

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

Project Information

Project Name: AHDC-Arlandria

HEROS Number: 900000010254855

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

RE Preparer: Kimberly Daragan-Cadena

State / Local Identifier:

Certifying Officer: James F. Parajon

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

Project Location: 221 W Glebe Rd, Alexandria, VA 22305

Additional Location Information:

The project site encompasses multiple parcels. See addresses listed below. 221 West Glebe Rd; 3606 Mt. Vernon Ave; 3608 Mt. Vernon Ave; 3610 Mt. Vernon Ave; 3612 Mt. Vernon Ave; 3700 Mt. Vernon Ave

Direct Comments to: kimberly.cadena@alexandriava.gov

Office of Housing
ATTN: Kim Cadena
421 King St., Suite 215
Alexandria, VA 22314

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

See attachment.

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

Alexandria has rapidly lost market-affordable housing over the last ten years, causing many low-income residents to either leave the city or become cost-burdened. Non-profit affordable housing developers have filled the gap the best they could through preservation, redevelopment, and new development, but the number of units created or preserved does not equal the units lost, nor do they sate the increasing demand for affordable units especially units affordable to households under 50% Area Median Income and affordable family-sized units. The construction of 474 affordable and deeply affordable units in Arlandria will provide housing for members of the community who may be displaced by rising rents and housing pressures related to Amazon's new HQ2 location in Arlington. Twenty-five percent of the units will be reserved for households at or below 40% AMI. The developer and the City are exploring the possibility of providing a neighborhood preference for those who live in the surrounding community to preserve long-standing cultural and community ties. The building will provide space for a sliding-scale cost medical clinic and a daycare, as well as space for City employees to provide services to community members, placing services into the community instead of requiring residents to travel for services. There will also be publicly accessible open space, addressing a community need for more open space in the area.

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

The project site is in Arlandria, a heavily Hispanic area where many of the residents are low- or very low-income. A majority are immigrants from Central America who settled in the area beginning in the 1980s. The neighborhood is an enclave within the city where the shared origins and experience of the community members has created a unique culture and sense of community. While very few market-affordable units remain in Alexandria, the rents in Arlandria remain some of the most affordable in the city. Many of the residents of the area are employed as day laborers or service sector employees and are housing cost-burdened. Rent increases, evictions, and non-renewals of leases can result in households living in overcrowded conditions. Other households are forced to leave Alexandria completely in search of cheaper housing far from their jobs and community. Arlandria is directly adjacent to National Landing,

the site of Amazon's HQ2, and a short distance from the new Potomac Yard Metro station. The potential influx of higher-earners looking for housing near Amazon headquarters or public transit could result in displacement of existing residents as rents increase and landlords rehabilitate or redevelop their properties to attract these new residents. Recent zoning changes in the area are intended to incentivize landlords to construct deeply affordable units in exchange for density bonuses that will allow more market-rate units, but it is unlikely the number of units created by private developers through these bonuses will equal the number lost because of redevelopment and rising rents. These trends can lead to both the displacement of existing residents and also the deterioration of the community and culture the residents have created.

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:

[Arlandria ER Signed.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
221 Glebe	Community Planning and Development (CPD)	Community Development Block Grants (Section 108 Loan Guarantee)
221 Glebe	Community Planning and Development (CPD)	Community Project Funding (CPF) Grants
221 Glebe	Community Planning and Development (CPD)	HOME Program

**Estimated Total HUD Funded,
Assisted or Insured Amount:** \$8,000,000.00

**Estimated Total Project Cost [24 CFR 58.2 (a)
(5)]:** \$266,000,000.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<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.
Coastal Barrier Resources Act 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	As shown on the attached map, this project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.
Flood Insurance 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	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area as seen on maps 5155190033E and 5155190029E, effective 6/16/2011 and generated on 5/17/22. 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.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<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: Ozone. As stated in the attached memo from the City of Alexandria's

