

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

Project Information

Project Name: Fisher-Grove

HEROS Number: 900000010507023

Start Date: 11/06/2025

Responsible Entity (RE): RALEIGH, 222 W Hargett St Raleigh NC, 27601

RE Preparer: William Hartye

State / Local Identifier: NC

Certifying Officer: Janet Cowell

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable):

Point of Contact:

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

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

Project Location: 401 Elders Grove Way, Raleigh, NC 27610

Additional Location Information:

401 Elders Grove Way, Raleigh, NC 27610 ("Subject Property") 35degrees47'05.6"N, 78degrees36'51.2"W. Wake County Parcel ID: 1714404836

Direct Comments to:

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

The project detailed below proposes to construct a mixed-use development consisting of five new buildings and associated incidentals (parking, amenity area, utilities, landscaping, playground, waste collection, lighting, etc.) on approximately 4.44-acres located at 401 Elders Grove Way, Raleigh, NC (Wake County Parcel ID: 1714404836). Four buildings are planned for affordable, multi-family apartments and one building is planned for community services such as healthcare and retail. Proposed Building #1 has a Gross square feet (SF) of 24,486 SF, is three stories tall, and includes 12, 1-bedroom units and 12, 2-bedroom units. Proposed Building #2 has a Gross SF of 40,245 SF, is three stories tall, and includes 12, 1-bedroom units, 18, 2-bedroom units, and 6, 3-bedroom units. Proposed Building #3 has a Gross SF of 75,540 SF, is four stories tall, and includes 16, 1-bedroom units, 24, 2-bedroom units, and 6, 3-bedroom units. Proposed Building #4 has a Gross SF of 82,807 SF, is four stories tall, and includes 16, 1-bedroom units, 33, 2-bedroom units, and 11, 3-bedroom units. Proposed Building #5 has a Gross SF of 8,325 SF, is one story tall, and includes one (1), 6,026 SF Suite, and two (2), 1,015 SF Suites. Proposed total Gross Floor Area equals 230,385 SF. Proposed total dwelling units equals 166. Total parking spots proposed equals 168 + 2 electric vehicle charging stations.

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

There is a widely documented need for affordable housing in the City of Raleigh ("City") and throughout the United States. The City is committed to creating, preserving, and encouraging the development of affordable housing units in Raleigh. In 2016, the City established an aspirational goal to create 570 affordable housing units per year for 10 years, for a grand total of 5,700 housing units by 2026. So far, the City has created and preserved 3,848 affordable housing units, completing over half of the 10-year goal. In total, there are 7,149 affordable units built and/or being built since 2016, with 3,301 units currently in the pipeline. The City's efforts primarily serve low- and moderate-income (LMI) individuals and families. Income limits are set each year by the U.S. Department of Housing and Urban Development and are based on the Area Median Income (AMI) per city or county. (<https://raleighnc.gov/housing/services/affordable-housing-goals>) This

environmental assessment is one of many first steps in the planned construction of a future mixed-use, affordable housing project on this site.

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

Per the NV5 Engineers and Consultants (NV5) Phase I Environmental Site Assessment (ESA) dated December 13, 2024, the subject property appears as cleared areas in the 1938 and 1949 aerial photographs reviewed by NV5. The subject property was shown as developed with 19 multi-family residential buildings as part of the Washington Terrace apartments in the photographs dated 1950 through 2017. Previous development at the subject property included one and two-story multi-family apartment buildings, a one-story welcome center, a modular office trailer, water, sewer, and stormwater utilities, and associated asphalt roadways, driveways and parking lots. Demolition of two buildings in the northern portion of the subject property occurred between the date of the 2017 and 2018 photographs. Demolition of the remaining buildings at the subject property occurred between the 2019 and 2020 photographs reviewed by NV5. As early as 1938, surrounding areas have been utilized as residential with mixed commercial and institutional (school) use. In 2014, DHIC purchased from foreclosure Washington Terrace, a 23-acre, 245-unit low-income housing project. Completed or under construction are 162 apartment units, 140 age-restricted apartment units, and 58 for-sale townhomes (17 of which are affordable) over four phases of development. The proposed project is the final phase of the development.

