

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

Project Information

Project Name: The-Place-at-Burlington

HEROS Number: 900000010307747

Responsible Entity (RE): BURLINGTON COUNTY, 49 RANCOCAS ROAD MT
HOLLY NJ, 08060

RE Preparer: Monica Rego

State / Local Identifier:

Certifying Officer Jennifer Hiros
r:

**Grant Recipient (if different than Responsible
Entity):**

Point of Contact:

**Consultant (if applicab
le):**

Point of Contact:

Project Location: , Burlington, NJ 08016

Additional Location Information:

The Place at Burlington is located near the intersection of John F. Kennedy Way and Salem Road in Burlington Township, Burlington County, NJ. The project will be developed on a +/- 10-acre parcel identified on the Township Tax Map as Block 105.1, Lot 6.02, presently owned by the Township. The project is located in close proximity

to Route 130, Route 295, and the New Jersey Turnpike. The proposed project site is located in a residential neighborhood and is bounded by a residential townhouse development under construction to the north, single-family detached homes to the south, J.F. Kennedy Way and commercial properties to the west, and open space/undeveloped property to the east. Various medical and healthcare-related buildings are located along Salem Road, just north of and within walking distance of the proposed project site. The Place at Burlington has access to Route 130 and Route 295, as well as access to the Burlington South Light Rail stop 3 miles to the north of the project site. NJ Transit Bus 413 route runs along County Route 541 to the east of the proposed project and a bus stop 2 miles from the site.

Direct Comments to:

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

The Place at Burlington will be a 100% affordable, non-inclusionary, multifamily community comprised of 84 units. The proposed project entails the new construction of rental housing of 84 units including 6 one-bedrooms, 48 two-bedrooms, and 30 three-bedroom units. 11 of the 84 units will be HOME-assisted units that will consist of 3 one-bedroom units, 6 two-bedroom units, and 2 three-bedroom units. 5 of the 11 HOME-assisted units will be set aside for formerly homeless individuals and/or families, and 5 units will be set aside for disabled and homeless veterans to be referred to the project by the Burlington County Continuum of Care through the Burlington County's Rapid Re-housing Program. Each unit will have its own private entrance, amount four (4) three-story buildings. there are no elevators or common areas in the residential buildings. rents for the apartments will be restricted to a combination of 60% AMI, 50%, and 30% AMI. The project will include a stand-alone community building to be used by residents for programmed activities. The community building houses a common room, a kitchen/catering area (no cooking), property management offices, and storage areas for maintenance equipment. An outdoor patio area adjacent to the community building will also be provided. All units will include washer and dryer hookups, dishwashers, frost-free refrigerators, linen closets, pantries, blinds, ample storage space, luxury flooring, and air conditioning. the apartments will be Energy Star certified. There will be 188 parking spaces for residents and guests adjacent to the buildings. parking is unassigned and designed to accommodate an average of two (2) spaces per unit. This also includes 14 accessible parking spaces. Charging stations for electric vehicles will also be included. This community has received an award of 9% LIHTC credits.

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

The purpose of the proposed project is to construct 84 affordable, non-inclusionary apartments in a newly constructed multifamily community. The Place at Burlington will be an income-restricted affordable housing that will be deed restricted as affordable for 32 years. The proposed project is necessary to provide desperately needed affordable housing for the surrounding areas and will satisfy the New Jersey court's identification of the need for additional affordable housing in Burlington Township.

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

The Place at Burlington is located near the intersection of John F. Kennedy Way and Salem Road in Burlington Township, Burlington County, NJ. The project will be developed on a +/- 10-acre parcel identified on the Township Tax Map as Block 105.1, Lot 6.02, presently owned by the Township. The project is located in close proximity to Route 130, Route 295, and the New Jersey Turnpike. The proposed project site is located in a residential neighborhood and is bounded by a residential townhouse development under construction to the north, single-family detached homes to the south, J.F. Kennedy Way and commercial properties to the west, and open space/undeveloped property to the east. Various medical and healthcare-related buildings are located along Salem Road, just north of and within walking distance of the proposed project site. The Place at Burlington has access to Route 130 and Route 295, as well as access to the Burlington South Light Rail stop 3 miles to the north of the project site. NJ Transit Bus 413 route runs along County Route 541 to the east of the proposed project and a bus stop 2 miles from the site.

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

Determination:

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

Approval Documents:

7015.15 certified by Certifying Officer on:

7015.16 certified by Authorizing Officer on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name
M22-DC-34-0212	Community Planning and Development (CPD)	HOME Program

Estimated Total HUD Funded, Assisted or Insured Amount: \$550,000.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$24,416,385.00

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. The closest airport is Trenton Mercer Airport located approximately 84,480 feet northeast of the proposed project. Newark Airport, the most relatively Large/Medium Hub is located around 290,400 feet to the northeast. The nearest Military Airfield, Lakehurst Naval Air Station, is located 158,400 feet to the east. Therefore, the proposed project is not within an Airport Clear Zone or Accident Potential Zone.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	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		
<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project's county or air quality management district is in non-attainment status for the following: Carbon monoxide, Ozone, Particulate Matter, <2.5 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.</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>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.</p>
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. The adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. 24 CFR Part 58.5(i)(2)(i) states that "it is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemical and gases and radioactive substances, where a hazard could affect the health and safety of occupants..." A Preliminary Assessment Report and Phase I Environmental Site Assessment (August 2022) was performed and revealed the following Recognized Environmental Conditions (RECs) which require additional investigation/remediation/mitigation: HREC-1/CREC-1 -Historically Applied Pesticides. Based on a review of aerial</p>

