

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

**Project Information**

**Project Name:** Lieser-School-Redevelopment

**HEROS Number:** 900000010428643

**Start Date:** 09/30/2024

**Responsible Entity (RE):** VANCOUVER, DEPARTMENT OF COMMUNITY  
PRESERVATION & DEVEL. VANCOUVER WA, 98668

**RE Preparer:** Bryan Monroe

**State / Local Identifier:**

**Certifying Officer:** Samantha Whitley

**Grant Recipient (if different than Responsible Entity):** Housing Authority of the City of Vancouver

**PHA Code:** WA008

**Point of Contact:** Scott Sharba

**Consultant (if applicable):**

**Point of Contact:**

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 preparer, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

**Project Location:** 8806 SE Northgate Ave, Vancouver, WA 98664

**Additional Location Information:**

The project is located at 8806 SE Northgate Avenue in central Vancouver, Washington and encompasses two congruous parcels (APN# 37916085 and 37916081. The site was a previous elementary school that has since been demolished (Prior to the federal funding nexus). Adjacent land uses include single-family homes to the east, south, and west; single-family homes, multi-family development, and a school to the north.

**Direct Comments to:** City of Vancouver  
%Economic Prosperity and Housing Department  
PO Box 1995  
Vancouver WA 98668

samantha.whitley@cityofvancouver.us

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

The first phase of the Lieser School Redevelopment Project includes a short plat subdivision of an approximately 8.13-acre lot into three lots and the construction of a new public right-of-way called Potomac Circle. The ROW improvements include a cul-de-sac, sidewalks, and street trees. Utility improvements include water, sanitary, and storm infrastructure. Potomac Circle will physically impact roughly 1 acre of land including ground disturbance and tree removal. However, the impact of the development has been minimized through grading that follows the existing topography, with protection of trees in the vicinity of the project to the extent possible. Water and sewer main routing is routed as efficiently as possible to avoid unnecessary ground disturbance and storm drainage for all the proposed development is allowed to directly infiltrate into the ground through bio-retention planters and swales. The new public ROW will feature pedestrian safety and traffic calming improvements such as raised crosswalks and rectangular rapid flashing beacons (RRFB). While no further development is proposed at this time, two of the three lots are expected to be sold to a local non-profit organization and the City of Vancouver. The sold lots are to be developed into a new early childhood education center and public park, respectively. The final lot will be retained by the Vancouver Housing Authority (VHA) for a future multifamily residential building. None of these future developments are expected to utilize federal funds but are being noted as part of the project for the purposes of context for this environmental review.

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

According to the City of Vancouver's 2023 Housing Action Plan, Vancouver must add 2,500 units per year over the next 10 years to meet new and existing demand, with at least 1,000 new units affordable to households that earn less than 80% of the area median income. The Lieser School Redevelopment project is a direct response to the considerable shortage of affordable housing in Vancouver and Clark County. While the residential development portion of this project is not the immediate proposed action, the short plat subdivision and the construction of the public street improvements will provide the necessary infrastructure to serve the development; therefore, the public interest should be served by the proposed plat and infrastructure improvements.

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

The approximately 8.13-acre parcel (APN# 37916085) site is generally vacant, flat, and covered with mowed grass and intermittent landscaping trees. The parcel also includes a small playground that will be removed as part of the construction of the public street. The other 0.76 acre parcel (APN# 37916081) is also generally flat but features a surface parking lot serving as overflow parking for the existing child care center directly to the east of this site. The immediate neighborhood is characterized by single family and low-rise residential development. Existing connections into the site at SE 88th Avenue, SE Northgate Avenue, and SE Columbia Ridge Drive/Boulder Avenue are expected to be preserved as part of the future development plan. The new public road will provide access into the site but, in order to reduce vehicular traffic in the neighborhood, will not connect through to SE Northgate Avenue. Pedestrian connections however, may be provided by a trail or pathway to continue access for pedestrians and bicycles. According to a 2023 affordable housing study conducted by Cascadia Partners, the Vancouver Heights neighborhood is considered a "vulnerability area" for gentrification. This trend is expected to continue absent considerable investments in affordable housing in the immediate area.