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

[FIG - 2 Subject Property Aerial.pdf](#)

[FIG - 1 Subject Property Site Vicinity Exhibit.pdf](#)

[Photo Log 0924 2025.pdf](#)

Determination:

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

Approval Documents:

7015.15 certified by Certifying Officer
on:

7015.16 certified by Authorizing Officer
on:

Funding Information

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
M-23-MC-37-0206	Community Planning and Development (CPD)	HOME Program	\$264,835.00
M-24-MC-37-0206	Community Planning and Development (CPD)	HOME Program	\$548,667.00
M-25-MC-37-0206	Community Planning and Development (CPD)	HOME Program	\$203,970.00

Estimated Total HUD Funded, \$2,543,703.00
Assisted or Insured Amount:

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$53,941,879.00

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	☐ Yes ☒ No	The subject property is not within a civil or military airport runway clear zone nor does the proposed project included in this funding request propose construction of any new structures or other site features that could impact local airports. The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project complies with Airport Hazards requirements.
Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	☐ Yes ☒ No	The subject property is not within or near a North Carolina Coastal Barrier Resources Act (CBRA) area. Therefore, this project complies with the Coastal Barrier Resources Act.

Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	☐ Yes ☒ No	The proposed project is located within a FEMA Area of Minimal Flood Hazard (Zone X). The attached FEMA Firmette identifies a nearby flood hazard elevation of 193 ft above mean sea level (amsl). The subject property has an elevation of 330 ft amsl per City of Raleigh 2-foot contour mapping and current USGS topograph, making the Site 137-feet higher than the identified flood hazard elevation. (https://maps.raleighnc.gov/iMAPS/) 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		
Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	☐ Yes ☒ No	Construction activities would have short-term minor impacts related to emissions and fugitive dust. Long-term minor emissions from the operation of the development buildings and vehicle emissions would result in less than significant impacts. The project's county or air quality management district is in attainment status for all criteria pollutants. Wake County, NC historically has been 1-hour ozone (1979, revoked on June 17, 1984), 8-hour ozone (1997 revoked on December 26, 2007), and carbon monoxide (1971, transportation conformity expired on September 18, 2015). Wake County was entered into a carbon monoxide (CO) Limited Maintenance Plan which documents that Wake County is well below the CO National Ambient Air Quality Standard (NAAQS) and introduced a State Implementation Plan (SIP), which

		outlined current levels of emissions. The project complies with the Clean Air Act.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	☐ Yes ☒ No	The subject property is not within a North Carolina Department of Environmental Quality (NCDEQ) Coastal Area Management Act (CAMA) County. The project complies with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	☐ Yes ☒ No	Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. Radon analysis indicated elevated levels of radon or consideration of radon will occur following construction. Adverse radon 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. NV5 Engineers and Consultants (NV5) completed a Phase I Environmental Site Assessment (ESA) of the subject property dated December 13, 2024 which did not identify any recognized environmental conditions (RECs) or controlled RECs (CRECs) associated with the subject property. No hazardous materials were observed stored on the subject property during TRC Engineers, Inc.'s September 24, 2025 Site Visit.
Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	☐ Yes ☒ No	TRC Engineers, Inc. staff reviewed the US Fish and Wildlife Information for Planning and Consultation (IPaC) (https://ipac.ecosphere.fws.gov/) - Official Species List Generated 9/29/2025. NC Heritage Program Natural & Cultural Resources Community listed species were also reviewed https://www.ncnhp.org/data/speciescommunity-search (Accessed 10/6/2025) and a Species Conclusion Table

		prepared. A species determination key was completed for the northern long-eared bat and/or tricolored bat indicating no effect to the proposed endangered species based on the specifics of the proposed project. No federally or state listed species are present at the site. Less than significant impacts to vegetation and wildlife habitats are anticipated. The proposed HUD assisted project is in compliance with the Endangered Species Act of 1973. This project will have No Effect on listed species based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office. This project is in compliance with the Endangered Species Act.
Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C	☐ Yes ☒ No	The proposed HUD assisted project does not include a hazardous facility. The proposed project will not increase residential density or conversion. TRC Engineers, Inc. reviewed the NCDEQ Division of Waste Management Site Locator Tool documenting active UST/AST permits within a 1-mile radius of the proposed project Site. Aboveground storage tanks are only required to be registered with NCDEQ - Underground Storage Tanks (UST) Section if they meet the definition of an Oil Terminal Facility (Capacity over 21,000 gallons). Most ASTs do not meet this definition and do not require registration. TRC did not identify any registered ASTs on the NCDEQ Site Locator Tool within 1-Mile of the proposed project. TRC staff reviewed current Google aerial imagery and Streetview imagery (accessed 10/02/2025) and did not identify any AST containers > 100-gallons within 1-Mile of the proposed project. The project is in compliance with explosive and flammable hazard requirements.