		<p>photographs, it appears that portions of the Subject Site were historically used for agricultural purposes from at least 1930. A historically applied pesticide (HAP) site investigation was completed pursuant to the New Jersey Department of Environmental Protection (NJDEP) Site Remediation and Waste Management Program and revealed that Arsenic impacts were present at the Subject Site. Remedial action was performed consisting of excavating and relocation off-site of the identified arsenic impacts on the Subject Site, with the exception of the northwest corner which could not be excavated due to the presence of NJDEP-regulated wetlands. The remedial action selected to address the arsenic-impacted soil located within the mapped wetlands area was the institution of engineering control in the form of restrictive fencing. Periodic monitoring and reporting to the NJDEP will be required to maintain the protectiveness of the restrictive fencing remedy. The limits of the protective fencing are presented in the Attachment - Approximate Limits of Engineering Controls. No additional hazardous sites were identified within 3,000 feet of the project (Known Contaminated Site List). The proposed project site does not contain any structures, therefore asbestos-containing materials and lead-based paint are not of concern.</p>
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>This project has been determined to have No Effect on listed species. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act. An official species list from the local U.S. Fish and Wildlife Service field office was requested through the U.S. Fish & Wildlife Service Information for Planning and</p>

		<p>Consultation (IPAC) to assist in the evaluation of potential impacts of the proposed project. The list identifies species that should be considered under Section 7 of the Endangered Species Act, a project tracking number, and other pertinent information from the field office. The report indicates that there are 4 threatened, endangered, or candidate species on the species list. However, there are no critical habitats within the proposed project area under the jurisdiction of the Fish and Wildlife Service. A review of the Landscape Project 3.3 mapping indicates that the proposed project site is adjacent to a Species Based Habitat Rank 1- Habitat Type- Wetlands. Within this habitat, there is a Species Based Habitat Rank 3 (vernal pool) for the Great Blue Heron and the Black-crowned Night-Heron, which is a State Threatened Species. The Landscape Project classifies habitat patches from Rank 1 to Rank 5. Classifications are based on the status of the species for which the patch provides habitat and whether there are any documented occurrences of a species of concern. Critical habitats of concern are those containing land with Rank 3 to Rank 5. Natural Heritage Database, the Office of Natural Lands Management (ONLM) has identified 343 Natural Heritage Priority Sites, representing some of the best remaining habitats for rare species and rare ecological communities in the state. Although the primary focus of these sites is rare plant species and ecological communities, the DEP Endangered and Nongame Species Program also provided key information and assisted with the delineation of a number of the sites that encompass significant habitats for rare animals. The proposed project site is not identified on the National Heritage Priority Sites in</p>
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		<p>NJ Mapping. In an email dated July 20, 2022, from the NJDEP indicated that "Our vernal habitat specialist of the T&E Unit completed their review on 3/22/2022 - confirming the presence of a certified vernal pool but determined that no adverse impacts are anticipated from the project. Therefore, there are no T&E concerns with the project". Since the proposed project is proximate to habitats of Rank 3 species and the potential occurrence of Black-crowned Night-Heron, measures to avoid any negative impacts on the critical habitat have been incorporated into the project design. Based on the approved site plans, no activity associated with the proposed project will occur within or adjacent to the Rank 3 Habitat. The proposed project will leave all existing acres of wooded areas undeveloped and no tree removal or activity is proposed that would disturb the species. Finally, there will be no wetland buffer disturbances as no new construction is proposed in the buffer area. Therefore, the proposed project will not permanently displace or in any way impact any critical wildlife or adversely affect them. In order to minimize/eliminate effects to the Black-crowned Night Heron Rank 3 area, the procedures and protocols set forth in the Mitigation Measures and Conditions of this report will be implemented by the developer.</p>
<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.</p>
<p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project includes activities that could potentially convert agricultural land to a non-agricultural use, but an exemption applies. The project is in</p>

		compliance with the Farmland Protection Policy Act. The project is not on soils classified as prime farmland, farmland of statewide importance, or NJ Farmland Preservation Program land.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The Preliminary Screening identified no noise generators in the vicinity of the project. The project is in compliance with HUD's Noise regulation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is located on a sole source aquifer. Following consultation with the regional EPA office, it has been determined that this project will not contaminate the aquifer and create a significant hazard to public health. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	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 JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. Based on data provided by Environmental Justice information from the EJ View Map, the subject property is located within an area that contains approximately 12% of the population that is considered to be low-income. As a result, the proposed project has been