		Department of Transportation & Environmental Services the 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.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a Coastal Zone, but it has been determined to be consistent with the State Coastal Management Program, as stated in the attached letter from the Virginia Department of Environmental Quality. The project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. The adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on information provided by the US Fish and Wildlife Service about the habitat of the endangered and proposed endangered species and the nature of the project, this project has been determined to have No Effect on listed species. This project is in compliance with the Endangered Species Act without mitigation.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. The storage container contains gasoline. The project site is approximately 3,140 feet from the container. The Acceptable Separation Distance is 493 feet. The Separation Distance from the project is

		acceptable. The project is in compliance with explosive and flammable hazard requirements.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. Alexandria is in a Census-designated Urban Area and has no farmland. The project is in compliance with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not occur in a floodplain as seen on maps 5155190033E and 5155190029E, effective 6/16/2011 and generated on 5/17/22. The project is in compliance with Executive Order 11988.
Historic Preservation 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 with the Virginia Department of Historic Resources and the federally recognized tribes, it was determined the project will have No Adverse Effect on historic properties.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	A Noise Assessment was conducted. The noise level was normally unacceptable: 68 db. See noise analysis. The project will use windows with increased soundproofing to attenuate the interior noise level to below 45 db. See attached window information. The project is in compliance with HUD's Noise regulation with mitigation.
Sole Source Aquifers 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 not located on a sole source aquifer area. There are no sole source aquifers in or adjacent to Alexandria. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection 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. No on-site wetlands are present according to the National Wetlands Inventory and the City of Alexandria (see attached maps generated May 9, 2022). No off-site wetlands will be affected because the development's stormwater runoff will be subject to a Stormwater Management Plan Permit which limits

		the stormwater outflows from the site and the levels of pollutants in the runoff. The project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	As shown on the attached map, Alexandria is not within proximity of a NWSRS river. The project takes place entirely within Alexandria. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]

