



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

451 Seventh Street, SW
Washington, DC 20410
www.hud.gov

espanol.hud.gov

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

Project Information

Project Name:

The Salvation Army Anaheim Center of Hope Permanent Supportive Housing Phase 1 (“Center of Hope”)

Responsible Entity:

County of Orange/OC Housing and Community Development

Grant Recipient (if different than Responsible Entity):

State/Local Identifier:

CA/059

Preparer:

Jaclyn Canzone, OC Housing & Community Development

Certifying Officer Name and Title:

Bidwell, Director, OC Housing and Community Development

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable):

LSA Associates, Inc.
20 Executive Park, Suite 200
Irvine, California 92614
Attention: Romi Archer

Direct Comments to:

Stephen Stoewer, Senior Project Manager
City of Anaheim
201 S. Anaheim Boulevard, 10th Floor
Anaheim, CA 92805

Project Location:

1340 S Lewis St, Anaheim, CA 92805

Additional Location Information:

The proposed project is located in an industrial area of Anaheim.

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

The proposed project includes the construction of one 5-story residential building that will house up to 98 Permanent Supportive Housing units with two one-bedroom manager units for a total of up to 100 units. The proposed project total costs is approximately \$42,000,000 and will use up to 16 Project-Based Vouchers from the Orange County Housing Authority with an approximate annual value of \$246,144 for 20 years under the 2020 Supportive Housing Notice of Funding Availability. The project site is approximately 10.28 acres and is located at 1340 S. Lewis Street in the City of Anaheim. The Salvation Army is proposing to develop a 5.5 acre portion of the 10.28 acre site. The purpose and need of the project is to provide long-term housing solutions for individuals who are exiting a chronically homeless condition including homeless individuals with disabilities or mental illness in the County of Orange.

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

The purpose and need of the project is to provide long-term housing solutions for individuals who are exiting a chronically homeless condition including homeless individuals with disabilities or mental illness in the County of Orange.

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

The project area is predominantly industrial and has no residential uses around it. All of the surrounding land uses are manufacturing, warehousing, and Salvation Army offices and facilities.

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

[Project Location.pdf](#)

Funding Information

Grant Number	HUD Program	Program Name
2020HCPV	Public Housing	City of Anaheim Project-Based Voucher Program (50 PBV)
	Public Housing	16 Orange County Housing Authority Project-Based Vouchers

Estimated Total HUD Funded Amount: \$20,000,000 - Estimated combined 20-year value of the City of Anaheim and County of Orange PBV

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$42,000,000

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

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The 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 Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	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 <input type="checkbox"/> <input checked="" type="checkbox"/>	Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project's county or air quality management district is in non-attainment status for the following: Particulate Matter, <2.5 microns, Particulate Matter, <10 microns. This project does not exceed de minimis emissions levels or the screening

		level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act. Using the California Department of Fish and Wildlife's National Diversity Database (CNNDDB), the project site does not have endangered species active in the area. Currently, the project site is a vacant lot, and does not support a livable habitat for the endangered species present in the Anaheim Quad. Therefore, there is no effect to endangered species.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	A search of the Anaheim Fire Department's hazardous/flammable materials database was conducted, and 230 sites were identified in a one-mile radius. However, there is only one site close enough to pose a risk. The ABC Supply Company located 550 ft to the southeast of the project site houses above ground storage tanks (ASTs). Three of ASTs contain propane, isobutane, and mixed butane all stored in large quantities and above ambient pressure. However, there is a single-story concrete warehouse building between the tanks and the project site. A site assessment and blast analysis was conducted by ACTA to analyze blast risk using HUD's barrier analysis specifications. ACTA's blast

		analysis concluded that the adjacent warehouse will act as a thermal barrier sufficient to shield persons on the project site in the open or residents and buildings from damage risk from fireballs, or heat flux in the event of ignition of the pressurized chemicals. The separation distance for the project is acceptable due to the adjacent warehouse blocking potential heat flux and fireball accidents. The project is in compliance with explosive and flammable hazard requirements.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act. Currently, the project site is classified as Urban and Built-Up land. Therefore, there would be no effect to agricultural land.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	This project does not occur in a floodplain. 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	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Based on the project description the project has No Potential to Cause Effects. 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 <input checked="" type="checkbox"/> <input type="checkbox"/>	A Noise Assessment was conducted. The noise level was normally unacceptable: 65.3 db. See noise analysis. 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	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	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 <input type="checkbox"/> <input checked="" type="checkbox"/>	Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990.

Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. The project is in compliance with Executive Order 12898. The project is located in Census Tract 863.03 which does not have a high residential population due to its location in an industrial area of Anaheim. Because the project would result in the establishment of new permanent support housing for homeless individuals and families in Anaheim and Orange County, it would not result in negative impacts to environmental justice populations.

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

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

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

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		

Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The proposed project is listed in the City's Development Activity map created by the City's Planning and Zoning Department. Currently, the project site is zoned as industrial, however, it allows for transitional housing. Therefore, the project is not inconsistent with the City's Planning and Zoning, or the Anaheim Comprehensive Housing Strategic Plan.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	Based on the Soil Map of the Department of Agriculture's Natural Resources Conservation Service, the project location is underlain by Metz loamy sand, and Metz loamy sand, moderately fine substratum. Metz loamy sand is considered to be a somewhat excessively drained soils that formed in alluvial material form mixed, but dominantly sedimentary rocks. The project location is located at an approximate elevation of 157' feet above mean sea level (amsl) and is relatively flat. The natural drainage is poorly drained, and the runoff for this type of soil is low. With the installment of the project, the site will be connected to local storm drains.
Hazards and Nuisances including Site Safety and Noise	3	The Metrolink Orange County line is adjacent to the project site. The Orange line runs daily from 4:00 am to 12:00 am. Interstate 5 (I-5) is less than 2 miles west of the project site. The railway noise generates a normally unacceptable amount of sound with DNL of 64.8-69.1. The addition of construction noise will not generate higher-than-usual decibels during project construction. Mitigation Measure: Due to the proximity of the rail line to the project site, fencing would need to be implemented. Per Metrolink Engineering and Construction Standards, fencing must be at least 20 feet away from the track lines.
Energy Consumption	2	Construction will utilize California Housing's Green Criteria, and the City's Green building code which includes the incorporation of energy-saving construction and design. In addition, the project would be subject to the City's requirements to install Energy Star appliances in the dwelling units.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	The unemployment rate within California is 3.9% (December 2019), while the national average is 3.6%. As of November of 2019, Anaheim's unemployment rate is 2.5%. Currently, the unemployment rate in Anaheim is in a stagnant projection, and has been maintaining the current

		unemployment rate as of 2019. The project is housing project and would not affect employment or income.
Demographic Character Changes, Displacement	1	Population and household trends have been steadily increasing between 2010 and 2018, the overall population of Anaheim has increased by 4.6%. As of 2018, the City of Anaheim's population was 352,005, comparatively to 2010's approximate population of 336,443. Because the project would serve to house homeless and under-housed populations with new dwellings, no displacement would occur.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	The project site is located in two different school districts, Anaheim Elementary School District (AESD), and the Anaheim Union High School District (AUHSD). The closest school in the AESD is the Paul Revere Elementary School which is approximately 1.4 miles away from the project location. The closet school in the AUHSD is Sycamore Junior High school located approximately 2.9 miles away from the project location, and the closest high school is Katella High School which is 1.5 miles away from the project location. While the project is a residential project, it is not expected to create additional demand for schools or impact capacity because the populations that would occupy the project would generally not include families with school age children.
Commercial Facilities	2	In proximity to the project site, retailers include: local restaurants, the Anaheim Marketplace, local retail shops, medical clinics, and laundry facilities. There is a gas station less than 0.8 miles to the northeast of the project site, and there is a Walmart Neighborhood market store 1.0 miles to the northwest. Because the project site is in an industrial area, residential support uses like grocery stores would need to be accessed via public transportation, walking or bicycling.
Health Care and Social Services	1	The Anaheim Global Medical Center (Global Medical Center) is the nearest hospital to the project site, located approximately 1.1 miles way. Global Medical Center is a non-profit regional medical center that is committed to providing high quality, professional, and compassionate healthcare. Global Medical Center offers a full range of inpatient, emergency services, specialty services, and a trauma center. In addition, there are several medical clinics,