		<p>determined not to have adverse environmental impacts on low-income communities. In addition, the area of the proposed project generally has overall Pollution and Source values less than the State average. The proposed project area has a higher-than-average minority population. The proposed project would involve the construction of 84 units of affordable housing units that will benefit low-income and minority populations. Therefore, the proposed project meets the objectives set forth in Executive Order 12898 as well as HUD's Departmental Strategy 2012: * Equal access to safe and healthy housing by all Americans * Mitigating risks to communities in disaster-prone areas * Providing access to affordable, accessible, quality housing free of hazards to residents' health * Working to achieve inclusive, sustainable communities free from discrimination Accordingly, no negative impacts will occur to subject populations as a result of the proposed project.</p>
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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	2	The proposed project was reviewed by the Township of Burlington Planning Board and	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Zoning / Scale and Urban Design		received preliminary and final major site plan approval.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	The proposed project site is currently undeveloped. There is minimal topographic relief across the site. A Geotechnical Engineering Report was prepared by Terracon Consultants, Inc. The test borings performed for this exploration indicated that the site subsurface soils are generally favorable to support the proposed structure on conventional shallow foundations, subsequent to the performance of a ground improvement program for Buildings 1 and 2. The proposed project will include the installation of new storm drains and inlets and incorporates stormwater quality management consisting of 5 detention basins in accordance with New Jersey Stormwater Management of existing drains that will enhance and improve the drainage and stormwater runoff from the existing development.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	3	There are no unusual significant hazards or nuisances associated with the proposed project site. There may be some temporary noise impacts to the surrounding area during construction activities, and Best Management Practices for site safety during construction	1. Outfit all construction equipment with operating mufflers. 2. Fully comply with all applicable local ordinances. 3. Eliminate/minimize night construction activities.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>activities must be implemented. Prudent site construction and noise mitigation procedures will be implemented during construction to ensure that noise and site safety hazards are eliminated to the degree practicable. HUD policy requires that the proposed site and adjacent areas be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of occupants of the property or conflict with the intended use of the property. Based on a review of the Site Investigation/Remedial Investigation/Remedial Action Workplan prepared by Marathon Engineering & Environmental. It appears that a small portion of the proposed project site (northwest corner) has been impacted by the presence of Historical Applied Pesticides (HAP). The portion of the site containing HAP above applicable NJDEP Direct Contact Residential Soil Remediation Standards has been approved to be addressed through the establishment of engineering and institutional controls, and a Response Action Outcome has been issued. The proposed remediation is protective of</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		public health, safety, and the environment. These measures will eliminate any potential health and safety exposure to future occupants. The new construction of the existing site will incorporate appropriate ADA requirements which will help eliminate existing potential tripping/site access hazards.	
Energy Efficiency			
SOCIOECONOMIC			
Employment and Income Patterns	1	The proposed project entails 100% affordable units which are greatly needed in the area. The proposed project will not have a long-term impact on employment or income patterns. However, there will be a short-term positive impact on the economy due to construction spending and construction jobs associated with the proposed project.	
Demographic Character Changes / Displacement	2	The proposed project is being constructed on an undeveloped parcel, will provide affordable housing for the area, and is located in an area that is currently predominantly residential. No demographic character changes or displacements are expected from the proposed project.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	Public school students residing in the proposed project would be served by the Burlington Township School District which operates four schools. There is	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		available capacity at these schools, resulting in limited to no impact on the local educational facilities.	
Commercial Facilities (Access and Proximity)	1	The location of the proposed project site will offer residents access to shopping and commercial services at the Willingboro Town Center, and a community-scale shopping center located on County Route 541 (Mt. Holly Road) and Bromely Boulevard less than three miles to the northwest of the proposed project. Residents will not necessarily require a car to access shopping and commercial service opportunities. As the proposed project consists of new housing for low-income residents, the proposed project will have a positive impact on the demand for retail services in the vicinity.	
Health Care / Social Services (Access and Capacity)	2	Virtua Willingboro Hospital, part of southern New Jersey's Virtua system, is located less than a quarter mile from the proposed project site. The hospital is part of a medical campus that includes office buildings with primary care physicians, specialists, and clinics affiliated not only with Virtua but also with Cooper Medical Center in Camden and the Children's Hospital of Philadelphia (CHOP). Acute Specialty Hospital of South Jersey, located on Sunset Road, provides long-term care for	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		patients with complex medical issues. The proposed project will have little to no additional impact on the demand for healthcare services and there should be little to no adverse effect on the social services that are already available in the area.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The proposed project would generate construction debris during the construction period, however, would not increase the long-term generation of solid waste. The proposed project will utilize the existing excellent solid waste and recycling facilities of Burlington Township and Burlington County and given that the proposed project consists of housing for low-income residents in need in the area, the proposed project will have no adverse long-term impact on solid waste disposal/recycling services.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The new construction will utilize the existing Township run wastewater infrastructure and no adverse impacts are anticipated. A will-serve letter has been issued by Burlington Township DPW indicating available capacity at the wastewater treatment plant.	
Water Supply (Feasibility and Capacity)	2	The new construction will utilize the existing potable water infrastructure and no adverse impacts are anticipated. A will-serve letter has been issued by Burlington	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		Township DPW indicating available capacity at the water pump station.	
Public Safety - Police, Fire and Emergency Medical	2	The Burlington Township Police Department is located 4 miles from the proposed project site and the Willingboro Police Department is located .7 miles from the proposed project site. Municipal offices which include the police department are located 2.4 miles from the proposed project site. The Willingboro Fire Department is located .7 miles from the proposed project. Given the proximity and robust nature of Burlington Township and Willingboro Township's, public safety infrastructure, the proposed project will have little to no additional impact on the demand for police protection and fire protection.	
Parks, Open Space and Recreation (Access and Capacity)	2	The proposed project site has excellent proximity to Sylvan Lake in Burlington Township which offers swimming and a children's playground. This facility is less than a mile and a half from the proposed project site. Burlington City operates an indoor recreation building (Keegan Center) that offers programs and classes for adults. Residents of Burlington Township can participate in both adult and youth programs at Keegan Center. It is not anticipated that the proposed project will result in significant	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		additional use of these facilities, therefore no adverse effect on existing parks, open spaces, and recreational facilities is anticipated.	
Transportation and Accessibility (Access and Capacity)	2	The proposed project site enjoys excellent highway access. The site is approximately 1.2 miles southeast of U.S. 130, a multi-lane arterial that connects with I-195 to the north. I-195 runs east to the Jersey Shore and west to Trenton. The proposed project will also be less than three miles from the Interstate 295 interchange on Burlington-Mt. Holly Road (County Route 541) in Burlington Township. The New Jersey Turnpike is less than a mile further east of I-295, also on Burlington-Mt. Holly Road. No long-term adverse impact on transportation and accessibility is anticipated.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	3	The proposed project site is currently a relatively flat parcel that is predominantly an open farm field with a wooded wetland area within the eastern portion. Based on the Threatened and Endangered Species Habitat Suitability Assessment, there is a Species Based Habitat Rank 3 for Great Blue Heron and the Black-crowned Night-Heron. There will be some minor tree removal to accommodate the proposed project, the extent of	1. Soil erosion and sediment control measures shall be installed prior to construction activities in accordance with applicable NJ Soils and Sediment Control Regulations and shall be monitored daily (by contractor) to ensure effectiveness and maintenance (cleaning, repair, and or replacement) performed as necessary. 2. Construction stormwater shall be managed on-site

