



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

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

Project Information

Project Name: The Fillmore/St. James Plaza Development

Responsible Entity: The City of Alexandria, VA

Grant Recipient (if different than Responsible Entity):

State/Local Identifier:

Preparer: Lucinda Metcalf, Housing Analyst, Office of Housing

Certifying Officer Name and Title: Mark B. Jinks, City Manager

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable):

Direct Comments to:

City of Alexandria, VA
Office of Housing
421 King Street,
Alexandria, VA 22314
703-746-4990

Project Location:

5000 and 5001 Echols Avenue, Alexandria, VA

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

The current property consists of two lots of record located at 5000 and 5001 Echols Avenue. The total land area of the site is approximately 2.98 acres or 129,810 square feet. The project site is located within the boundaries of the Alexandria West Small Area Plan, and is currently zoned R-12, low density residential. The property has been re-zoned to CRMU-M, commercial residential mixed use (medium). As part of this project, the City will be vacating approximately 0.2 acres (8,888 square feet) at the end of Echols Avenue. The existing cul-de-sac will be reconfigured to a t-shaped terminus that will require less land. The applicant will dedicate approximately 0.06 acres (2,744 square feet) of right-of-way along Fillmore Avenue to the City. A 15 foot land reservation will be made along the proposed West Lot property line extending from Echols Avenue to Fillmore Avenue. The reservation will allow for future study of a possible road connection from Echols Avenue to Fillmore Avenue aligned west of the subject property.

The developer, AHC Inc. will demolish the existing church and its administration building to construct a multi-family building that will include 93 units of affordable housing serving a mix of 50% and 60% of the area median income (AMI) , with structured underground parking. A daycare facility will be provided within one of the buildings, and the project will feature a pedestrian walkway connecting Echols Avenue to Fillmore Avenue. Building heights will taper downward from Fillmore Avenue in the direction of Echols Avenue providing transition to the single family residents.

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

The proposed redevelopment will provide a critical source of affordable housing for current and future low and moderate income residents whose tenancy and local employment is essential to the Area’s and City’s future economic development and sustainability (as noted in the City’s Housing Master Plan), as well as to the City’s strategic plan goal of maintaining neighborhoods that are diverse and inclusive.

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

Existing Conditions: The project site is located within the boundaries of the Alexandria West Small Area Plan. The southern property boundary is also adjacent to the Beauregard Small Area Plan boundary. The site is bound by Fillmore Avenue to the north and east, the Hermitage nursing home facility to the south, and Echols Avenue and single family homes to the west. The site has been occupied by the Methodist Church, which has two structures on the property, a sanctuary and an administration building.

There is considerable topography on the existing site. The property slopes down towards the east, with a grade change of approximately 38 feet from the Echols Avenue side, down to the north east corner of the property along Fillmore Avenue. These slopes contain a significant number of mature trees. A variety of uses surround the area including an elder care facility, low-density residential, high density residential, institutional (Northern Virginia Community College), office, and hotel. There is also an assortment of building typologies proximate to the site ranging from single-family homes and single-story churches, to high-rise apartments and office towers.

In terms of transportation access, the site is close to major roads such as Interstate 395, Seminary Road, North Beauregard Street, and Braddock Road. There are two bus stops adjacent the site along Fillmore Avenue that are served by WMATA and Dash routes. These bus routes provide access to Old Town, the Pentagon, Ballston, Tysons Corner, and the Van Dorn Metro station. The site is also proximate to the proposed “Corridor C” high-capacity transit station at Fillmore Avenue and North Beauregard Street

Trends: Planned redevelopment in the Area of the City, which is immediately adjacent to the Beauregard Plan Area, is likely to drive the price of new rental and ownership housing to unaffordable levels. The affordable housing development proposed in the Area would not be economically feasible without the provision of federal low income housing tax credits and City loan funds at advantageous rates and terms.

Funding Information

Grant Number	HUD Program	Funding Amount
M-13-MC-51-0501	HOME	\$880,000
M-14-MC-51-0501		
M-13-MC -	CDBG	\$285,765

Estimated Total HUD Funded Amount:

The City will be providing \$880,000 in federal HOME dollars.
\$285,765 in CDBG funds have been provided for predevelopment.

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

The estimated total project cost is \$30.1 M, which includes the following:

\$19M in LIHTC
 \$4M in Private Debt
 \$1.4M in AHC Inc. funds
 \$3.1M in Housing Trust Fund monies
 \$1.5M in City Funds
 \$880,000 in HOME
 \$285,765 CDBG (for initial predevelopment loan)

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

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The impact category is not applicable to the proposed project as no airport runway clear zones fall within the City.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The impact category is not applicable to the proposed project as there are no coastal barriers in the City of Alexandria.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The development site at is not located in the is not in an area identified by the Federal Emergency Management Agency (FEMA) as being within a Special Flood Hazard Area.