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

[ERR\\_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-24-CP-WA-2314	Community Planning and Development (CPD)	Community Project Funding (CPF) Grants	\$4,000,000.00

**Estimated Total HUD Funded, \$4,000,000.00  
Assisted or Insured Amount:**

**Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$4,000,000.00**

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

<b>Compliance Factors:</b> 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)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.
<b>Coastal Barrier Resources Act</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
<b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance

		may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b>		
<b>Air Quality</b> Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project's county or air quality management district is in non-attainment status for the following: Carbon monoxide and Ozone. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.
<b>Coastal Zone Management Act</b> Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.
<b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is exempt from radon consideration. New buildings will be reviewed under the current adopted building codes at the time of permit submittal. The project is in compliance with contamination and toxic substances requirements.
<b>Endangered Species Act</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project will have No Effect on listed species based on a report by a certified wildlife biologist. Per the report there are no listed species or designated critical habitats in the action area. This project is in compliance with the Endangered Species Act.

<b>Explosive and Flammable Hazards</b> Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There are no current or planned stationary aboveground storage containers with contents listed in Appendix I of 24 CFR part 51 subpart C within 1 mile of the project site. The closest tanks of concern are liquified oxygen tanks located 1,100 feet away with buildings in between the tanks and project site. Per the HUD Acceptable Distance Separation tool, the tanks are well outside the acceptable distances for thermal effects to people or buildings. The project is in compliance with explosive and flammable hazard requirements.
<b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. Site is located in an urban populated area. The project site was previously used as an elementary school. The project is in compliance with the Farmland Protection Policy Act.
<b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. reference FEMA FIRM 53011C0502D
<b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106.
<b>Noise Abatement and Control</b> Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is for construction of a public road that is required as part of the land division proposal. The project is in compliance with HUD's Noise regulation.
<b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is located on a sole source aquifer. Following consultation with the regional EPA office, it has been determined that this project will not

		contaminate the aquifer and create a significant hazard to public health. The project is in compliance with Sole Source Aquifer requirements.
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.
<b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
<b>HUD HOUSING ENVIRONMENTAL STANDARDS</b>		
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

**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.

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
<b>LAND DEVELOPMENT</b>			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The project is specifically for road construction to complete a land division permit allowing the sale of the newly created land parcels. The project site is currently zoned for single residential uses at 6-9 dwelling units per acre. The City of Vancouver Long Range Planning department is in the process of updating the citywide comprehensive plan and zoning designations for the entire city. The zoning for the site is proposed to be a medium density multifamily residential	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		zone that also potentially allows for some commercial uses. Future uses and developments on abutting parcels will require land use and building permit review for compliance with local zoning code regulations. The road construction project has received land use permit and engineering plan approval, demonstrating compliance with local comprehensive and zoning plan regulations. The project is consistent with the community's land use and development plans requiring no variances to the current zoning designation.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	The project will not significantly affect or be affected by soil and slope conditions. A geotechnical report was prepared by Columbia West Engineering Inc. that included on-site testing and recommendations for the project. The report finds that the soil is suitable for the proposed development. Site slopes are noted at 0-5%. Liquefaction potential at the site is noted as "very low". There are no indications of erosion hazards or hydric soils. Erosion control measures are required during construction by local ordinance. Post-construction drainage and stormwater will be treated by a rain garden and drywell system that infiltrates on-site. Consultations with NOAA and EPA have been completed for stormwater related effects to endangered species and the sole source aquifer.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	No nuisances or hazards are expected as a result of the completed road project. The proposed development will not result in any significant noise, glare, or odor generation beyond what would be anticipated through allowed land uses through the local municipal zoning code. Noise generated from construction activities will be mitigated by limiting hours of operation as required through the local municipal	



Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		nuisance ordinance. The project does not appear to be affected by any natural hazards such as faults, steep slopes, water bodies, seismic activity hazards, wind/storm hazards. Abutting land uses are low-density residential, therefore the project is not expected to be affected by off-site nuisance land uses that produce noxious odors, light glare, noise or urban blight associated with man-made hazards such as quarries, refuse dumps, hazardous above or below ground storage tanks, point-source air pollution, ground water and soil contamination.	
<b>SOCIOECONOMIC</b>			
Employment and Income Patterns	2	The road project is located in the census tract 431 in Clark County, Washington. The median household income in this census tract is \$82,056 which is 4% less than the median income for households citywide and 13% less than the state median household income (2023 ACS 5-yr data). The road project will provide short-term construction employment opportunities. Future uses of the newly created lots will provide only a few long-term pre-school and property management employment opportunities. The proposed project is not expected to have a significant impact on household income or employment opportunity. The future housing development proposed by Vancouver Housing Authority will likely provide income restricted housing to lower income residents. No impacts are anticipated from the proposed new construction.	
Demographic Character Changes / Displacement	2	The median age in Tract 431 is 51 years compared to the respective city and state median ages of 39 and 38. Therefore an older than average population resides in this area. In terms of race and ethnicity the surrounding tract is less diverse than the city and state as a whole. Tract 431 is 91.8% white, and 88.7% non-Latino compared to	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>84.8% white and 85% non-Latino citywide. The proposed road project will not impact the age, race or ethnicity in the area. The future residential housing project could potentially provide a more age and racially diverse population, but the proposed development is also several years out before completion and occupancy. The current poverty level is \$15,650. The tract surrounding the road project has an estimated poverty level of 8.4% compared to the citywide rate of 6.2% and statewide rate of 10.3%. The road construction or the future uses on abutting sites are not likely to result in a higher level of poverty. In terms of education, Census tract 431 has similar if not higher percentages of high school graduates, bachelor's degree and advanced degree attainment than Clark County and state residents. Households with access to computers and broadband internet service is at 91.3%, which is comparable to the balance of city and state households at 93%. The proposed early education facility may provide additional educational opportunity for local children as well as childcare opportunities for working parents in the area. There was no housing unit displacement involved with the project. The previous land use was a school facility that was demolished (prior to the federal funding nexus) due to the age of the building and maintenance costs of this project. The school program was moved to newly completed school campus approximately 1 mile away.</p>	
Environmental Justice EA Factor	2	<p>The construction of the road is not expected to pose environmental justice issues. The population in the area is predominantly white, non-Hispanic. Owner-occupied households are at 75% and renter-occupied households are at 25% of the total households. For the future housing use</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		there is convenient access to public transportation (.25 miles), grocery markets (1.25 miles), and health care (.25 miles) schools (1.30 miles) and parks (abutting site). The project site is located in the heart of a residential zoned area away from heavy industrial sites. The Phase I ESA report found no recognized environmental conditions that would affect the site.	
<b>COMMUNITY FACILITIES AND SERVICES</b>			
Educational and Cultural Facilities (Access and Capacity)	2	A former elementary school building being used as a virtual learning center was recently demolished at the project site. The building was deteriorating beyond maintenance capabilities and the virtual learning center relocated to a new school campus located approximately 1.25 miles away. Sidewalks are in place from the project site to the new school facilities. Following completion of this access road project, the proposed uses for adjacent land parcels include a daycare, early education facility, public park, low-income housing and a new fire station. The daycare center and early education center will enhance educational opportunities for the area. Additional or alternative services do not appear to be needed to ensure safe, suitable, access to educational facilities. The Vancouver school district was consulted on the capacity of the local public schools. No reply was received. Public school districts typically redistribute resources based on fall enrollment counts. No impacts are anticipated from the proposed new construction.	
Commercial Facilities (Access and Proximity)	2	The site is .25 miles south of a major commercial corridor including a variety of retail shops, commercial services, and restaurants all served by public bus rapid transit facilities. The nearest full-service grocery store is located 1.5 miles from the project site. The existing local retail and	