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
		<p>which will be minimized to the degree feasible. Best Management Practices as set forth in the Mitigation Measures and Conditions shall be employed to minimize any potential impacts. Accordingly, there will be little to no adverse impacts from the project on existing natural resources.</p>	<p>via temporary detention structures during the course of demolition and construction activities. No stormwater discharge shall be permitted to adjacent properties containing wetlands or threatened and endangered species habitat. 3. No hazardous materials or petroleum products shall be stored on-site in the vicinity of the wetlands and threatened and endangered species habitat. 4. Eliminate night demolition and construction activities in the vicinity of the threatened and endangered species habitat. 5. Minimize construction vehicles and personnel traffic within the wetland buffers. Adequate delineation, signage, and temporary construction fencing of wetlands, buffers, and endangered species habitats shall be employed. 6. All excavated material shall be disposed of in a lawful manner. The material shall be placed in such a way as to not interfere with the positive drainage of the receiving area. 7. All debris, wood, trash, and other loose materials shall be discarded and legally disposed of offsite. No debris shall</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
			<p>enter or remain in the water. 8. Plastic under landscaped or gravel areas shall not be permitted. All sub-gravel liners shall be made of filter cloth or other permeable material. 9. All fill used during construction activities shall be clean and free of toxins. 10. Prior to construction, a silt fence shall be erected at the limits of disturbance along the wetland side of the development with a 10-foot return on each end. The fence must be maintained and remain in place until all demolition and construction activities are completed. 11. There will be no disturbance beyond the NJDEP freshwater wetland buffer averaging line other than minor tree clearing. 12. All regulated activities shall not cause any unreasonable interference with the free flow of a regulated feature by placing or dumping any materials, equipment, or debris of structures within or adjacent to the regulated area. Upon completion of the work, all excess materials, debris, equipment, silt fences, and other temporary soil erosion and sediment control devices shall be</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
			removed from all regulated areas. 13. Avoid the use of pesticides in and around potential T&E species.
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)		<p>The limit of development of the proposed project site is currently a relatively flat parcel that is mostly an open farm field. Within the easternmost portion of the proposed project site, there are wetlands and sensitive habitats. There is no construction or tree removal proposed within wetlands or sensitive areas, and all wetland buffer averaging lines will be maintained. Therefore, there will be no adverse impacts from the project on existing natural resources.²⁰ Construction activities will take place in proximity to buffer zones for freshwater wetlands, as well as habitats that could potentially support threatened and endangered species. Best Management Practices as set forth in the Mitigation Measures and Conditions shall be employed to minimize any potential impacts.</p>	<p>1. Soil erosion and sediment control measures shall be installed prior to construction activities in accordance with applicable NJ Soils and Sediment Control Regulations and shall be monitored daily (by contractor) to ensure effectiveness and maintenance (cleaning, repair, and or replacement) performed as necessary. 2. Construction stormwater shall be managed on-site via temporary detention structures during the course of demolition and construction activities. No stormwater discharge shall be permitted to adjacent properties containing wetlands or threatened and endangered species habitat. 3. No hazardous materials or petroleum products shall be stored on-site in the vicinity of the wetlands and threatened and endangered species habitat. 4. Eliminate night demolition and construction activities in the vicinity of the threatened and endangered species habitat. 5. Minimize construction vehicles and</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
			<p>personnel traffic within the wetland buffers. Adequate delineation, signage, and temporary construction fencing of wetlands, buffers, and endangered species habitats shall be employed. 6. All excavated material shall be disposed of in a lawful manner. The material shall be placed in such a way as to not interfere with the positive drainage of the receiving area. 7. All debris, wood, trash, and other loose materials shall be discarded and legally disposed of offsite. No debris shall enter or remain in the water. 8. Plastic under landscaped or gravel areas shall not be permitted. All sub-gravel liners shall be made of filter cloth or other permeable material. 9. All fill used during construction activities shall be clean and free of toxins. 10. Prior to construction, a silt fence shall be erected at the limits of disturbance along the wetland side of the development with a 10-foot return on each end. The fence must be maintained and remain in place until all demolition and construction activities are completed. 11. There will be no disturbance beyond the NJDEP</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
			freshwater wetland buffer averaging line other than minor tree clearing. 12. All regulated activities shall not cause any unreasonable interference with the free flow of a regulated feature by placing or dumping any materials, equipment, or debris of structures within or adjacent to the regulated area. Upon completion of the work, all excess materials, debris, equipment, silt fences, and other temporary soil erosion and sediment control devices shall be removed from all regulated areas. 13. Avoid the use of pesticides in and around potential T&E species.
Other Factors 2			

Supporting documentation

[The Place at Burlington Supportive Documents.pdf](#)

Additional Studies Performed:

Phase I Environmental

Field Inspection [Optional]: Date and completed by:

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

1. National Plan of Integrated Airport Systems.
2. John H. Chafee Coastal Barrier Resource System- NJ Map
3. NJDEP Bureau of GIS - Coastal Barrier Resource for New Jersey Layer
4. NJDEP Coastal Planning Areas Map
5. CRBS - List of Communities
6. FEMA National Flood Hazard Layer
7. USEPA, Green Book,