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

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

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The project was designed concurrently with the development of the Arlandria-Chirilagua Small Area Plan and the developer coordinated closely with City staff to design the project to be in conformance with the Plan, including in height, open space, and use. The project site had been previously identified as a target site for redevelopment into affordable housing or mixed-use development. The project is in line with the scale specified in City plans and the buildings are designed to complement	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		each other as part of the urban fabric. See Zoning attachment.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	1	The project site currently has no stormwater retention and treatment facilities. The project is required to use stormwater best management practices and reduce stormwater flows to below those of the project site before redevelopment. The project is also required to develop a Stormwater Pollution Prevention Plan. In addition, the project will be installing storm sewers with upgraded capacities to handle future flows and roof drains will connect directly to the storm sewers, reducing the amount of runoff onto nearby streets. See Stormwater attachment.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	Site noise during construction will occur during designated hours in accordance with the City Noise Control Code. HVAC and mechanical equipment will be required to be equipped with noise reducing devices to comply with the City noise limit at the property line. Deliveries, loading, and unloading will be restricted to certain hours and vehicles will not be permitted to idle for more than ten minutes. See Noise attachment.	
SOCIOECONOMIC			
Employment and Income Patterns	2	The project site is primarily an underutilized parking lot. There are some small businesses on the site, such as a barber and a restaurant, whose employees would be impacted by the redevelopment of the project site during construction (and possibly after, should the business choose not to return). The businesses will receive relocation assistance. The project will contain commercial space and the existing businesses will have a right to return if they choose to do so. The	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>project will generate temporary jobs during construction and some permanent jobs when completed, primarily for tenants of the commercial space in the building, but also those related to the new health clinic and flex space for City services. Property maintenance and property management jobs will also be created.</p>	
<p>Demographic Character Changes / Displacement</p>	<p>1</p>	<p>Rising rents and the arrival of Amazon's HQ2 have increased displacement pressure throughout Alexandria and especially in the Arlandria area where the project is located. The project will help maintain the demographic character of the area and prevent displacement of residents who can no longer afford market-rate housing in the surrounding area by providing below-market rents. As the project site is primarily asphalt parking lots and some small commercial businesses, no existing residents will be displaced. The project will displace a small number of businesses. However, the developer is discussing the possibility of creating commercial space in the second building to allow some of the businesses to return. The developer will be conforming with URA requirements regarding assistance for displaced businesses.</p>	<p>Conformance with URA regulations about business displacement and assistance</p>
<p>Environmental Justice EA Factor</p>	<p>2</p>	<p>The project was developed with considerable community engagement and input. Because of this input, one-quarter of the project's units are reserved for households at the 40% AMI level. There were two adverse environmental effects identified: noise and soil contamination. The exterior noise level was calculated to be in the "Normally Unacceptable" level. The developer intends to mitigate this by using windows with an STC rating high</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>enough to provide sufficient noise attenuation. There are potential RECs in the soil which may contaminate the groundwater below the project. The developer intends to use a vapor barrier system and exhaust fans to prevent the build up of any harmful vapors in the underground parking area. They will also use a groundwater filtering system during and after construction to prevent contamination of water flowing from the site into the storm sewer system. No overall negative environmental justice impact is anticipated.</p>	
COMMUNITY FACILITIES AND SERVICES			
<p>Educational and Cultural Facilities (Access and Capacity)</p>	<p>2</p>	<p>The Leonard "Chick" Armstrong Recreation Center and Cora Kelly School for Math, Science, and Technology are proximate to the project site. The site is also on multiple bus lines which connect to the Metro system, allowing access to the museums and cultural facilities of Washington D.C. The bus lines also connect to Old Town Alexandria, which has many museums and cultural activities as well. Alexandria City Public Schools anticipates the project will generate almost 400 students across all grades, but has multiple projects in its Capital Improvement Plan to increase school capacity and continually reevaluates its existing and projected capacity. See Culture and Schools attachment.</p>	
<p>Commercial Facilities (Access and Proximity)</p>	<p>2</p>	<p>The area is well supplied with commercial facilities, both within walking distance and via public transportation. There are multiple restaurants and grocery stores within walking distance as well as clothing stores and banks and ATMs. The</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		Potomac Yard shopping center is a short bus ride away and features multiple big box retail stores. See Surrounding Area map.	
Health Care / Social Services (Access and Capacity)	1	Part of the building's commercial space will be used as health and dental clinic space for Neighborhood Health, which provides free or low-cost services to communities that typically do not have access to health care. Another part of the space will be reserved for the City of Alexandria to use as office space for departments who provide services to the neighborhood. See Health attachment.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The project is required to send all solid waste to the Covanta Energy Waste Facility. The facility has not expressed any concerns about a lack of capacity. The project is also required to submit a Recycling Implementation Plan to the City and abide by its conditions. See Solid Waste attachment.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	1	As part of the project, the developer will install sanitary sewer pipes with a greater diameter and capacity than those currently existing on the site. This greater capacity will accommodate future growth in flows. AlexRenew, the City's sewage treatment authority, expressed no concerns about the additional growth affecting sewage treatment capacity. See Sewers attachment.	
Water Supply (Feasibility and Capacity)	2	The project is serviced by Virginia American Water, which expressed no concerns about the effect the project will have on the existing water supply. The project is required to use WaterSense or equivalent low-flow fixtures. See Green Building attachment.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Public Safety - Police, Fire and Emergency Medical	2	The Alexandria Fire and Police Departments are actively recruiting to fill and expand their duty rosters. Members of the Fire Department also serve as Emergency Medical Technicians. The project site is close to I-395, which provides quick access to both Inova Alexandria hospital and the hospitals in Washington, D.C.	
Parks, Open Space and Recreation (Access and Capacity)	1	The project is walking distance from Four Mile Run Park, the Dale Street Community Garden, and the Leonard "Chick" Armstrong Recreation Center. The project improves the park and recreational space in the neighborhood by replacing existing buildings and parking lots with a new park. Part of the project is a 0.38 acre park with a public access easement allowing for public use between the hours of 5am and 10pm. The park programming was designed in concert with Recreation, Parks, and Cultural Activities staff to ensure it is appropriate for all ages and abilities. See Recreation attachment.	
Transportation and Accessibility (Access and Capacity)	2	The site is located in a relatively transit rich portion of the city. There is access to the Potomac Yard Metro Rail Station (1.0 mile to the east of the subject site) via Dash bus routes 36A/B, which operate 10-15-minute headways. The WMATA 10A/B/E bus routes on Mt. Vernon Avenue operate at slightly less frequent headways and provide access between Ballston and the Pentagon Metro station. In total, there are five different bus lines which have stops within 1/4 mile of the project. See Transit attachment. As of September 2021, DASH buses are fare-free. Metro is introducing a reduced-fare program for low-income riders.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	There are no unique natural features or water resources on the project site.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The project site is completely developed with no wildlife present and minimal vegetation. The project will not have an impact on vegetation or wildlife.	
Other Factors 1			
Other Factors 2			
CLIMATE AND ENERGY			
Climate Change	2	The original submission in HEROS (May 9, 2022) was input prior to HUD releasing the new Climate Change EA Factors being released in HEROS; therefore, compliance with this factor is not warranted at this point.	
Energy Efficiency	2	The project must comply with the City's 2019 Green Building Policy, which mandates all new multifamily construction achieve LEED, Earthcraft, Green Globes or equivalent certification and meet energy use reduction targets. EnergyStar appliances are required throughout the building. The project is also required to be solar ready to allow for the potential future installation of solar panels. The project has registered with Viridiant its intent to pursue the Earthcraft Gold certification. See Green Building attachment.	

