

ATTACHMENT A: PROJECT DESCRIPTION

WA011 Renton Housing Authority Capital Fund and Operating Subsidy Proposed Activities for 2016 – 2020

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1.0 INTRODUCTION

All activities receiving Capital Fund Grants and Operating Subsidies from the U.S. Department of Housing and Urban Development (HUD) are required to undergo review pursuant to the National Environmental Policy Act (NEPA), consistent with HUD’s rules (24 CFR Part 58). The City of Renton is the NEPA Responsible Entity (RE) for Renton Housing Authority’s (RHA) proposals.

This document describes RHA’s proposed Capital Fund and Operating Subsidy activities for 2016 to 2020. These activities are evaluated in the accompanying NEPA Environmental Assessment (EA). NEPA review for RHA’s proposed activities is being accomplished by a single programmatic EA review for the period 2016 to 2020 and is applicable to all affected properties in the Renton Housing Authority’s portfolio.

Capital Funds and Operating Subsidies for the five-year period are identified in Exhibit 1 and Exhibit 2.

Exhibit 1. Capital Fund Grant

Fiscal Year	Grant
WA01P011501-16 (FY 2016)	\$325,037
Estimated 2017	\$330,000
Estimated 2018	\$330,000
Estimated 2019	\$330,000
Estimated 2020	\$330,000

Source: US HUD District 10, Renton Housing Authority 2016

Exhibit 2. Operating Subsidy

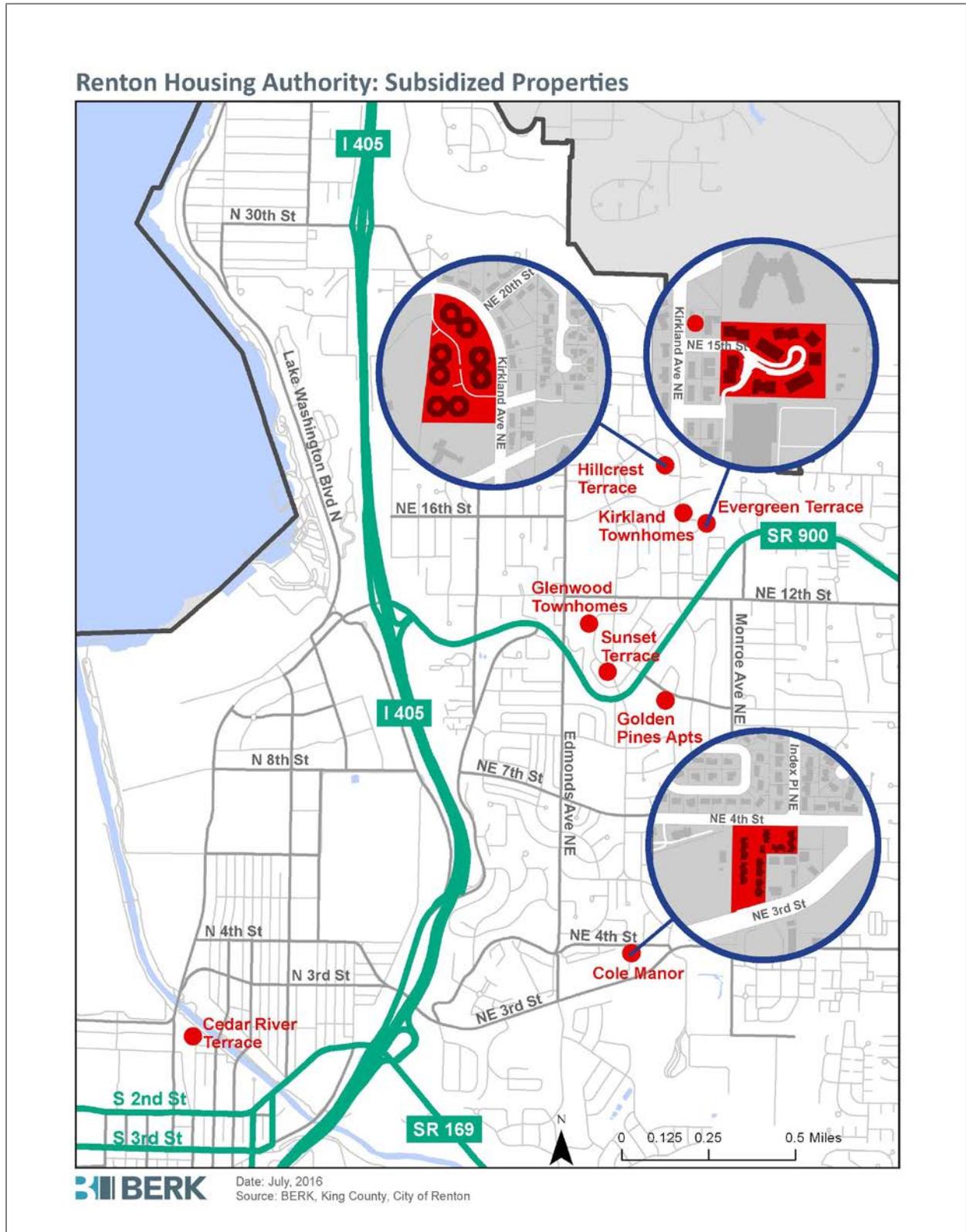
Fiscal Year	Subsidy
2016	\$641,696
Estimate based on 2016 LIPH inventory 2017	\$600,000
Estimate based on 2016 LIPH inventory 2018	\$600,000
Estimate based on 2016 LIPH inventory 2019	\$600,000
Estimate based on 2016 LIPH inventory 2020	\$600,000