National Area, and County-Level Multi-Pollutant Information, <http://www.epa.gov/airquality/greenbook/multipol.html> 8. NJDEP Bureau of Air Quality Planning, Attainment Areas Status, <http://www.state.nj.us/dep/baqp/aas.html#co1> 9. NJDEP Bureau of Air Quality State Implementation Plans 10. NJDEP - Bureau of GIS - CAFRA Boundary Map Layer 11. NJDEP - Bureau of GIS - Known Contaminated Sites Map Layer 12. Phase I Environmental Site Assessment (ESA) and Preliminary Assessment, Salem Road & J.F. Kennedy Way, Burlington Township, New Jersey, August 11, 2022 13. Site Investigation/Remedial Investigation/Remedial Action Workplan prepared by Marathon Engineering & Environmental, dated November 7, 2019 14. Response Action Outcome, prepared by Marathon Engineering & Environmental, dated February 5, 2021. 15. NJDEP Radon Potential Map - <https://www.nj.gov/dep/rpp/radon/radonin.htm> 16. NJDEP Bureau of GIS - Natural Heritage Priority Sites in New Jersey Layer 17. USFWS - Federally-Listed and Candidate Species Occurrences in NJ 18. NJDEP Landscape 3.3 Viewer 19. Letter from the Deputy State Historic Preservation Officer 20. NJDEP Bureau of GIS - Historic Properties Layer 21. HUD Day/Night Noise Level Assessment Tool\ 22. NJDOT Roadway Information and Traffic Monitoring System Program 23. Correspondence from Barbara Smith, USEPA - EPA Sole Source Aquifer Review of HUD Projects 24. NJDEP Bureau of GIS - Sole Source Aquifer Layer 25. NJDEP Bureau of GIS - Wetlands Layer 26. National Wild and Scenic Rivers System NJ List 27. NJDEP Bureau of GIS -Wild and Scenic Rivers Buffer Zone Layer 28. Environmental Justice EJView Mapper 29. Geotechnical Engineering Report, The Place at Burlington, Burlington Twp., NJ, January 6, 2022 30. An Analysis of the Market for The Place at Burlington, General Occupancy Affordable Housing Development, Burlington Township, New Jersey, August 2021

[The Place at Burlington Supportive Documents\(1\).pdf](#)

List of Permits Obtained:

1. Resolution of the Township of Burlington Planning Board Granting Preliminary and Final Site Plan Approval, dated, August 16, 2021 2. New Jersey Department of Environmental Protection - Freshwater Wetlands Letter of interpretation: Line Verification NJDEP (File # 0306-05-006.1) 3. New Jersey Soil Erosion Sediment Control Plan Permit -9/12/22

Public Outreach [24 CFR 58.43]:

Public Outreach was conducted as part of the Township of Burlington planning board meetings, which required public outreach to all landowners within 200 feet of the proposed project.

Cumulative Impact Analysis [24 CFR 58.32]:

According to the Council on Environmental Quality (CEQ) regulations, cumulative impacts represent the "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7)." To the extent reasonable and practical, this EA considered the combined effect of the proposed project and other actions occurring or proposed in the vicinity of the proposed project site. The proposed project would not contribute to a significant cumulative impact under the National Environmental Policy Act because it would consist of a low-income development project on a vacant parcel, which was determined to be consistent with the proposed project area land use and zoning designations, and would be near existing mass transit and transportation services. State and local planning guidelines encourage the development of multifamily housing in areas served by transit and near commercial and cultural amenities because this type of development contributes less to cumulative effects on the environment in comparison to the development of sites in more remote locations with fewer transit connections, many of which contain native vegetation and wildlife species.

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

Affordable, residential developments similar to the proposed project are critical to the long-term socioeconomic vitality of communities like the Township of Burlington. The proposed project uniquely fills the need for affordable housing within the Township of Burlington and will satisfy the New Jersey courts' identification of the need for additional affordable housing in Burlington Township. In addition, physical and social constraints were also considered in identifying and rejecting alternatives. Other potential sites or alternative uses for the proposed project would be unresponsive to the needs of the community and therefore should be rejected. As a result, no alternatives to the action were considered.

No Action Alternative [24 CFR 58.40(e)]

The No Action Alternative would provide no benefit at all to the human environment, the neighborhood, or the Township, and would deny decent affordable housing to those in the Township who are in need. The No Action Alternative would leave the site as an underutilized parcel, with the unrealized potential for more meaningful development.

Summary of Findings and Conclusions:

The proposed project will have no significant adverse impacts on the environment or the human environment and would provide a much-needed enhancement to the neighborhood.

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
Endangered Species Act	1. Soil erosion and sediment control measures shall be installed prior to construction activities in accordance with applicable NJ Soils and Sediment Control Regulations and shall be monitored daily (by contractor) to ensure effectiveness and maintenance (cleaning, repair, and or replacement) performed as necessary. 2. Construction stormwater shall be managed on site via temporary detention structures during the course of demolition and construction activities. No stormwater discharge shall be permitted to adjacent properties containing wetlands or threatened and endangered species habitat. 3. No hazardous materials or petroleum products shall be stored on site in the vicinity of the wetlands and threatened and endangered species habitat. 4. Eliminate night demolition and construction activities in the vicinity of the threatened and endangered species habitat. 5. Minimize construction vehicles and personnel traffic within the wetland buffers. Adequate delineation, signage and temporary construction	N/A		