		urgent care facilities, vision, and dental offices within a 5 mile radius of the project site.
Solid Waste Disposal / Recycling	2	The City of Anaheim contracts with Republic Services which offers a wide range of solid waste services for the project location. Along with standard trash disposal service, bulky item collection, container exchange, and container rentals are offered by Republic Services.
Waste Water / Sanitary Sewers	2	Orange County Sanitation District (OCSD) manages Anaheim's sewer and water facilities. The OCSD treats an average 130 million gallons of wastewater per day (mgd). The sanitary sewer is transported through Anaheim's sewers serviced by Anaheim's Public Works. At this location, the wastewater is treated physically and biologically before being recharged into the Groundwater Replenishment Supply.
Water Supply	2	The City of Anaheim's water supply comes from wells and water imported from Northern California and also the Colorado River. Anaheim is also involved with the Groundwater Replenishment System (GWRS), a joint effort of the Orange County Water District (OCWD), Orange County Sanitation District (OCSD), and various Orange County cities. GWRS recycles wastewater and uses advanced treatment technologies to clean wastewater and returns it into the recharge basins in Anaheim. Currently, the GWRS program has produced 308,768,448 gallons of water to Orange County. The project site will have recycled groundwater, per the Anaheim South Recycled Water Project.
Public Safety - Police, Fire and Emergency Medical	2	The Anaheim Police Department (APD) is committed to serving the community through teamwork and constant pursuit of excellence. The nearest police station is the main branch of the APD, at 425 S Harbor Boulevard. The Anaheim Fire & Rescue (AFR) is committed to ensuring the safety and welfare of the public through the fire and medical services that they provide. The AFR has 270 employed staff for the residential population of 350,000. The nearest fire station to the project is the AFR Station #3 located at 1717 S Clementine Street.
Parks, Open Space and Recreation	2	Anaheim has an ample amount of parks and recreation centers designed to take advantage of green spaces that provide a wide range of recreational activities for community members. The closest park is the Paul Revere Park located approximately 1.1 miles away. The park has a children's play area with various playground equipment, a fitness zone, a sand volleyball court and picnic tables. The Downtown Anaheim Community center serves as the

		closest community center. The center serves as a senior citizen activity center, an community driven art gallery, and space for the community to rent rooms for private events.
Transportation and Accessibility	2	Located less than 0.2 miles away from the location site is the Ball-Lewis Stop on Orange County Transit Authority (OCTA) Line 46. Within a one block radius of the project site there are 5 OCTA bus stops. The Anaheim Regional Transportation Intermodal Center (ARTIC) offers various bus lines, local and regional and also offers the Anaheim Metrolink station. ARTIC is located 2.8 miles away from the project site.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	No impacts to unique natural features are anticipated as the project is located within a vacant lot. The property does not include important farmland or other "Farmland of Statewide or Local Importance" as identified as the USDA. Therefore, no agricultural Land would be taken out of production. The closest water resource near the project site is the Santa Ana River, approximately 1.3 miles away. Due to the location of the project site, the project would not interfere with any water resources.
Vegetation, Wildlife	2	The projection location is undeveloped and occupied by shipping containers. The chance of wildlife in the project boundaries is low due to the lack of vegetation in the area. There are 6 trees located at the northeastern portion of the project site. The project location is located within a light commercial and industrial area of Anaheim.
Other Factors		

Additional Studies Performed:

The studies performed on the project site are as followed: 1. [Noise Analysis](#) 2. [Air Quality Memo](#) 3. [SHPO consultation](#) 4. [Traffic Analysis](#) 5. [Acceptable Separation Distance \(ASD\)/Explosion Hazard Analysis](#) 6. [Phase 1 Environmental Site Assessment](#).