Supporting documentation

[Transit.pdf](#)

[Green Building.pdf](#)

[Culture and Schools.pdf](#)

[Zoning.pdf](#)

[Surrounding Area.png](#)

[Recreation.pdf](#)

[Health.pdf](#)

[Stormwater.pdf](#)

[Sewers.pdf](#)

[Schools.pdf](#)

[Noise.pdf](#)

[SolidWaste.pdf](#)

Additional Studies Performed:

Field Inspection [Optional]: Date and completed
by:

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

Jonathan Frederick, Housing Alexandria Aaron Remolona, Housing Alexandria Jacob Kamon, Advanced Project Management Anna Franco, Department of Planning and Zoning, City of Alexandria Nathan Imm, Department of Planning and Zoning, City of Alexandria Carson C. Lucarelli, Department of Planning and Zoning, City of Alexandria William Skrabak, Transportation and Environmental Services, City of Alexandria Russell Furr, Alexandria Fire Department National Rivers Inventory US Census Bureau US Fish and Wildlife Service US Environmental Protection Agency US Federal Emergency Management Agency Chelsea Jefferies, Virginia Department of Historic Resources John Fisher, Virginia Department of Environmental Quality Virginia Department of Transportation Polysonics Acoustics and Technology Consulting ECS, LLC

List of Permits Obtained:

Coordinated Development District Conceptual Design Plan Review Development Special Use Permit Transportation Management Plan Special Use Permit City of Alexandria City Charter Section 9.06 Review General Virginia Pollutant Discharge Elimination System for Discharges of Stormwater from Construction Activities and Stormwater Pollution Prevention Plan Virginia Department of Environmental Quality Coastal Zone Management Concurrence Letter Virginia Department of Historic Resources "No Historic Properties Affected" Concurrence Letter

Public Outreach [24 CFR 58.43]:

Region 3 EPA Administrator Kerry Johnson, HUD Environmental Field Officer Jonathan Frederick, Housing Alexandria Ingris Moran, Tenants and Workers United Rev. Christopher P. Christensen, St. Rita's Catholic Church

[UpdatedCommunityOutreach.pdf](#)

Cumulative Impact Analysis [24 CFR 58.32]:

While the overall project is large in size, the impact it will have is somewhat muted by its likelihood to absorb current community members in need of affordable housing. For instance, student generation will likely be lower because students who already attend Alexandria City Public Schools will remain in the system even though they have moved into the new building, reducing the number of units that will contribute new students to the system. Similarly, transit demand may shift from one stop to another, but the overall increase in riders will not be as high as it could be if all the residents of the project were new to the area.