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
		commercial services should benefit from the additional residents provided by the adjacent future proposed uses. No impacts are anticipated from the proposed new road construction.	
Health Care / Social Services (Access and Capacity)	2	Emergency and non-emergency health services appear to be available and accessible and there appears to be capacity in the number of providers and medical staff serving the area. A regional hospital is located .5 miles away. A request was made for hospital capacity data however no reply was received. Surrounding the hospital are several more medical clinics, physician offices, imaging and laboratory facilities.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	No evidence of improper solid waste management or the improper disposal of hazardous substances or petroleum products was observed through the Phase I ESA report provided by Maul Foster Alongi. Future waste disposal needs will be determined at the time development permits are submitted for future land uses. No impacts are anticipated from the proposed new road construction.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	New municipal wastewater infrastructure is being installed as part of the road construction project to adequately serve the proposed future developments and will not overload the design capacity. The City of Vancouver utility service providers approved the project for sanitary and storm sewer capacity as part of the land use permit approval process. No adverse impacts are anticipated from the proposed new construction.	
Water Supply (Feasibility and Capacity)	2	New municipal water system infrastructure is being installed as part of the road construction project to adequately serve the proposed future developments. The City of Vancouver, as utility service provider, approved the project for municipal water service capacity as part of the land use	

<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
		permit approval process. No adverse impacts are anticipated from the proposed new construction.	
Public Safety - Police, Fire and Emergency Medical	2	The project's location appears to provide adequate access to police, fire and emergency medical services and the average response time and capacity of police, fire, and emergency medical services is sufficient. No impacts are anticipated from the proposed new construction. The City of Vancouver reviewed and approved the project in terms of fire suppression water supply as part of the land use permit process. Future buildings will also require additional Fire Department consultation and permit approval.	
Parks, Open Space and Recreation (Access and Capacity)	2	Open spaces, recreational and cultural facilities appear to be located within a reasonable proximity to the project and are safely accessible through pedestrian walkways, bicycle routes or mass transportation. A large regional park is located approximately .5 miles to the north. Future development of one of the adjacent lots is proposed for a new public park. The proposed residential development will also contribute to park infrastructure through the payment of development impact fees to ensure that recreation facilities can maintain an adequate level of service. The project is not projected to overburden these facilities. No impacts are anticipated from the proposed new road construction. The future residential development will increase use of recreation facilities.	
Transportation and Accessibility (Access and Capacity)	2	Access to the subject site is by way of a local arterial. The project site is .25 miles south of a major arterial street with rapid bus transit facilities with frequency of service to provide access to employment, retail, educational institutions, healthcare, and recreation. Access to regional interstate 205 is approximately 1.25 miles to the east	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		of the project site. Additional traffic analysis will be performed with future development permits ensuring that traffic improvement maintain an adequate level of service. Future developments will also contribute through payment of development impact fees to ensure that traffic facilities maintain an adequate level of service. No adverse impacts are anticipated from the proposed road construction.	
<b>NATURAL FEATURES</b>			
Unique Natural Features /Water Resources	2	No unique natural features or areas were identified surrounding the proposed project. Unique natural features or areas include bluffs, cliffs, public or private scenic areas, and/or special natural resources on the property or in the vicinity of the property.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The applicant obtained a biological assessment of the project site and provided an USFWS IPAC report to identify critical habitats and threatened and endangered species on or near the stie. The report concluded that the proposed development would not cause harm to any threatened or endangered species. A consultation was also conducted with NOAA that resulted in a determination of no harm to fish species.	
Other Factors 1	2	The subject property's county or air quality management district is in attainment status for most criteria pollutants. The City of Vancouver is in maintenance for ozone and CO2. The proposed development is anticipated to have no effect on air quality standards. The subject property is in compliance with the Clean Air Act.	
Other Factors 2	2	No other factors of concern were identified at or in the vicinity of the subject property.	
<b>CLIMATE AND ENERGY</b>			
Climate Change	2	Per the CDC Agency for Toxic Substances and Disease Registry environmental justice mapper the following potential foreseeable future climate risks were identified:	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		wildfire, extreme heat, and drought. The road project will not be at risk however future residential and educational uses may be at risk. Development of abutting site is not expected for several years. No site or building plans for the future land uses have been submitted. Future building permit plans will be reviewed for compliance with local fire department regulations.	
Energy Efficiency	2	The road construction project is not anticipated to affect long term energy resource consumption. Future structural development of the abutting sites will require compliance with the building energy codes in effect at the time of permit application. The site is within walking distance of high-capacity transit allowing for alternative transportation options as well as convenient access to commercial, retail, and service facilities.	