	<p>fencing of wetlands, buffers and endangered species habitat shall be employed.</p> <p>6. All excavated material shall be disposed of in a lawful manner. The material shall be placed in such a way as to not interfere with the positive drainage of the receiving area</p> <p>7. All debris, wood, trash, and other loose materials shall be discarded and legally disposed of offsite. No debris shall enter or remain in the water.</p> <p>8. Plastic under landscaped or gravel areas shall not be permitted. All sub-gravel liners shall be made of filter cloth or other permeable material.</p> <p>9. All fill used during construction activities shall be clean and free of toxins.</p> <p>10. Prior to construction, a silt fence shall be erected at the limits of disturbance along the wetland side of the development with a 10- foot return on each end. The fence must be maintained and remain in place until all demolition and construction activities are completed.</p> <p>11. There will be no disturbance beyond the NJDEP fresh water wetland buffer averaging line other than minor tree clearing</p> <p>12. All regulated activities shall not cause any unreasonable interference with the free flow of a regulated feature by placing or dumping any materials, equipment, debris of structures within or adjacent to the regulated area. Upon completion of the work, all</p>			
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	<p>excess materials, debris, equipment, silt fences and other temporary soil erosion and sediment control devices shall be removed from all regulated areas.</p> <p>13. Avoid use of pesticides in and around potential T&E species.</p>			
Contamination and Toxic Substances	<p>If anything is found, there will be a corrective action according to all applicable regulations, by appropriately licensed individuals.</p>	N/A	<p>1. Employ spill mitigation measures to immediately clean up spills, fuel, or other hazardous materials. 2. Ensure that the Historically Applied Pesticide deed noticed area identified in the northwestern portion of the site remains fenced off during and after construction to ensure that there is no exposure.</p>	
Hazards and Nuisances including Site Safety and Site-Generated Noise	<p>1. Outfit all construction equipment with operating mufflers. 2. Fully comply with all applicable local ordinances. 3. Eliminate/minimize night construction activities.</p>	N/A	<p>1. Site safety during demolition and construction can be managed through the</p>	

			<p>use of Best Management Practices (BMPs) (e.g., perimeter fencing, construction safety meetings, etc.) during demolition and construction operations. In addition, the use of BMPs and industry standard practices (e.g., high visibility signage) can help improve site safety during the property's normal operation. 2. Noise Abatement and Control measures (detailed above) shall be implemented.</p>	
<p>Unique Natural Features /Water Resources</p>	<p>1. Soil erosion and sediment control measures shall be installed prior to construction activities in accordance with applicable NJ Soils and Sediment Control Regulations and shall be monitored daily (by contractor) to ensure effectiveness and maintenance (cleaning, repair, and or</p>	<p>N/A</p>		

	<p>replacement) performed as necessary. 2. Construction stormwater shall be managed on-site via temporary detention structures during the course of demolition and construction activities. No stormwater discharge shall be permitted to adjacent properties containing wetlands or threatened and endangered species habitat. 3. No hazardous materials or petroleum products shall be stored on-site in the vicinity of the wetlands and threatened and endangered species habitat. 4. Eliminate night demolition and construction activities in the vicinity of the threatened and endangered species habitat. 5. Minimize construction vehicles and personnel traffic within the wetland buffers. Adequate delineation, signage, and temporary construction fencing of wetlands, buffers, and endangered species habitats shall be employed. 6. All excavated material shall be disposed of in a lawful manner. The material shall be placed in such a way as to not interfere with the positive drainage of the receiving area. 7. All debris, wood, trash, and other loose materials shall be discarded and legally disposed of offsite. No debris shall enter or remain in the water. 8. Plastic under landscaped or gravel areas shall not be permitted. All sub-gravel liners shall be made of filter cloth or other permeable material. 9. All fill used during construction</p>			
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	<p>activities shall be clean and free of toxins. 10. Prior to construction, a silt fence shall be erected at the limits of disturbance along the wetland side of the development with a 10-foot return on each end. The fence must be maintained and remain in place until all demolition and construction activities are completed. 11. There will be no disturbance beyond the NJDEP freshwater wetland buffer averaging line other than minor tree clearing. 12. All regulated activities shall not cause any unreasonable interference with the free flow of a regulated feature by placing or dumping any materials, equipment, or debris of structures within or adjacent to the regulated area. Upon completion of the work, all excess materials, debris, equipment, silt fences, and other temporary soil erosion and sediment control devices shall be removed from all regulated areas. 13. Avoid the use of pesticides in and around potential T&E species.</p>			
<p>Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)</p>	<p>1. Soil erosion and sediment control measures shall be installed prior to construction activities in accordance with applicable NJ Soils and Sediment Control Regulations and shall be monitored daily (by contractor) to ensure effectiveness and maintenance (cleaning, repair, and or replacement) performed as necessary. 2. Construction stormwater shall be managed on-site via temporary detention</p>	<p>N/A</p>		

	<p>structures during the course of demolition and construction activities. No stormwater discharge shall be permitted to adjacent properties containing wetlands or threatened and endangered species habitat. 3. No hazardous materials or petroleum products shall be stored on-site in the vicinity of the wetlands and threatened and endangered species habitat. 4. Eliminate night demolition and construction activities in the vicinity of the threatened and endangered species habitat. 5. Minimize construction vehicles and personnel traffic within the wetland buffers. Adequate delineation, signage, and temporary construction fencing of wetlands, buffers, and endangered species habitats shall be employed. 6. All excavated material shall be disposed of in a lawful manner. The material shall be placed in such a way as to not interfere with the positive drainage of the receiving area. 7. All debris, wood, trash, and other loose materials shall be discarded and legally disposed of offsite. No debris shall enter or remain in the water. 8. Plastic under landscaped or gravel areas shall not be permitted. All sub-gravel liners shall be made of filter cloth or other permeable material. 9. All fill used during construction activities shall be clean and free of toxins. 10. Prior to construction, a silt fence shall be erected at the limits of</p>			
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	<p>disturbance along the wetland side of the development with a 10-foot return on each end. The fence must be maintained and remain in place until all demolition and construction activities are completed. 11. There will be no disturbance beyond the NJDEP freshwater wetland buffer averaging line other than minor tree clearing. 12. All regulated activities shall not cause any unreasonable interference with the free flow of a regulated feature by placing or dumping any materials, equipment, or debris of structures within or adjacent to the regulated area. Upon completion of the work, all excess materials, debris, equipment, silt fences, and other temporary soil erosion and sediment control devices shall be removed from all regulated areas. 13. Avoid the use of pesticides in and around potential T&E species.</p>			
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Project Mitigation Plan