Source: US HUD District 10, Renton Housing Authority 2016

2.0 PORTFOLIO OF PROPERTIES

The Renton Housing Authority manages eight subsidized properties that are available to low income households or low-income senior or disabled households. See Exhibit 3 and Exhibit 4. NEPA exempt activities would be conducted at all eight properties. Exempt and non-exempt activities are proposed on four properties – Cole Manor, Evergreen Terrace, Hillcrest Terrace, and Sunset Terrace (prior NEPA clearance in 2011).

Exhibit 3. Vicinity Map - Renton Housing Authority Subsidized Sites subject to NEPA Evaluation



Source: King County, City of Renton, BERK Consulting 2016

See Section 4.2 for proposed activities.

**Exhibit 4. Renton Housing Authority Subsidized Public & Senior Housing
subject to NEPA Evaluation – Building and Site Photos**



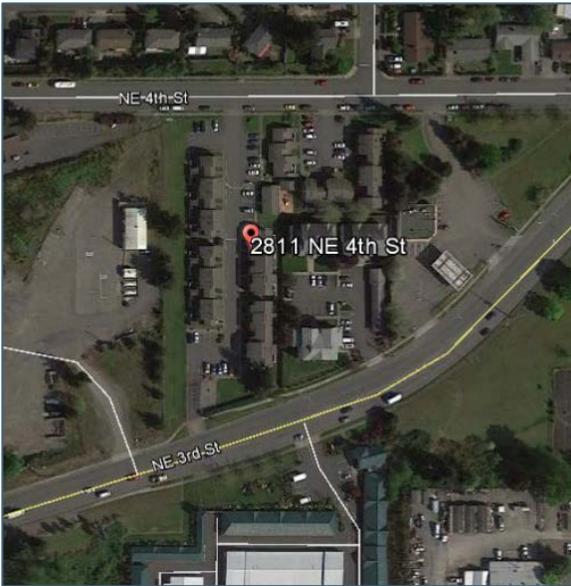
1. Hillcrest Terrace, 1442 Hillcrest Lane NE

Built: 1966 | Units: 60
Maximum Income per household: 80% AMI
Must be over 62 yrs. or disabled

2. Evergreen Terrace, 3027 NE 15th

Built: 1968 | Units: 50
Maximum Income per household: 80% AMI
Must be over 62 yrs. or disabled
See Section 4.2 for proposed activities.

