMs will be removed, encapsulated, or enclosed by a Virginia-licensed asbestos abatement contractor prior to disturbance. An independent third-party asbestos project monitor/industrial hygienist will monitor the contractor for compliance with applicable asbestos regulations, document completion of work, and perform air monitoring/final clearance air testing as needed. If unidentified ACMs are encountered during the work, they will be properly managed. If any ACMs remain, they will be addressed in an Operations and Maintenance Plan. LBP will be handled pursuant to the EPA's Renovation, Repair, and Paint (RRP) Rule. Renovation work will comply with 29 CFR 1926.62, the OSHA "Lead Exposure in Construction" Standard. All generated debris containing lead-based paint will be appropriately disposed in accordance with applicable EPA RCRA requirements. Universal wastes (e.g., fluorescent lamps, batteries) encountered during rehabilitation activities will be managed and disposed of in accordance with applicable federal and state regulations. Any materials containing polychlorinated biphenyls (PCBs), if encountered, will be properly handled, removed, and disposed of by licensed contractors in accordance with EPA regulations.

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**

Based on geospatial mapping tools and satellite imagery, including ArcGIS Pro, Google Earth Pro, and aerial photography (map attached), the project site is not within 15,000 feet of a military airport nor within 2,000 feet of a civilian airport. Ronald Reagan Washington National Airport, a civilian airport, is located approximately 11,000 feet to the north of the project site.

Supporting documentation

[D Airport Hazards Map.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 on April 10, 2026, at <https://www.fws.gov/CBRA/Maps/Mapper.html> (data last modified December 19, 2024), the subject property is not located within an existing or proposed Coastal Barrier Resource System. Therefore, the project is in compliance with Coastal Barrier Resources Act regulations. No mitigation measures or further investigations are warranted, and this project has no potential to impact a CBRS Unit.

Supporting documentation

[E CBRS Map.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:

[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) #515519-0041F, effective January 11, 2024, the subject property is located in Zone X, outside the 100 and 500-year flood zones. According to the FEMA Flood Map Service Center accessed at <https://msc.fema.gov/portal/home>, there are no preliminary or pending FIRMs for the subject property. According to the National Flood Insurance Program (NFIP) Community Status Book accessed at <https://www.fema.gov/flood-insurance/work-with-nfip/community-status-book>, the subject property is located in Community ID #515519B which is a participating community in the NFIP. However, as no structures or insurable improvements are located within a Special Flood Hazard Area (Zone A or Zone AE), and flood insurance is not required under the NFIP.

Supporting documentation

[Flood Hazard FEMA FIRM.pdf](#)

[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:

De minimis levels for ozone range from 10 to 100 tons per year (tph), units that are not provided above.

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 the EPA Green Book 8-Hour Ozone Area Information, the subject property is located within an area designated as non-attainment the 8-Hour ozone standard. The proposed project consists of the rehabilitation of an existing 11-story age-restricted apartment building and is not expected to generate emissions exceeding de minimis thresholds or the screening level established by the state or air quality management district for this pollutant. Due to the nature of the project, long-

term impacts on air quality are not expected. Short-term impacts may occur from air emissions generated during construction activities associated with the rehabilitation of the property. However, short-term increases in emissions are expected to be below the General Conformity Rule applicability thresholds and would not contribute to a violation of Federal, state, or local air regulations. Overall, the proposed development is expected to result in no more than de minimis impacts to air quality.

Supporting documentation

[Air Quality VA Nonattainment areas.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) mapper accessed on April 20, 2026, at <https://coast.noaa.gov/czm/mystate/>, the subject property is located within a Coastal Management Zone. The Virginia Department of Environmental Quality (VDEQ) indicated that the proposed undertaking was consistent with the previous project submission to the Virginia Coastal Management Program and that no mitigation measures or further consultation was warranted. Additional coordination is not necessary due to the change in project scope. The original determination and current response is attached.

Supporting documentation

[CZM Letter 2023.pdf](#)

[VA CZM Response.pdf](#)

[CZM Request to VDEQ.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

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

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

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

None of the above

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.

For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances* (excluding radon) 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?)

Provide a map or other documentation of absence or presence of contamination** and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.

No

Explain:

✓ Yes

* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.

** Utilize EPA's Enviromapper, NEPAAssist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions* from having to consider radon in the contamination analysis listed in CPD Notice [CPD-23-103](#)?