### Supporting documentation

#### Additional Studies Performed:

Phase I ESA Archaeological predetermination report Section 106 SHPO/THPO  
Consultation Site Biological assessment NMFS consultation EPA aquifer consultation

**Field Inspection [Optional]:** Date and completed  
by:

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

EPA NEPAAssist- <https://www.epa.gov/nepa/nepassist> FEMA-  
<https://msc.fema.gov/portal/home> CBRS Mapper-  
<https://www.fws.gov/CBRA/Maps/Mapper.html> iPac-  
<https://ipac.ecosphere.fws.gov/>, Tribal Directory Assessment Tool (TDAT)-  
<https://egis.hud.gov/TDAT/> DAHP- <https://dahp.wa.gov/project-review/section-106>  
NPS Wild and Scenic Rivers- <https://www.nps.gov/subjects/rivers/wild-and-scenic-rivers.htm> City of Vancouver Planning Dept- Anthony Tortorici City of Vancouver  
Transportation Engineer- Jen Patrick City of Vancouver Solid Waste-- Amanda

Romero City of Vancouver Water Engineer- Giff Hancock City of Vancouver Sewer Engineer- Mark Castle City of Vancouver Stormwater Engineer- Mark Hazuka City of Vancouver Building plans examiner- Patricia Thompson Confederated Tribes and Bands of the Yakama Nation Confederated Tribes of Siletz Indians of Oregon Confederated Tribes of the Grand Ronde Community of Oregon Confederated Tribes of the Umatilla Indian Reservation Confederated Tribes of the Warm Springs Reservation of Oregon Cowlitz Indian Tribe Nez Perce Tribe

**List of Permits Obtained:**

City of Vancouver Land Use Permit- Short Plat City of Vancouver Civil Engineering Construction Permit.

**Public Outreach [24 CFR 58.43]:**

Based on the size of the development proposal no public hearing or SEPA review was required. A published 14-day notice of development was issued for the land use permitting for the project. Public comments were considered during the findings and conclusions and decision of the land use permit process. No appeals on the land use permit nor the SEPA determination were received.

**Cumulative Impact Analysis [24 CFR 58.32]:**

There are no adverse cumulative impacts anticipated from the road construction project nor future site development. No undue impacts from the project will occur to factors such as healthcare, transportation, water and sewer utilities, infrastructure, and schools.

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

No other sites were identified that met the project's size, zoning, and program requirements.

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

The "no action" alternative is that the subject property will remain vacant forgoing the needed public housing, recreational and educational facilities. The land would likely be sold to for-profit housing development.

**Summary of Findings and Conclusions:**

The benefits of the proposal include repurposing underutilized land to provide additional affordable housing, public park and child education opportunities. The project will also add additional landscaping, trees, and best available science stormwater treatment. Potentially adverse impacts will result from future land uses



that occupy the newly created lots. Expected impacts may include noise, traffic. The general development impacts have been planned for in the City's Comprehensive Plan for growth management and more specific impacts are managed through the local zoning code regulations.