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

The original concept for the site included a road connecting Mt Vernon Avenue to W Glebe Road, but this plan required a land swap with a neighboring property owner, who declined to participate. The road would have provided a connection between Mt. Vernon Avenue and West Glebe Road, offering an alternative to a complex intersection further south. However, another adjoining property owner consented to sell their property to the developer. Because of this, the design was reconfigured to contain a large publicly accessible open space which abuts an existing alley. This open space was designed so it can easily be converted to a road in the future if needed. The change to the site layout resulted in the project going from 475 units to 474 units.

No Action Alternative [24 CFR 58.40(e)]

If no action is taken, the site will remain underutilized. The owners will likely sell the project site to another developer in the future and expensive market-rate housing might be constructed. The surrounding neighborhood (and the city as a whole) will continue to lose market-rate housing affordable to low-income households and residents of the neighborhood will be displaced by the rising rents. As residents leave, the strong ties that define the community will fray and the area will lose the unique culture that defines it.

Summary of Findings and Conclusions:

The primary benefit of the project is the addition of 474 affordable housing units in an area where there is high demand for housing, especially affordable housing. It also provides area benefits in the form of open space, a health care center that charges on a sliding-scale, space for social services, and a low-cost daycare. Potential adverse effects of the project are an increase in students in the school system and an increase in traffic. Alexandria Public Schools works with the Department of Planning and Zoning to create yearly projections of student generation rates and is working to increase overall school capacity, which will reduce the effects of additional students in the school system. The project is located within 1/4 mile of several bus stops, some

of which connect to the new Potomac Yard Metro station. The DASH bus system, which services a majority of these stops, is free to all riders. WMATA, which operates the Metrobus and Metrorail systems, is introducing a reduced-fare program for low-income people.. There will be a Capital Bikeshare station outside the project. The project has been parked based on City guidelines and as it is a very transit accessible location, it is anticipated most residents will be using transit, biking, or walking/rolling as a means of travel.

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Contamination and Toxic Substances	<p>The project will use engineering controls to mitigate potential vapor intrusion. A vapor barrier system and exhaust fan system will be used to prevent and mitigate the any vapors which may infiltrate from the soil. Groundwater will be filtered before discharge into the storm sewer system.</p> <p>Any water removed during the construction dewatering process will also be filtered before being discharged into the storm sewer system.</p>	N/A	During construction, a temporary filtration system will be used to remove potential contaminants from water removed during the dewatering process. A permanent filtration system will be installed during the construction of the foundation to prevent possible contamination	

			of water discharged into the storm sewer system. A vapor barrier will be installed during the construction of the garage, as well as exhaust fans to prevent and remove harmful vapor build up.	
Noise Abatement and Control	Noise attenuating materials and building techniques will be utilized.	N/A		
Demographic Character Changes / Displacement	Conformance with URA regulations about business displacement and assistance	N/A	The developer will work with the affected businesses in accordance with the Uniform Relocation Act regulations.	

Project Mitigation Plan

Removal of contaminants during the dewatering process will be monitored by a consultant hired by the project developer with reports being regularly provided to the City. The installation of the vapor barrier system, exhaust fans, and windows will be monitored by the City of Alexandria Department of Code Administration. The Department of Housing will monitor compliance with URA regulations concerning business displacement.

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

[Airport Hazards.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

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

1. Is the project located in a CBRS Unit?

No

Document and upload map and documentation below.

Yes

Compliance Determination

As shown on the attached map, this project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

[Alexandria Coastal Barrier Resources Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Flood Insurance

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

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

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

✓ Yes

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

[FIRMETTE.pdf](#)

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

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

✓ No

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

Yes

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

Yes

✓ No

Screen Summary

Compliance Determination

The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area as seen on maps 5155190033E and 5155190029E, effective 6/16/2011 and generated on 5/17/22. 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

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

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

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

Yes

No

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

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

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

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

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

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

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

Ozone 0.07 ppb (parts per million)

Provide your source used to determine levels here:

See attached memo from City of Alexandria Department of Transportation and Environmental Services

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

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

Enter the estimate emission levels:

Ozone ppb (parts per million)

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

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

Screen Summary

Compliance Determination

The project's county or air quality management district is in non-attainment status for the following: Ozone. As stated in the attached memo from the City of Alexandria's Department of Transportation & Environmental Services the 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 letter March 2023.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

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

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

- Yes
 No

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

- Yes
 No

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

- Yes, without mitigation

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

Yes, with mitigation

No, project must be canceled.