**Exhibit 4. Renton Housing Authority Subsidized Public & Senior Housing
subject to NEPA Evaluation – Building and Site Photos**

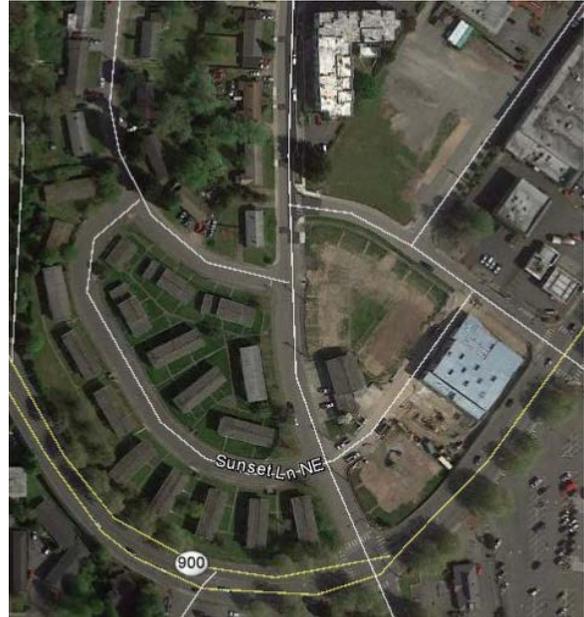


3. Cole Manor, 2811 NE 4TH

Built: 1981 | Units: 28

Maximum Income per household: 80% AMI

See Section 4.2 for proposed activities.



4. Sunset Terrace Redevelopment, NE Sunset Blvd

Demolished for Redevelopment

Will be mixed income redevelopment with market rate
and subsidized housing

See Section 4.2 for proposed activities.

**Exhibit 4. Renton Housing Authority Subsidized Public & Senior Housing
subject to NEPA Evaluation – Building and Site Photos**



**5. Glennwood Townhomes,
1141 & 1147 Glennwood Avenue**

Built 2012 | Units: 8
Maximum Income per household: 50% AMI
See Section 4.1 for proposed activities.

6. Kirkland Townhomes, 1508 Kirkland Ave NE

Built 2014 | Units: 18
Maximum Income per household: 50% AMI
See Section 4.1 for proposed activities.

**Exhibit 4. Renton Housing Authority Subsidized Public & Senior Housing
subject to NEPA Evaluation – Building and Site Photos**



7. Golden Pines, 2901 NE 10th

8. Cedar River Terrace, 51 Burnett Street

Built: 1976 | Units: 53

Built 1978 | Units: 72

Must be over 62 yrs., Maximum Income per household: 50% AMI

Must be over 62 yrs., Maximum Income per household: 50% AMI

See Section 4.1 for proposed activities.

See Section 4.1 for proposed activities.

Source: Renton Housing Authority, Google Earth, BERK Consulting 2016

The Renton Housing Authority also manages market rate housing; those dwellings are not subsidized and not addressed in this NEPA evaluation.

3.0 NEPA REVIEW

The U.S. Department of Housing and Urban Development (HUD) has developed NEPA rules that are implemented by RE's and contained in 24 CFR Part 58. The rules identify categories of activities that are exempt from NEPA review, those that are categorically excluded, or that require EAs that lead to a finding of no significance, or that are potentially significant and require an environmental impact statement (EIS).

- **58.34 Exempt activities.** Across the eight subsidized housing properties, exempt activities would occur over the 2016 – 2020 period such as administration and management, public services and training, and minor maintenance such as normal cleaning, landscaping, etc.
- **58.35 Categorical exclusions.** Across three of the properties – Cole Manor, Evergreen Terrace, and Hillcrest Terrace – categorically excluded activities are proposed including rehabilitation and Americans with Disability Act (ADA) barrier removals.
- **58.36 Environmental assessments.** Some proposals could alter or expand existing site improvements and depending on the nature and extent of changes require an EA (e.g. solid waste enclosures increased the capacity of the facility by more than 20 percent though impervious areas were increased by less than 20 percent).
- **58.37 Environmental impact statement determinations.** No activities are proposed that would require an environmental impact statement during the 2016-2020 period. Given redevelopment of Sunset Terrace has already been studied under NEPA in 2011, additional review is not needed (see Section 4.2).

