

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

Project Information

Project Name: IHBGC-HUD-Duplexes-Eagle-Hill-SBIT

HEROS Number: 900000010461175

Start Date: 03/25/2025

Responsible Entity (RE): Shoalwater Bay Indian Tribe, PO Box 130 Tokeland WA,
98590

RE Preparer: Austin McCloskey

State / Local Identifier: WA

Certifying Officer: Quintin Swanson

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable): Landau Associates, Inc.

Point of Contact: Brian Beiger

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

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

Project Location: 10 Eagle Hill Road, Tokeland, WA 98590

Additional Location Information:

10 Eagle Hill Road is nearby address, project is located within the below coordinates which are approximately 1,200' northeast of the nearby address. A permanent address will be connected to this project after completion. (46 Degrees 43'53.17"N 124 Degrees 1'48.41"W)

Direct Comments to:

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

The proposed development would include (2) two 1-acre residential lots and (2) duplex buildings for a total of (4) residential units. These lots are located at the intersection of Eagle Hill and Forest Road. Roadway infrastructure improvement would include additional improvements to Eagle Hill Road, TTP Route 34 Section 10 and Forest Road, TTP Route 3 Sections 10-30. The total road improvement would include 0.51 miles of 24-foot wide paved roadway with a 5-foot sidewalk on one side. Over 90% of the roadway will include vegetative filter strips per Washington Department of Ecology details on the downhill side of the roadway. To continue the effort made for utility extensions up Eagle Hill Road, this project will further develop the utilities and infrastructure to prepare the property for potential future community upland relocation developments. Utility infrastructure improvements would include electrical, water, telecommunications, and sewer. The development sites will also require storm water drainage, and water quality plans which all would be part of the site development and civil design plans. Direct and indirect impacts to identified critical areas will be avoided through the project design. The tribal goals for this upland development are designed to foster a positive relationship with the natural environment by not only limiting development, but also by implementing natural preservation and enhancement measures. Enhancing the health and livelihood of the critical habitat areas is a high priority for the Tribal Council and Tribal Community. Critical areas identified during the assessment of the project will call for conservation, preservation and enhancement measures. Acres of impact (limit of construction): 7.56 Acres Total Impervious surface: 1.72 Acres (Roof, Drives, Pavement, Sidewalk, and Curb) Length of vegetative filter strips: 2,514 LF Length of ditches, with & without riprap: 232 LF with riprap, 224 LF without riprap Number of outfalls (dispersion down the hill): 2 outfalls Number and size of culverts: No culverts

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

Shoalwater Bay Indian Tribe's proposed new housing construction project will start to address the need for housing and infrastructure for the Tribe's managed relocation process and to address the tribal community's housing shortage. The reservation is

located on a narrow area of land sandwiched between the ocean to the West and hillsides to the East. A berm constructed by the Army Corp of Engineers currently protects the area from storm surges and flooding. With rising sea levels, the berm is a stopgap measure. These conditions have prevented SBIT from building housing for the 475 tribal members. The HUD formula allocation sheets shows the housing shortage for our Tribe (Number of AIAN Households with less than 80% of Median Family Income) is an astounding 206 units. This award will provide for the construction of 2 duplexes on reservation/trust land to provide a total of 4 housing units along with the construction of the supporting infrastructure that includes an access road with utilities to the site, as well as the water and septic development to support the housing within a 5-year performance period. The proposed project is the result of a planning process that started in 2009 in order to provide safe public services and housing opportunities to Tribal members that are not at risk to natural disasters. The Project represents the first construction phase of a multi-phased project to relocate Tribal members and essential services out of flood prone and Tsunami risk areas that the Tribe currently inhabits. The Eagle Hill project will provide a small amount of housing opportunities and facilitate the completion of the RAISE Loop project. The RAISE Loop project is a future project not included in the HUD NEPA funding that will result in the construction of approximately 3.2 miles of two-lane roadway with attendant utilities need for future development of upland areas not subject to natural risks. The goal of the SBIT, which includes the Eagle Hill Project as well as the RAISE Loop project is to eventually relocate all residential housing, schools, healthcare and other vital services to the upland areas of Tribal managed lands. The need for relocation is driven by increasing risks associated with sea-level rise, chronic flooding, and the potential for catastrophic tsunami impacts generated by an earthquake along the Cascadia Subduction Zone (CSZ). The consequences of a CSZ-generated tsunami would be devastating. In addition to the significant risk to human life, critical tribal infrastructure, services, and economic resources would likely be destroyed. Even for those who survive the initial event, the earthquake is anticipated to cause up to 8.5 feet of coastal subsidence, further increasing long-term vulnerability to storm surge, tidal inundation, and chronic flooding.