Screen Summary**Compliance Determination**

This project is located in a Coastal Zone, but it has been determined to be consistent with the State Coastal Management Program, as stated in the attached letter from the Virginia Department of Environmental Quality. The project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[Alexandria 4432 Construction of a 474 Unit Apt Sanse and Naja.pdf
CZMA Package.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

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

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

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

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

No

- Yes

3. Mitigation

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

Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated.

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

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

The project will use engineering controls to mitigate potential vapor intrusion. A vapor barrier system and exhaust fan system will be used to prevent and mitigate the any vapors which may infiltrate from the soil. Groundwater will be filtered before discharge into the storm sewer system. Any water removed during the construction dewatering process will also be filtered before being discharged into the storm sewer system.

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

Complete removal

Risk-based corrective action (RBCA)

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. The adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.

Supporting documentation

[RE Vapor barrier system.pdf](#)

[Arlandria Phase II Report 12072021.pdf](#)

[Arlandria Phase I ESA.pdf](#)

Are formal compliance steps or mitigation required?

✓ Yes

No

Endangered Species

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Mitigation as follows will be implemented:

- ✓ No mitigation is necessary.

Explain why mitigation will not be made here:

The project is urban infill and, based on the species' preferred habitat, will have no effect on listed species. There is little to no vegetation on the project site currently to attract listed or candidate species.

Screen Summary
Compliance Determination

Based on information provided by the US Fish and Wildlife Service about the habitat of the endangered and proposed endangered species and the nature of the project, this project has been determined to have No Effect on listed species. This project is in compliance with the Endangered Species Act without mitigation.

Supporting documentation

[Species Profile for Tricolored bat.pdf](#)

[Species List Virginia Ecological Services Field Office 060823.pdf](#)

[NE Consistency Letter Northern Long Eared Bat Rangewide Determination Key 20230314.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Explosive and Flammable Hazards

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

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

No

Yes

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

No

Yes

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

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

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

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

No

Yes

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

Yes

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

No

Screen Summary

Compliance Determination

There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. The storage container contains gasoline. The project site is approximately 3,140 feet from the container. The Acceptable Separation Distance is 493 feet. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

[ASTs Distances.pdf](#)

[Acceptable Separation Distance Electronic Assessment Tool.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Farmlands Protection

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

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

Yes

No

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

The project is the redevelopment of existing buildings and parking lots. No agricultural land will be impacted.

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. Alexandria is in a Census-designated Urban Area and has no farmland. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

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

Are formal compliance steps or mitigation required?

Yes

No

Floodplain Management

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

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

55.12(c)(3)

55.12(c)(4)

55.12(c)(5)

55.12(c)(6)

55.12(c)(7)

55.12(c)(8)

55.12(c)(9)

55.12(c)(10)

55.12(c)(11)

None of the above

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

[FIRMETTE.pdf](#)

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

Does your project occur in a floodplain?

No

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

Yes

Screen Summary**Compliance Determination**

This project does not occur in a floodplain as seen on maps 5155190033E and 5155190029E, effective 6/16/2011 and generated on 5/17/22. The project is in compliance with Executive Order 11988.

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

Yes

✓ No

Historic Preservation

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

Threshold

Is Section 106 review required for your project?

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

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

Step 1 – Initiate Consultation

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

- ✓ State Historic Preservation Offer (SHPO) Completed

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

- ✓ Catawba Indian Nation Completed
- ✓ Delaware Nation, Oklahoma Completed

✓ Pamunkey Indian Tribe Response Period Elapsed

✓ Other Consulting Parties

✓ Alexandria Archeology Completed

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

Consulting parties were selected based on the recommendations of the Virginia Department of Historic Resources.

