

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

Project Information

Project Name: Cook-Plaza-Homelessness-Resource-Center

HEROS Number: 900000010443938

Start Date: 12/17/2024

Responsible Entity (RE): MULTNOMAH COUNTY, COMMUNITY DEVELOPMENT
PORTLAND OR, 97204

RE Preparer: Fanny Rodriguez-Adams

State / Local Identifier:

Certifying Officer: Lolita Broadous

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable): PBS Engineering and Environmental

Point of Contact: Susan Garland

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: 19421 SE Stark St, Portland, OR 97233

Additional Location Information:

Figure 1 shows the project site location. Figure 2 shows the current configuration of the property. Figure 3 shows the proposed layout of the site following project completion.

Direct Comments to: Fanny Rodriguez- Adams, Program Specialist Senior
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Multnomah County Dept. of Human Services, 209 SW 4th
Avenue, Suite 200, Portland, OR 97204

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

This project will remodel an existing vacant commercial office building on the property serve as a Homelessness Resources Center. This building has two above-ground stories and a basement, with a total square footage of 14,150 sf. Renovation work will primarily target the interior of the building, where additional bathroom, shower, laundry, and meal preparation facilities will be added. Exterior work on the building will be limited to the addition of guardrails on the roof, replacement of outdoor HVAC equipment, installation of privacy fencing, and repair of any broken glazing or seals on windows and doors. Construction is expected to take place in 2025. When it opens, the remodeled building will serve as a day center, providing hygiene services, case management and housing navigation. The center will also retain the capacity to serve up to 90 people at a time during severe weather emergencies. In addition to the remodel of the existing building, 28 personal shelter units will be installed in what is currently the secure paved parking area, providing 24/7 village-style shelter for up to 42 people. The housing pods will be installed on wood platforms directly on top of the existing pavement. Ground disturbance for the project is expected to be limited to the extension of utility services to the personal shelter site. Permits have not been finalized but it is expected that utility trenching up to five feet deep, two feet wide, and up to 300 linear feet will take place to extend the existing utilities. See the draft plan set attached to this submittal.

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

In December 2023, HUD's Annual Homeless Assessment Report found that Oregon has the second-highest rate of unsheltered homeless people in the United States (HUD 2023). Oregon also ranked within the top five states with the biggest increase in experiences of homelessness since 2007, states with the biggest difference in homelessness since the start of the pandemic, and states with large changes in

unaccompanied youth experiencing homelessness. The Purpose and Need for this project is to improve the availability of services for those experiencing unsheltered homelessness. The day use facility will provide access to hygiene facilities as well as referral services to find transitional or long-term housing. In addition, the pod village will provide low-barrier overnight shelters for up to 42 people. During extreme weather events, the existing structure will continue to provide an extreme-weather event heating or cooling shelter. These services and facilities will improve the safety and health of program participants by providing an alternative to camping in unsafe locations. It will help provide a pathway to long-term housing success, as well as improving day-to-day lives by enabling program participants to have clean clothes, safe shower and bathroom facilities, heat during winter and cooling in the summer. The program will also improve conditions in surrounding neighborhoods where unsafe encampments may impede safe pedestrian routes, create unsanitary conditions, and become a focus of law enforcement activity.

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

The project site is located in a mixed-use transportation corridor with adjoining multi-family, commercial, and health care facilities. The Gresham has a population of approximately 110,000 (Gresham 2023) and is part of the larger Portland Metropolitan area, with a population of more than 2 million. The Gresham Community Development plan notes that residents in many areas of the City are at risk for housing displacement due to rising housing costs and the redevelopment of older homes. Housing sale prices and rental housing costs have increased sharply since 2018, which incomes have remained flat or grown slightly. Since 2013, City Council has recognized that addressing housing issues is fundamental to the success of Gresham, its overall vitality and character. The City has many efforts underway to address unmet housing needs. The City completed a Housing Capacity Analysis (HCA) in 2021, updated its Consolidated Plan for the 2021-2025 period, and City Council made housing a priority in the 2022-2025 Strategic Plan, among many other ongoing city efforts. In addition to City efforts, Metro, the area's regional government, has made supportive housing services one of its highest priorities (Metro 2024). A voter initiative passed in 2020 has raised funds for Metro to work with County Governments to reduce homelessness through programs and services that help people find and keep safe and stable homes. These include: * Emergency services such as outreach and shelter * Placement into housing * Help paying rent (both emergency and long-term rent assistance) * Advocacy and case management * Services in the areas of mental health, physical health, language and culture needs, education, employment, addiction and recovery, tenant rights and others. The proposed project is part of this larger, ongoing effort to address the crisis of unsheltered persons in our region.

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

[Fig 3 Site Plan.pdf](#)

[Fig 2 Site Map.pdf](#)

[Fig 1 Location.pdf](#)

[SitePhotos.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:

[Determinations and Compliance Findings Signature_heros-download-1738897858236.pdf](#)

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
B-24-CP-OR-1811	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$1,666,279.00

Estimated Total HUD Funded, \$1,666,279.00

Assisted or Insured Amount:

Estimated Total Project Cost [24 CFR 58.2 (a) \$8,360,000.00

(5)]:

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

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determination (See Appendix A for source determinations)</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6</p>		
<p>Airport Hazards Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project site is located approximately 8 miles southeast of the nearest airport, Portland International Airport. There are no military airports within 15,000 feet and no civilian airports within 2,500 feet. Figure 4 shows the location of the project site with respect to airports. The project is in compliance with Airport Hazards requirements.</p>
<p>Coastal Barrier Resources Act Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.</p>
<p>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Figure 5 shows that the project site is not located in a mapped flood hazard area. FIRMette 4105CO214J, effective February 1, 2019, is also attached as part of this submittal. No additional flood insurance regulations are triggered by the proposed project location. 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.</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5</p>		
<p>Air Quality Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Portland-Vancouver area is in maintenance for ozone (O3) and carbon monoxide (CO), and the proposed project site is located within this area. In 2007 the Oregon Department of Environmental Quality and the Southwest Clean Air Agency (Washington) developed maintenance plans to reduce the presence of and</p>

	<p>impacts from ozone. In 2004 the Department of Environmental Quality adopted the Portland-area carbon monoxide maintenance plan. These plans focus on improving vehicle and industrial sources of ozone and carbon monoxide, which are the largest contributors to these pollutants. Documentation on the AQMAs covering the project site is attached. The proposed project is not restricted by these plans. The EPA de minimis levels for generation in a maintenance area are 50 tons/year for ozone and 100 tons/year for carbon monoxide (https://www.epa.gov/general-conformity/de-minimis-tables). The only construction included in the project are renovations in the existing building, and installation of "pod village" shelters in the current parking area. The site is currently vacant, although maintenance of the building and grounds is taking place on an as-needed basis. Once operational, an estimate of 20 vehicle trips per day for staff has been used for calculations, although the site is located very close to light rail and bus transportation, so actual daily vehicle trips may be fewer. All of these trips are assumed to originate locally (20 mile round trips). EPA provides average emissions data for several classes of vehicles. These calculations used the "fleet" category. In order to avoid biasing the calculations low, a category with relatively higher emissions levels was chosen. Estimate Starting points: 7,300 trips of 20 miles EPA estimates the "average" vehicle CO emission per mile was 4.702 grams in 2020, the most recent year available. This results in a projected yearly increase in CO emissions resulting from the expanded field capacity at the park of: $(7300 * 20 * 4.702) = 686,492$ grams CO</p>
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		<p>per year This converts to 0.69 metric tons/year, which is well below the EPA de minimis level of 100 tons/year in maintenance areas. The de minimis level for ozone emissions in maintenance areas is also 100 tons/year. Vehicles do not typically emit ozone directly, but NOx emissions can contribute to its formation in the lower atmosphere and are used as a proxy measure. EPA estimates 0.686 grams per mile NOx emissions for the average fleet vehicle (2020). Using the same calculations as above, this results in increased emissions of 100,156 grams or 0.10 tons of NOx per year from new vehicle trips. The EPA Ozone (NOx) de minimis values for air quality maintenance areas is 100 tons per year. Both values are well below de minimis emissions guidelines for Air Quality Maintenance Areas. Attachments: AQ documents.pdf</p>
<p>Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project is not located in a coastal zone. Figure 6, attached, shows the distance between the project site and Oregon's designated coastal zone. No additional development restrictions due to coastal considerations are in place for this project site.</p>
<p>Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The Phase I ESA identified no recognized environmental conditions likely to impact the property. During this NEPA assessment, a site inspection was performed, property manager interview conducted, and DEQ records were checked to ensure there were no new reasonable ascertainable conditions on or near the property with the potential to impact conditions there. No new environmental concerns were identified. Figure 7 shows sites regulated by the Oregon Department of Environmental Quality with respect to the location of the project site. A hazardous building materials survey was</p>

		<p>performed for the building on the property in October 2022. No asbestos-containing building materials were identified during the survey. In addition, three sections of paint were tested for lead content. Paint on interior stairway steps tested positive for lead at 52.2 parts per million (ppm). During renovation, any areas where hazardous building materials have been identified, or where suspect materials are found that have not been previously tested, will be handled, remediated, and safely disposed per Oregon and OSHA standards.</p>
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area. This project is in compliance with the Endangered Species Act. The U.S. Fish and Wildlife Service issued a list of threatened and endangered species that may occur near the proposed project area on December 19, 2024. Five special status species were listed. Northern spotted owl <i>Strix occidentalis caurina</i> Streaked horned lark <i>Eremophila alpestris strigata</i> Yellow-billed cuckoo <i>Coccyzus americanus</i> Northwestern pond turtle <i>Actinemus marmorata</i> Monarch butterfly <i>Danaus Plexippus</i> The Northern spotted owl's preferred habitats, as reported by USFWS, are mature and structurally complex forests that contain the structures and characteristics required for nesting, roosting, and foraging. General features that support nesting and roosting typically include a moderate to high canopy cover; a multi-layered, multi-species canopy with large overstory trees; a high incidence of large trees with various deformities; large snags; large accumulations of fallen trees and other woody debris on the ground; and</p>

		<p>sufficient open space below the canopy for northern spotted owls to fly. Northern spotted owls use the following forest types: Douglas-fir, western hemlock, grand fir, white fir, ponderosa pine, Shasta red fir, mixed evergreen, mixed conifer hardwood and coast redwood. The project is located in a dense urban area and is not near or in such a habitat, so it is unlikely to have any effect on the northern spotted owl. The preferred habitat of streaked horned larks are prairie and open coastal areas. A key attribute of suitable lark habitat is large open landscape free from visual obstruction. The project site is located in a dense urban area where no prairie or open coastal areas are present. The development of this site will not affect streak horned larks. The Oregon Department of Fish and Wildlife (ODFW) reports that the yellow-billed cuckoo is an extirpated species in Oregon state. This project is unlikely to have any effect on yellow-billed cuckoos. Northwestern Pond turtles are semi-aquatic, requiring both aquatic and terrestrial habitats that are within close proximity and connected to one another. Northwestern pond turtles use aquatic habitat for breeding, feeding, overwintering, and sheltering. Preferred aquatic conditions are those with abundant basking sites, underwater shelter sites, and standing or slow-moving water. The planned project is more than 1,000 feet from any surface water, and will not increase the amount of impervious area in the watershed. This project is unlikely to have an effect on the northwestern pond turtle. The monarch butterfly is a migratory species that relies on certain host plant species (milkweed, <i>Asclepias</i> spp.) for food in the caterpillar stage. The project site is located in a fully-built out urban lot</p>
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		<p>where milkweed other native vegetation is not present. The redevelopment of this site will not affect the monarch butterfly. The USFWS reports no critical habitats within the project area, as shown in Figure 8 (USFWS 2023e). The National Oceanic and Atmospheric Administration (NOAA) Fisheries agency reports that the drainage basin where the proposed project is located is essential fish habitat for Chinook and Coho Salmon. Because all stormwater will be managed on site, no process water will be generated, and no increase in impervious area will result from this project, there will be no impacts to NOAA fisheries species as a result of this project.</p>
<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Prior to the site visit, PBS performed a detailed review of aerial photographs of the area within one mile of the proposed project site in order to identify any possible above-ground tanks that may contain explosive materials. No tanks were identified. During the site visit, PBS staff checked these findings by performing a windshield survey of non-residential streets within a mile of the site. No Explosives or Flammable Hazards were identified. There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.</p>
<p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>The project site is a vacant commercial office site, which is fully built-out and paved, and is within a commercial corridor in the City of Gresham's urban growth boundary. There is no agriculture or prime farmland at or near the site. This project is in compliance with prime farmland regulations.</p>