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

The project area contains a section of paved road, gravel surface road, and undeveloped forestlands. The forests lands within and adjacent to the project have been subject to historic and recent commercial timber harvest. Gravel roads have been constructed through these forestlands to facilitate timber harvest and hauling. The project area forestlands exist as medium-aged, second-growth timber. Land uses adjacent to the project area include a single-family residence and police station. The character of the project area is similar to other native forestlands within other portions of the Reservation. There are no noteworthy special features or characteristics within the project area. The project site is currently utilized to access

the Tribe's emergency management facility, a single-family residence, and undeveloped lands east of Hwy 105. These trends will continue in the absence of the project.

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

[APE Figures - Eagle Hill Road Project.pdf](#)

[SitePhotos_Landau Eagle Hill Phase I ESA_rpt 041726_.pdf](#)

Determination:

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

Approval Documents:

**7015.15 certified by Certifying Officer
on:**

**7015.16 certified by Authorizing Officer
on:**

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
23ICWA14180	Other	IHBG Competitive	\$6,167,683.00

**Estimated Total HUD Funded, \$6,167,683.00
Assisted or Insured Amount:**

**Estimated Total Project Cost [24 CFR 58.2 (a) \$6,167,683.00
(5)]:**

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	☐ Yes ☒ No	The closest airport, Willapa Harbor Airport, is located more than 75,000 feet away. Source: NEPAassist. https://nepassisttool.epa.gov/nepassist/nepamap.aspx . Accessed April 15, 2026.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	☐ Yes ☒ 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.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	☐ Yes ☒ No	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area (53049C0185D, effective on 5/18/2015). 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	☐ Yes ☒ No	The project is located in an attainment area and no nonattainment areas are located in proximity to the project. Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. Attached screenshots from the NEPAassist website show that the Eagle Hill Road project is in attainment for all criteria pollutants. Source: NEPAassist, https://nepassisttool.epa.gov/nepassist/nepamap.aspx , Accessed April 28, 2026. The project is in compliance with the Clean Air Act.

Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	☐ Yes ☒ No	As of July 22, 2020, Washington State Department of Ecology (Ecology) notified HUD of the following: "Ecology has concluded that it is unnecessary for U.S. Department of Housing and Urban Development (HUD) to continue to send project information in order to receive Ecology's concurrence that the funding phase of the project is consistent with Washington's CZMP. Therefore, we are writing to inform you that HUD no longer needs to require applicants to send Ecology letters seeking our concurrence on projects for which HUD plans to release federal funding." Concurrence from Ecology for Coastal Zone Management (CZM) is no longer required under a Part 58 or Part 50 Environmental Review in Washington State. However, at the time of project development, the activity may trigger review if it falls under other parts of the Coastal Zone Management Act (CZMA) regulations for federal agency activities (Title 15 CFR Part 930, Subpart C), or consistency for activities requiring a federal license or permit (Title 15 CFR Part 930, Subpart D) and will be subject to all enforceable policies of the Coastal Zone Management Program. It is during the local permitting process that a project might be subject to CZM and further review by Ecology. Reference: US Department of Housing and Urban Development, Environmental Guidance website. https://www.hud.gov/states/shared/working/r10/environment. Accessed April 28, 2026.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	☐ Yes ☒ 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. Radon testing