Any findings will be handled according to all applicable regulations, by appropriately licensed individuals.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

✓ No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

Screen Summary

Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. The closest airport is Trenton Mercer Airport located approximately 84,480 feet northeast of the proposed project. Newark Airport, the most relatively Large/Medium Hub is located around 290,400 feet to the northeast. The nearest Military Airfield, Lakehurst Naval Air Station, is located 158,400 feet to the east. Therefore, the proposed project is not within an Airport Clear Zone or Accident Potential Zone.

Supporting documentation

[Airport Hazards.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Coastal Barrier Resources

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

1. Is the project located in a CBRS Unit?

No

Document and upload map and documentation below.

Yes

Compliance Determination

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

Supporting documentation

[Coastal Barrier Resources.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Flood Insurance

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

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

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

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

Yes

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

Yes

- No

Screen Summary

Compliance Determination

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

Supporting documentation

[FEMA.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

Carbon monoxide	9.00	ppm (parts per million)
Ozone	70.00	ppb (parts per million)
Particulate Matter, <2.5 microns	35.00	µg/m ³ (micrograms per cubic meter of air)

Provide your source used to determine levels here:

USEPA, Green Book, National Area and County-Level Multi-Pollutant Information, <http://www.epa.gov/airquality/greenbook/multipol.html> NJDEP Bureau of Air Quality Planning, Attainment Areas Status, <http://www.state.nj.us/dep/baqp/aas.html#co1> Conformity determination thresholds at 40 CFR 93.153(b) <https://www.epa.gov/general-conformity/de-minimis-emission-levels>

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

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

Enter the estimate emission levels:

Carbon monoxide	ppm (parts per million)
Ozone	ppb (parts per million)
Particulate Matter, <2.5 microns	µg/m ³ (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: Carbon monoxide, Ozone, Particulate Matter, <2.5 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

[Coastal Zone Management.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Contamination and Toxic Substances

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

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

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

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

No

- Yes

3. Mitigation

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

Can adverse environmental impacts be mitigated?

Adverse environmental impacts cannot feasibly be mitigated.

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

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

If anything is found, there will be a corrective action according to all applicable regulations, by appropriately licensed individuals.

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

- ✓ Complete removal

Risk-based corrective action (RBCA)

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. The adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. 24 CFR Part 58.5(i)(2)(i) states that "it is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemical and gases and radioactive substances, where a hazard could affect the health and safety of occupants..." A Preliminary Assessment Report and Phase I Environmental Site Assessment (August 2022) was performed and revealed the following Recognized Environmental Conditions (RECs) which require additional investigation/remediation/mitigation: HREC-1/CREC-1 -Historically Applied Pesticides. Based on a review of aerial photographs, it appears that portions of the Subject Site were historically used for agricultural purposes from at least 1930. A historically applied pesticide (HAP) site investigation was completed pursuant to the New Jersey Department of Environmental Protection (NJDEP) Site Remediation and Waste Management Program and revealed that Arsenic impacts were present at the Subject Site. Remedial action was performed consisting of excavating and relocation off-site of the identified arsenic impacts on the Subject Site, with the exception of the

northwest corner which could not be excavated due to the presence of NJDEP-regulated wetlands. The remedial action selected to address the arsenic-impacted soil located within the mapped wetlands area was the institution of engineering control in the form of restrictive fencing. Periodic monitoring and reporting to the NJDEP will be required to maintain the protectiveness of the restrictive fencing remedy. The limits of the protective fencing are presented in the Attachment - Approximate Limits of Engineering Controls. No additional hazardous sites were identified within 3,000 feet of the project (Known Contaminated Site List). The proposed project site does not contain any structures, therefore asbestos-containing materials and lead-based paint are not of concern.

Supporting documentation

[Contamination and Toxic Substances.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Endangered Species

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- ✓ Mitigation as follows will be implemented:

1. Soil erosion and sediment control measures shall be installed prior to construction activities in accordance with applicable NJ Soils and Sediment Control Regulations and shall be monitored daily (by contractor) to ensure effectiveness and maintenance (cleaning, repair, and or replacement) performed as necessary.
2. Construction stormwater shall be managed on site via temporary detention structures during the course of demolition and construction activities. No stormwater discharge shall be

permitted to adjacent properties containing wetlands or threatened and endangered species habitat. 3. No hazardous materials or petroleum products shall be stored on site in the vicinity of the wetlands and threatened and endangered species habitat. 4. Eliminate night demolition and construction activities in the vicinity of the threatened and endangered species habitat. 5. Minimize construction vehicles and personnel traffic within the wetland buffers. Adequate delineation, signage and temporary construction fencing of wetlands, buffers and endangered species habitat shall be employed. 6. All excavated material shall be disposed of in a lawful manner. The material shall be placed in such a way as to not interfere with the positive drainage of the receiving area. 7. All debris, wood, trash, and other loose materials shall be discarded and legally disposed of offsite. No debris shall enter or remain in the water. 8. Plastic under landscaped or gravel areas shall not be permitted. All sub-gravel liners shall be made of filter cloth or other permeable material. 9. All fill used during construction activities shall be clean and free of toxins. 10. Prior to construction, a silt fence shall be erected at the limits of disturbance along the wetland side of the development with a 10-foot return on each end. The fence must be maintained and remain in place until all demolition and construction activities are completed. 11. There will be no disturbance beyond the NJDEP fresh water wetland buffer averaging line other than minor tree clearing. 12. All regulated activities shall not cause any unreasonable interference with the free flow of a regulated feature by placing or dumping any materials, equipment, debris of structures within or adjacent to the regulated area. Upon completion of the work, all excess materials, debris, equipment, silt fences and other temporary soil erosion and sediment control devices shall be removed from all regulated areas. 13. Avoid use of pesticides in and around potential T&E species.