Field Inspection (Date and completed by):

Romi Archer 1/31/2020

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

Anaheim Fire Department Station #7: (714)-765-4311 Anaheim Fire Department, Hazardous Materials Anaheim Police Department: (714)-765-1900

List of Permits Obtained:

Grading permit Building permit Occupancy permit

Public Outreach [24 CFR 50.23 & 58.43]:

None conducted.

Cumulative Impact Analysis [24 CFR 58.32]:

This analysis determines whether the project's implementation would contribute potential cumulative impacts that would affect the community adversely. The project would have no cumulative adverse impacts to the following issues: Airport Hazards, Coastal Resources/Coastal Zones, Flood Insurance/Floodplain, Endangered Species, Farmlands, Sole Source Aquifers, Historical Resources, Wetland, Wild and Scenic Rivers, Community Facilities and Services, Energy Consumption, Socioeconomics and Natural Features. Under the Clean Air Act, the project would not exceed the federal de minimis threshold pursuant to the 1990 amendment to the Federal Clean Air Act or local SCAQMD for construction or operation. The project is below these thresholds, the project contribution to potential cumulative impacts would be minimal. During the project's construction, temporary increases in noise levels are anticipated. The project would be required to comply with City Noise Ordinances, and would be required to comply with noise mitigation measures regarding the design of the building.

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

There are very few opportunities to provide permanent support housing in Orange County in an area where there are limited existing residences. This project is rather unique because it is located in an industrial area where there are few opponents to this type of land use. Therefore, additional sites were not evaluated for consideration of this type of residential use.

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

Under the No-Action Alternative the parcel will remain undeveloped, and used as storage for trucks and shipping containers.

Summary of Findings and Conclusions:

The proposed project is beneficial to the underrepresented homeless population, by creating permanent housing units. Overall, the project will be easing the housing crisis in Southern California. Currently, the project site is located in an industrial and light commercial area, which will eliminate potential conflicts with existing residential uses. All potential impacts have been mitigated and fall within standard construction and construction nuisance abatement measures.

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

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into

project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Complete
Noise Abatement and Control	Building facade upgrades such as higher than standard construction or double-paned windows are required for dwelling units represented by Receptor R-1.A Mechanical ventilation systems such as air conditioning are required for all dwelling units so that windows can remain closed for a prolonged period of time. In addition, exterior wall assembly shall sheet or exceed the assumed exterior wall assembly that include fiber cement board siding or three-coat cement plaster, one layer of 0.5-inch-thick plywood or OSB, 2-inch x 4-inch wood stud wall channels spaced at 16 inches and a minimum R-19 fiberglass insulation, and one layer of 5/8 inch-thick Type X gypsum board. All windows in the residential rooms shall have a minimum window STC rating of 28. See Noise Impact Analysis memorandum.	N/A	
Hazards and Nuisances including Site Safety and Site-Generated Noise	Due to the proximity of the rail line to the project site, fencing would need to be implemented. Per Metrolink Engineering and Construction Standards, fencing must be at least 20 feet away from the track lines.	N/A	
Permits, reviews and approvals	Grading permit Building permit Occupancy permit	N/A	
Cultural/Archaeology	A qualified professional archaeologist shall be contacted in the event that cultural resources and/or human remains are encountered during construction activities. If any such resources are discovered, contractors should stop work in the immediate area of the find, and contact the archaeologist to assess	N/A	

the nature of the find. Upon completion of any monitoring activities, the archaeologist should prepare a report to document the methods and results of monitoring activities. This report should be submitted to the SCCIC. If human remains are encountered, the regulatory process outlined in Health and Safety Code Section 7050.5 must be followed, which involves coordination with the Native American Heritage Commission and a Native American Most Likely Descendant

Greenhouse Gas Reduction/Sustainability

The applicable California Department of Resources Recycling and Recovery (CalRecycle) Sustainable (Green) Building Program Measures are the following: 1) Recycle/reuse at least 50 percent of the construction material (including, but not limited to, soil, mulch, vegetation, concrete, lumber, metal, and cardboard) (CalRecycle 2019a). 2) Use green building materials such as those materials that are rapidly renewable or resource efficient, and recycled and manufactured in an environmentally friendly way, for at least 10 percent of the project, as specified on the CalRecycle website (CalRecycle 2019b).