Yes

Explain:

✓ No

* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

4. Is the proposed project new construction or substantial rehabilitation where testing will be conducted but cannot yet occur because building construction has not been completed?

Yes

Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be uploaded to the mitigation section within this screen.

✓ No

5. Was radon testing or a scientific data review conducted that provided a radon concentration level in pCi/L?

✓ Yes

No

If no testing was conducted and a review of science-based data offered a lack of science-based data for the project site, then document and upload the steps taken to look for documented test results and science-based data as well as the basis for the conclusion that testing would be infeasible or impracticable.

Explain:

File Upload:

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

Non-radon contamination was found in a previous question.

6. How was radon data collected?

✓ All buildings involved were tested for radon

A review of science-based data was conducted

Enter the Radon concentration value, in pCi/L, derived from the review of science-based data:

Provide the documentation* used to derive this value:

File Upload:

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen.

Radon concentration value is greater than or equal to 4.0 pCi/L and/or non-radon contamination was found in a previous question. Continue to Mitigation.

* For example, if you conducted radon testing then provide a testing report (such as an ANSI/AARST report or DIY test) if applicable (note: DIY tests are not eligible for use in multifamily buildings), or documentation of the test results. If you conducted a scientific data review, then describe and cite the maps and data used and include copies of all supporting documentation. Ensure that the best available data is utilized, if conducting a scientific data review.

7. Were the radon test results for any dwelling unit tested at or above 4.0 pCi/L?

Yes

Radon Mitigation is required for the question to proceed.

Enter the total number of dwelling units tested:

How many dwelling units tested at or above 4.0 pCi/L:

Enter the highest radon test result value:

Document the test results for all dwelling units tested with a copy of the test results for all dwelling units or testing report(s) covering all units:

File Upload:

✓ No

Provide a copy of the test results for all dwelling units tested or testing report(s) covering all units tested:

See "The Ladrey Senior Living Haz Survey 2025"

File Upload:

Based on the response, the review is in compliance with this section. Continue to the Screen Summary at the bottom of this screen:

Non-radon contamination was found in a previous question.

8. Mitigation

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

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan*.

Can all adverse environmental impacts be mitigated?

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

- ✓ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.
Provide all mitigation requirements** and documents in the Screen Summary at the bottom of this screen.

* Refer to CPD Notice [CPD-23-103](#) for additional information on radon mitigation plans.

** Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

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

Prior Phase II ESAs of the subject property identified soil and groundwater impacts likely resulting from the past use of the site as a dumping ground and junkyard. Based on these findings, the Virginia Department of Environmental Quality (VDEQ) was notified and issued a No Further Action letter, dated December 6, 2023. VDEQ noted that future redevelopment of the site could result in encountering contaminated soil and groundwater. To address this possibility, any excavating work will adhere to a site-specific Environmental Management Plan (EMP).

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

Complete removal

Risk-based corrective action (RBCA)

Other

* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

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

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: an ASTM Phase I Environmental Site Assessment (ESA), ASTM Phase II ESAs, and Hazardous Material Surveys. According to these studies, the site previously contained a landfill/city dump and a junkyard, and soil and groundwater impacts were found. Based on the nature of the planned building renovations, excavation activities will be limited to some utility work and landscaping. Excavating activities at the site should be performed under a written Environmental Management Plan (EMP). Additionally, according to the

Environmental Testing Services report prepared by ECS and dated December 16, 2025, various asbestos-containing materials (ACMs) and lead-based paint (LBP) were identified in association with the building. Recommendations from the ECS report include removal, encapsulation, or enclosure by a Virginia-licensed asbestos abatement contractor prior to disturbance of ACMs; retaining an asbestos project monitor/industrial hygienist as an independent third party to monitor the asbestos abatement contractor for general compliance with applicable asbestos regulations, document completion of work, and perform air monitoring/final clearance air testing as needed; proper management of previously unidentified ACMs if encountered during the work; and implementation of an Operations and Maintenance Plan for any ACMs that remain. LBP should be handled pursuant to the EPA's Renovation, Repair, and Paint (RRP) Rule. Renovation work should comply with 29 CFR 1926.62, the OSHA "Lead Exposure in Construction" Standard. All generated debris containing lead-based paint is to be appropriately disposed of in accordance with applicable EPA RCRA requirements. Short-term radon performed by ECS indicated radon concentrations were below 4.0 pCi/L; therefore, follow-up testing is not required, and no further action is recommended at this time. As stated in ANSI/AARST guidelines, testing should be repeated at least every 5 years and in conjunction with any sale of a building.