		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.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	☐ Yes ☒ No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property. The project complies with the Farmland Protection Policy Act.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	☐ Yes ☒ No	The proposed project is located within a FEMA Area of Minimal Flood Hazard (Zone X). The attached FEMA Firmette identifies a nearby flood hazard elevation of 193 ft above mean sea level (amsl). The subject property has an elevation of 330 ft amsl per City of Raleigh 2-foot contour mapping and current USGS topograph, making the Site 137-feet higher than the identified flood hazard elevation. (https://maps.raleighnc.gov/iMAPS/). The project is in compliance with Executive Orders 11988 and 13690.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	☐ Yes ☒ No	Based on Section 106 consultation there are no conflicts with historic preservation of cultural resources. Correspondence with SHPO and THPO officials is attached. The project complies with Section 106.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	☐ Yes ☒ No	The Preliminary Screening identified no noise generators in the vicinity of the project. The proposed project involves the construction of the final phase of an affordable housing community (Washington Terrace). The subject property was previously constructed with multi-family residential housing

		units for approximately 70-years which were razed in 2020. The proposed project will remain consistent with former use and effectively return long-term noise levels to pre-2020 baseline levels. Construction activities would have noticeably higher noise levels than current levels. Operation of the development would have a minor long-term increase in noise levels from traffic and ground maintenance. These impacts would be less than significant. The project complies with the Noise Control Act of 1972. 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	☐ Yes ☒ No	There are no Sole Source Aquifers located in North Carolina. The project complies with Sole Source Aquifer requirements and the Safe Drinking Water Act of 1974.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	☐ Yes ☒ No	The USFWS National Wetlands Inventory Map was reviewed. No wetlands were identified within the proposed project boundary or adjoining properties. The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property. No wetlands/potential wetlands were observed during TRC Engineers, Inc.'s September 24, 2025 Site Visit. The project complies with Executive Order 11990. 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)	☐ Yes ☒ No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		

ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	☐ Yes ☒ No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898.