**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
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**Project Mitigation Plan**

No formal mitigation necessary. Applicant is responsible to apply for and obtain required development permits prior to construction.

**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

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

#### Supporting documentation

[3000 foot Airport Radius 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)	

**This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.**

### Compliance Determination

This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

### Supporting documentation

[Coastal Barrier 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.

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

Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

#### Supporting documentation

[FFRMS Determination.pdf](#)

[FEMA MAP 53011C0502D.pdf](#)

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

Lieser-School-  
Redevelopment

Vancouver, WA

900000010428643

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**

Carbon monoxide 100.00 ppm (parts per million)  
Ozone 100.00 ppb (parts per million)

**Provide your source used to determine levels here:**  
40 CFR 93.153

**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:**

Carbon monoxide ppm (parts per million)  
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**

The project's county or air quality management district is in non-attainment status for the following: Carbon monoxide and Ozone. This project does not exceed *de minimis* emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.

**Supporting documentation**

[Air Quality Maintenance Confirmation SWCAA 5-7-25.pdf](#)  
[SWCAA-Ozone and CO Maintenance Area Boundary.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

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

### Screen Summary

#### **Compliance Determination**

This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.

#### **Supporting documentation**

[Coastal Management Zones Map.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		
<a href="https://www.onecpd.info/environmental-review/site-contamination">https://www.onecpd.info/environmental-review/site-contamination</a>		

**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:

Phase I ESA completed by Maul Foster Alongi Inc February 27, 2025. No RECs were found that would affect the project.

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:

Activity is for construction of a new road only. No buildings are proposed for construction at this time. Future buildings to include a day care and 100 unit apartment building.

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.

### **Screen Summary**

#### **Compliance Determination**

Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is exempt from radon consideration. New buildings will be reviewed under the current adopted building codes at the time of permit submittal. The project is in compliance with contamination and toxic substances requirements.

#### **Supporting documentation**

[2025 02 27 Lieser Phase I ESA Updated.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

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below. Documentation may include letters from the Services, species lists from the Services' websites, surveys or other documents and analysis showing that there are no species in the action area.

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

**Screen Summary**

**Compliance Determination**

This project will have No Effect on listed species based on a report by a certified wildlife biologist. Per the report there are no listed species or designated critical habitats in the action area. This project is in compliance with the Endangered Species Act.

**Supporting documentation**

[NOAA programatic compliance confirmation.pdf](#)  
[Threatend and Endangered Species BA Report.pdf](#)

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

Yes

✓ No

## Explosive and Flammable Hazards

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

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

✓ No

Yes

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

No

✓ Yes

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

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR

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

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

✓ No

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

Yes

### **Screen Summary**

#### **Compliance Determination**

There are no current or planned stationary aboveground storage containers with contents listed in Appendix I of 24 CFR part 51 subpart C within 1 mile of the project site. The closest tanks of concern are liquified oxygen tanks located 1,100 feet away with buildings in between the tanks and project site. Per the HUD Acceptable Distance Separation tool, the tanks are well outside the acceptable distances for thermal effects to people or buildings. The project is in compliance with explosive and flammable hazard requirements.

#### **Supporting documentation**

[Known AST locations- VHA Lieser.pdf](#)

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

Yes

✓ No



## Farmlands Protection

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

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

Yes

✓ No

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

The project is located in an urban area developed for single family residences at 6 dwelling units per acre. Site was previously an elementary school (now demolished).

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

### Screen Summary

#### **Compliance Determination**

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. Site is located in an urban populated area. The project site was previously used as an elementary school. The project is in compliance with the Farmland Protection Policy Act.

#### **Supporting documentation**

[2010 Census urbanized area 2024.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 information<sup>1</sup> to determine flood elevation. Include documentation and an explanation of why this is the best available information<sup>2</sup> for the site. Note that newly constructed and substantially improved<sup>3</sup> 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.

<sup>1</sup> 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.

<sup>2</sup> 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.