N/A

South Coast Air Quality Management District Rule 403 (Fugitive Dust)

The following measures from the South Coast Air Quality Management District (SCAQMD) Rule 403 are required for fugitive dust suppression: 1) Apply nontoxic chemical soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for 10 days or more). 2) Water active sites at least twice daily (locations where grading is to occur will be thoroughly watered prior to earthmoving). 3) Cover all trucks hauling dirt, sand, soil, or other loose materials, or maintain at least 2 feet (ft) (0.6 meter [m]) of freeboard (vertical

N/A

space between the top of the load and the top of the trailer) in accordance with the requirements of California Vehicle Code Section 23114. 4) Pave construction access roads at least 100 ft (30 m) onto the site from the main road. a?cents Reduce traffic speeds on all unpaved roads to 15 miles per hour (mph) or less.

Mitigation Plan

All the listed conditions and mitigation measures will be incorporated in the design of the project, notes on the grading plans or conditions of approval on the Building Permit.

[Mitigation Plan.pdf](#)

Determination:

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

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

Preparer Signature: Jaclyn Canzone Date: 9/3/2020

Name/Title/Organization:

Jaclyn Canzone / Staff Specialist / OC Housing & Community Development

Certifying Officer Signature: Julia Bidwell Date: 9/9/2020

Name/Title:

Julia Bidwell / Director OC Housing & Community Development

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

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

[1 Airport.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

[2CBRS Map.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

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

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

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

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

Yes

Screen Summary

Compliance Determination

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

Supporting documentation

[10 Floodplain.pdf](#)

Are formal compliance steps or mitigation required?

Yes

- ✓ No

Air Quality

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

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

Yes

No

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

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

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

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

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

Ozone

Particulate Matter, <2.5 microns

- ✓ Particulate Matter, <10 microns

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

Particulate Matter, <2.5 microns µg/m3 (micrograms per cubic meter of air)
Particulate Matter, <10 microns µg/m3 (micrograms per cubic meter of air)

Provide your source used to determine levels here:

AQ memo.

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:

Particulate Matter, <2.5 microns	µg/m3 (micrograms per cubic meter of air)
Particulate Matter, <10 microns	µg/m3 (micrograms per cubic meter of air)

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: Particulate Matter, <2.5 microns, Particulate Matter, <10 microns. This project does not exceed *de minimis* emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Zone Management Act

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

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

Yes

No

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

Screen Summary

Compliance Determination

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

Supporting documentation

[5 Coastal zone.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

Explain:

Based on the searches on Envirostor and GeoTracker, the site has not been recorded as a site containing hazardous materials. Other nearby sites have been noted as closed in the reports and should not affect the site with regard to proximity issues of hazardous substances.

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

Yes

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project

occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.

Supporting documentation

[Geotracker.pdf](#)

[EnviroStor.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.

This selection is only appropriate if none of the activities involved in the project have potential to affect species or habitats. Examples of actions without potential to affect listed species may include: purchasing existing buildings, completing interior renovations to existing buildings, and replacing exterior paint or siding on existing buildings.

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

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.

Screen Summary

Compliance Determination

This project will have No Effect on listed species due to the nature of the activities involved in the project. This project is in compliance with the Endangered Species Act. Using the California Department of Fish and Wildlife's National Diversity Database (CNNDDB), the project site does not have endangered species active in the area. Currently, the project site is a vacant lot, and does not support a livable habitat for the endangered species present in the Anaheim Quad. Therefore, there is no effect to endangered species.