		indicated radon levels below 4.0 pCi/L. No mitigation is required. See attached documents for supporting materials and references. The project is in compliance with contamination and toxic substances requirements.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	☐ Yes ☒ No	This project May Affect, but is Not Likely to Adversely Affect, marbled murrelet and western snowy plover. Informal consultation was conducted with USFWS. There were no species under the jurisdiction of NMFS within the action area. This project is in compliance with the Endangered Species Act without mitigation.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	☐ Yes ☒ No	All tanks were found to be farther than the acceptable separation distance using HUD calculation standards. No planned tanks were identified. A detailed description of the analysis and references is attached.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	☐ Yes ☒ No	The Eagle Hill Road project is not located on land in use as farmland or potentially valuable farmland. The project corridor occurs on a previously developed gravel road through undeveloped forested land, or through roads and parking lots that have already been developed. Attached is a map from USDA's web soil survey showing that no soils important for farming occur in the project area.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	☐ Yes ☒ No	The Eagle Hill Road project is located in Tokeland, Washington, and CISA flood mapping is not currently available. The FEMA Floodplain panel number 53049C0185D show that the project site is not located in the 0.2 PFA zone (Zone B, 500-year Floodplain) delineated on the floodplain panel. See attached documents for full analysis and references. The project is in compliance with Executive Orders 11988 and 13690.
Historic Preservation National Historic Preservation Act of	☐ Yes ☒ No	Based on Section 106 consultation there are No Historic Properties Affected

1966, particularly sections 106 and 110; 36 CFR Part 800		because there are no historic properties present. The project is in compliance with Section 106.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	☐ Yes ☒ No	No noise generating sources were found in the project vicinity. See attached documentation for analysis and sources.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	☐ Yes ☒ No	The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	☒ Yes ☐ No	This project results in direct impacts to 0.02 acres of wetlands. An 8-step Process has been completed. With transfer of 0.03 acre of mitigation credits from the SBIT Ghost Dike Advanced Wetland Mitigation Site, identified in the mitigation section of this review, the project will be in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	☐ Yes ☒ No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		

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

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

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

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The proposed project follows tribal land use, zoning and planning laws. The project was designed in accordance with the Shoalwater Bay Indian Tribe Masterplan.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Geotechnical evaluation completed for the site determined conditions to be suitable for the proposed project and provides recommendations for proof rolling and subgrade correction, reinforcement and stabilization of embankments, moisture conditioning of soils, use of engineered fill where necessary, and consideration of drainage or groundwater management during construction. A qualified geotechnical professional will observe earthwork and subgrade preparation to verify compliance with recommendations. Geotechnical evaluation attached.	All geotechnical engineering recommendations for site preparation, including grading, drainage, embankment and sidewalk construction, will be incorporated into project design and construction according the Preliminary Geotechnical Engineering Report. A qualified geotechnical professional will observe earthwork and subgrade preparation to verify compliance with recommendations.
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	The project area is currently undeveloped and does not contain any identified hazards, nuisances, or safety concerns.	
SOCIOECONOMIC			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Employment and Income Patterns	2	The project is limited to road improvements and a small amount of residential housing and will have no effect on employment or income factors.	
Demographic Character Changes / Displacement	1	The Project will increase housing for tribal residents, and conforms to applicable zoning. The demographics of the area are not expected to change, and no one will be displaced by the project. The project will decrease displacement by providing housing and protection from Cascadia subduction zone earthquakes and tsunamis.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	The proposed Project adds residential housing; therefore, there may be a small increase in demand for educational and cultural services and facilities. It is expected that the incremental increase in demand from the additional housing can be met by the existing educational and cultural facility capacity.	
Commercial Facilities (Access and Proximity)	2	The Project site is located close to many commercial facilities. New residents may have a small but positive impact on local commercial businesses.	
Health Care / Social Services (Access and Capacity)	2	Because the proposed Project increases residential population, a demand for healthcare and social services and facilities may be	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		associated with residents. However, healthcare services will not be adversely affected due to the size of the Project, and it is expected that the incremental increase in demand can be met by the existing capacity.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The project is not anticipated to increase the overall scale of solid waste disposal. Existing service routes will be extended to the new housing units. It is expected that the incremental increase in demand can be met by the existing capacity.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The project will result in a slight increase in wastewater and sanitary sewage loads due to the creation of new housing units. The wastewater will be treated in septic systems.	
Water Supply (Feasibility and Capacity)	2	The project will increase the availability of potable water through the installation of water supply lines to the proposed duplexes and residential lots. Water supply will not be adversely affected as it is expected that water needs at the site will be met by the existing water supply capacity.	
Public Safety - Police, Fire and Emergency Medical	2	Public safety services, including police, fire, and emergency medical services, will be available to residents. However, public safety services will not be adversely affected due to the size of	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		the Project, and it is expected that the incremental increase in demand can be met by the existing capacity.	
Parks, Open Space and Recreation (Access and Capacity)	2	The project will have no effect on parks, open space, or recreational opportunities in the vicinity.	
Transportation and Accessibility (Access and Capacity)	2	The proposed project will result in a small increase in transportation facilities through the improvement of existing, and creation of new roads. These roads will increase the capacity of tsunami evacuation routes.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	The project area borders two forested, depressional wetlands. A small amount of wetland impacts (0.02 acre) of wetland impacts will be required to expand the existing roadbed. Wetland mitigation credits generated from the Ghost Dike Advanced Mitigation Site will be used to offset these impacts.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The project will result in the loss of commercial forestlands. These forestlands are likely utilized by a wide variety of common wildlife species. Residential development will likely cause wildlife species to seek out higher quality habitats in the vicinity of the project area. It is not likely to adversely affect ESA listed fish and wildlife species.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Other Factors 1			
Other Factors 2			
ENERGY			
Energy Efficiency			