No mitigation is necessary.

Screen Summary

Compliance Determination

This project has been determined to have No Effect on listed species. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act. An official species list from the local U.S. Fish and

Wildlife Service field office was requested through the U.S. Fish & Wildlife Service Information for Planning and Consultation (IPAC) to assist in the evaluation of potential impacts of the proposed project. The list identifies species that should be considered under Section 7 of the Endangered Species Act, a project tracking number, and other pertinent information from the field office. The report indicates that there are 4 threatened, endangered, or candidate species on the species list. However, there are no critical habitats within the proposed project area under the jurisdiction of the Fish and Wildlife Service. A review of the Landscape Project 3.3 mapping indicates that the proposed project site is adjacent to a Species Based Habitat Rank 1- Habitat Type- Wetlands. Within this habitat, there is a Species Based Habitat Rank 3 (vernal pool) for the Great Blue Heron and the Black-crowned Night-Heron, which is a State Threatened Species. The Landscape Project classifies habitat patches from Rank 1 to Rank 5. Classifications are based on the status of the species for which the patch provides habitat and whether there are any documented occurrences of a species of concern. Critical habitats of concern are those containing land with Rank 3 to Rank 5. Natural Heritage Database, the Office of Natural Lands Management (ONLM) has identified 343 Natural Heritage Priority Sites, representing some of the best remaining habitats for rare species and rare ecological communities in the state. Although the primary focus of these sites is rare plant species and ecological communities, the DEP Endangered and Nongame Species Program also provided key information and assisted with the delineation of a number of the sites that encompass significant habitats for rare animals. The proposed project site is not identified on the National Heritage Priority Sites in NJ Mapping. In an email dated July 20, 2022, from the NJDEP indicated that "Our vernal habitat specialist of the T&E Unit completed their review on 3/22/2022 - confirming the presence of a certified vernal pool but determined that no adverse impacts are anticipated from the project. Therefore, there are no T&E concerns with the project". Since the proposed project is proximate to habitats of Rank 3 species and the potential occurrence of Black-crowned Night-Heron, measures to avoid any negative impacts on the critical habitat have been incorporated into the project design. Based on the approved site plans, no activity associated with the proposed project will occur within or adjacent to the Rank 3 Habitat. The proposed project will leave all existing acres of wooded areas undeveloped and no tree removal or activity is proposed that would disturb the species. Finally, there will be no wetland buffer disturbances as no new construction is proposed in the buffer area. Therefore, the proposed project will not permanently displace or in any way impact any critical wildlife or adversely affect them. In order to minimize/eliminate effects to the Black-crowned Night Heron Rank 3 area, the procedures and protocols set forth in the Mitigation Measures and Conditions of this report will be implemented by the developer.

Supporting documentation

[Endangered Species.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Explosive and Flammable Hazards

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

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

No

Yes

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

No

Yes

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

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR
- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.

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

No

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

Yes

Screen Summary

Compliance Determination

There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

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

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

No

Screen Summary

Compliance Determination

This project includes activities that could potentially convert agricultural land to a non-agricultural use, but an exemption applies. The project is in compliance with the Farmland Protection Policy Act. The project is not on soils classified as prime farmland, farmland of statewide importance, or NJ Farmland Preservation Program land.

Supporting documentation

[Farmlands Protection.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:

[FEMA\(1\).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

[FEMA\(2\).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)].
- 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:

Staff determination that the project is not located in a historic property/district and will not be affected. Will confirm with SHPO.

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

[Construction of Affordable Housing Development_ Burlington County.msg Historic Preservation.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**

The Preliminary Screening identified no noise generators in the vicinity of the project. The project is in compliance with HUD's Noise regulation.

Supporting documentation

[Site Location.pdf](#)

[Noise Abatement and Control.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

Yes

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

Yes

Document and upload MOU or Agreement below.

No

4. 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

Yes

No

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

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

No

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

Yes

Screen Summary

Compliance Determination

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

Supporting documentation

[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

Yes

2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.

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

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

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

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

Screen Summary

Compliance Determination

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

Supporting documentation

[Wetlands Protection.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

1. Is your project within proximity of a NWSRS river?

No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

Screen Summary

Compliance Determination

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

Supporting documentation

[Wild and Scenic Rivers.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Environmental Justice

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

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

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

Yes

No

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

Screen Summary

Compliance Determination

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. Based on data provided by Environmental Justice information from the EJ View Map, the subject property is located within an area that contains approximately 12% of the population that is considered to be low-income. As a result, the proposed project has been determined not to have adverse environmental impacts on low-income communities. In addition, the area of the proposed project generally has overall Pollution and Source values less than the State average. The proposed project area has a higher-than-average minority population. The proposed project would involve the construction of 84 units of affordable housing units that will benefit low-income and minority populations. Therefore, the proposed project meets the objectives set forth in Executive Order 12898 as well as HUD's Departmental Strategy 2012: * Equal access to safe and healthy housing by all Americans * Mitigating risks to communities in disaster-prone areas * Providing access to affordable, accessible, quality housing free of hazards to residents' health * Working to achieve inclusive, sustainable

communities free from discrimination Accordingly, no negative impacts will occur to subject populations as a result of the proposed project.

Supporting documentation

[Environmental Justice.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No