The RE must make a determination of the level of environmental review required for every project and document it in the Environmental Review Record (ERR). At a minimum in Washington State, NEPA-exempt activities address flood disaster protection and airport clear zones. Categorically excluded activities document the same information as exempt activities but also provide compliance documentation regarding related Federal laws and authorities (24 CFR 58.5). Activities subject to an EA fill in similar but more extensive checklist information than categorically excluded items.

HUD Guidance has clarified the distinction between maintenance activities that are exempt and rehabilitation activities that are either categorically excluded (where work is minor and does not disturb the ground) or otherwise may require an EA. (Notice CPD-16-02, February 8, 2016) Maintenance includes, but is not limited to, lawn care, repainting, fixing leaks, washing windows, carpet replacement, servicing elevators, replacing stoves/refrigerators/microwaves, etc. Rehabilitation includes, but is not limited to, new landscaping, construction of new walkways, stripping paint surfaces, replacing windows and doors, installation of new furnace systems, re-siding, major rewiring of buildings, new plumbing systems, and others.

The Renton Housing Authority Capital Fund and Operating Subsidy program consists of a mix of exempt and non-exempt activities; to ensure completeness this EA evaluates all proposed categories of activities.

4.0 CAPITAL FUND AND OPERATING SUBSIDY ACTIVITIES

The proposal consists of Renton Housing Authority's (RHA's) proposed Capital Fund and Operating Subsidy activities for 2016 to 2020. Activities include:

- Public Housing Authority-wide administration, operations, technical assistance, training, fees and costs, and delivery of services such as summer youth programs.
- Low Income Public Housing Authority-wide maintenance including appliance replacement, non-dwelling equipment and tools.
- Plans and designs of the Sunset Terrace Replacement Units (prior NEPA clearance in 2011).

- Maintenance, Rehabilitation, and Public Facility Improvements at Hillcrest Terrace, Evergreen Terrace, and Cole Manor.

This section categorizes activities that apply across the Renton Housing Authority subsidized housing properties, and those that apply to individual properties.

4.1 Areawide Activities

Across the Renton Housing Authority portfolio of eight subsidized properties (see Exhibit 3), the 5-year plan includes the following activities considered exempt in Sec. 58.34. These activities are programmatically addressed in the EA where necessary to address 24 CFR 58.6 Requirements.

1. Environmental and other studies, resource identification, and development of plans and strategies
2. Administrative and management activities
3. Public services that will not have a physical impact or result in any physical changes, such as summer youth programs
4. Purchase of tools, non-dwelling equipment
5. Engineering or design costs
6. Technical assistance and training
7. Operating Costs:
 - a. Maintenance: ongoing property cleaning, landscaping and similar; replacement of failing appliances
 - b. Security
 - c. Operation
 - d. Furnishings
 - e. Equipment
 - f. Supplies
 - g. Staff training and recruitment
8. Fees and Costs

4.2 Site-Specific Activities

WA011000001-Sunset Terrace

9. The activity consists of development planning and design of replacement units on Sunset Terrace property. The site was approved for demolition/disposition in 2012, and addressed in the following NEPA Documents and the associated Record of Decision and revisions:
 - a. CH2MHill and ICF International. 2011. Sunset Area Community Planned Action NEPA/SEPA Environmental Impact Statement. Final. April. (ICF 00593.10.) Bellevue and Seattle, WA. Prepared for City of Renton and the Renton Housing Authority, Renton, WA.¹

¹ The same Environmental Impact Statement in 8.a addressed the construction of the Glennwood Townhomes and Kirkland Townhomes. However, areawide activities identified in Section 4.1 would apply to these sites.