Supporting documentation

[SHO-TITLE-7-Zoning.pdf](#)

[SBIT_MasterPlan250715.pdf](#)

[PacificCounty_ord-162-zoning-map.pdf](#)

[eagle hill geotech.pdf](#)

[Zoning_PacificCounty.pdf](#)

Additional Studies Performed:

Phase 1 Assessment Wetland Delineation Biological Assessment

Field Inspection [Optional]: Date and completed

by:

Brian Bieger

2/24/2026 12:00:00 AM

[SitePhotos_Landau Eagle Hill Phase I ESA_rpt 041726_.pdf](#)

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

CDC Data, Pacific County, State Mean Pre-Mitigated Radon Level in Tested Buildings, Annual, <https://ephtracking.cdc.gov/DataExplorer/?c=31> DAHP. Washington State Department of Archaeology and Historic Preservation. RE: Not Eligible for the National Register. October 6, 2025. Federal Aviation Administration. Traffic Flow Management System Counts, Airports. <https://www.aspm.faa.gov/tfms/sys/Airport.asp>, Accessed April 29, 2026. FEMA Flood Maps. <https://www.fema.gov/flood-maps>. Accessed April 2026. Google, Inc. Google Earth Pro. Imagery Date May 9, 2024; accessed April 28 2026. HUD. 2026. Acceptable Separation Distance Electronic Assessment Tool. <https://www.hudexchange.info/programs/environmental-review/asd-calculator/>. Accessed April 28, 2026. National Wild and Scenic Rivers, [Rivers.gov](https://rivers.gov). <https://rivers.gov/map?river=skagit>, Accessed April 28, 2026. NEPAassist, <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, accessed April 15, 2026. Pacific County Zoning Map, <https://co.pacific.wa.us/PDF/ord-162-zoning-map.pdf>, Accessed April 17, 2026. US Department of Agriculture, Web Soil Survey, <https://websoilsurvey.nrcs.usda.gov/app/>, Accessed by May 11, 2026. US Department of Housing and Urban Development, Environmental Guidance website.

<https://www.hud.gov/states/shared/working/r10/environment>. Accessed October 23, 2025. Washington State Dept. of Ecology, <https://ecology.wa.gov/Regulations-Permits/Plans-policies/State-implementation-plans/Maintenance-SIPs>. Accessed February 10, 2026.