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

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

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

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	The proposed project is part of the overall plan of the City of Raleigh to provide new, affordable, residential housing. The subject property is zoned RX-5 (Residential Mixed-Use) effective May 2, 2024. Raleigh's RX-5 zoning is a Residential Mixed-Use district that allows for a variety of housing types at a density exceeding 10 dwelling units per acre, and a maximum building height of five stories. This district is intended to integrate higher-density residential development with some limited commercial and retail uses. The subject property was previously constructed with multi-story, multi-family affordable residential housing units for approximately 70-years. The proposed project will remain consistent with former use and existing zoning requirements. The project development plans are currently under review by the City of Raleigh for compliance. Accounting for conformance with the City of Raleigh Unified Development Ordinance / Wake County Unified Development Code, no mitigation would be required.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Subject property soils fall under the USDA-NRCS classification of Urban. Urban soils are a diverse group of soils extensively altered by human activity in urban and suburban areas. Key characteristics include being a mix of natural and man-made materials like construction debris, and significant compaction from heavy use. These soils often have unpredictable layers due to mixing and filling. The subject property was previously constructed with multi-family residential housing units for approximately 70-years. The proposed project will remain consistent with former use. The Site will not require extensive grading to support the planned development. Stormwater management plans are included in the project development plans and are currently under review by the City of Raleigh for compliance. The Sedimentation Pollution Control Act of 1973 must be properly addressed for any land disturbing activity. An erosion & sedimentation control plan will be required if one or more acres are to be disturbed. The ESC Plan must be filed with and approved by applicable Regional Office (NC DEMLR) at least 30 days before beginning activity. A NPDES construction Stormwater permit (NCG010000) is also usually issued with approval of the ESC Plan. Accounting for the applicable design and installation of appropriate perimeter sediment trapping devices as well as stable Stormwater conveyances and outlets, no adverse environmental impacts are anticipated.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	3	A Phase I ESA did not find any Recognizable Environmental Concerns (RECs) present at the site. The environmental database review did not identify any known hazards or nuisance (hazardous waste, water dischargers, toxic releases, Superfund or Brownfield sites, and toxic substances)	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		violations that would create an unsafe environment for the workers of this project. The only project-related noise will be generated during construction by machinery and equipment. Activities will also generate minor amounts of dust and dirt; appropriate mitigation measures will be utilized to minimize dust and dirt. Garbage and construction debris will be collected and disposed of according to appropriate local, state, and federal regulations. This development should not contribute to noise levels higher than what adjoining properties contribute. To mitigate the minor impact of noise created by the equipment during construction, activities will take place between the hours of 7:00 a.m. to 11:00 p.m. To mitigate the creation and dispersion of dust that may result from construction activities, dusty roads should be watered as needed. To maintain site safety while construction activities are taking place, all unauthorized individuals will be prevented from entry onto the subject property by the construction contractor personnel.	
SOCIOECONOMIC			
Employment and Income Patterns	1	Construction of new affordable housing and mixed-use retail/medical will provide new jobs during both the construction phase and operational phase for a positive impact to the community. No mitigation would be required.	
Demographic Character Changes / Displacement	2	The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020; therefore, there are no existing residents or businesses to be displaced by the proposed project. The proposed project will return affordable residential housing to the subject property. No mitigation would be required.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Environmental Justice EA Factor		In accordance with Executive Order 14173: Ending Illegal Discrimination and Restoring Merit-Based Opportunity, analysis of compliance for this authority is no longer required.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property, effectively returning demand to the pre-2020 baseline. The proposed residential project includes a community gathering area / computer center and fitness center. St. Augustine's University Mary E. Phillips High School, Longview School, and Enloe Magnet High School are located within 0.50-miles of the proposed project Site. The proposed project will have no negative impact on educational and cultural facilities. No mitigation would be required.	
Commercial Facilities (Access and Proximity)	2	The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property. The proposed development also includes retail and medical commercial use providing new healthcare options for the community. Restaurants, banking, auto-service and other retail establishments are within 0.5-miles south of the proposed project Site along New Bern Avenue, the main east-west commercial corridor through the City of Raleigh. A Food Lion grocery is located 0.60-miles north of the proposed project Site. No mitigation would be required.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Health Care / Social Services (Access and Capacity)	1	The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property, effectively returning demand to the pre-2020 baseline. The proposed redevelopment plans include a medical facility as part of the new development which will provide new healthcare options needed for those within the nearby communities to create a positive impact. The proposed project Site is located within 0.5-miles of a Pharmacy (Josef's Pharmacy) and 2-miles of the WakeMed Hospital Campus. No mitigation would be required.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property, effectively returning demand to the pre-2020 baseline. The proposed Mixed-Use development plans include a solid waste and recycling collection area for disposal pickup. Construction activities will be conducted so as to minimize run-off and safely dispose of waste products. Any waste generated during construction will be handled/disposed per all applicable governmental regulations. Contact the NCDEQ Solid Waste Section at 217 W Jones Street Raleigh, NC 27603, (919) 707-8200 for additional guidance. No mitigation would be required.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property, returning wastewater/sewer	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		demand near to the pre-2020 baseline. The proposed project will be served by existing 8" sewer lines along N Fisher St and Oakwood Ave. The proposed development plans are currently under review by City of Raleigh Planning Department for conformance with applicable sewer design/capacity standards. No mitigation would be required.	
Water Supply (Feasibility and Capacity)	2	The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property, returning water demand near to the pre-2020 baseline. The proposed project will be served by existing 8" water lines along N Fisher St and Oakwood Ave. The proposed development plans are currently under review by City of Raleigh Planning Department for conformance with applicable water supply design/capacity standards. No mitigation would be required.	
Public Safety - Police, Fire and Emergency Medical	2	The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property, returning emergency response demand near to the pre-2020 baseline. With that said, public safety will not be diminished. The proposed development plans are currently under review by City of Raleigh Planning Department for conformance with applicable fire suppression design standards. The proposed project is located within 2-miles of the WakeMed Hospital Campus. No mitigation would be required.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Parks, Open Space and Recreation (Access and Capacity)	2	The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property, returning park / open space demand near to the pre-2020 baseline. The proposed project plans include a playground with a minimum of 4 play stations/activities and a covered picnic table with 2 tables and grill. The proposed project is located 1-mile from Lion's Park (multi-sport park including BMX trail, baseball fields , tennis courts, playground, and rec center). Fisher Street Park is located a block south of the proposed project. A Boys and Girls Club facility is located 0.45-miles north of the proposed project. No mitigation would be required.	
Transportation and Accessibility (Access and Capacity)	2	The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property, returning traffic demand near to the pre-2020 baseline. No new roads or road expansions are included in the proposed project plans. A bus stop is located at the southwest corner of the subject property Site (Oakwood Ave. at Fisher St.) No mitigation would be required.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	There are no unique natural features or water resources within the proposed project area or surrounding areas. No mitigation would be required.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The subject property is currently maintained as a vacant grassed lot in a heavily developed, highly trafficked, urban environment. The proposed project will not	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		have a negative effect on vegetation or wildlife. No mitigation would be required.	
Other Factors 1	2	No other factors are known that would adversely impact this proposed development.	
Other Factors 2			
CLIMATE AND ENERGY			
Climate Change		In accordance with Executive Order 14148: Initial Rescissions of Harmful Executive Orders and Actions, analysis of compliance for this authority is no longer required.	
Energy Efficiency	1	This development will adhere to current zoning and building code regulations to ensure utilization of energy efficient building components. Building materials and practices will incorporate the latest adopted building codes and green energy appliances. No mitigation would be required.	