<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Figure 5 shows that the project site is not located in a mapped flood hazard area or in the 0.2% flood hazard area. FIRMette 4105CO214J, effective February 1, 2019, is also attached as part of this submittal. No additional flood regulations are triggered by the proposed project location. This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Multnomah County notified Oregon SHPO and tribal historic preservation offices with an interest in the project location on November 14, 2024. SHPO assigned the project case number 24-2274. On November 20, 2024, SHPO sent a concurrence letter that no historical resources would be impacted by the project. The 30-day notification period for THPOs expired on December 19, 2024. The Grand Ronde tribe THPO requested a copy of the Inadvertent Discovery Plan for the project, which was sent to them on January 14. No other concerns or questions were received from the Notified THPOs. Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: None. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>A Noise Assessment was conducted. The noise level was normally unacceptable: 72.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation with mitigation. Mitigation on the residential units will include air conditioning in each unit and acoustic tile or equivalent to ensure noise levels are below HUD guidelines. Per HUD's noise guidance document this mitigation is above the requirements in</p>

		the City building code. See attached documents.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The proposed project site is not located on a sole source aquifer. Figure 10 shows that the nearest SSA is located across the Columbia River in Vancouver, WA. The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not located near any wetlands or surface waters. The site is already completely paved, and stormwater is managed onsite via existing drywells. There will be no changes to impervious area or stormwater drainage on the project site and no impact to wetlands will occur. The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not located near any proposed or designated wild and scenic rivers. The nearest wild and scenic river is the Sandy River, which is approximately four miles east of the project site and its nearest point. No impacts to wild and scenic rivers are anticipated. This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. Per the new the executive order this section may be disregarded without affecting the overall findings.

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	1	<p>The Gresham Community Development Plan sets out the land use goals and policies for the community. This project will provide emergency shelter during weather emergencies and supported transitional housing for up to 20 people who are experiencing homelessness. Land use policies pertinent to this project include the housing policies described in Chapter 10 of the plan (https://www.greshamoregon.gov/Comprehensive-Plan/) The Plan prioritizes the need to diversify housing from the currently-typical single family lot so that other housing types and more affordable housing become available. About 44% of Gresham's households are cost-burdened, which has factored into the increase in unhoused residents. To quote from the plan: Housing Need of People Experiencing Homelessness: The 2022 Point-In-Time Count describes approximately 48 households experiencing unsheltered homelessness in Gresham in 2022.5 In addition, 1,106 students in the Gresham-Barlow, Centennial, and Reynolds School Districts experienced homelessness. 6 The number of people experiencing homelessness in Multnomah County was 5,228 in 2022.7 These numbers may be underestimates, especially because people experiencing homelessness may move between cities in the Portland region. Strategies to support the needs of these households and individuals will range from emergency assistance (including rent and utility assistance), permanent supportive</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>housing (including supportive housing with services), and improved access to an affordable unit. This project will help to implement the Comprehensive Plan goals by providing transitional housing to unsheltered individuals as well as outreach and assistance to other residents experiencing homelessness. The scale and design of the site will continue to fit in with the neighborhood as the existing building will remain and will be rehabilitated. Zoning for the site is Commercial Multi-Family (CMF), which is compatible with its planned use.</p>	
<p>Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff</p>	<p>2</p>	<p>This site is already developed, but currently vacant. The remodeling of the building and addition of pod shelters to one of the paved parking areas will not change conditions with regard to soil suitability, slope, erosion, or drainage. The project site is flat and paved. Ground disturbance during the site renovation will be minimal. Construction BMPs and an erosion control plan will be followed during construction to ensure there are no erosion impacts. No changes to the current drainage or storm water runoff are planned as part of this project. Stormwater on the project site and in the surrounding area is managed on-site via drywells. The soils are mapped as Multnomah-Urban land complex, 0-3% slopes. There are no significant development or drainage restrictions on this type of soil.</p>	
<p>Hazards and Nuisances including Site Safety and Site-Generated Noise</p>	<p>2</p>	<p>No new hazards or nuisances such as noise are anticipated from the proposed project. This site will operate as an emergency weather shelter, transitional housing site, and will provide resources for unhoused individuals in the area.</p>	<p>Noise mitigation beyond that required in City Code is incorporated as part of the project design.</p>
<p>SOCIOECONOMIC</p>			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Employment and Income Patterns	2	Short term employment associated with the project will include architectural, engineering, planning, permitting and other development professionals. Construction of the project will create short term jobs builders and renovation contractors. Long-term employment directly associated with the project site will increase slightly as a result of the proposed project. Following construction, the building will provide onsite employment for shelter staff, support providers, and property maintenance staff. Indirect employment and income patterns will also likely improve as a result of the project. Safe transitional housing combined with support services are important.	
Demographic Character Changes / Displacement	2	The project is not anticipated to have an adverse impact on the demographic character of the neighborhood as the property is in an existing mixed-use neighborhood. No residents will be displaced as a result of the project as the project site property is currently vacant.	
Environmental Justice EA Factor	2	No negative impacts that cannot be mitigated as part of project design have been identified during this assessment. No disproportionate adverse impacts to low income or minority communities will occur as part of this project.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	No impacts to educational or cultural facilities are anticipated as a result of this project. There will be no significant increase in households that could cause crowding of existing facilities. Davis Elementary school is located approximately 1,000 feet north of the project site. Gresham high school is located approximately 1 mile to the southeast, and can be accessed by public transportation from a stop two blocks from the project site. Many cultural facilities are located nearby or easily accessible by public transportation. The Rockwood branch of the Multnomah County Library system is located less than a mile west, on a public transportation route from the project site.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Commercial Facilities (Access and Proximity)	2	The project site is located in a mixed use neighborhood with a full range of commercial facilities available nearby. Restaurants and supermarkets are located on public transportation routes along Burnside and Stark Streets. There are facilities nearby for auto repair, laundry, veterinary services, and grocery. The neighborhood is served by a robust public transportation network of bus and light rail service, so any commercial facilities not available locally can be reached by transit.	
Health Care / Social Services (Access and Capacity)	1	Social services will be available onsite to assist those experiencing weather emergencies or homelessness. Cook Plaza staff will connect residents and day users with behavior health referrals, transitional housing assistance, hygiene and cooking facilities, and counseling. Across the street from the proposed project site is a Kaiser Permanente medical campus. That provides primary care, eye care, and pharmacy services for those with Kaiser insurance. Urgent care facilities are available within one mile to the east and south east of the project site, along public transit routes. The nearest hospital with an emergency room is the Legacy Mount Hood Medical Center, which is located approximately 1.5 miles east of the project site on Stark Street. Ambulance service is available throughout the metropolitan area and is provided by the company AMR under contract to Multnomah County. 2024 statistics show that ambulances were able to arrive to life threatening emergencies in the Metro area within 8 minutes for 90% of the time(https://www.opb.org/article/2024/11/01/amr-ambulance-multnomah-county-reliable/).	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	Solid waste and recycling services are provided to the project site by Waste Management of Oregon (https://www.oregonmetro.gov/tools-living/garbage-and-recycling/find-your-hauler). This project will not involve manufacturing or industrial processes, so only typical household	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		and office type wastes and recycling are expected to be generated.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The City of Gresham provides sanitary sewer service to the project site. This project will produce only normal sanitary wastes, not manufacturing or industrial process waste. All household and commercial sanitary wastes are treated at the City wastewater treatment plant, located north of the project site. It treats an average of 12 million gallons per day for Gresham and neighboring communities. This project will not result in a significant increase in sanitary wastewater or in the type of wastes the plant treats.	
Water Supply (Feasibility and Capacity)	2	The City of Gresham provides municipal drinking water to the project site. Gresham and the neighboring Rockwood Water Peoples Utility District operate the water system, which is sourced from the Bull Run watershed, groundwater wells in the Southshore Columbia Well Field. Prior to distribution, municipal water is filtered and treated with chlorine to remove any contaminants. This project will not result in a large increase in the number of households or other significant drain on the water supply. No impacts to the municipal drinking water system are anticipated from this project.	
Public Safety - Police, Fire and Emergency Medical	1	No negative impacts to public health and safety are anticipated from this project. The Portland-Gresham metropolitan area, as with many locations on the west coast, has been experiencing a homelessness crisis. There are far fewer options for transitional housing or shelters than there is currently a need for. This results in informal camps that can cause health and safety concerns for camp residents and their neighbors. This project will offer outreach services and some transitional housing to individuals experiencing homelessness. The pod shelters planned for this project will be located in a secure, fenced area, where residents will be safe and camps will not create a public nuisance. During hot and cold	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>weather events, the existing building will perform as an emergency shelter. Cold weather can be deadly both for unhouses residents and those who are house but have inadequate or unsafe heating sources. This facility will provide a warm indoor space during cold weather emergencies, and a cool indoor space during extreme heat events, when the elderly are particularly vulnerable to heat related health issues. By creating safe, supervised places for unhoused residents to receive assistance and transitional housing, this project will significant increase the safety of its clients, and will also incremental improve the burden on public safety services by reducing calls regarding unsanctioned campsite emergency calls. Emergency Services are readily available at the proposed project site. Ambulance service typically arrives within 8 minutes for life-threatening emergencies, and he hospital emergency room is less than three miles from the site on Stark Street. Two fire stations are located within about a mile of the project site. Gresham Fire and Emergency Station 74 is located about a mile north of the project site, and the main Gresham fire station is located about a mile to the southeast. Police service is also readily available. The main Gresham police department is located less than a mile to the southeast at the Gresham Civic Center.</p>	
<p>Parks, Open Space and Recreation (Access and Capacity)</p>	<p>2</p>	<p>No adverse impacts to parks or open spaces are anticipated from this project. The project will redevelop and existing commercial property and will not reduce open space or block access to it. Parks and open spaces are located nearby and are also accessible by public transportation from stops within two blocks of the project site. Davis Park is located less than a quarter mile north and provides skateboarding facilities, a walking path, and a futsal court. About a half mile to the northeast are the Parsons Pond and Fujitsu Pond natural area and fishing facility. Sports fields are</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		located at Pat Pfeifer Park within a mile to the west.	
Transportation and Accessibility (Access and Capacity)	2	The project site is served by frequent public transportation that connects throughout the entire metropolitan area. The #20 Burnside bus stops right outside the facility and provides service to downtown Portland, downtown Gresham, Gresham Mt.Hood Community College, the Gresham Transit Center to the east, and as far west as the Beaverton Transit center. Max light rail service is also available nearby, with the Ruby Junction blue line stop located two blocks to the south. This line connects all the way to Hillsboro, at the west of the Metropolitan area, and east to the Cleveland Stop and the east end. Connections are available from this line to the entire metropolitan area. Dial a ride service is available for disabled passengers through Lift Paratransit. This is an ADA accessible shared-ride service where trip reservations can be made up to three days in advance for service.	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	No unique natural features or water resources are located in or near the project area. No impacts to natural features or water resources are anticipated from this project.	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	The project site is vacant but previously developed. It is fully paved and built out with the exception of perimeter landscaping. It is located in a dense urban area. Any vegetation damaged or removed during the remodel will be replaced with climateappropriate plants as approved by the City code. Wildlife use of the site is extremely limited as it is fully paved and built out. Urban birds such as crows and sparrows are likely to forage through the property, and small mammals such as squirrels or other rodents may do the same. As the project site is already developed, it is not anticipated that this project will significantly impact any wildlife species.	
Other Factors 1			
Other Factors 2			

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
CLIMATE AND ENERGY			
Climate Change	2	No impacts to, or hazards from climate change are anticipated as a result of this project.	
Energy Efficiency	2	While energy consumption will slightly increase at the project site because the currently vacant facility will go into use for community outreach and transitional housing, the interior of the existing building is being remodeled to include energyefficient appliances and water-saving fixtures. The region is well-supplied with both renewable and conventional energy sources, and has a large proportion of hydropower and wind power in the region's supply. This project will not represent a significant increase in households or a new energy intensive use, and is not anticipated to impact energy supplies or consumption in the region.	