Supporting documentation

[Ladrey Phase I ESA 2025.pdf](#)
[The Ladrey Senior Living Haz Survey 2025.pdf](#)
[Hazardous Materials Survey.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.

Document and upload all documents used to make your determination below. Documentation should include a species list and explanation of your conclusion, and may require maps, photographs, and surveys as appropriate

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

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

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

Mitigation as follows will be implemented:

- ✓ No mitigation is necessary.

Explain why mitigation will not be made here:

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 the three identified species, as detailed in the attached Species Conclusion Table. In addition, no critical habitats were identified within the project area.

Screen

Summary

Compliance Determination

The City of Alexandria obtained an Official Species List for the subject property using the USFWS Information for Planning and Consultation (IPaC) website accessed on July 20, 2026, at <https://ecos.fws.gov/ipac/>. According to the Official Species List, three federally-listed species have the potential to be present within the project area (Northern Long-eared Bat, Tricolored Bat, Monarch Butterfly). 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 the identified species. The subject property is currently developed as a high-rise structure with less than an acre of maintained trees and lack of flowering flora. In addition, no critical habitats were identified within the project area. The City of Alexandria has determined that there will be No Effect on federally listed species based on the limited landscaped area on the Ladrey property and the determination letter from USFWS issued July 20, 2026. No consultation with the USFWS is required under Section 7 of the Endangered Species Act. This project is in compliance with the Endangered Species Act without mitigation.

Supporting documentation

[Species List Virginia Ecological Services Field Office 07202026.pdf](#)
[20260720 FWS determination letter.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

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

Yes

Screen Summary**Compliance Determination**

Project activities include the rehabilitation of the existing eleven-story structure which will not increase residential densities; the proposed rehabilitation includes 159 units, down from the 170 units currently in the building. Based on HUD guidelines, this project does not include development, construction, rehabilitation that will increase residential densities, or conversion; therefore, the project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

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:

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**

According to the U.S. Census Bureau Urbanized Area Map accessed on April 15, 2026, at <http://tigerweb.geo.census.gov/tigerweb/> (official November 30, 2025), the subject property is located within an urbanized area; therefore, the subject property is already in an area committed to urban development and is exempt from compliance with the Farmland Protection Policy Act per 7 CFR Part 658.2. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[Washington Arlington Urban Areas.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 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

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

Yes

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

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

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property's continued use for flood control, wetland projection, open space, or park land, but only if:

(1) The property is cleared of all existing buildings and walled structures; and

(2) The property is cleared of related improvements except those which:

(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);

(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and

(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

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

or other HUD assistance.

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

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

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

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

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

Describe:

✓ No

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

Yes

Describe:

✓ No

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

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information¹ to determine flood elevation. Include documentation and an explanation of why this is the best available information² for the site. Note that newly constructed and substantially improved³ structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

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

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

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

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

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

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

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary

Compliance Determination

This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.

Supporting documentation

[J K Flood Hazard FEMA FIRM.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

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

Threshold

Is Section 106 review required for your project?

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA). (See the PA Database to find applicable PAs.)

No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

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

Step 1 – Initiate Consultation

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

- ✓ State Historic Preservation Officer (SHPO) Completed

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

Other Consulting Parties

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

Federal undertakings require the Responsible Entity (RE) to make a determination of effect with respect to historic resources and consult with the State Historic Preservation Officer (SHPO) to obtain project clearance under Section 106 of the National Historic Preservation Act. GTA submitted a consultation package with supporting documentation to the SHPO on behalf of The City of Alexandria, the Responsible Entity. Tribal Historic Preservation Officers (THPOs) were not consulted according to the Appendix A checklist attached below.

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 Effects (APE) is limited to the subject property, while the Indirect (Visual) APE includes vicinity properties within a 0.25-mile viewshed to the property.

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
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Additional Notes:

None

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:

The subject property structures were previously surveyed by EHT Traceries in April 2023 under DHR ID: 100-5616.

No

Step 3 –Assess Effects of the Project on Historic Properties

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

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

✓ No Historic Properties Affected

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

Document reason for finding:

No historic properties present.