List of Permits Obtained:

Section 404 Nationwide permit from the US Army Corps of Engineers Biological
Opinion from the US Fish and Wildlife Service

Public Outreach [24 CFR 58.43]:

Public outreach for the project has been conducted through Tribal Council meetings, community engagement sessions, and coordination with Tribal members throughout the planning process. The Shoalwater Bay Indian Tribe has incorporated community input since the inception of the upland relocation strategy beginning in 2009. Project updates and planning discussions have been presented at Tribal Council meetings, which are open to Tribal membership, ensuring opportunities for public review and comment. Additionally, coordination has occurred with relevant agencies, including the Washington Department of Archaeology and Historic Preservation and federal partners as part of regulatory review processes. The following is a list of specific community outreach events that have occurred in the last two years. *

Open House-Community engagement dinner; September 17, 2024 -- This open house event included presentations, guest speakers, and formalized methods to receive community feedback. * Open House-Community engagement dinner; November 14, 2024 -- Same as above. * Biannual General Council Tribal Presentation; September 23, 2024 -- This biannual event was open to all Tribal members and was well attended. This event also included guest speakers, formal updates and progress reports, and avenues to provide feedback on Tribal projects. * Biannual General Winter Council Presentation; January 25, 2025 -- Same as above. * Bi-annual General Council; August 2, 2025 -- Same as above. * Annual Partnership Gathering; February 11 to 13, 2025 -- This multi-day event was intended to provide community members, stakeholders, local partners, government agencies, and the general public the opportunity to interact with Tribal planners, engineers, and other professionals to gain information about Tribal projects and provide informal feedback. * Community Day; June 18, 2026 -- This event was intended as a community outreach for the project and included information booths manned by Tribal employees, engineers, planners, and construction professionals to answer the public's questions about the project. All attendees were contacted after the event and given the opportunity to provide feedback. As part of the environmental review process, a Finding of No Significant

Impact (FONSI) notice will be disseminated to interested parties, agencies, and stakeholders in accordance with HUD requirements.

Cumulative Impact Analysis [24 CFR 58.32]:

Past land use actions within the project area have been limited, current and future impacts within the surrounding area are anticipated to occur regardless of the Eagle Hill Project. These include the relocation of the exiting Tribal facilities and residences that are in the low-lying Reservation areas subject to sea-rise, flooding, and tsunami risk impacts to the upland environments north and east of the Eagle Hill Project area. This relocation effort is expected to occur over the next 30-50 years and will result in the conversion of forested areas to medium-density residential areas. While this conversion will result in a loss of forested upland habitat, habitat for endangered species, and impacts to surface waters and wetlands will be avoided.

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

An initial plan was conceptualized and subsequent site plans were developed. The site development process was iterative between the project's experts and project partners to accurately assess and determine the design ability to meet project goals. The project sought design input from appropriate tribal government entities and other government entities as appropriate. To a large extent, the location of the proposed project is not flexible due to the surrounding topography and existing infrastructure that will be enhanced by the project. For those portions of the project that are not fixed, such as the location of the proposed multi-family housing units, the site plan has been refined based on the community-partner feedback.

No Action Alternative [24 CFR 58.40(e)]

In the case of a no-build alternative, the site would remain forested or be developed consistent with zoning laws. If undeveloped, the need for housing and tsunami escape routes would remain present in the community.

Summary of Findings and Conclusions:

The project will have primarily beneficial impacts by increasing the availability of safe, upland housing for Tribal members and by supporting long-term relocation efforts away from areas vulnerable to flooding, sea level rise, and tsunami hazards. The project will also improve transportation infrastructure and provided much needed emergency evacuation routes. Minor adverse impacts include the conversion of forested land to residential use, limited wetland impacts (approximately 0.02 acre), and temporary construction-related disturbances such as noise, dust, and erosion potential. The project was determined to not likely adversely impact ESA listed species. The potential impacts will be minimized through project design, adherence to regulatory requirements, and implementation of best management practices. Wetland impacts will be mitigated through the transfer of wetland mitigation credits

from the SBIT purchase of mitigation credits. Based on the analysis, the project will not result in significant adverse environmental impacts, and a Finding of No Significant Impact (FONSI) is appropriate.

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
Wetlands Protection	The project will result in unavoidable permeant impacts to 0.02 acre of palustrine wetlands. These impacts will be mitigated through the transfer of 0.03 acre of mitigation credits from the SBIT Ghost Dike Advanced Wetland Mitigation Site.	N/A		
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	All geotechnical engineering recommendations for site preparation, including grading, drainage, embankment and sidewalk construction, will be incorporated into project design and construction according the Preliminary Geotechnical Engineering Report. A qualified geotechnical professional will observe earthwork and subgrade preparation to verify compliance with recommendations.	N/A	All recommendations in the Preliminary Geotechnical Evaluation will be followed. (Attached in the Environmental Assessment Factors section).	