Supporting documentation

Additional Studies Performed:

PBS. 2022a. Hazardous Material Survey Report, 19415 to 19421 SE Stark Street Portland, OR. Prepared for Multnomah County. October. PBS 2022b. Phase I Environmental Site Assessment, Cook Plaza. 19415 and 19421 SE Stark Street Gresham, Oregon. Prepared for Multnomah County. September.

Field Inspection [Optional]: Date and completed by:

[SitePhotos.pdf](#)

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

City of Gresham, 2025. Maps and GIS Services. Available from <https://www.greshamoregon.gov/services/maps-and-gis/> City of Gresham, 2023. Gresham Community Development Plan. Revised edition. August. HUD. 2023. Homelessness Assessment Report <https://www.huduser.gov/portal/datasets/ahar/2023-ahar-part-1-pit-estimates-of-homelessness-in-the-us.html> Metro. 2024 Supportive Housing Services. <https://www.oregonmetro.gov/public-projects/supportive-housing-services> TriMet,

2025. Transportation Routes and Schedules. Available from
<https://trimet.org/home/routes/>

List of Permits Obtained:

No operational permits will be required once construction is complete. State and local permits needed for construction will include: * Oregon Construction General Stormwater Permit * Gresham Building permits * Gresham utility connection permits * Gresham Occupancy permit

Public Outreach [24 CFR 58.43]:

In person Community Engagement Public meeting at Cook Plaza on September 23, 2024. In person Multnomah County Board of County Commissioners presentation on 9/05/2024 which is also open to the public to attend or watch virtually. Newspaper publication for a 15 day public comment period on the Gresham Outlook newspaper will be published 2/11/2025 through 2/26/2025. Please see attached for additional stakeholders engagement efforts.

[Cook Plaza Stakeholders for Engagement.pdf](#)

Cumulative Impact Analysis [24 CFR 58.32]:

This project will have an incrementally positive impact when combined with other local and regional initiatives to address homelessness and create safe and livable communities for all residents. Regional governments, health organizations, and homeless service providers have committed to creating more affordable housing, long-term supportive housing, transitional housing and shelters. There has also been a push to increase access to behavioral health care and substance abuse services, as these issues often present significant barriers to achieving long-term housing.

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

This building is owned by the County, it has been used for extreme weather shelter in the past and would be a beneficial add on to the scope of work to have transitional housing. It's easily accessible by multiple sources of public transit, walkable and economically feasible since buildable land is in short supply in the urban growth boundary.

No Action Alternative [24 CFR 58.40(e)]

If this project did not go forward, the currently vacant site would likely remain vacant for a longer period of time. No new transitional housing would be made available, and emergency weather shelters would not be modernized. Hygiene services such as showering and meal service would not be available at this location.

Summary of Findings and Conclusions:

No impacts as defined under NEPA have been identified that cannot be mitigated by the project design. The project will improve health, social services, and emergency preparedness.

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	No CERCLA environmental conditions were identified. Hazardous building materials will be abated prior to renovations of the existing building per the hazmat survey that has been performed. Transitional housing units are prefabricated and will be placed on platforms above the ground, where radon intrusion is unlikely to occur.	N/A	A hazardous building materials survey has been performed for the existing structure which will be renovated. All hazardous building materials will be abated prior to construction and proper handling and disposal per State and OSHA regulations	

			will be followed.	
Noise Abatement and Control	See summary below.	N/A	Noise mitigation above that required in the current building code will be included in project design for the transitional housing units. This will include air conditioning in each unit and acoustic tiles or equivalent wall treatment to ensure safe and comfortable noise levels are met.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	Noise mitigation beyond that required in City Code is incorporated as part of the project design.	N/A	See above for noise mitigation that is part of project design.	

Project Mitigation Plan

Upon completion of the project as-builts and abatement documentation will be submitted to demonstrate the proper completion of mitigation measures proposed.

Supporting documentation on completed measures

APPENDIX A: Related Federal Laws and Authorities

Airport Hazards

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

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

No

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

Yes

Screen Summary

Compliance Determination

The project site is located approximately 8 miles southeast of the nearest airport, Portland International Airport. There are no military airports within 15,000 feet and no civilian airports within 2,500 feet. Figure 4 shows the location of the project site with respect to airports. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[Fig 4 airport.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

Coastal Barrier Resources

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

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Compliance Determination

This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Flood Insurance

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

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

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

Yes

2. Upload a FEMA/FIRM map showing the site here:

[FIRMETTE_f006298f-d72d-4256-9530-ae58c957bc6f.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The [FEMA Map Service Center](#) provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use the best available information to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

No

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

Yes

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

Yes

✓ No

Screen Summary

Compliance Determination

Figure 5 shows that the project site is not located in a mapped flood hazard area. FIRMette 4105CO214J, effective February 1, 2019, is also attached as part of this submittal. No additional flood insurance regulations are triggered by the proposed project location. 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

[Fig 5 fema.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Air Quality

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

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

Yes

No

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

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

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

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

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

- ✓ Ozone
- Particulate Matter, <2.5 microns
- Particulate Matter, <10 microns

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

Carbon monoxide 100.00 ppm (parts per million)
Ozone 50.00 ppb (parts per million)

Provide your source used to determine levels here:

The EPA de minimis levels for generation in a maintenance area are 50 tons/year for ozone and 100 tons/year for carbon monoxide (<https://www.epa.gov/general-conformity/de-minimis-tables>). The only construction included in the project are renovations in the existing building, and installation of "pod village" shelters in the current parking area.

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

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

Enter the estimate emission levels:

Carbon monoxide 0.69 ppm (parts per million)
Ozone 0.10 ppb (parts per million)

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

Yes, the project exceeds *de minimis* emissions levels or screening levels.

Screen Summary

Compliance Determination

The Portland-Vancouver area is in maintenance for ozone (O3) and carbon monoxide (CO), and the proposed project site is located within this area. In 2007 the Oregon

Department of Environmental Quality and the Southwest Clean Air Agency (Washington) developed maintenance plans to reduce the presence of and impacts from ozone. In 2004 the Department of Environmental Quality adopted the Portland-area carbon monoxide maintenance plan. These plans focus on improving vehicle and industrial sources of ozone and carbon monoxide, which are the largest contributors to these pollutants. Documentation on the AQMAs covering the project site is attached. The proposed project is not restricted by these plans. The EPA de minimis levels for generation in a maintenance area are 50 tons/year for ozone and 100 tons/year for carbon monoxide (<https://www.epa.gov/general-conformity/de-minimis-tables>). The only construction included in the project are renovations in the existing building, and installation of "pod village" shelters in the current parking area. The site is currently vacant, although maintenance of the building and grounds is taking place on an as-needed basis. Once operational, an estimate of 20 vehicle trips per day for staff has been used for calculations, although the site is located very close to light rail and bus transportation, so actual daily vehicle trips may be fewer. All of these trips are assumed to originate locally (20 mile round trips). EPA provides average emissions data for several classes of vehicles. These calculations used the "fleet" category. In order to avoid biasing the calculations low, a category with relatively higher emissions levels was chosen. Estimate Starting points: 7,300 trips of 20 miles EPA estimates the "average" vehicle CO emission per mile was 4.702 grams in 2020, the most recent year available. This results in a projected yearly increase in CO emissions resulting from the expanded field capacity at the park of: $(7300 * 20 * 4.702) = 686,492$ grams CO per year This converts to 0.69 metric tons/year, which is well below the EPA de minimis level of 100 tons/year in maintenance areas. The de minimis level for ozone emissions in maintenance areas is also 100 tons/year. Vehicles do not typically emit ozone directly, but NOx emissions can contribute to its formation in the lower atmosphere and are used as a proxy measure. EPA estimates 0.686 grams per mile NOx emissions for the average fleet vehicle (2020). Using the same calculations as above, this results in increased emissions of 100,156 grams or 0.10 tons of NOx per year from new vehicle trips. The EPA Ozone (NOx) de minimis values for air quality maintenance areas is 100 tons per year. Both values are well below de minimis emissions guidelines for Air Quality Maintenance Areas.

Attachments: AQ documents.pdf

Supporting documentation[AQ -ozone.pdf](#)[AQ -CO.pdf](#)[Appendix B Ozone.pdf](#)[Appendix B EPA Emissions table_04_43_060821.pdf](#)[Appendix B emmissions.pdf](#)[Appendix B De Minimis Tables.pdf](#)**Are formal compliance steps or mitigation required?**

Cook-Plaza-Homelessness-
Resource-Center

Portland, OR

900000010443938

Yes

✓ No

Coastal Zone Management Act

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

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

Yes

No

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

Screen Summary

Compliance Determination

This project is not located in a coastal zone. Figure 6, attached, shows the distance between the project site and Oregon's designated coastal zone. No additional development restrictions due to coastal considerations are in place for this project site.

Supporting documentation

[Fig 6 coastal.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:

The Phase I ESA identified no recognized environmental conditions likely to impact the property. During this NEPA assessment, a site inspection was performed, property manager interview conducted, and DEQ records were checked to ensure there were no new reasonable ascertainable conditions on or near the property with the potential to impact conditions there. No new environmental concerns were identified.

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.**

No CERCLA environmental conditions were identified. Hazardous building materials will be abated prior to renovations of the existing building per the hazmat survey that has been performed. Transitional housing units are prefabricated and will be placed on platforms above the ground, where radon intrusion is unlikely to occur.

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

The Phase I ESA identified no recognized environmental conditions likely to impact the property. During this NEPA assessment, a site inspection was performed, property manager interview conducted, and DEQ records were checked to ensure there were no new reasonable ascertainable conditions on or near the property with the potential to impact conditions there. No new environmental concerns were identified. Figure 7 shows sites regulated by the Oregon Department of Environmental Quality

with respect to the location of the project site. A hazardous building materials survey was performed for the building on the property in October 2022. No asbestos-containing building materials were identified during the survey. In addition, three sections of paint were tested for lead content. Paint on interior stairway steps tested positive for lead at 52.2 parts per million (ppm). During renovation, any areas where hazardous building materials have been identified, or where suspect materials are found that have not been previously tested, will be handled, remediated, and safely disposed per Oregon and OSHA standards.

Supporting documentation

[Fig 7 DEQ.pdf](#)

[Cook Hazmat.pdf](#)

[PhIRportSEStarkStGreshamOR_Final_signed.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Endangered Species

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

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

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

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

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

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

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

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below. Documentation may include letters from the Services, species lists from the Services’ websites, surveys or other documents and analysis showing that there are no species in the action area.