Supporting documentation

Additional Studies Performed:

NV5. (December 13, 2025). Report of Phase I Environmental Site Assessment Washington Terrace Lot 4 Raleigh, North Carolina. NV5 Project Number 121-24-73559.

Field Inspection [Optional]: Date and completed

by:

Environmental Consultant, TRC, Engineers, Inc.

8/29/2025 12:00:00 AM

[Photo Log 0924 2025.pdf](#)

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

September 28, 2025. USDA Natural Resources Conservation Service - Web Soils Survey, National Cooperative Soil Survey. <https://websoilsurvey.nrcs.usda.gov/app/>
September 29, 2025. US Fish & Wildlife Service National Wetlands Inventory. <https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper>
September 29, 2025. US Fish & Wildlife Service Information for Planning and Consultation (IPaC) Endangered Species Review. <https://ipac.ecosphere.fws.gov/user/login>
September 29, 2025. The North Carolina

Department of Environmental Quality (NCDEQ) Natural Heritage Program (NHP) Endangered Species Review. <https://www.ncnhp.org/> September 28, 2025. United States Environmental Protection Agency Map of Sole Source Aquifer Locations. <https://www.epa.gov/dwssa/map-sole-source-aquifer-locations> September 28, 2025. The North Carolina Department of Environmental Quality (NCDEQ) Coastal Management. <https://www.deq.nc.gov/about/divisions/coastal-management/about-coastal-management/cama-counties> September 28, 2025. US Fish & Wildlife Service Coastal Barrier Resources Act. <https://www.fws.gov/program/coastal-barrier-resources-act/maps-and-data> September 28, 2025. National Wild and Scenic Rivers System. <https://rivers.gov/north-carolina> September 28, 2025. Federal Emergency Management Agency (FEMA) Flood Map Service Center (MSC) FIRMette. <https://msc.fema.gov/portal/home> October 24, 2025. ER-2026-39-2. Correspondence from Ramona Bartos, Catawba Indian Nation Tribal Historic Preservation Officer. October 31, 2025. ER 25-3013. Correspondence from Caitlin Rogers Deputy State Historic Preservation Officer, North Carolina Department of Natural and Cultural Resources State Historic Preservation Office to City of Raleigh. September 28, 2025. City of Raleigh iMAPS website for parcel data. <https://maps.raleighnc.gov/imaps/> June 30, 2025. JDavis Architects, Raleigh, NC. Fisher Grove Administrative Site Review Plan Set. (ASR-0043-2025).