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5

<p>Clean Air</p> <p>Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Alexandria is meeting the National Ambient Air Quality Standards for pollutants and fine particles; therefore, this project is exempt from the conformity requirements. (T&ES).</p>
<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>In compliance with the Commonwealth of Virginia’s Department of Environmental quality (letter dated April 29, 2015) housing construction activities will be executed in a manner consistent with the Commonwealth of Virginia’s Coastal Resources Management Programs listed under “Enforceable Programs of Virginia’s Coastal Resources Management,” prior to project implementation. Therefore, as each site and specific activity is identified and if any of the enforceable programs are applicable, the required permits and approvals will be obtained. The project has an approved Final Site Plan which denotes the approvals needed.</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The project was reviewed as a Phase I Environmental Site Assessment by Specialized Engineering. The assessment has revealed no evidence of the presence or likely presence of any hazardous substances or petroleum products on the property under conditions that indicate an existing release, a past release, or a material threat of release of any hazardous substances or petroleum products into the structures on the property or into the ground, groundwater, or surface water of the property.</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The project will have no effect to the endangered species that have been identified in the City of Alexandria such as the Small Whorled Pogonia species and the Bald Eagle nesting. This was determined in consultation with U.S. Fish and Wildlife Services March 30, 2015 through a Tier I Broad Environmental Review process for 2015-2020.</p>

<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The Phase I Environmental Site Assessment report showed 11 tanks obtained through Virginia Leaking Tank data base that were ½ mile of the subject property. Due to the tanks location of the subject property the tanks will not have an adverse environmental impact.</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>This impact category is not applicable to the proposed project as the City of Alexandria is urban in nature and has no farmlands.</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to the FEMA DFIRM Floodplains flood zone map, the proposed project is not within a flood zone.</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>In consultation with the Virginia Department of Historic Resources, no historic properties will be affected by the proposed development.</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>No mitigation is required. The Day Night Noise Level for this site, as calculated using the U. S. Department of Housing and Urban Development's Assessment tool indicates an acceptable level of 57.5, with the assumption of any loud impulse sounds.</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There are no sole source aquifers in Alexandria. According to the City's Transportation and Environmental Services, the City's water quality volume determined by the site's proposed impervious area will be treated in accordance to Best Management Practice (BMP) facility.</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The project site lies within Four Mile Run Watershed (Zone B) thus storm water quantity controls will be designed to demonstrate the post development storm water runoff does not exceed the existing runoff quantities for the 2-year and 10-year storm events.</p>

Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	There are no wild and scenic rivers in the City.
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	This project will not have a disproportionately high and adverse human health or environmental effect on the minority of low-income population identified with the proposed property.

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

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

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

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The project has been rezoned from R-12 (Single-Family) to CRMU/M (Commercial Residential Mixed-Use Medium). The proposed project lies within the boundaries of the City's Alexandria West Small Area Plan. The plan notes that new development should be located in such a way to minimize the impacts on the residential areas and minimal impact on the adjacent single family homes in the area. The proposed density and uses are compatible with the surrounding area, and both of the proposed buildings will meet the City's Green Building standard of LEED Certified

		<p>(or equivalent) with the incorporation of public art within the design of the pedestrian mews running between the two buildings to meet the goals of the City's Public Art Policy.</p> <p>The Alexandria West Small Area Plan remains the governing document for this site with no future planning studies anticipated in the next fiscal year. Additionally, the neighboring Beauregard Small Area Plan was recently adopted (2013), and this parcel sits just outside of that plan area, thus it is unlikely that the property or surrounding area will undergo a planning study in the near-term.</p>
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	1	<p>The Alexandria water quality volume determined by the site's proposed impervious area shall be treated in a Best Management Practice (BMP) facility. The storm water Best Management Practices (BMPs) required for this project shall be constructed and installed under the direct supervision of the design professional or his designated representative. For example, the project has the implementation of two onsite storm water BMPs to meet the water quality criteria reductions and the Alexandria Water Quality Volume Default. This includes two sand filters and a Storm Filter. Prior to release of the performance bond, the design professional shall submit a written certification to the Director of the City's Transportation and Environmental Services Department that the BMPs are constructed and installed as designed and in accordance with the approved Final Site Plan, and clean and free of debris, soil, and litter by either having been installed or brought into service after the site was stabilized. Changing the Echols Avenue terminus from the cul-de-sac to the smaller t-shaped design also reduces the amount of impervious cover on the site which reduces the impact on storm water run-off.</p>
Hazards and Nuisances including Site Safety and Noise	1	<p>The project will comply to the City of Alexandria's Noise Control Code, Title 11, Chapter 5, which sets the maximum permissible noise level as measured at the property line. For example, all exterior building-mounted loudspeakers shall be prohibited and no amplified sound shall be audible at the property line. Supply deliveries, loading, and unloading activities shall not occur between the hours of 11:00pm and 7:00am. No vehicles associated with this project shall be permitted to idle for more than 10 minutes when parked. This includes a prohibition on idling for longer than 10 minutes in the loading dock area.</p>
Energy Consumption	1	<p>The proposed buildings will meet the City's Green Building standard of LEED Certified (or equivalent). For</p>