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

Screen Summary

Compliance Determination

This project will have No Effect on listed species because there are no listed species or designated critical habitats in the action area. This project is in compliance with the Endangered Species Act. The U.S. Fish and Wildlife Service issued a list of threatened and endangered species that may occur near the proposed project area on December 19, 2024. Five special status species were listed. Northern spotted owl *Strix occidentalis caurina* Streaked horned lark *Eremophila alpestris strigata* Yellow-billed cuckoo *Coccyzus americanus* Northwestern pond turtle *Actinemus marmorata* Monarch butterfly *Danaus Plexippus* The Northern spotted owl's preferred habitats, as reported by USFWS, are mature and structurally complex forests that contain the structures and characteristics required for nesting, roosting, and foraging. General features that support nesting and roosting typically include a moderate to high canopy cover; a multi-layered, multi-species canopy with large overstory trees; a high incidence of large trees with various deformities; large snags; large accumulations of fallen trees and other woody debris on the ground; and sufficient open space below the canopy for northern spotted owls to fly. Northern spotted owls use the following forest types: Douglas-fir, western hemlock, grand fir, white fir, ponderosa pine, Shasta red fir, mixed evergreen, mixed conifer hardwood and coast redwood. The project is located in a dense urban area and is not near or in such a habitat, so it is unlikely to have any effect on the northern spotted owl. The preferred habitat of streaked horned larks are prairie and open coastal areas. A key attribute of suitable lark habitat is large open landscape free from visual obstruction. The project site is located in a dense urban area where no prairie or open coastal areas are present. The development of this site will not affect streak horned larks. The Oregon Department of Fish and Wildlife (ODFW) reports that the yellow-billed cuckoo is an extirpated species in Oregon state. This project is unlikely to have any effect on yellow-billed cuckoos. Northwestern Pond turtles are semi-aquatic, requiring both aquatic and terrestrial habitats that are within close proximity and connected to one another. Northwestern pond turtles use aquatic habitat for breeding, feeding, overwintering, and sheltering. Preferred aquatic conditions are those with abundant basking sites, underwater shelter sites, and standing or slow-moving water. The planned project is more than 1,000 feet from any surface water, and will not increase the amount of impervious area in the watershed. This project is unlikely to have an effect on the northwestern pond turtle. The monarch butterfly is a migratory species that relies on certain host plant species (milkweed, *Asclepias* spp.) for food in the caterpillar stage. The project site is located in a fully-built out urban lot where milkweed other native vegetation is not present. The redevelopment of this site will not affect the monarch butterfly. The USFWS reports no critical habitats within the project area, as shown in Figure 8 (USFWS 2023e). The National Oceanic and Atmospheric

Administration (NOAA) Fisheries agency reports that the drainage basin where the proposed project is located is essential fish habitat for Chinook and Coho Salmon. Because all stormwater will be managed on site, no process water will be generated, and no increase in impervious area will result from this project, there will be no impacts to NOAA fisheries species as a result of this project.

Supporting documentation

[Yellow-billed Cuckoo.pdf](#)

[Streaked Horned lark.pdf](#)

[Northwestern Pond Turtle.pdf](#)

[Northern spotted owl.pdf](#)

[Monarch butterfly.pdf](#)

[EFH Mapper - Reporting Page.pdf](#)

[Species List_ Oregon Fish And Wildlife Office.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

Prior to the site visit, PBS performed a detailed review of aerial photographs of the area within one mile of the proposed project site in order to identify any possible above-ground tanks that may contain explosive materials. No tanks were identified. During the site visit, PBS staff checked these findings by performing a windshield survey of non-residential streets within a mile of the site. No Explosives or Flammable Hazards were identified. There are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

✓ No

Farmlands Protection

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

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

Yes

No

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

The project site is a vacant commercial office site, which is fully built-out and paved, and is within a commercial corridor in the City of Gresham's urban growth boundary. There is no agriculture or prime farmland at or near the site. This project is in compliance with prime farmland regulations.

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 project site is a vacant commercial office site, which is fully built-out and paved, and is within a commercial corridor in the City of Gresham's urban growth boundary. There is no agriculture or prime farmland at or near the site. This project is in compliance with prime farmland regulations.

Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

Floodplain Management

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

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

Yes

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

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

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

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

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

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

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

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

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

or other HUD assistance.

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

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

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

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

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

Describe:

No

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

Yes

Describe:

No

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

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

Select one of the following three options:

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

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

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

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

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

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

5. Does your project occur in the FFRMS floodplain?

Yes

No

Screen Summary

Compliance Determination

Figure 5 shows that the project site is not located in a mapped flood hazard area or in the 0.2% flood hazard area. FIRMette 4105CO214J, effective February 1, 2019, is also attached as part of this submittal. No additional flood regulations are triggered by the proposed project location. This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.

Supporting documentation

[FIRMETTE_f006298f-d72d-4256-9530-ae58c957bc6f\(1\).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)

✓ Confederate Tribes of the Grand Ronde	Completed
✓ Confederated Tribes of the Siletz	Completed
✓ Confederated Tribes of the Umatilla	Completed
✓ Confederated Tribes of Warm Springs	Completed
✓ Cowlitz Indian Tribe	Completed
✓ Nez Perce Tribe	Completed

Other Consulting Parties

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

All THPOs listed in HUD's tribal directory assistance tool were notified as was the Oregon SHPO.

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:**

Figure 9 shows the APE for the project.

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:

No historic properties are likely to be affected by the project. SHPO has sent a concurrence letter which is included as an attachment to this submittal.

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

No Adverse Effect

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

Document reason for finding:

See the attached correspondence with SHPO and applicable THPOs.

Does the No Adverse Effect finding contain conditions?

Yes (check all that apply)

✓ No

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

Adverse Effect

Screen Summary

Compliance Determination

Multnomah County notified Oregon SHPO and tribal historic preservation offices with an interest in the project location on November 14, 2024. SHPO assigned the project case number 24-2274. On November 20, 2024, SHPO sent a concurrence letter that no historical resources would be impacted by the project. The 30-day notification period for THPOs expired on December 19, 2024. The Grand Ronde tribe THPO requested a copy of the Inadvertent Discovery Plan for the project, which was sent to them on January 14. No other concerns or questions were received from the Notified THPOs. Based on Section 106 consultation the project will have No Adverse Effect on historic properties. Conditions: None. Upon satisfactory implementation of the conditions, which should be monitored, the project is in compliance with Section 106.

Supporting documentation

[Cook Plaza IDP.pdf](#)
[Sub Frm SHPO Cook Plaza.pdf](#)
[SHPO Response Email.pdf](#)
[SHPO Case Number 24-2274.pdf](#)
[Clr Frm SHPO-Cook Plaza.pdf](#)
[Fig 9 SHPO APE.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Noise Abatement and Control

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972 General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B

1. What activities does your project involve? Check all that apply:

- New construction for residential use

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

None of the above

4. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000' from a major road, 3000' from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

There are no noise generators found within the threshold distances above.

- ✓ Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

- ✓ Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Is your project in a largely undeveloped area?

- ✓ No

Document and upload noise analysis, including noise level and data used to complete the analysis below.

Yes

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

Document and upload noise analysis, including noise level and data used to complete the analysis below.

6. **HUD strongly encourages mitigation be used to eliminate adverse noise impacts. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review.**

- ✓ Mitigation as follows will be implemented:

See summary below.

Based on the response, the review is in compliance with this section. Document and upload drawings, specifications, and other materials as needed to describe the project's noise mitigation measures below.

No mitigation is necessary.

Screen Summary

Compliance Determination

A Noise Assessment was conducted. The noise level was normally unacceptable: 72.0 db. See noise analysis. The project is in compliance with HUD's Noise regulation with mitigation. Mitigation on the residential units will include air conditioning in each unit and acoustic tile or equivalent to ensure noise levels are below HUD guidelines. Per HUD's noise guidance document this mitigation is above the requirements in the City building code. See attached documents.

Supporting documentation

[traffic count.png](#)

[Prj_PDX_Prt_150_NEM_1-3.pdf](#)

[DNL Calculator - HUD Exchange.pdf](#)

Are formal compliance steps or mitigation required?

Yes

- ✓ No

Sole Source Aquifers

General requirements	Legislation	Regulation
<p>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.</p>	<p>Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)</p>	<p>40 CFR Part 149</p>

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

- Yes
- ✓ No

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

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

- ✓ No

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

Yes

Screen Summary

Compliance Determination

The proposed project site is not located on a sole source aquifer. Figure 10 shows that the nearest SSA is located across the Columbia River in Vancouver, WA. The project

is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.

Supporting documentation

[Fig 10 SSA.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wetlands Protection

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

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

No

✓ Yes

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

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

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

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

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

Screen Summary

Compliance Determination

The project site is not located near any wetlands or surface waters. The site is already completely paved, and stormwater is managed onsite via existing drywells. There will be no changes to impervious area or stormwater drainage on the project site and no impact to wetlands will occur. The project will not impact on- or off-site wetlands. The project is in compliance with Executive Order 11990.

Supporting documentation

[Fig 11 NWI Wetlands.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Wild and Scenic Rivers Act

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

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

No

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

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

Screen Summary

Compliance Determination

This project is not located near any proposed or designated wild and scenic rivers. The nearest wild and scenic river is the Sandy River, which is approximately four miles east of the project site and its nearest point. No impacts to wild and scenic rivers are anticipated. This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[Fig 12 Wild and Scenic.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. Per the new the executive order this section may be disregarded without affecting the overall findings.

Supporting documentation

[EJScreen Community Report.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No



U.S. Department of Housing and Urban Development
 451 Seventh Street, SW
 Washington, DC 20410
www.hud.gov
espanol.hud.gov

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

Project Information

Project Name: Cook-Plaza-Homelessness-Resource-Center

HEROS Number: 900000010443938

Start Date: 12/17/2024

Project Location: 19421 SE Stark St, Portland, OR 97233

Additional Location Information:

Figure 1 shows the project site location. Figure 2 shows the current configuration of the property. Figure 3 shows the proposed layout of the site following project completion.

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

This project will remodel an existing vacant commercial office building on the property serve as a Homelessness Resources Center. This building has two above-ground stories and a basement, with a total square footage of 14,150 sf. Renovation work will primarily target the interior of the building, where additional bathroom, shower, laundry, and meal preparation facilities will be added. Exterior work on the building will be limited to the addition of guardrails on the roof, replacement of outdoor HVAC equipment, installation of privacy fencing, and repair of any broken glazing or seals on windows and doors. Construction is expected to take place in 2025. When it opens, the remodeled building will serve as a day center, providing hygiene services, case management and housing navigation. The center will also retain the capacity to serve up to 90 people at a time during severe weather emergencies. In addition to the remodel of the existing building, 28 personal shelter units will be installed in what is currently the secure paved parking area, providing 24/7 village-style shelter for up to 42 people. The housing pods will be installed on wood platforms directly on top of the existing pavement. Ground disturbance for the project is expected to be limited to the extension of utility services to the personal shelter site. Permits have not been finalized but it is expected that utility trenching up to five feet deep, two feet wide, and up to 300 linear feet will take place to extend the existing utilities. See the draft plan set attached to this submittal.

Funding Information

Grant Number	HUD Program	Program Name	
B-24-CP-OR-1811	Community Planning and Development (CPD)	Community Development Block Grants (CDBG) (Entitlement)	\$1,666,279.00

Estimated Total HUD Funded Amount: \$1,666,279.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$8,360,000.00

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
Contamination and Toxic Substances	No CERCLA environmental conditions were identified. Hazardous building materials will be abated prior to renovations of the existing building per the hazmat survey that has been performed. Transitional housing units are prefabricated and will be placed on platforms above the ground, where radon intrusion is unlikely to occur.
Noise Abatement and Control	See summary below.
Hazards and Nuisances including Site Safety and Site-Generated Noise	Noise mitigation beyond that required in City Code is incorporated as part of the project design.
Permits, reviews, and approvals	No operational permits will be required once construction is complete. State and local permits needed for construction will include: * Oregon Construction General Stormwater Permit * Gresham Building permits * Gresham utility connection permits * Gresham Occupancy permit

Project Mitigation Plan

Upon completion of the project as-builts and abatement documentation will be submitted to demonstrate the proper completion of mitigation measures proposed.