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

No Adverse Effect

Adverse Effect

Screen Summary

Compliance Determination

The subject property consists of one eleven-story age-restricted apartment building. The Sponsor is submitting this project through the HUD Special Applications Center (SAC) Program with additional funding through a Virginia Housing low-income housing tax credit (LIHTC) application, consisting of the rehabilitation of the existing apartment structure. A review of the National Register of Historic Places and the Virginia Cultural Resources Information System (V-CRIS) Map, accessed on April 20, 2026, at <https://vcris.dhr.virginia.gov/VCRIS/Mapviewer/>, does not indicate that the Ladrey High-Rise (DHR ID: 100-5616) is listed on the National Register of Historic Places (NRHP). Additionally, according to a previous submittal of the subject property to the Virginia Department of Historic Resources, the Virginia State Historic Preservation Officer (SHPO) indicated that the subject property and south adjoining structure were not eligible for the NRHP. While the Indirect (Visual) APE for the subject property contains numerous evaluated and unevaluated structures, the viewshed of these sites will not be altered by rehabilitation of the existing building. It should be noted that the Mount Vernon Memorial Highway (DHR ID: 029-0228-0131) is identified as being partially located through the subject property. However, this highway was built in 1932, and the subject building was construction 40 years later. Therefore, it is unlikely that any associated historic resources remain on the subject property. Based on the Section 106 tribal consultation requirements, tribal consultation was not required, as documented in Appendix A (attached). During a previous submission consulted for this project, the SHPO approved the project with a "no adverse effect" finding on June 2, 2023, provided that a professional archaeologist oversees the excavation of two mechanical trenches across the filled creek in order to collect stratigraphic data, and that the SHPO be provided a copy of their report. This project is being resubmitted to the SHPO due to a change to the site boundary and scope of work (rehabilitation of the structure rather than the previously proposed demolition). GTA submitted the project to DHR's ePIX Portal on April 20, 2026, and submitted a request to the SHPO on April 22, 2026. On May 20, 2026, DHR determined that no historic properties will be affected by the proposed project.

Supporting documentation

[VA DHR No Effect Letter 2026.pdf](#)
[L DHR SHPO Response 20230602.pdf](#)
[VA DHR Project Submission.pdf](#)
[DHR VCRIS Listing.pdf](#)
[Appendix A Tribal Consultation Not Required.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

✓ Rehabilitation of an existing residential property

NOTE: For major or substantial rehabilitation in Normally Unacceptable zones, HUD encourages mitigation to reduce levels to acceptable compliance standards. For major rehabilitation in Unacceptable zones, HUD strongly encourages mitigation to reduce levels to acceptable compliance standards. See 24 CFR 51 Subpart B for further details.

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))

Indicate noise level here: 63

Based on the response, the review is in compliance with this section. Document and upload noise analysis, including noise level and data used to complete the analysis below.

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: 63

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

Screen Summary

Compliance Determination

The subject property is located approximately 2.1 miles from the Ronald Reagan International Airport, 9.3 miles from Joint Base Andrews, and 9.9 miles from the Davison Army Airfield (AAF). According to the 2021 noise contour map for the Ronald Reagan International Airport (attached), the subject property is located well outside of the outermost (65 dB) contour line for the airport. Based on the interpolation between the contours for the Ronald Reagan International Airport and the subject

property, the noise level for this facility is estimated to be roughly 57 dB at the subject property. According to the 2017 noise contour map for Joint Base Andrews (sourced from Air Installations Compatible Use Zones (AICUZ), the subject property is located well outside of the outermost (65 dB) contour line for the facility and it is not suspected to impact the noise characteristics of the subject property. According to the 2010 noise contour map for the Davison AAF (produced by the US Army Public Health Command), the subject property is located well outside of the outermost (60 dB) contour line for the facility and it is not suspected to impact the noise characteristics of the subject property. There are no other military airfields or other civil airports within 15 miles of the subject property that would be considered a noise source. The subject property is located within 1,000 feet of Wythe Street, North Fairfax Street, Pendleton Street, and North Washington Street. Traffic count information from the City of Alexandria for the year 2022 was obtained from the Virginia Department of Transportation (VDOT) website accessed at <https://data.virginia.gov/dataset/aadt-2022-city-of-alexandria>. Vehicle classification information was obtained from the aforementioned websites and the following vehicle percentages were utilized in the calculations: 98% cars, 1% medium trucks and 1% heavy trucks for Wythe Street; 93% cars, 3% medium trucks and 2% heavy trucks for North Fairfax Street; 92% cars, 2% medium trucks and 4% heavy trucks for Pendleton Street; and 97% cars, 0% medium trucks and 1% heavy trucks for North Washington Street. The subject property is not located within 3,000 feet of a railway. Noise from Ronald Reagan International Airport and these four roads were used in the Day/Night Noise Level (DNL) Calculator. The Noise Assessment Location (NAL) is located near the northern boundary of the property along Wythe Street; the effective distance is measured from the building facade to the center of the street. The NAL was chosen near the northern boundary of the subject property where the two closest streets (Wythe Street and N Fairfax Street) with available traffic data are present. The DNL output for Wythe Street and N Fairfax Street are both 58 dB. The results of the noise assessment (attached) indicate an acceptable noise level of 63 dB. This project is in compliance with HUD's noise regulations.