[Fisher Grove - Site Plan Sheets for ER.pdf](#)

List of Permits Obtained:

Public Outreach [24 CFR 58.43]:

City of Raleigh will post a Finding of No Significant Impact (FONSI) and a Request for Release of Funds (RROF) for the required period before forwarding to HUD in Greensboro, NC. City of Raleigh will post the FONSI and RROF on the City's website (<https://raleighnc.gov/housing/services/community-development-reports-and-documents>).

Cumulative Impact Analysis [24 CFR 58.32]:

The construction of this affordable apartment complex is a short-term, single phase construction activity. This construction project is not linked with any other neighborhood/community construction and/or infrastructure projects. The project aims to provide new affordable housing options on the property as specified in the City's 2016 10-year housing plan goals. An adverse cumulative impact is not anticipated.

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

There are no alternatives or project modifications being considered at this time. The goal is to provide affordable rental housing for this community.

No Action Alternative [24 CFR 58.40(e)]

Many residents will be cost burdened with the high cost of market rate rentals in the City of Raleigh and Wake County.

Summary of Findings and Conclusions:

The project will entail temporary noise, dirt, and dust, but it will benefit the community by providing affordable housing and healthcare options in proximity to transit. The project will comply with all environmental regulations outlined in this review. Accounting for the voluntary Best Management Practices (BMPs) and conformance with required City of Raleigh, Wake County, and/or NCDEQ regulatory requirements presented below, this project will have no significant impact upon the environment.

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

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

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Contamination and Toxic Substances	Developer will incorporate radon mitigation system for entire building	N/A	Developer will provide Radon Mitigation system plan	

Project Mitigation Plan

Developer will be responsible for implementing the radon system

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 subject property is not within a civil or military airport runway clear zone nor does the proposed project included in this funding request propose construction of any new structures or other site features that could impact local airports. The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project complies with Airport Hazards requirements.

Supporting documentation

[RDU Map Exhibit.pdf](#)

[Airport contours RDU.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

The subject property is not within or near a North Carolina Coastal Barrier Resources Act (CBRA) area. Therefore, this project complies with the Coastal Barrier Resources Act.

Supporting documentation

[CBRS Exhibit.pdf](#)
[CAMA.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

The proposed project is located within a FEMA Area of Minimal Flood Hazard (Zone X). The attached FEMA Firmette identifies a nearby flood hazard elevation of 193 ft above mean sea level (amsl). The subject property has an elevation of 330 ft amsl per City of Raleigh 2-foot contour mapping and current USGS topograph, making the Site 137-feet higher than the identified flood hazard elevation.

(<https://maps.raleighnc.gov/iMAPS/>) 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

[Raleigh 2-ft Contours.pdf](#)

[Floodzone Exhibit.pdf](#)

[FIRMETTE_46a947da-5fcc-4751-8798-784ea75a6bdd.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

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

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

✓ Yes

No

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

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

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

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

Screen Summary

Compliance Determination

Construction activities would have short-term minor impacts related to emissions and fugitive dust. Long-term minor emissions from the operation of the development buildings and vehicle emissions would result in less than significant impacts. The project's county or air quality management district is in attainment status for all criteria pollutants. Wake County, NC historically has been 1-hour ozone (1979, revoked on June 17, 1984), 8-hour ozone (1997 revoked on December 26, 2007), and

carbon monoxide (1971, transportation conformity expired on September 18, 2015). Wake County was entered into a carbon monoxide (CO) Limited Maintenance Plan which documents that Wake County is well below the CO National Ambient Air Quality Standard (NAAQS) and introduced a State Implementation Plan (SIP), which outlined current levels of emissions. The project complies 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**

The subject property is not within a North Carolina Department of Environmental Quality (NCDEQ) Coastal Area Management Act (CAMA) County. The project complies with the Coastal Zone Management Act.

Supporting documentation[CAMA\(1\).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)
Reference		
https://www.onecpd.info/environmental-review/site-contamination		

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

☒ ASTM Phase I ESA

☐ ASTM Phase II ESA

☐ Remediation or clean-up plan

☐ ASTM Vapor Encroachment Screening.

☐ None of the above

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

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

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

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

✓ No

Explain:

NV5 Engineers and Consultants (NV5) completed a Phase I Environmental Site Assessment (ESA) of the subject property dated December 13, 2024 which did not identify any recognized environmental conditions (RECs) or controlled RECs (CRECs) associated with the subject property. No hazardous materials were observed stored on the subject property during TRC Engineers, Inc.'s September 24, 2025 Site Visit.