Project Mitigation Plan

The mitigation plan for this project consists of two primary elements. The first is the successful transfer of wetland mitigation bank credits which will be overseen by SBIT Tribal biologist Austin Mathews. The Senior Construction Manager, Sam Hyatt with Wenaha Group, will be responsible for ensuring that project agreements and specifications are followed during project 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 closest airport, Willapa Harbor Airport, is located more than 75,000 feet away.
Source: NEPAassist. <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>. Accessed April 15, 2026.

Supporting documentation

[Airport_Backup.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

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 53049C0185D effective on 5-18-2015.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 (53049C0185D, effective on 5/18/2015). 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

[Floodplain_Backup.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

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

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

✓ Yes

No

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

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

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

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

Screen Summary

Compliance Determination

The project is located in an attainment area and no nonattainment areas are located in proximity to the project. Based on the project description, this project includes no activities that would require further evaluation under the Clean Air Act. Attached screenshots from the NEPAAssist website show that the Eagle Hill Road project is in attainment for all criteria pollutants. Source: NEPAAssist,

<https://nepassisttool.epa.gov/nepassist/nepamap.aspx>, Accessed April 28, 2026.
The project is in compliance with the Clean Air Act.

Supporting documentation

[Air Quality Backup.pdf](#)

[Areas meeting and not meeting air standards - Washington State Department of Ecology.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

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

Screen Summary

Compliance Determination

As of July 22, 2020, Washington State Department of Ecology (Ecology) notified HUD of the following: "Ecology has concluded that it is unnecessary for U.S. Department of Housing and Urban Development (HUD) to continue to send project information in order to receive Ecology's concurrence that the funding phase of the project is consistent with Washington's CZMP. Therefore, we are writing to inform you that HUD no longer needs to require applicants to send Ecology letters seeking our concurrence on projects for which HUD plans to release federal funding." Concurrence from Ecology for Coastal Zone Management (CZM) is no longer required

under a Part 58 or Part 50 Environmental Review in Washington State. However, at the time of project development, the activity may trigger review if it falls under other parts of the Coastal Zone Management Act (CZMA) regulations for federal agency activities (Title 15 CFR Part 930, Subpart C), or consistency for activities requiring a federal license or permit (Title 15 CFR Part 930, Subpart D) and will be subject to all enforceable policies of the Coastal Zone Management Program. It is during the local permitting process that a project might be subject to CZM and further review by Ecology. Reference: US Department of Housing and Urban Development, Environmental Guidance website.

<https://www.hud.gov/states/shared/working/r10/environment>. Accessed April 28, 2026.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Contamination and Toxic Substances

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

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

☒ ASTM Phase I ESA

☐ ASTM Phase II ESA

☐ Remediation or clean-up plan

☐ ASTM Vapor Encroachment Screening.

☐ None of the above

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

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

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

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

✓ No

Explain:

No recognized environmental conditions, controlled recognized environmental conditions or historical recognized environmental conditions were identified during the Phase I Environmental Site Assessment. The Phase I ESA for the project was performed to the ASTM-E1527-21 standard.

Yes

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

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

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

Yes

Explain:

✓ No

* Notes:

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

test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

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

Yes

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

✓ No

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

✓ Yes

No

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

Explain:

File Upload:

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

Non-radon contamination was found in a previous question.

6. How was radon data collected?

All buildings involved were tested for radon

- ✓ A review of science-based data was conducted

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

0.9

Provide the documentation* used to derive this value:

Review of CDC's publicly available county Radon data (attached) shows that in Pacific County, state reported pre-mitigation radon levels have been tested at least 29 times during the most recent 10-year period for which data is available, and the average result is 0.9 pCi/L, well below the EPA's recommended limit of 4.0 pCi/L. See documentation

File Upload:

[Radon Data_PacificCounty.pdf](#)

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

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

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

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. Radon testing indicated radon levels below 4.0 pCi/L. No mitigation is required. See attached documents for supporting materials and references. The project is in compliance with contamination and toxic substances requirements.