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:**

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
221 W Glebe Rd, Alexandria, VA 22305	Not Eligible	Yes	✓ Not Sensitive
3606 Mt. Vernon Ave, Alexandria, VA 22305	Not Eligible	Yes	✓ Not Sensitive
3608 Mt. Vernon Ave., Alexandria, VA 22305	Not Eligible	Yes	✓ Not Sensitive

Additional Notes:

The properties were all evaluated for National Register eligibility because of age; however, they were not found to be historic.

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

No Adverse Effect

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

Document reason for finding:

The buildings to be demolished were determined not to be historic and the surrounding historic properties will not be directly or indirectly affected by the redevelopment.

Does the No Adverse Effect finding contain conditions?

Yes (check all that apply)

No

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

concurrence(s) or objection(s) below.

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation with the Virginia Department of Historic Resources and the federally recognized tribes, it was determined the project will have No Adverse Effect on historic properties.

Supporting documentation

[HUD Funding Redevelopment 221 West Glebe Rd 3606 3608 3610 3612 3700 Mount Vernon Ave Virginia.pdf](#)
[P and Z to DHR 221 W Glebe.pdf](#)
[APE Exhibits 2.pdf](#)
[APE Exhibit 1.pdf](#)
[VCRIS Resources APE.pdf](#)
[Pamunkey Indian Tribe Consultation Letter.pdf](#)
[Delaware Nation THPO Consultation Letter.pdf](#)
[Delaware Nation Consultation Letter.pdf](#)
[Catawba Consult THPO Letter.pdf](#)
[Catawba Consult Letter.pdf](#)
[Catawba Response 2023 1139 2.docx](#)
[2022 5029 19MAY23.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

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

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

- New construction for residential use

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

Rehabilitation of an existing residential property

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

An interstate land sales registration

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

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

Indicate the findings of the Preliminary Screening below:

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

- ✓ Noise generators were found within the threshold distances.

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

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

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

Is your project in a largely undeveloped area?

- ✓ No

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

Yes

Unacceptable: (Above 75 decibels)

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

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

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

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

- ✓ Mitigation as follows will be implemented:

Noise attenuating materials and building techniques will be utilized.

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

No mitigation is necessary.

Screen Summary

Compliance Determination

A Noise Assessment was conducted. The noise level was normally unacceptable: 68 db. See noise analysis. The project will use windows with increased soundproofing to attenuate the interior noise level to below 45 db. See attached window information. The project is in compliance with HUD's Noise regulation with mitigation.

Supporting documentation

[Distances from W Glebe and Mt Vernon.pdf](#)

[DNL Calculator HUD Exchange Mt Vernon 1.pdf](#)

[DNL Calculator HUD Exchange Mt Vernon 2.pdf](#)

[DNL Calculator HUD Exchange W Glebe.pdf](#)

[Building R1 Pella Impervia Window Cut Sheet.pdf](#)

[Building R2 Intus Window Cutsheet.pdf](#)

Are formal compliance steps or mitigation required?

✓ Yes

No

Sole Source Aquifers

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

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

- Yes
- No

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

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

- No

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

Yes

Screen Summary

Compliance Determination

The project is not located on a sole source aquifer area. There are no sole source aquifers in or adjacent to Alexandria. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[Sole Source Aquifer Map.png](#)

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. No on-site wetlands are present according to the National Wetlands Inventory and the City of Alexandria (see attached maps generated May 9, 2022). No off-site wetlands will be affected because the development's stormwater runoff will be subject to a Stormwater Management Plan Permit which limits the stormwater outflows from the site and the levels of pollutants in the runoff. The project is in compliance with Executive Order 11990.

Supporting documentation[NWI Map.pdf](#)[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

As shown on the attached map, Alexandria is not within proximity of a NWSRS river. The project takes place entirely within Alexandria. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Nationwide Rivers Inventory.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

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

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

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

Yes

No

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

Yes

No

Explain:

The two adverse environmental effects related to the project are noise and contaminated soils. Both of these effects will be resolved through mitigation. The affects of the noise on residents will be mitigated through the use of noise attenuating materials. The soil contamination is marginal and primarily will affect the underground parking, not the commercial or residential portions of the buildings.

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

**Screen Summary
Compliance Determination**

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No