Yes

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

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

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

Yes

Explain:

✓ No

* Notes:

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

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

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

✓ Yes

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

No

8. Mitigation

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

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan*.

Can all adverse environmental impacts be mitigated?

No, all adverse environmental impacts cannot feasibly be mitigated.
Project cannot proceed at this location.

- ✓ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.
Provide all mitigation requirements** and documents in the Screen Summary at the bottom of this screen.

* Refer to CPD Notice [CPD-23-103](#) for additional information on radon mitigation plans.

** Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

9. Describe how compliance was achieved. 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.**

Developer will incorporate radon mitigation system for entire building

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

Complete removal

Risk-based corrective action (RBCA)

Other

* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

** Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. Radon analysis indicated elevated levels of radon or consideration of radon will occur following construction. Adverse radon 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. NV5 Engineers and Consultants (NV5) completed a Phase I Environmental Site Assessment (ESA) of the subject property dated December 13, 2024 which did not identify any recognized environmental conditions (RECs) or controlled RECs (CRECs) associated with the

subject property. No hazardous materials were observed stored on the subject property during TRC Engineers, Inc.'s September 24, 2025 Site Visit.

Supporting documentation

[NV5 Phase I ESA.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

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

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

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

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

Explain your determination:

TRC Engineers, Inc. staff reviewed the US Fish and Wildlife Information for Planning and Consultation (IPaC) (<https://ipac.ecosphere.fws.gov/>) - Official Species List Generated 9/29/2025. NC Heritage Program Natural & Cultural Resources Community listed species were also reviewed <https://www.ncnhp.org/data/speciescommunity-search> (Accessed 10/6/2025) and a Species Conclusion Table prepared. A species determination key was completed for the northern long-eared bat and/or tricolored bat indicating no effect to the proposed endangered species based on the specifics of the proposed project. No federally or state listed species are present at the site. Less than significant impacts to vegetation and wildlife habitats are anticipated. The proposed HUD assisted project is in compliance with the Endangered Species Act of 1973.

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

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

Screen Summary**Compliance Determination**

TRC Engineers, Inc. staff reviewed the US Fish and Wildlife Information for Planning and Consultation (IPaC) (<https://ipac.ecosphere.fws.gov/>) - Official Species List Generated 9/29/2025. NC Heritage Program Natural & Cultural Resources Community listed species were also reviewed <https://www.ncnhp.org/data/speciescommunity-search> (Accessed 10/6/2025) and a Species Conclusion Table prepared. A species determination key was completed for the northern long-eared bat and/or tricolored bat indicating no effect to the proposed endangered species based on the specifics of the proposed project. No federally or state listed species are present at the site. Less than significant impacts to vegetation and wildlife habitats are anticipated. The proposed HUD assisted project is in compliance with the Endangered Species Act of 1973. This project will have No Effect on listed species based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office. This project is in compliance with the Endangered Species Act.

Supporting documentation

[Species List_ Raleigh Ecological Services Field Office \(2\).pdf](#)
[Species Conclusion Table 25 1006 Fisher Grove.pdf](#)
[20250929 NE TA TRI CLR BAT RW.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**

The proposed HUD assisted project does not include a hazardous facility. The proposed project will not increase residential density or conversion. TRC Engineers, Inc. reviewed the NCDEQ Division of Waste Management Site Locator Tool documenting active UST/AST permits within a 1-mile radius of the proposed project Site. Aboveground storage tanks are only required to be registered with NCDEQ - Underground Storage Tanks (UST) Section if they meet the definition of an Oil Terminal Facility (Capacity over 21,000 gallons). Most ASTs do not meet this definition and do not require registration. TRC did not identify any registered ASTs on the NCDEQ Site Locator Tool within 1-Mile of the proposed project. TRC staff reviewed current Google aerial imagery and Streetview imagery (accessed 10/02/2025) and did not identify any AST containers > 100-gallons within 1-Mile of the proposed project. The project is in compliance with explosive and flammable hazard requirements. 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

[FIG - 2 Subject Property Aerial\(1\).pdf](#)

[FIG - 1 Subject Property Site Vicinity Exhibit\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

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

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

Yes

✓ No

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

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property. The project complies with the Farmland Protection Policy Act.