<sup>3</sup> 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. reference FEMA FIRM 53011C0502D

**Supporting documentation**

[FFRMS Determination\(1\).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" <a href="https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf">https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf</a>

### 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):

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

✓ Confederated Tribes and Bands of the Yakama Nation      Completed

✓ Confederated Tribes of Siletz Indians of Oregon      Completed



✓ Confederated Tribes of the Grand Ronde	Completed
✓ Confederated Tribes of the Warm Springs	Completed
✓ Confederated Tribes Umatilla Indian Reservation	Completed
✓ Cowlitz Indian Tribe	Completed
✓ Nez Perce Tribe	Completed

#### Other Consulting Parties

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

The proposed project involves ground disturbing actions. Selected Tribal consult parties were determined through use of the HUD TDAT tool. SHPO was not consulted on the demolition of the school building as part of the ERR process as it occurred prior to the establishment of the federal funding nexus. The City of Vancouver building demolition permit (DMO-330513-344763) was issued on December 5, 2022 and closed on October 3, 2023. The federal nexus for the grant funding occurred on March 9, 2024.

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:**  
301 S LIESER RD, VANCOUVER, WA 98664

**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
----------------------------------	-----------------------------	------------------	--------------------------

**Additional Notes:**

Site was not designated on the National Register, Washington State Registry, Clark County Heritage Registry, or listed as Clark County Cultural Resource at the time of demolition. The site is now vacant.

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

Yes

✓ 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**

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106.

**Supporting documentation**

[SHPO property inventory form.pdf](#)

[Sect 106 Grand Ronde Consultation Correspondence.pdf](#)

[Tribe Contact and Comment Request.pdf](#)

[Historic Properties and Districts Map.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

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

### Screen Summary

#### **Compliance Determination**

Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is for construction of a public road that is required as part of the land division proposal. The project is in compliance with HUD's Noise regulation.

#### **Supporting documentation**

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

Lieser-School-  
Redevelopment

Vancouver, WA

900000010428643

Yes

✓ No

### Sole Source Aquifers

General requirements	Legislation	Regulation
<b>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.</b>	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

✓ No

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

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

No

✓ Yes

3. Does your region have a memorandum of understanding (MOU) or other working agreement with Environmental Protection Agency (EPA) for HUD projects impacting a sole source aquifer?

Yes

✓ No

**5. Will the proposed project contaminate the aquifer and create a significant hazard to public health?**

Consult with your Regional EPA Office. Your consultation request should include detailed information about your proposed project and its relationship to the aquifer and associated streamflow source area. EPA will also want to know about water, stormwater and waste water at the proposed project. Follow your MOU or working agreement or contact your Regional EPA office for specific information you may need to provide. EPA may request additional information if impacts to the aquifer are questionable after this information is submitted for review. Does your MOU or working agreement exclude your project from further review?

✓ No

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

Yes

**Screen Summary**

**Compliance Determination**

The project is located on a sole source aquifer. Following consultation with the regional EPA office, it has been determined that this project will not contaminate the aquifer and create a significant hazard to public health. The project is in compliance with Sole Source Aquifer requirements.

**Supporting documentation**

[EPA R10 SSA Determination\\_ Lieser School Redevelopment Project.pdf](#)

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

Yes

✓ No

## Wetlands Protection

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

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

No

✓ Yes

**2. Will the new construction or other ground disturbance impact an on- or off-site 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, potholes, wet meadows, river overflows, mud flats, and natural ponds.**

**"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."**

✓ No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.

Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination

Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

## Screen Summary



**Compliance Determination**

The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.

**Supporting documentation**

[NWI 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**

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

#### **Supporting documentation**

[Wild and Scenic Rivers No Effect Determination.pdf](#)

#### **Are formal compliance steps or mitigation required?**

Yes

✓ No

## Environmental Justice

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

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

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

Yes

✓ No

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

### **Screen Summary**

#### **Compliance Determination**

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

#### **Supporting documentation**

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

Yes

✓ No