	example, Energy Star labeled appliances will be installed in all multi-family residential units.
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Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	Since the project is affordable housing no significant effect on employment or income levels is projected. The project will be providing a vital resource for the low to moderate income households who live or work in the City.
Demographic Character Changes, Displacement	2	Demographic character changes or displacement is not expected to have an impact from the development project. The project will be providing a vital resource to help the City maintain its economic and social diversity.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	1	The student generation rate for affordable housing units is 0.6 students per unit, or 55.8 for the 93 affordable apartments. Therefore the total number of elementary school students forecasted for this new development is 58.4. School facility planning efforts are taking the potential impacts of this development into account. The proposed development project is incorporated into the ongoing long-range enrollment forecasts that will be part of the Long-Range Educational Facilities Plan. Additionally, ACPS plans to include this project in their short-range enrollment forecast update to be released in the spring. This project is located in the John Adams Elementary School and Hammond Middle School attendance area. An onsite day care center plans to operate a pre-kindergarten program to accommodate student increase anticipated from the development.
Commercial Facilities	1	The proposed land-use change and density is compatible with the surrounding neighborhood. The site has been rezoned from R-12 residential to CRMU-M Commercial Residential Mixed Use-Medium. While there are large institutional uses around the project site such as the Northern Virginia Community College, there is also an abundance of residential housing stock in varying forms from single family homes on Echols Avenue, to high-rise apartment towers on Seminary Road just south of the site.
Health Care and Social Services	1	A variety of uses surround the area including an elder care facility, low-density residential, high density residential, institutional (Northern Virginia Community College),

		<p>office, and hotel. There is also an assortment of building typologies proximate to the site ranging from single family homes and single-story churches, to high-rise apartments and office towers.</p> <p>Daycare employee training sessions will be conducted on an ongoing basis, including as part of any employee orientation, to discuss all Special Use Permit provisions and requirements. Parents will be informed on an ongoing basis, including as part of any parent orientation, of all applicable Special Use Permit provisions and requirements. (P&Z)</p>
Solid Waste Disposal / Recycling	1	<p>The required storage space for both trash and recycling materials will be in compliance with the City's "Solid Waste and Recyclable Materials Storage Space Guidelines." Solid waste collection services will be provide to the condominium townhomes portion of the development. All refuse / recycling receptacles will be placed at the City Right-of-Way.</p>
Waste Water / Sanitary Sewers	1	<p>The City will ensure the development has an adequate sanitary sewer out fall. For example, five sections of the existing sanitary sewer within North Beauregard Street will be implemented in order to support the proposed development. Improvements will also include the replacement of two runs of sanitary pipe and the lining of three runs of sanitary pipe. During development, adequate space for solid waste will be provided and development will meet all the minimum street standards.</p>
Water Supply	1	<p>Fire Hydrants shall remain in-service and unobstructed during construction. A certified licensed fire protection engineer will perform a fire water flow analysis to assure adequate water supply for the structure is being considered.</p>
Public Safety - Police, Fire and Emergency Medical	1	<p>The proposed development is not expected to have significant impacts to the surrounding roadway network. A public and emergency vehicle access easement would be established to allow vehicles to turn around at the new terminus. Fire Hydrants shall remain in-service and unobstructed during construction.</p>
Parks, Open Space and Recreation		<p>There will be 51.2 percent open space on the site, more than the required 40 percent in the CRMU-M zone. The open space will be a combination of ground level open space and amenity open space. A 14,000 square foot public open space amenity will create a pedestrian connection between Echols Avenue and Fillmore Avenue. Additional landscaping shall be provided to meet the required 25% canopy coverage requirement. Public art will be incorporated within public open space.</p>