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

Screen Summary**Compliance Determination**

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property. The project complies with the Farmland Protection Policy Act.

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

Fisher-Grove

Raleigh, NC

900000010507023

Yes

✓ No

Floodplain Management

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

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

Yes

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

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

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

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

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

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

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

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

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

or other HUD assistance.

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

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

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

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

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

Describe:

✓ No

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

Yes

Describe:

✓ No

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

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

Select one of the following three options:

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

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

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

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

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

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

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary

Compliance Determination

The proposed project is located within a FEMA Area of Minimal Flood Hazard (Zone X). The attached FEMA Firmette identifies a nearby flood hazard elevation of 193 ft above mean sea level (amsl). The subject property has an elevation of 330 ft amsl per City of Raleigh 2-foot contour mapping and current USGS topograph, making the Site 137-feet higher than the identified flood hazard elevation. (<https://maps.raleighnc.gov/iMAPS/>). The project is in compliance with Executive Orders 11988 and 13690.

Supporting documentation

[Raleigh 2-ft Contours\(1\).pdf](#)

[Floodzone Exhibit\(1\).pdf](#)

[FIRMETTE_46a947da-5fcc-4751-8798-784ea75a6bdd\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Historic Preservation

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

Threshold

Is Section 106 review required for your project?

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

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

Step 1 – Initiate Consultation

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

- ✓ State Historic Preservation Offer (SHPO) Completed
- ✓ Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)
- ✓ Catawba Indian Nation Completed

Other Consulting Parties

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

Consulted with NC SHPO and the Catawba Indian Nation

Document and upload all correspondence, notices and notes (including comments and objections received below).

Was the Section 106 Lender Delegation Memo used for Section 106 consultation?

Yes

No

Step 2 – Identify and Evaluate Historic Properties

1. **Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:**

401 Elders Grove Way, Raleigh, NC 27610

In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.

Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
----------------------------------	-----------------------------	------------------	--------------------------

Additional Notes:

2. **Was a survey of historic buildings and/or archeological sites done as part of the project?**

Yes

✓ No

Step 3 –Assess Effects of the Project on Historic Properties

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5)] Consider direct and indirect effects as applicable as per guidance on direct and indirect effects.

Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.

✓ No Historic Properties Affected

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

Document reason for finding:

✓ No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Adverse Effect

Screen Summary**Compliance Determination**

Based on Section 106 consultation there are no conflicts with historic preservation of cultural resources. Correspondence with SHPO and THPO officials is attached. The project complies with Section 106.

Supporting documentation

[SHPO Response - Fisher Grove - ER-25-3013_NC.pdf](#)
[Catawba Response - Fisher Grove - 2026-39-2.docx](#)

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 proposed project involves the construction of the final phase of an affordable housing community (Washington Terrace). The subject property was previously constructed with multi-family residential housing units for approximately 70-years which were razed in 2020. The proposed project will remain consistent with former use and effectively return long-term noise levels to pre-2020 baseline levels. Construction activities would have noticeably higher noise levels than current levels. Operation of the development would have a minor long-term increase in noise levels from traffic and ground maintenance. These impacts would be less than significant. The project complies with the Noise Control Act of 1972. The project is in compliance with HUD's Noise regulation.

Supporting documentation

[USGS 1993.pdf](#)

[RDU Map Exhibit\(1\).pdf](#)

[NCDOT AADT Map.pdf](#)

[DNL Calculation.pdf](#)

[Airport contours RDU\(1\).pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

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

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

Yes

✓ No

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

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

✓ No

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

Yes

Screen Summary**Compliance Determination**

There are no Sole Source Aquifers located in North Carolina. The project complies with Sole Source Aquifer requirements and the Safe Drinking Water Act of 1974.

Supporting documentation

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 USFWS National Wetlands Inventory Map was reviewed. No wetlands were identified within the proposed project boundary or adjoining properties. The subject property was historically developed as affordable, multi-family residential housing for approximately 70-yrs. The former buildings were razed in 2020. The proposed project will return affordable residential housing to the subject property. No wetlands/potential wetlands were observed during TRC Engineers, Inc.'s September 24, 2025 Site Visit. The project complies with Executive Order 11990. The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.

Supporting documentation

[Wetlands Exhibit.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.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No