Determination:

<input checked="" type="checkbox"/>	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
<input type="checkbox"/>	Finding of Significant Impact

Preparer Signature: Fanny Rodriguez-Adams **Date:** 2/6/2025

Name / Title/ Organization: Fanny Rodriguez-Adams / / MULTNOMAH COUNTY

Certifying Officer Signature: Lolita Broadous 2/10/25 **Date:**

Name/ Title: DCHS, Youth and Family Services, Housing & Stability Manager

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

OREGON SHPO CLEARANCE FORM

Do not use this form for ODOT or Federal Highway projects or to record archaeological sites

This form is for: **federal** cultural resource reviews (Section 106); **state** cultural resource reviews (ORS 358.653)

SECTION 1: PROPERTY INFORMATION

SHPO Case Number:

Resource Name: Cook Plaza Homelessness Resources Center

Street Address: 19421 SE Stark Street

City: Gresham

County: OR

Agency Project #

Project Name:

If there is not a street address, include the Township, Range, and Section, cross streets, or other address description

Owner: Private Local Gov State Gov Federal Gov Other: _____

Are there one or more buildings or structures? YES NO – If no, skip to Section 2 and append photo(s)

Is the property listed in the National Register of Historic Places? YES – Individually YES – In a district NO

Original Construction date: ____ 1990 ____ Check box if date is estimated

Siding Type(s) and Material(s):

Window Type(s) and Material(s):

Has the property been physically altered? No Alterations Few Alterations Major / Many Alterations

SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY - Check the appropriate box

The purpose of this review is to avoid impacts to properties that are "eligible" (historic) or already listed in the National Register of Historic Places. Fully establishing historic significance can be very costly and time consuming. Therefore initial evaluations are based on age (50 years or greater) and integrity (historic appearance), which are the minimum qualifications for listing in the National Register. Additional documentation may be needed further in the process, but typically initial evaluations allow the review process to proceed expeditiously.

The property is considered **Eligible** at this time because it is already listed in the National Register **or**

- is at least 50 years old **and** retains its historic integrity (minimal alterations to key features)
- has potential significance (architectural or historical)

The property is considered **Not Eligible** at this time because it:

- is less than 50 years old **or** is 50 years or older but there have been major alterations to key features
- is known to have no significance, based on National Register-level documentation and evaluation

SECTION 3: APPLICANT DETERMINATION OF EFFECT - Check the appropriate box

The project has **NO EFFECT** on a property that is eligible or already listed in the National Register, either because there is no eligible property involved or the eligible property will not be impacted physically or visually.

The project will have a minor impact on a property that is eligible or already listed in the National Register, and therefore there is **NO ADVERSE EFFECT**. Minor impacts include replacement of some, but not all, siding, doors, or windows, etc.

The project will have a major impact on a property that is eligible or already listed in the National Register, therefore there is an **ADVERSE EFFECT**. Major impacts include full or partial demolition, complete residing, full window replacement, etc.

STATE HISTORIC PRESERVATION OFFICE COMMENTS – Official use only

Eligibility: Concur with the eligibility determination above.
 Do not concur with the eligibility determination above.

Effect: Concur with the effect determination above.
 Do not concur with the effect determination above.

RECEIVED STAMP

Signed: _____ Date: _____

RLS	
ILS	

CONTACT INFORMATION STAMP

Comments:

OREGON SHPO CLEARANCE FORM

Do not use this form for ODOT or Federal Highway projects or to record archaeological sites

SECTION 4: PREVIOUS ALTERATIONS TO THE BUILDING OR STRUCTURE

Only complete this section for buildings that are 50 years old or older. Describe any alterations that have already occurred to the building, such as material replacement, including siding, windows, and doors; any additions, including garages; and any removal or addition of architectural details, such as brackets, columns, and trim. Provide estimated dates for the work. Attach additional pages as necessary.

The existing building on the property was constructed in 1990, based on City of Gresham Records. It includes approximately 13,000 square feet (sf) with two stories above-ground and a basement. Please see the attached photographs and current aerial view of the property. The building formerly housed an unemployment office, and has since 2022 been used infrequently as a severe weather shelter site. Outside of the building is a secure fenced parking area to its south.

SECTION 5: PROJECT DESCRIPTION

Describe what work is proposed, including what materials will be used and how they will be installed. Specifically identify what historic materials will be retained, restored, replaced, or covered. Include drawings, photos, cut sheets (product descriptions), additional sheets, and other materials as necessary. For vacant lots, please describe the intended use.

This project will remodel the building to serve as a Homelessness Resources Center. When it opens, the remodeled building will serve as a day center, providing hygiene services, case management and housing navigation. The center will also retain the capacity to serve up to 90 people at a time during severe weather emergencies.

In addition, 28 personal shelter units will be installed in what is currently the secure paved parking area, providing 24/7 village-style shelter for up to 42 people. Ground disturbance for the project is expected to be limited to the extension of utility services to the personal shelter site. Permits have not been finalized but it is expected that utility trenching up to five feet deep, two feet wide, and up to 3—linear feet will take place to extend the existing utilities.

Construction is expected to take place in 2025. See the attached plans for the expected outcome of the East County Homelessness Resource Center project construction.

SECTION 6: FUNDING SOURCE

ARRA
 FCC
 FERC
 HUD
 ODOE
 USDARD
 USFS
 HPF
 Other: _____

SECTION 7: AGENCY CONTACT INFORMATION

Name of Organization Submitting the Project: Multnomah County Department of Human Services

Project Contact Name and Title: Fanny Rodriguez-Adams, Senior Program Specialist, Youth and Family Services Division

Street Address, City, Zip: 209 SW 4th Avenue, Suite 200, Portland, OR 97204

Phone: 503-988-7440 Email: fanny.rodriguez@multco.us

Date of Submission:

SECTION 8: ATTACHMENTS

REQUIRED	<input checked="" type="checkbox"/> 3 – 4, color, 4 x 5 photographs of the subject property, digital or print. One photo is sufficient for vacant property
AS NEEDED <i>Contact SHPO staff with questions</i>	<input checked="" type="checkbox"/> Project area map, for projects including more than one tax lot. (Required for HPF-funded projects). See instructions.
	<input checked="" type="checkbox"/> Additional drawings, reports, or other relevant materials
	<input type="checkbox"/> Continuation sheet for sections 4 or 5, or additional context to determine National Register Eligibility.

SHPO Mailing Address: Review and Compliance, Oregon SHPO, 725 Summer St. NE, Suite C, Salem, OR 97301
Documents meeting all aspects of the digital submission policy may be submitted by email to
ORSHPO.Clearance@oregon.gov

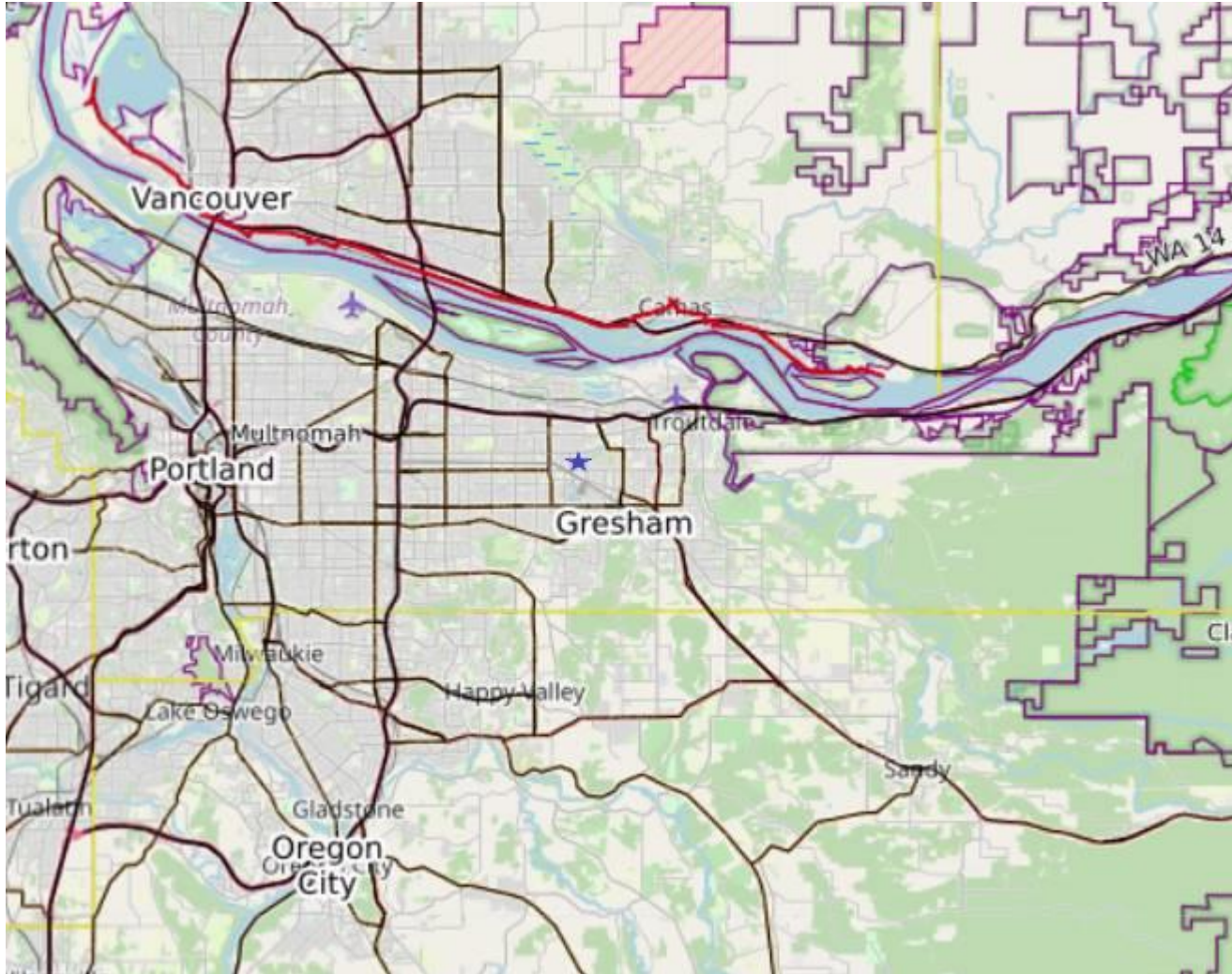
OREGON SHPO CLEARANCE FORM CONTINUATION SHEET

Do not use this form for ODOT, Federal Highway projects or to record archaeological sites

CONTINUATION SHEET

- Include additional documentation for Section 4 or 5 as necessary. Attach maps, drawings, and reports as needed to illustrate current conditions and the planned project. If submitting this form by email, photos and maps may be inserted into continuation sheets.
- If completing a complete Determination of Eligibility (DOE) or Finding of Effect (FOE), use continuation sheets as necessary or include appendixes.