- b. Reevaluation / Addendum, Renton Sunset Terrace Redevelopment 2014, Prepared By: BERK Consulting in association with CH2MHill, Mithun, and Weinman Consulting LLC
- c. Reevaluation / Addendum Renton Sunset Terrace Redevelopment 2016, Prepared By: BERK Consulting in association with CH2MHill, CRC, Mithun, Perteet, and Weinman Consulting LLC

WA011000002-Hillcrest Terrace

Hillcrest Terrace is identified for the following activities:

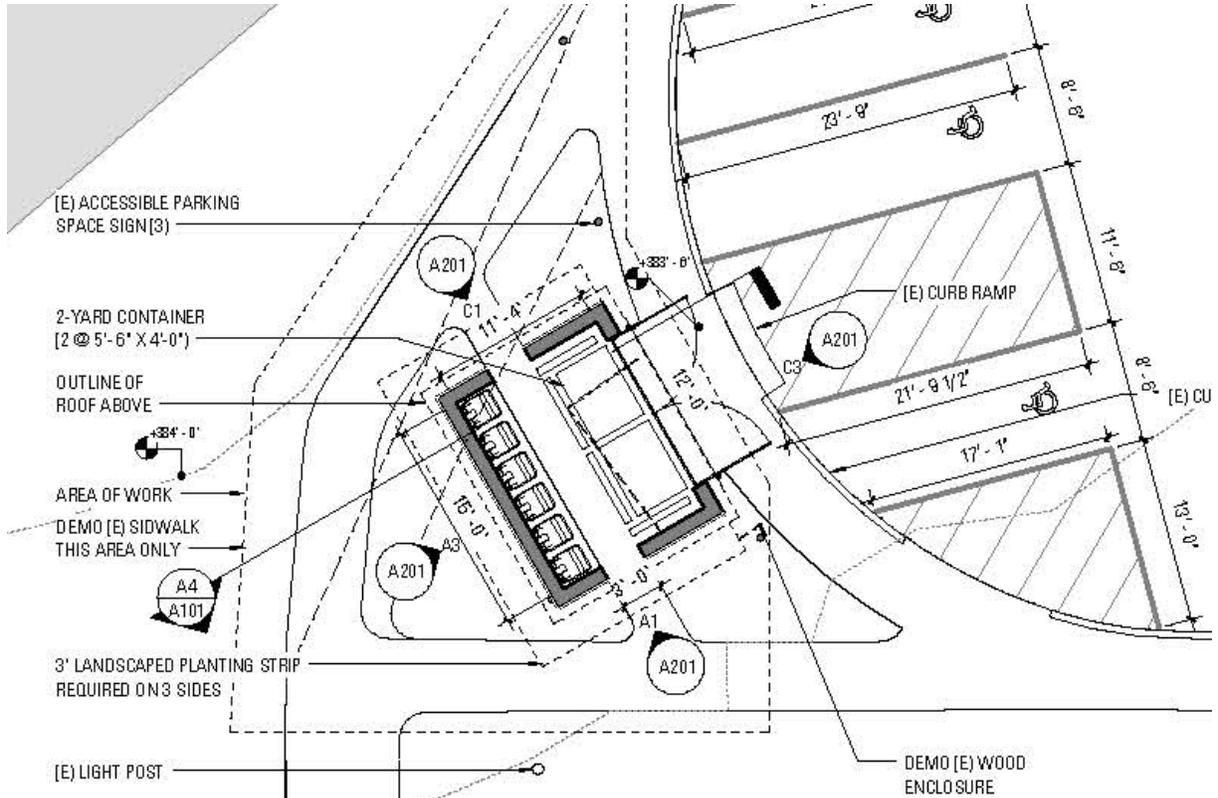
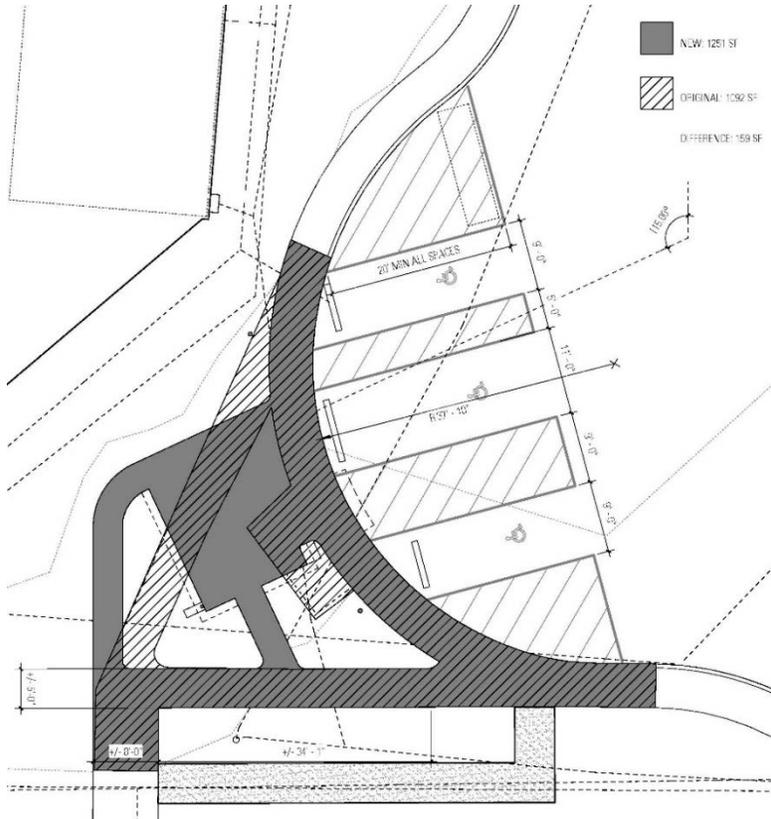
10. Site improvement:

- a. Garbage-recycling station, 2016:
 - i. Description: The station expands and improves an existing garbage and recycling collection area, adding space for more garbage, recycling, and yard waste bins, adding a ramp, replacing and extending enclosure walls, replacing and rearranging sidewalks, adding landscaping, and adding a roof. See Exhibit 5 for photos and diagrams. See Appendix A for a scaled site plan and list of activities.
 - ii. NEPA Review Status: The existing footprint of the solid waste enclosure expanded more than 50 percent to a size of 240 square feet requiring review under an environmental assessment, though the sidewalks and impervious area increased by less than 20 percent consistent with a categorical exclusion threshold (see thresholds at 24 CFR 58.35(a)(1))³. The station has been constructed as of March 2016 consistent with preceding budget requests. Because the station was not part of its own environmental clearance under NEPA, and is not exempt, it is addressed in this EA.
- b. Americans with Disability Act (ADA) access upgrades, 2017 – 2020:
 - i. Description: Upgrades may include replacement of current failing sidewalks, extra ADA curb cuts, and possible ADA mail box areas. Sidewalks that are replaced will be pervious to the extent feasible, and will offset any additions of impervious area.
 - ii. NEPA Review Status: ADA curb cuts and mail box areas are consistent with the categorical exclusion regarding improvements to address mobility by seniors and the disabled.² RHA staff anticipate like for like replacement of sidewalks, which would be categorically excluded (less than 20 percent change in size is categorically excluded)³. In any case it is programmatically addressed in this EA for completeness.

² Categorical exclusion includes “Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons.” (24 CFR 58.35 (a)(2))

³ Categorical exclusion includes “Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent (e.g., replacement of water or sewer lines, reconstruction of curbs and sidewalks, repaving of streets).” (24 CFR 58.35 (a)(1))

Exhibit 5. Hillcrest Garbage-Recycling Enclosure



Source: Schemata 2015, Google Earth 2016

11. Dwelling Structures:

- a. Shop building modernization, 2016:
 - i. Description: Utilize old laundry/office/foyer area for maintenance storage and work space. See Appendix A for a schematic of the current building.
 - ii. NEPA Review Status: Some of the modernization work may be considered exempt maintenance or may be considered categorically-excluded rehabilitation depending on whether normal cleaning and servicing is conducted or if there is intensive cleaning or replacement of equipment, windows, paneling, ceilings, floors, etc. For completeness, it is encompassed in this programmatic EA.
- b. Interior unit repairs, 2016-2017:
 - i. Description: Unit repairs including painting, flooring, cabinets, and fixtures. Paint type is anticipated to be latex-based paint. Asbestos abatement of flooring and base adhesives by contractors at the time of vacant unit renovation work. See Appendix B for a detailed list of repairs.
 - ii. NEPA Review Status: The work includes a mix of maintenance and rehabilitation activities, which are exempt or categorically excluded, respectively. See Appendix B for an identification of both categories of activities. Rehabilitation activities would not change the use of the structures, or increase density; the efforts are not anticipated to cost more than 75 percent of the value of the improvements following rehabilitation.⁴
- c. Dwelling Equipment, 2016-2020:
 - i. Description: Replace appliances and hot water heaters.
 - ii. NEPA Review Status: These are considered exempt maintenance, but are programmatically addressed in this EA to address 24 CFR 58.6 Requirements. See Appendix B.