Supporting documentation

[ENV 31260877 NAL Map.pdf](#)

[ENV 31260877 Noise Assessment Map.pdf](#)

[Noise Contours Davison Army Airfield.pdf](#)

[Noise Contours DCA.pdf](#)

[Noise Contours Joint Base Andrews.pdf](#)

[DNL Calculator.pdf](#)

Are formal compliance steps or mitigation required?

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Alexandria, VA

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Yes

✓ No

Sole Source Aquifers

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

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

✓ Yes

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

No

Screen Summary**Compliance Determination**

Based on the project description, the project consists of activities that are unlikely to have an adverse impact on groundwater resources. The project is in compliance with Sole Source Aquifer requirements. According to the Sole Source Aquifer layer obtained from Sole Source Aquifer Locations Map, accessed on April 17, 2026, at <https://www.epa.gov/dwssa/map-sole-source-aquifer-locations>, the subject property is not located within the boundaries of a Sole Source Aquifer. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[O Sole Source Aquifer Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 requires avoiding to the extent possible the long and short term adverse impacts associated with the destruction or modification of wetlands, and avoiding actions that directly or indirectly support new construction in wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory must be used as a primary screening tool, but observed or known wetlands not delineated on NWI maps must also be evaluated.	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 24 CFR 55.10 and referenced in Executive Order 11990? The term "new construction" shall include grading, clearing, draining, dredging, channelizing, filling, diking, impounding, and related activities for any structure or facilities, including the siting of new manufactured housing units.

No

✓ Yes

2. Will the new construction activities directly impact an onsite wetland?

The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, prairie potholes, wet meadows, river overflows, mud flats, and natural ponds. This definition includes those wetland areas separated from their natural supply of water as a result of activities such as the construction of structural flood protection methods or solid fill roadbeds and activities such as mineral extraction and navigation improvements. This definition includes both wetlands subject to and those not subject to Section 404 of the Clean Water Act as well as constructed wetlands.

✓ No, an onsite wetland will not be directly impacted by new construction activities, as defined in 24 CFR 55.10.

Yes, there is an onsite wetland that will be directly impacted by new construction activities, as defined 24 CFR 55.10.

3. Will the proposed project indirectly affect wetlands by modifying the flow of stormwater, releasing pollutants, or otherwise changing conditions that contribute to wetlands viability?

Yes, wetlands may be indirectly affected by changing conditions that contribute to wetlands viability.

- ✓ No, wetlands will not be indirectly affected by changing conditions that contribute to wetlands viability.

4. Will the proposed project indirectly affect off-site wetlands?

Yes, off-site wetlands may be indirectly affected.

- ✓ No, off-site wetlands will not be indirectly affected by changing conditions that contribute to wetlands viability.

Screen Summary

Compliance Determination

According to the USFWS National Wetlands Inventory accessed on April 17, 2026, at <https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper>, there are no mapped wetland areas on the subject property. The subject property currently consists of an eleven-story apartment structure with a parking lot and landscaped areas. Therefore, the project is in compliance with Executive Order 11990.

Supporting documentation

[P Wetlands Map.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 and Scenic Rivers website accessed on April 20, 2026, at <https://www.rivers.gov/map>, there are no Wild and Scenic Rivers in the vicinity of the subject property. In addition, according to the Nationwide Rivers Inventory list accessed on April 20, 2026, at <https://www.nps.gov/subjects/rivers/nationwide-rivers-inventory.htm>, there are no Virginia Rivers listed that are upstream or downstream of the subject property within one mile. Therefore, the proposed undertaking has no potential to impact these resources, and no mitigation measures or further investigations are warranted. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Q Wild and Scenic Rivers Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