Figure 1, Site Vicinity



OREGON SHPO CLEARANCE FORM CONTINUATION SHEET

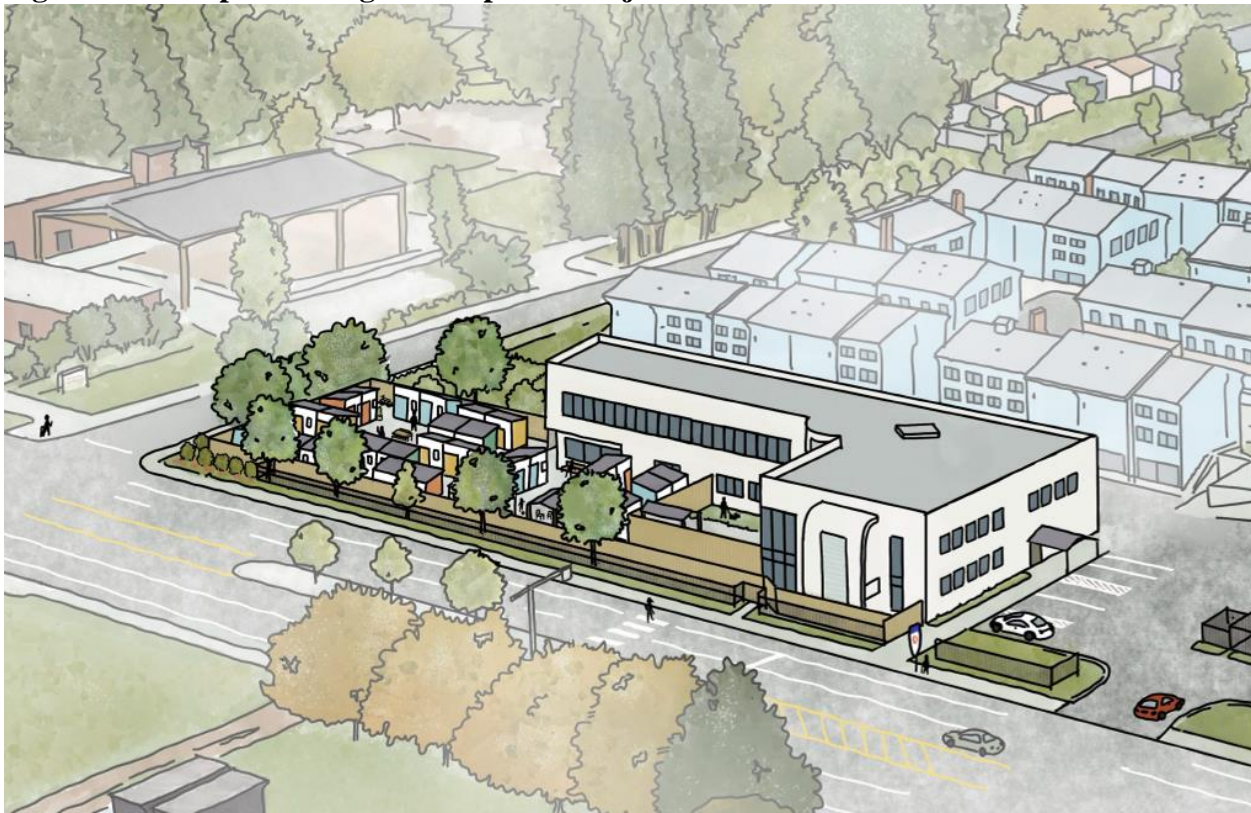
Do not use this form for ODOT, Federal Highway projects or to record archaeological sites

Figure 2 Current Site Layout



Building renovation and new pod village are both located on the western of the two tax lots.

Figure 3. Concept Drawing of Completed Project



OREGON SHPO CLEARANCE FORM CONTINUATION SHEET

Do not use this form for ODOT, Federal Highway projects or to record archaeological sites

Figure 4. Draft Plan view of proposed project

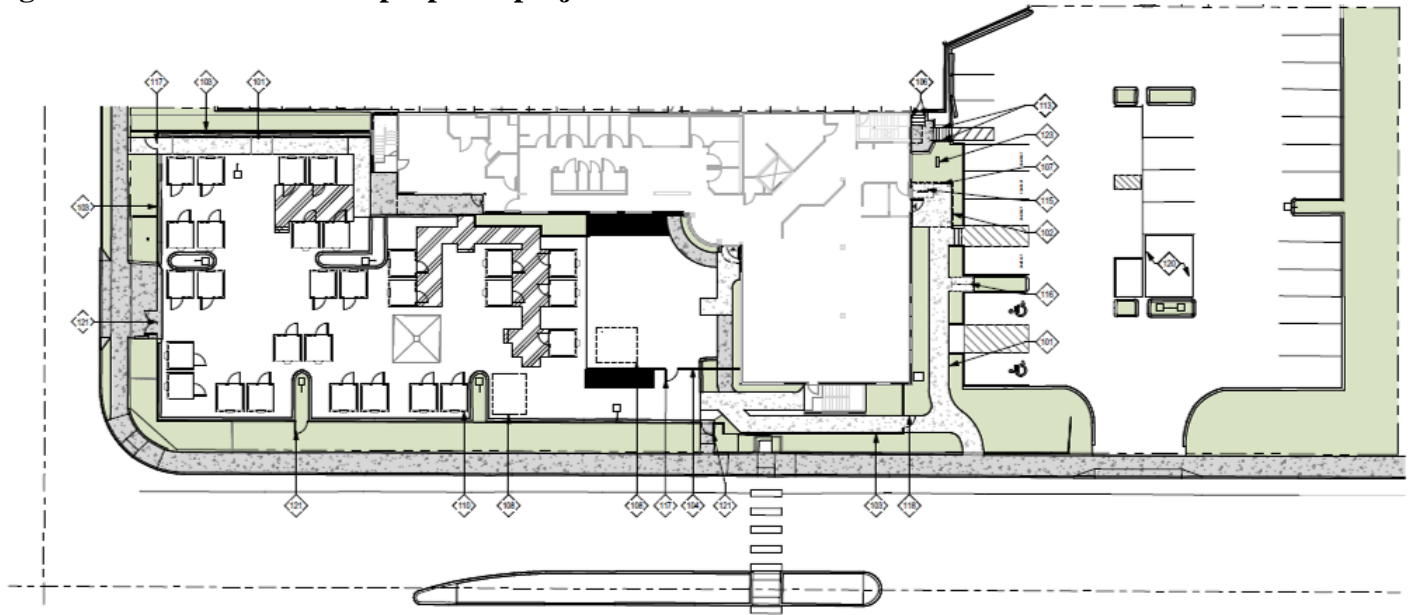


Photo 1. Existing Building from the Southwest



OREGON SHPO CLEARANCE FORM CONTINUATION SHEET

Do not use this form for ODOT, Federal Highway projects or to record archaeological sites

Photo 2. Building from the East



OREGON SHPO CLEARANCE FORM CONTINUATION SHEET

Do not use this form for ODOT, Federal Highway projects or to record archaeological sites

Photo 3. Planned pod village location from second-story window of building



OREGON SHPO CLEARANCE FORM INSTRUCTIONS

Do not use this form for ODOT, Federal Highway projects or to record archaeological sites

SECTION 1: PROPERTY INFORMATION:

- Include complete address and agency project number and name, if applicable.
- Check YES if there are any buildings on the site. Check NO if it is a vacant parcel (in which case it will be evaluated for archaeology and the potential impact on surrounding buildings only.)
- Check YES if your research (look on our website at <http://heritagedata.prd.state.or.us/historic/> and/or call your local planning office) shows the property is listed. Check NO if you find that it is not listed.
- Fill in the construction date. Check box if date is estimated.
- Describe the siding and window types and materials. Examples: double hung wood windows; vertical wood siding.
- Check to what degree the property has been altered. Ask yourself, would the original owner recognize the building, or have there been many changes that obscure the historic features?

SECTION 2: APPLICANT DETERMINATION OF ELIGIBILITY:

- Check the ELIGIBLE box if the building is listed (National Register OR Local landmarks register), has previously been evaluated as eligible, or is 50 years of age AND the majority of the exterior historic features are retained.
- Check the NOT ELIGIBLE box if the building is not yet 50 years old, or if in your opinion there have been many and/or major changes (e.g. additions, siding and/or window replacement, porch enclosures).
- Applicants who acknowledge that the property meets the minimum qualifications for listing in the National Register but choose to contest this determination must complete a Determination of Eligibility (DOE). The DOE must demonstrate that the property is not eligible for the National Register using the Criteria listed in National Register Bulletin 15, "How to Apply the National Register Criteria for Evaluation." The DOE may be submitted on continuation sheets or as a separate document.

SECTION 3: APPLICANT DETERMINATION OF EFFECT:

- Check the NO EFFECT box if the property is NOT ELIGIBLE for listing in the National Register or if the work will not replace or alter the appearance of any of the building's exterior features.
- Check the NO ADVERSE EFFECT box if the property is ELIGIBLE for listing or is already listed in the National Register and the work is visible (e.g. re-roofing with same materials, window or siding repair, adding a vent) but will not remove or obscure historic features.
- Check ADVERSE EFFECT if the property is ELIGIBLE or listed in the National Register and the work includes major changes, such as replacing the siding or windows.

SECTION 4: PREVIOUS ALTERATIONS

- List the changes that **already** occurred to the building, including siding, windows, doors, porches, additions including dormers, or if the property was moved. Include the approximate date of each alteration. The information can be provided in list format.

SECTION 5: PROJECT DESCRIPTION:

- Clearly describe what is being repaired or replaced, and how that work will be done. What materials and installation process are proposed? Include sufficient information (e.g. close-up photos, product specification sheets) so we can compare what exists with what is proposed. The information can be provided in list format.

SECTION 6: FUNDING SOURCE:

- Check the federal or state agency funding the project; or check "other" and fill in the agency name.

SECTION 7: AGENCY CONTACT INFORMATION:

- List the name of the organization submitting the Clearance Form

SECTION 8: ATTACHMENTS:

- Photos: Include photos of the entire building, especially the elevations that can be seen from the street. Include close-ups of features that will be impacted by the project.
- Additional Information: When applicable, include window specifications, plans or diagrams that illustrate pertinent existing conditions and/or proposed work
- Continuation sheets for additional Section 4 or 5 narrative or to append a formal Determination of Eligibility (DOE) or Finding of Effect (FOE). These materials may also be submitted as a separate document.
- A map with location of project clearly marked with latitude and longitude coordinates in decimal degree format to the 5th decimal point is REQUIRED for all projects funded with Historic Preservation Funds through the Certified Local Government Grant. A single point for projects encompassing less than 5 acres is sufficient.



Oregon

Tina Kotek, Governor

Parks and Recreation Department

Oregon Heritage/
State Historic Preservation Office
725 Summer St. NE, Suite C
Salem, OR 97301-1266
(503) 986-0690
Fax (503) 986-0793
oregonheritage.org



November 20, 2024

Fanny Rodriguez-Adams
Multnomah County
209 SW 4th Ave, Ste 200
Portland, OR 97204

RE: SHPO Case No. 24-2274

HUD, Multnomah County, Cook Plaza Homelessness Resources Center

This project will remodel building to serve as a Homelessness Resources Center, 1990 Building
19421 SE Stark Street, Gresham, Multnomah County

Dear Fanny Rodriguez-Adams:

Thank you for submitting information for the undertaking referenced above. We concur with the determination that the cultural resource(s) identified is(are) not eligible for listing in the National Register of Historic Places. We concur that there will be no historic properties affected for this undertaking.

This concludes consultation with our office under Section 106 of the National Historic Preservation Act (per 36 CFR Part 800) and/or Oregon Revised State (ORS) 358.653 for built-environment resources. If you have not already done so, be sure to consult with all appropriate Native American tribes and interested parties regarding the proposed undertaking.

If the undertaking design or effect changes or if additional historic properties are identified, further consultation with our office will be necessary before proceeding with the proposed undertaking. Additional consultation regarding this case must be sent through Go Digital. In order to help us track the undertaking accurately, reference the SHPO case number above in all correspondence.

Please contact our office if you have any questions, comments or need additional assistance.

This letter refers to built-environment resources only. Comments pursuant to a review for archaeological resources will be sent separately.

Sincerely,

Dylan Tsolakos
Compliance Program Specialist

dylan.tsolakos@opr.d.oregon.gov

cc: Austin Van Nette, Multnomah County

Youth & Family Services Division

Mark Mitchell
Director, Community Planning Development
US Department of Housing and Urban Development
1220 SW Third Avenue, Suite 400
Portland, OR 97204
Mark.Mitchell@hud.gov
Office: (971) 222-2612 Work mobile: (202) 285-7388

August 27, 2024

SUBJECT: Delegation of Certifying Officer for Multnomah County in accordance with 24 C.F.R. 58

Dear Mr. Mitchell,

The Multnomah County Department of County Human Services is a recipient of funds from the U.S. Department of Housing and Urban Development. These funds are subject to environmental review, decision-making and action responsibilities under the National Environmental Policy Act (NEPA) and 24 C.F.R. Part 58, "Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities".