WA011000003-Evergreen Terrace

12. Site improvement, 2017 – 2020:

- a. ADA access upgrades.
 - i. Description: Possible replacement of current failing sidewalks, extra ADA curb cuts, and possible ADA mail box areas as well as improvements in the common laundry room area. Sidewalks that are replaced will be pervious to the extent feasible, and will offset any additions of impervious area.
 - ii. NEPA Review Status: See 9.b regarding status of activities as categorically excluded or subject to EA.

⁴ See exemption at 24 CFR 58.35 (3) "Rehabilitation of buildings and improvements when the following conditions are met: (ii) In the case of multifamily residential buildings: (A) Unit density is not changed more than 20 percent; (B) The project does not involve changes in land use from residential to non-residential; and (C) The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation."

13. Dwelling Structures, 2016-2017:

- a. Interior unit repairs.
 - i. Description: Interior repairs including paint, flooring, cabinets, and fixtures. Asbestos abatement of flooring and base adhesives by contractors at the time of vacant unit renovation work. See Appendix C for a list of improvements.
 - ii. NEPA Status: The work includes a mix of maintenance and rehabilitation, which are exempt or categorically excluded, respectively. See Appendix C for an identification of both categories of activities. Rehabilitation activities would not change the use of the structures, or increase density; the efforts are not anticipated to cost more than 75 percent of the value of the improvements following rehabilitation.

14. Dwelling Equipment, 2016-2020:

- a. Description: Replace appliances and hot water heaters.
- b. NEPA Review Status: These are considered exempt maintenance, but are programmatically addressed in this EA to address 24 CFR 58.6 Requirements. See Appendix C.

WA011000005-Cole Manor

15. Site improvement:

- a. Perimeter fence replacement and sidewalk work, 2016:
 - i. Description: Perimeter fence replacement may exceed one cubic foot soil disturbance as new post holes may be required to be dug for fence post placement. Sidewalk work includes replacing current damaged sidewalks with new, such as where trees have buckled sidewalks. Sidewalks that are replaced will be pervious to the extent feasible, and will offset any additions of impervious area.
 - ii. NEPA Review Status: Activities focus on replacement of a fence and sidewalk, and would be categorically excluded³ (less than 20 percent change in size is categorically excluded). In any case it is programmatically addressed in this EA for completeness.
- b. ADA access upgrades, 2017 – 2020:
 - i. Description: Access upgrades include ADA curb cuts, dumpster locations, and common laundry room area. It is anticipated that the improvements at the dumpster locations would include altering an access ramp to reduce the slope, and that there would be an increase in impervious area at that location.
 - ii. NEPA Review Status: See 9.b for categorization of ADA work under NEPA.

16. Dwelling Structures:

- a. Siding Replacement, 2016:
 - i. Replace exterior siding with new siding material (Hardie-Plank type siding); old material to be removed by contractor for disposal. Activities are rehabilitation in nature, and categorically excluded, but addressed in this EA.

b. Interior repairs, 2016-2017:

- i. Description: paint, flooring, cabinets, fixtures. Paint is anticipated to be latex based paint. Cabinet replacement would occur as needed; floors to be replaced. No asbestos containing materials have been identified.
- ii. NEPA Review Status: Activities are a mix of maintenance (paint, flooring) and rehabilitation (re-siding, cabinets), which are exempt or categorically excluded respectively. However, the activities are programmatically addressed in this EA. Rehabilitation activities would not change the use of the structures, or increase density; the efforts are not anticipated to cost more than 75 percent of the value of the improvements following rehabilitation.

17. Dwelling Equipment, 2016-2020:

- a. Description: Replace appliances and hot water heaters.
- b. NEPA Review Status: These are considered exempt maintenance but are programmatically addressed in this EA, to address 24 CFR 58.6 Requirements.