Supporting documentation

[Landau Eagle Hill Phase I ESA_rpt 041726_NoAttachments.pdf](#)
[Contamination-and-Toxic-Substances_Summary_and_Radon.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

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

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

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

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

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

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

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

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

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

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

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

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

4. Informal Consultation is required

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

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

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

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

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

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

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

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

Mitigation as follows will be implemented:

✓ No mitigation is necessary.

Explain why mitigation will not be made here:

The project underwent informal consultation and received letter of concurrence from USFWS for determination of "may affect, not likely to adversely affect". There are no ESA species under the purview of the NMFS within the action area. See attached materials.

Screen

Compliance Determination

This project May Affect, but is Not Likely to Adversely Affect, marbled murrelet and western snowy plover. Informal consultation was conducted with USFWS. There were no species under the jurisdiction of NMFS within the action area. This project is in compliance with the Endangered Species Act without mitigation.

Summary

Supporting documentation

[Landau Shoalwater Biological Assessment_rpt_05_07_26.pdf](#)

[Landau Eagle Hill Biological Assessment _Appendix G - Species List_ Washington Fish And Wildlife Office.pdf](#)

[Landau Eagle Hill Biological Assessment - Appendix F - Landau Red Plains Shoalwater Delineation_rpt Final_032026.pdf](#)

[Landau Eagle Hill Biological Assessment _Appendix E 60415 - 90percent Eagle Hill Road HH Report.pdf](#)

[Landau Eagle Hill Biological Assessment -Appendix D _FishMoving-Policy-StandardsProtocols.pdf](#)

[Landau Eagle Hill Biological Assessment - Appendix C - 60415 - 90percent Eagle Hill Road Plans.pdf](#)

[Landau Eagle Hill Biological Assessment - Appendix B Excerpt from 2012 Concurrence Letter.pdf](#)

[2026-06-16_Eagle Hill and RAISE Loop Projects_2026-0020758_Signed.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

All tanks were found to be farther than the acceptable separation distance using HUD calculation standards. No planned tanks were identified. A detailed description of the analysis and references is attached.

Supporting documentation

[Explosives Analysis Summary_EagleHill.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

2. Does your project meet one of the following exemptions?

- Construction limited to on-farm structures needed for farm operations.
- Construction limited to new minor secondary (accessory) structures such as a garage or storage shed
- Project on land already in or committed to urban development or used for water storage. (7 CFR 658.2(a))

☐ Yes

☒ No

3. Does “important farmland,” including prime farmland, unique farmland, or farmland of statewide or local importance regulated under the Farmland Protection Policy Act, occur on the project site?

- Utilize USDA Natural Resources Conservation Service’s (NRCS) Web Soil Survey <http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm>
- Check with your city or county’s planning department and ask them to document if the project is on land regulated by the FPPA (zoning important farmland as non-agricultural does not exempt it from FPPA requirements)
- Contact NRCS at the local USDA service center <http://offices.sc.egov.usda.gov/locator/app?agency=nrcs> or your NRCS state soil scientist <https://www.nrcs.usda.gov/wps/portal/nrcs/main/national/contact/states/> for assistance

✓ 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

The Eagle Hill Road project is not located on land in use as farmland or potentially valuable farmland. The project corridor occurs on a previously developed gravel road through undeveloped forested land, or through roads and parking lots that have already been developed. Attached is a map from USDA's web soil survey showing that no soils important for farming occur in the project area.

Supporting documentation

[Soil Map_ Eagle Hill Grading limits - 20260417_13035201132_1_Soil_Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires Federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

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

Yes

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

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

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

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

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

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

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

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

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

or other HUD assistance.

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

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

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

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

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

Describe:

✓ No

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

Yes

Describe:

✓ No

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

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

Select one of the following three options:

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

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

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

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

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

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

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary

Compliance Determination

The Eagle Hill Road project is located in Tokeland, Washington, and CISA flood mapping is not currently available. The FEMA Floodplain panel number 53049C0185D show that the project site is not located in the 0.2 PFA zone (Zone B, 500-year Floodplain) delineated on the floodplain panel. See attached documents for full analysis and references. The project is in compliance with Executive Orders 11988 and 13690.