As County Chair of the County, I hereby delegate to Mohammad Bader, Director of Department of County Human Services, the authority to carry out the responsibilities of certifying officer as provided in 24 C.F.R. Part 58,, its related Federal authorities listed in Sections 58.5 and 58.6, as well as Section 102 of NEPA and its related provisions in 40 CFR parts 1500 through 1508.

Further, as the delegated certifying officer, Mr.Bader, is also authorized to and accepts on behalf of the County the jurisdiction of the federal courts for the enforcement of all these responsibilities.

The effective date of this delegation is immediate and shall run until revoked by me or by the end of my term in office. In the event of the authority delegated not being exercised a sub-delegation has been assigned to Lolita Broadous, Housing Stability Manager at Youth and Family Services.

Jessica Vega Pederson

Jessica Vega Pederson
Chair

Multnomah County, OR

Signed on this __ day of August, 2024

Mohammad Bader
Director of Department of County Human Services
209 SW 4th Ave Suite 240
Portland, Or 97204-1841
503-988-6283 Desk
971-253-9082 mobile
mohammad.bader@multco.us

Lolita Broadous
Housing & Stability Manager
Youth and Family Services Division at Department of County Human Services
209 SW 4th Ave.
Portland, OR 97204
(971) 645-8633 mobile
lolita.broadous@multco.us

Cc: Office of Environment and Energy

Audit trail

Details

FILE NAME Certifying Officer Delegation-Region X_Multnomah County - 9/3/24, 11:23 AM

STATUS ● Signed

STATUS TIMESTAMP 2024/09/03
18:30:56 UTC

Activity



SENT

stephan.herrera@multco.us **sent** a signature request to:
• Jessica Vega Pederson (jessica.vegapederson@multco.us)

2024/09/03
18:28:30 UTC



SIGNED

Signed by Jessica Vega Pederson (jessica.vegapederson@multco.us)

2024/09/03
18:30:56 UTC



COMPLETED

This document has been signed by all signers and is **complete**

2024/09/03
18:30:56 UTC

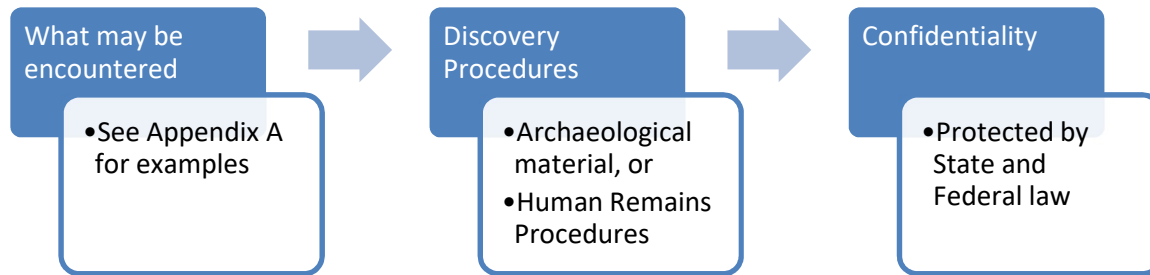
The email address indicated above for each signer may be associated with a Google account, and may either be the primary email address or secondary email address associated with that account.

ARCHAEOLOGICAL INADVERTENT DISCOVERY PLAN (IDP)

Cook Plaza Homelessness Resource Center

Austin Van Nette January 2025 SHPO Case # 24-2274

HOW TO USE THIS DOCUMENT



Archaeology consists of the physical remains of the activities of people in the past. This IDP should be followed should any archaeological sites, objects, or human remains are found. These are protected under Federal and State laws and their disturbance can result in criminal penalties.

This document pertains to the work of the Contractor, including any and all individuals, organizations, or companies associated with the Rhine Village Renovation Project.

WHAT MAY BE ENCOUNTERED

Archaeology can be found during any ground-disturbing activity. If encountered all excavation and work in the area **MUST STOP**. Archaeological objects vary and can include evidence or remnants of historic-era and precontact activities by humans. Archaeological objects can include but are not limited to:

- **Stone flakes, arrowheads, stone tools, bone or wooden tools, baskets, beads.**
- Historic building materials such as **nails, glass, metal** such as cans, barrel rings, farm implements, **ceramics, bottles, marbles, beads.**
- Layers of **discolored earth** resulting from hearth fire
- Structural remains such as **foundations**
- **Shell** Middens
- **Human skeletal remains** and/or **bone fragments** which may be whole or fragmented.

For photographic examples of artifacts, please see Appendix A. (Human remains not included)

If there is an inadvertent discovery of any archaeological objects see procedures below.

If in doubt call it in.

DISCOVERY PROCEDURES: WHAT TO DO IF YOU FIND SOMETHING

1. Stop ALL work in the vicinity of the find
2. Secure and protect area of inadvertent discovery with 30 meter/100 foot buffer—work may continue outside of this buffer

3. Notify Project Manager and Agency Official
4. Project Manager will need to contact a professional archaeologist to assess the find.
5. If archaeologist determines the find is an archaeological site or object, contact SHPO. If it is determined to *not* be archaeological, you may continue work.

HUMAN REMAINS PROCEDURES

1. If it is believed the find may be human remains, stop ALL work.
2. Secure and protect area of inadvertent discovery with 30 meter/100 foot buffer, then work may continue outside of this buffer with caution.
3. Cover remains from view and protect them from damage or exposure, restrict access, and leave in place until directed otherwise. **Do not take photographs. Do not speak to the media.**
4. Notify:
 - Project Manager Austin Van Net **503-313-7221**
 - Consultant Susan Garland **503-417-7704**
 - Oregon State Police **DO NOT CALL 911 800-442-0776**
 - Oregon SHPO **503-986-0690**
 - Appropriate Native American Tribes
 - Confederated Tribes of the Siletz Indians 503-444-2532
 - Confederated Tribes of the Umatilla Indian Reservation 541-429-7234
 - Confederated Tribes of the Warm Springs Reservation 541-553-1161
 - Cowlitz Indian Tribe 360-577-5680
 - Nez Perce Tribe 208-621-3851
5. If the site is determined not to be a crime scene by the Oregon State Police, do not move anything! The remains will continue to be *secured in place* along with any associated funerary objects, and protected from weather, water runoff, and shielded from view.
6. Do not resume any work in the buffered area until a plan is developed and carried out between the State Police, SHPO, LCIS, and appropriate Native American Tribes and you are directed that work may proceed.

CONFIDENTIALITY

Multnomah County and employees shall make their best efforts, in accordance with federal and state law, to ensure that its personnel and contractors keep the discovery confidential. The media, or any third-party member or members of the public are not to be contacted or have information regarding the discovery, and any public or media inquiry is to be reported to DAHP. Prior to any release, the responsible agencies and Tribes shall concur on the amount of information, if any, to be released to the public.

To protect fragile, vulnerable, or threatened sites, the National Historic Preservation Act, as amended (Section 304 [16 U.S.C. 470s-3]), and Oregon State law (ORS 192.501(11)) establishes that the location of archaeological sites, both on land and underwater, shall be confidential.

APPENDICES AND SUPPLEMENTARY MATERIALS

A. Visual reference and examples of archaeology

APPENDIX A

VISUAL REFERENCE GUIDE TO ENCOUNTERING ARCHAEOLOGY



Figure 1: Stone flakes



Figure 2: Stone tool fragments



Figure 3: Cordage



Figure 4: Shell midden



Figure 5: Historic glass artifacts



Figure 6: Historic metal artifacts



Figure 7: Historic building foundations

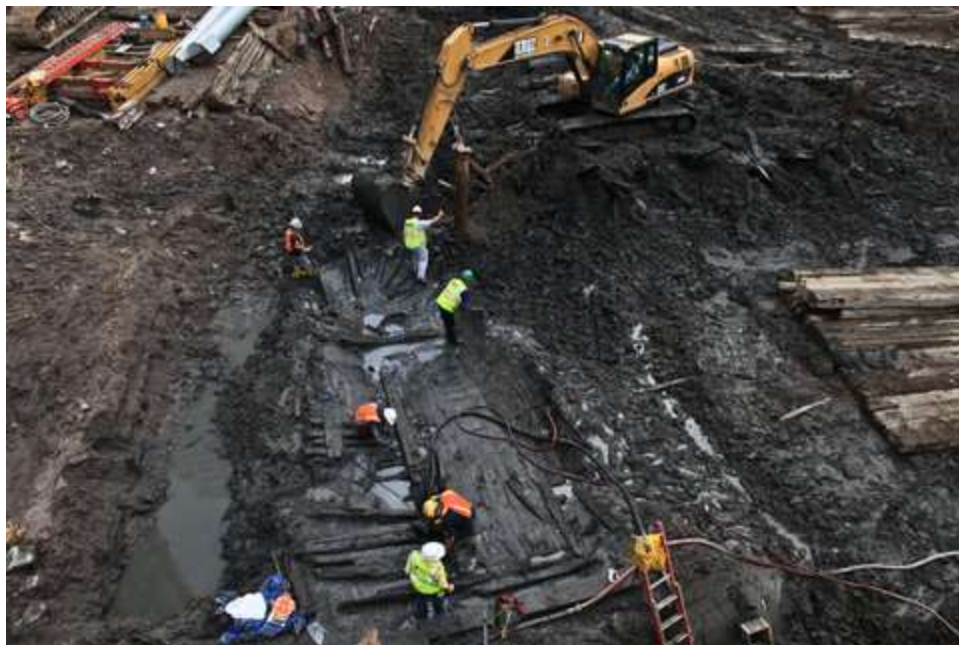


Figure 8: 18th Century ship

Youth & Family Services Division

November 14, 2024

Mr. James Gordon
Tribal Historic Preservation Officer
Cowlitz Indian Tribe
PO Box 2547
Longview, WA 98632

Via email: jgordon@cowlitz.org; biyall@tc.cowlitz.org
Regarding: Cook Plaza Homeless Resource Center Renovation and Expansion
Multnomah County
19421 SE Stark Street
Gresham, Oregon 97233

Dear Mr. Gordon:

Multnomah County is seeking financial assistance from the US Housing and Urban Development Agency (HUD) to renovate an existing commercial building in Gresham, Oregon into a homelessness resources center and emergency shelter. If HUD elects to fund the project construction work, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970).

In accordance with NEPA requirements Multnomah County is notifying interested Tribes that the project will involve remodeling an existing office-style commercial building to provide emergency weather shelter services, case management, hygiene day services, and housing navigation assistance. The project will also add 28 personal shelter units to a portion of the building's existing parking lot. Ground disturbance is expected to be limited to the extension of utility services to the pod village next to the building. Layout has not been finalized, but will involve utility installation approximately 5 feet deep in a trench up to 2 feet wide and up to 300 linear feet. **This project will develop and follow an inadvertent Discovery Plan in accordance with Oregon State Regulations.**

Multnomah County is notifying and seeking information about possibly affected cultural resources in the project site from the following Indian Tribes:

Tribe Name

Confederated Tribes of the Siletz Indians of Oregon
Confederated Tribes of the Grand Ronde Community of Oregon
Confederated Tribes of the Umatilla Indian Reservation
Confederated Tribes of the Warm Springs Reservation of Oregon
Cowlitz Indian Tribe

Nez Perce Tribe

Please review the attached information describing the project's location, current conditions, and planned renovations. If you have questions or concerns regarding this project, please contact me within thirty (30) days of your receipt of this request. If no responses are received, Multnomah County will notify HUD so the federal agency may determine how to proceed with Section 106 review in accordance with 36 CFR § 800.3(b)(4).