Supporting documentation

[7 Endangered Species\(1\).pdf](#)

[7 Endangered Species Quad.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

A search of the Anaheim Fire Department's hazardous/flammable materials database was conducted, and 230 sites were identified in a one-mile radius. However, there is only one site close enough to pose a risk. The ABC Supply Company located 550 ft to the southeast of the project site houses above ground storage tanks (ASTs). Three of ASTs contain propane, isobutane, and mixed butane all stored in large quantities and above ambient pressure. However, there is a single-story concrete warehouse building between the tanks and the project site. A site assessment and blast analysis was conducted by ACTA to analyze blast risk using HUD's barrier analysis specifications. ACTA's blast analysis concluded that the adjacent warehouse will act as a thermal barrier sufficient to shield persons on the project site in the open or residents and buildings from damage risk from fireballs, or heat flux in the event of ignition of the pressurized chemicals. The separation distance for the project is acceptable due to the adjacent warehouse blocking potential heat flux and fireball accidents. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

[ACTA Salvation Army HUD Memo Final 3-13-2020.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:

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act. Currently, the project site is classified as Urban and Built-Up land. Therefore, there would be no effect to agricultural land.

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. The project is in compliance with the Farmland Protection Policy Act. Currently, the project site is classified as Urban and Built-Up land. Therefore, there would be no effect to agricultural land.

Supporting documentation

[9 Farmlands.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:

[10 Floodplain\(1\).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. The project is in compliance with Executive Order 11988.

Supporting documentation

[FIRMETTE_48bdc930-0d7a-11ea-955b-0050569c5fb0.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

General requirements	Legislation	Regulation
<p>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</p>	<p>Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)</p>	<p>36 CFR 800 "Protection of Historic Properties" http://www.access.gpo.gov/nara/cfr/waisidx_10/36cfr800_10.html</p>

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).

Threshold (b). Document and upload the memo or explanation/justification of the other

determination below:

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

Screen Summary

Compliance Determination

Based on the project description the project has No Potential to Cause Effects. The project is in compliance with Section 106.

Supporting documentation

[Salvation Army HUD NEPA archaeo memo.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

Indicate noise level here: 65.3

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.

Indicate noise level here: 65.3

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:

Building facade upgrades such as higher than standard construction or double-paned windows are required for dwelling units represented by Receptor R-1.A Mechanical ventilation systems such as air conditioning are required for all dwelling units so that windows can remain closed for a prolonged period of time. In addition, exterior wall assembly shall meet or exceed the assumed exterior wall assembly that include fiber cement board siding or three-coat cement plaster, one layer of 0.5-inch-thick plywood or OSB, 2-inch x 4-inch wood stud wall channels spaced at 16 inches and a minimum R-19 fiberglass insulation, and one layer of 5/8 inch-thick Type X gypsum board. All windows in the residential rooms shall have a minimum window STC rating of 28. See Noise Impact Analysis memorandum.

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: 65.3 db. See noise analysis. The project is in compliance with HUD's Noise regulation with mitigation.

Supporting documentation

[Noise Memo 20200414.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

[13 Sole Source Aquifers.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

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

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

No

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

Yes

Screen Summary

Compliance Determination

Based on the project description this project includes no activities that would require further evaluation under this section. The project is in compliance with Executive Order 11990.

Supporting documentation

[14 Wetlands.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

[15 Wild and Scenic Rivers.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:

No, the environmental impacts are not disproportionately high for low-income, and minority communities.

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

Screen Summary

Compliance Determination

Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. The project is in compliance with Executive Order 12898. The project is located in Census Tract 863.03 which does not have a high residential population due to its location in an industrial area of Anaheim. Because the project would result in the establishment of new permanent support housing for homeless individuals and families in Anaheim and Orange County, it would not result in negative impacts to environmental justice populations.

Supporting documentation

[16 Environmental Justice.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No