Supporting documentation

[Floodplain_Backup\(1\).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" 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)].
	No, because the project consists solely of activities covered by the ACHP's PROGRAM COMMENT ON CERTAIN HOUSING, BUILDING AND TRANSPORTATION UNDERTAKINGS, as demonstrated in the ACHP PC Checklist.
✓	Yes, because the project includes activities with potential to cause effects (direct or indirect).

Step 1 – Initiate Consultation

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

- ✓ State Historic Preservation Offer (SHPO) Completed
- ✓ Advisory Council on Historic Preservation Completed

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

- | | |
|--|-----------|
| ✓ Dan Penn THPO, Chehalis Reservation | Completed |
| ✓ Kris Miller, THPO, Skokomish Indian Tribe | Completed |
| ✓ Lia Frenchmen THPO, Quinault Indian Nation | Completed |
| ✓ Robert Brunoe THPO, Tribes of Warm Springs | Completed |

Other Consulting Parties

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

Washington State Department of Archeological and Historic Preservation (DAHP) was consulted, and Tribal Historic Preservation Officers (THPOs) identified using TDAT (Tribal Directory Assessment Tool). No requests were received from tribal contacts. DAHP concurred with the determination of No Historic Properties Affected.

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
WA DAHP	Not Eligible	Yes	✓ Not Sensitive

Additional Notes:

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

[Tribe Letter EagleHill May 2026.pdf](#)

[APE Figures - Eagle Hill Road Project\(1\).pdf](#)

[SHPO NHP Letter 250906232.pdf](#)

[DAHP Section 106 Consultation Package - SBIT HUD-IHGBC 7-9-2025 s.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.

Based on the response, the review is in compliance with this section. Document and upload a map showing the location of the project relative to any noise generators below.

Noise generators were found within the threshold distances.

Screen Summary

Compliance Determination

No noise generating sources were found in the project vicinity. See attached documentation for analysis and sources.

Supporting documentation

[EagleHillRd Noise Summary and Backup.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

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

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

Yes

✓ 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. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[SSA_Backup.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 requires avoiding to the extent possible the long and short term adverse impacts associated with the destruction or modification of wetlands, and avoiding actions that directly or indirectly support new construction in wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory must be used as a primary screening tool, but observed or known wetlands not delineated on NWI maps must also be evaluated.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

1. Does this project involve new construction as defined in 24 CFR 55.10 and referenced in Executive Order 11990? The term "new construction" shall include grading, clearing, draining, dredging, channelizing, filling, diking, impounding, and related activities for any structure or facilities, including the siting of new manufactured housing units.

No

✓ Yes

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

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

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

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

You must determine that there are no practicable alternatives to wetlands development by completing the 8-Step Process.

Provide a completed 8-Step Process as well as all documents used to make your determination, including a map. Be sure to include the early public notice and the final notice with your documentation.

3. 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.

The project will result in unavoidable permeant impacts to 0.02 acre of palustrine wetlands. These impacts will be mitigated through the transfer of 0.03 acre of mitigation credits from the SBIT Ghost Dike Advanced Wetland Mitigation Site.

Which of the following mitigation actions have been or will be taken? Select all that apply:

Permeable surfaces

Natural landscape enhancements that maintain or restore natural hydrology through infiltration

Native plant species

Bioswales

Evapotranspiration

Stormwater capture and reuse

Green or vegetative roofs with drainage provisions

Natural Resources Conservation Service conservation easements

✓ Compensatory mitigation

Screen Summary

Compliance Determination

This project results in direct impacts to 0.02 acres of wetlands. An 8-step Process has been completed. With transfer of 0.03 acre of mitigation credits from the SBIT Ghost

Dike Advanced Wetland Mitigation Site, identified in the mitigation section of this review, the project will be in compliance with Executive Order 11990.

Supporting documentation

[wetland 8step memo.pdf](#)

[Final Wetland Bank Use Plan_revised.pdf](#)

[EPA_R10_401_WQC_2026_NWP_Seattle_12-18-25.pdf](#)

[Enclosure 2- DrawingsUpdated.pdf](#)

[ENClosure 1- Verification Letter.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 Backup.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No