I appreciate your input on this matter. Please contact me by email at fanny.rodriquez@multco.us, or by phone at 503-988-7440 if you have any questions or concerns.

Sincerely,

Fanny Rodriguez-Adams

Fanny Rodriguez-Adams
Senior Program Specialist, Youth and Family Services Division
Multnomah County Division I Housing Stability Team

Attachment(s): Project Summary

Youth & Family Services Division

November 14, 2024

Mr. Christopher Bailey
Cultural Protection Specialist
Confederated Tribes of the Grand Ronde Community of Oregon
8720 Grand Ronde Road
Grand Ronde, OR 97347

Via email: THPO@grandronde.org; Cheryle.kennedy@grandronde.org
Regarding: Cook Plaza Homeless Resource Center Renovation and Expansion
Multnomah County
19421 SE Stark Street
Gresham, Oregon 97233

Dear Mr. Bailey:

Multnomah County is seeking financial assistance from the US Housing and Urban Development Agency (HUD) to renovate an existing commercial building in Gresham, Oregon into a homelessness resources center and emergency shelter. If HUD elects to fund the project construction work, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970).

In accordance with NEPA requirements Multnomah County is notifying interested Tribes that the project will involve remodeling an existing office-style commercial building to provide emergency weather shelter services, case management, hygiene day services, and housing navigation assistance. The project will also add 28 personal shelter units to a portion of the building's existing parking lot. Ground disturbance is expected to be limited to the extension of utility services to the pod village next to the building. Layout has not been finalized, but will involve utility installation approximately 5 feet deep in a trench up to 2 feet wide and up to 300 linear feet. **This project will develop and follow an inadvertent Discovery Plan in accordance with Oregon State Regulations.**

Multnomah County is notifying and seeking information about possibly affected cultural resources in the project site from the following Indian Tribes:

Tribe Name

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Confederated Tribes of the Grand Ronde Community of Oregon

Confederated Tribes of the Umatilla Indian Reservation
Confederated Tribes of the Warm Springs Reservation of Oregon
Cowlitz Indian Tribe
Nez Perce Tribe

Please review the attached information describing the project's location, current conditions, and planned renovations. If you have questions or concerns regarding this project, please contact me within thirty (30) days of your receipt of this request. If no responses are received, Multnomah County will notify HUD so the federal agency may determine how to proceed with Section 106 review in accordance with 36 CFR § 800.3(b)(4).

I appreciate your input on this matter. Please contact me by email at fanny.rodriguez@multco.us, or by phone at 503-988-7440 if you have any questions or concerns.

Sincerely,

Fanny Rodriguez-Adams

Fanny Rodriguez-Adams
Senior Program Specialist, Youth and Family Services Division
Multnomah County Division I Housing Stability Team

Attachment(s): Project Summary

Youth & Family Services Division

November 14, 2024

Mr. Keith Baird
Tribal Historic Preservation Officer
PO Box 365
Lapwai, ID 83540

Via email: keithb@nezperce.org; nptec@nezperce.org
Regarding: Cook Plaza Homeless Resource Center Renovation and Expansion
Multnomah County
19421 SE Stark Street
Gresham, Oregon 97233

Dear Mr. Baird:

Multnomah County is seeking financial assistance from the US Housing and Urban Development Agency (HUD) to renovate an existing commercial building in Gresham, Oregon into a homelessness resources center and emergency shelter. If HUD elects to fund the project construction work, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970).

In accordance with NEPA requirements Multnomah County is notifying interested Tribes that the project will involve remodeling an existing office-style commercial building to provide emergency weather shelter services, case management, hygiene day services, and housing navigation assistance. The project will also add 28 personal shelter units to a portion of the building's existing parking lot. Ground disturbance is expected to be limited to the extension of utility services to the pod village next to the building. Layout has not been finalized, but will involve utility installation approximately 5 feet deep in a trench up to 2 feet wide and up to 300 linear feet. **This project will develop and follow an inadvertent Discovery Plan in accordance with Oregon State Regulations.**

Multnomah County is notifying and seeking information about possibly affected cultural resources in the project site from the following Indian Tribes:

Tribe Name

Confederated Tribes of the Siletz Indians of Oregon
Confederated Tribes of the Grand Ronde Community of Oregon
Confederated Tribes of the Umatilla Indian Reservation
Confederated Tribes of the Warm Springs Reservation of Oregon
Cowlitz Indian Tribe

Nez Perce Tribe

Please review the attached information describing the project's location, current conditions, and planned renovations. If you have questions or concerns regarding this project, please contact me within thirty (30) days of your receipt of this request. If no responses are received, Multnomah County will notify HUD so the federal agency may determine how to proceed with Section 106 review in accordance with 36 CFR § 800.3(b)(4).

I appreciate your input on this matter. Please contact me by email at fanny.rodriquez@multco.us, or by phone at 503-988-7440 if you have any questions or concerns.

Sincerely,

Fanny Rodriguez-Adams

Fanny Rodriguez-Adams
Senior Program Specialist, Youth and Family Services Division
Multnomah County Division I Housing Stability Team

Attachment(s): Project Summary

Youth & Family Services Division

November 14, 2024

Ms. Delores Pigsley
Chairwoman
Confederated Tribes of Siletz Indians of Oregon
201 SE Swan Avenue
Siletz, OR 97380

Via email: dpigsley@msn.com; culturalresources@ctsi.nsn.us
Regarding: Cook Plaza Homeless Resource Center Renovation and Expansion
Multnomah County
19421 SE Stark Street
Gresham, Oregon 97233

Dear Ms. Pigsley:

Multnomah County is seeking financial assistance from the US Housing and Urban Development Agency (HUD) to renovate an existing commercial building in Gresham, Oregon into a homelessness resources center and emergency shelter. If HUD elects to fund the project construction work, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970).

In accordance with NEPA requirements Multnomah County is notifying interested Tribes that the project will involve remodeling an existing office-style commercial building to provide emergency weather shelter services, case management, hygiene day services, and housing navigation assistance. The project will also add 28 personal shelter units to a portion of the building's existing parking lot. Ground disturbance is expected to be limited to the extension of utility services to the pod village next to the building. Layout has not been finalized, but will involve utility installation approximately 5 feet deep in a trench up to 2 feet wide and up to 300 linear feet. **This project will develop and follow an inadvertent Discovery Plan in accordance with Oregon State Regulations.**

Multnomah County is notifying and seeking information about possibly affected cultural resources in the project site from the following Indian Tribes:

Tribe Name
Confederated Tribes of the Siletz Indians of Oregon
Confederated Tribes of the Grand Ronde Community of Oregon
Confederated Tribes of the Umatilla Indian Reservation
Confederated Tribes of the Warm Springs Reservation of Oregon
Cowlitz Indian Tribe
Nez Perce Tribe

Please review the attached information describing the project's location, current conditions, and planned renovations. If you have questions or concerns regarding this project, please contact me within thirty (30) days of your receipt of this request. If no responses are received, Multnomah County will notify HUD so the federal agency may determine how to proceed with Section 106 review in accordance with 36 CFR § 800.3(b)(4).

I appreciate your input on this matter. Please contact me by email at fanny.rodriguez@multco.us, or by phone at 503-988-7440 if you have any questions or concerns.

Sincerely,

Fanny Rodriguez-Adams

Fanny Rodriguez-Adams
Senior Program Specialist, Youth and Family Services Division
Multnomah County Division I Housing Stability Team

Attachment(s): Project Summary

Youth & Family Services Division

November 14, 2024

Mr. Carey Miller
Tribal Historic Preservation Officer
Confederated Tribes of the Umatilla Indian Reservation
46411 Timine Way
Pendleton, OR 97801

Via email: careymiller@ctuir.org; garyburke@ctuir.org
Regarding: Cook Plaza Homeless Resource Center Renovation and Expansion
Multnomah County
19421 SE Stark Street
Gresham, Oregon 97233

Dear Mr. Miller:

Multnomah County is seeking financial assistance from the US Housing and Urban Development Agency (HUD) to renovate an existing commercial building in Gresham, Oregon into a homelessness resources center and emergency shelter. If HUD elects to fund the project construction work, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970).

In accordance with NEPA requirements Multnomah County is notifying interested Tribes that the project will involve remodeling an existing office-style commercial building to provide emergency weather shelter services, case management, hygiene day services, and housing navigation assistance. The project will also add 28 personal shelter units to a portion of the building's existing parking lot. Ground disturbance is expected to be limited to the extension of utility services to the pod village next to the building. Layout has not been finalized, but will involve utility installation approximately 5 feet deep in a trench up to 2 feet wide and up to 300 linear feet. **This project will develop and follow an inadvertent Discovery Plan in accordance with Oregon State Regulations.**

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Cowlitz Indian Tribe
Nez Perce Tribe

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I appreciate your input on this matter. Please contact me by email at fanny.rodriguez@multco.us, or by phone at 503-988-7440 if you have any questions or concerns.

Sincerely,

Fanny Rodriguez-Adams

Fanny Rodriguez-Adams
Senior Program Specialist, Youth and Family Services Division
Multnomah County Division I Housing Stability Team

Attachment(s): Project Summary

Youth & Family Services Division

November 14, 2024

Mr. Robert Brunoe
Tribal Historic Preservation Officer
Confederated Tribes of the Warm Springs Reservation of Oregon
1233 Veterans Street
Warm Springs, OR 97761

Via email: Robert.brunoe@ctwsbnr.org, info@warmsprings.com
Regarding: Cook Plaza Homeless Resource Center Renovation and Expansion
Multnomah County
19421 SE Stark Street
Gresham, Oregon 97233

Dear Mr. Brunoe:

Multnomah County is seeking financial assistance from the US Housing and Urban Development Agency (HUD) to renovate an existing commercial building in Gresham, Oregon into a homelessness resources center and emergency shelter. If HUD elects to fund the project construction work, it will become an undertaking subject to review under Section 106 of the National Historic Preservation Act, 54 U.S.C. 306108, and its implementing regulations, 36 CFR Part 800. Pursuant to 36 CFR § 800.2(c)(4), and 7 CFR § 1970.5(b)(2) of the regulations, "Environmental Policies and Procedures" (7 CFR Part 1970).

In accordance with NEPA requirements Multnomah County is notifying interested Tribes that the project will involve remodeling an existing office-style commercial building to provide emergency weather shelter services, case management, hygiene day services, and housing navigation assistance. The project will also add 28 personal shelter units to a portion of the building's existing parking lot. Ground disturbance is expected to be limited to the extension of utility services to the pod village next to the building. Layout has not been finalized, but will involve utility installation approximately 5 feet deep in a trench up to 2 feet wide and up to 300 linear feet. **This project will develop and follow an inadvertent Discovery Plan in accordance with Oregon State Regulations.**

Multnomah County is notifying and seeking information about possibly affected cultural resources in the project site from the following Indian Tribes:

Tribe Name
Confederated Tribes of the Siletz Indians of Oregon
Confederated Tribes of the Grand Ronde Community of Oregon
Confederated Tribes of the Umatilla Indian Reservation
Confederated Tribes of the Warm Springs Reservation of Oregon

Cowlitz Indian Tribe
Nez Perce Tribe

Please review the attached information describing the project's location, current conditions, and planned renovations. If you have questions or concerns regarding this project, please contact me within thirty (30) days of your receipt of this request. If no responses are received, Multnomah County will notify HUD so the federal agency may determine how to proceed with Section 106 review in accordance with 36 CFR § 800.3(b)(4).

I appreciate your input on this matter. Please contact me by email at fanny.rodriquez@multco.us, or by phone at 503-988-7440 if you have any questions or concerns.

Sincerely,

Fanny Rodriguez-Adams

Fanny Rodriguez-Adams
Senior Program Specialist, Youth and Family Services Division
Multnomah County Division I Housing Stability Team

Attachment(s): Project Summary