Transportation and Accessibility	1	The project site is well served by bus transit options, and based on other affordable housing developments in the City, transit ridership will likely increase at these stops when the affordable housing building is occupied. This site is served by several bus stops. The site is close to major roads such as Interstate 395, Seminary Road, North Beauregard Street, and Braddock Road. There are two bus stops adjacent the site along Fillmore Avenue that are served by WMATA and Dash routes. These bus routes provide access to Old Town, the Pentagon, Ballston, Tysons Corner, and the Van Dorn Metro station. The site is also proximate to the proposed "Corridor C" high-capacity transit station at Fillmore Avenue and North Beauregard Street. The development will also provide significant pedestrian and streetscape improvements along Fillmore Avenue.
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Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	1	In order to provide a more sustainable use of natural resources, EPA-labeled Water Sense or equivalent low flow fixtures will be used. A list of applicable mechanisms can be found at Http://www.epa.gov/WaterSense/pp/index.htm . (T&ES)
Vegetation, Wildlife	1	This project is not expected to significantly impact vegetation or wildlife.
Other Factors		

Additional Studies Performed:

Field Inspection (Date and completed by):

A pre-construction walk/survey of the site occurred with the City's Transportation and Environmental Services Construction & Inspection staff to document existing conditions prior to any land disturbing activities.

The City's archaeologists have determined there is no observable historical or archeology evidence of cemeteries or burial grounds on this property.

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

The Virginia Department of Historic Resources: Amanda Lee, Historic Preservationist

Various City Departments, including the Department of Transportation and Economic Development; Planning and Zoning; and Recreation, Parks and Cultural Activities,

List of Permits Obtained:

All required permits from Virginia Department of Environmental Quality, Environmental Protection Agency, Army Corps of Engineers, Virginia Marine Resources, and building and construction permits shall be in place for all project construction and mitigation work prior to release of the final site plan. This includes the state requirement for a Construction General Permit and associated Stormwater Pollution Prevention Plan.

Public Outreach [24 CFR 50.23 & 58.43]:

There was a wide-range of community outreach to groups, organizations, and citizens throughout the design phases of the proposal including:

- Echols Avenue residents
- Domain Condo Association
- The Hermitage
- Northern Virginia Community College
- Church of the Resurrection
- Seminary West Civic Association
- Upland Park residents (Foster Avenue and Fairbanks Avenue)

Three general community meetings were held over the course of the design and planning phases which City staff also attended. The project was also presented to groups individually such as the Seminary West Civic Association, and the Northern Virginia Community College. General topics of concern raised by the community during the meetings included traffic impacts, parking impacts, affordable housing, and the heights of the proposed buildings.

Cumulative Impact Analysis [24 CFR 58.32]:

Construction of this project is estimated to be completed by the end of 2017.

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

Currently, there have not been any unresolved conflicts concerning alternative uses of available resources.

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

Currently, there have not been any unresolved conflicts concerning alternative uses of available resources.

Summary of Findings and Conclusions:

The environmental assessment on The Fillmore/St. James Church site was prepared by the City of Alexandria, Office of Housing, to certify that this project will not have a significant impact on the environment. The project conforms to local planning and zoning requirements and is compatible with existing neighborhoods where it will be located. Site slopes, soil erosion, and hazards are not being impacted or created, nor are there any existing conditions that would impact the project.

The project does not indicate significant demographic changes or increased burdens to infrastructure, social, or emergency services systems. Commercial, cultural, and recreational facilities will be accessible through the use of nearby public transportation. The project is not located in the 100- or 500-year flood zone, nor are there any wetlands on the project site. The area is urban with no farmland and no significant vegetation or wild life.

Based on these results, the City is certifying that a Finding of No Significant Impact is applicable to this project.

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

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

Law, Authority, or Factor	Mitigation Measure
Virginia Department of Environmental Quality, Environmental Protection Agency, Army Corps of Engineers, Virginia Marine Resources	All required permits from Virginia Department of Environmental Quality, Environmental Protection Agency, Army Corps of Engineers, and Virginia Marine Resources shall be in place for all project construction and mitigation work prior to release of the final site plan. This includes the state requirement for a Construction General Permit and associated Storm water Pollution Prevention Plan.

Determination:

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

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

Preparer Signature: Lucinda Metcalf Date 10-7-16

Name/Title/Organization: Lucinda Metcalf, Housing Analyst, Office of Housing

Certifying Officer Signature:  Date: 10-7-16

Name/Title: Mark B. Jinks, City Manager

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

APPROVED AS TO FORM:

Christina Schuman Brown
ASSISTANT CITY ATTORNEY