



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

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

Project Information

Project Name: Community Resource Center/Feeding Chittenden Addition

Responsible Entity: City of Burlington, Vermont

Grant Recipient (if different than Responsible Entity): Champlain Housing Trust

State/Local Identifier:

Preparer: Christine Curtis, Senior Community Development Specialist, Community & Economic Development Office, City of Burlington, Vermont

Certifying Officer Name and Title: Brian Pine, Director, Community & Economic Development Office, City of Burlington, Vermont

Consultant (if applicable): Todd Scheffer, P.G. Principal - SRW Environmental Consulting, LLC

Direct Comments to:

Christine Curtis, Senior Community Development Specialist
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Project Location: 228 North Winooski Avenue, Burlington, Vermont 05401

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

The proposed project includes the construction of a two-story addition to the Feeding Chittenden building to better accommodate the staffing and services of the food shelf and Community Resource Center (CRC). The CRC meets critical needs for people experiencing homelessness – a warm (or cool) place to be during the day with access to food, clothing, computers, emergency housing resources, essential services and support in accessing public benefits. The proposed two-story addition will provide expanded program space on the first floor, administrative offices and

meeting space on the second floor, a redesigned parking lot for safer pedestrian access, and a second entrance to separate CRC/hot meal programs access from the grocery program.

The scope of work includes construction of a new 1,200 square foot, two-story, wood-framed addition on the west elevation of the existing building at 228 North Winooski Avenue. Construction activities include a new foundation; cementitious clapboard siding; windows and doors; spray-foam insulation; membrane roof; stairs; commercial electrical and lighting package; electric heat-pump heating and cooling; commercial finishes and tile flooring. The first floor will include an expanded dining and lounge area, and public bathroom; the second floor will include administrative offices and meeting space. Sitework includes a new driveway curb-cut; new parking lay-out; new concrete walks and installation of exterior canopy; paving; and new landscaping.

No changes to the existing building are proposed, except where the addition will be connected. In 2023 an interior renovation project of the existing building was completed under a separate environmental review.

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

The program/project addresses the urgent and growing needs of individuals experiencing homelessness, housing instability, and food insecurity in Chittenden County. The project directly responds to the increasing demand for essential services, aligning with CDBG's mission to improve the living conditions and economic opportunities for low-income individuals and communities.

The intended outcomes include improved access to essential services, expanded program space, increased capacity to serve individuals, enhanced job training opportunities, and a reduction in social isolation. Participants are meant to be better off by having access to a dignified and comfortable environment, nutritious meals, and comprehensive support on their path to stable housing and economic stability.

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

Homelessness has risen rapidly in Burlington since the pandemic. Statewide, the 2023 Point in Time count found that an estimated 3,295 people – or 51 out of every 10,000 people – were experiencing homelessness in Vermont. This was the second highest rate of homelessness in the country. This included 758 people in Chittenden County, which includes the City of Burlington. Along with homelessness, food insecurity was identified as an area of need according to Burlington’s 2024 Consolidated Plan - citizen participation and consultation process. Feeding Chittenden is the largest emergency food provider in Vermont and has worked for decades at this location to alleviate hunger by feeding people and cultivating opportunity. The food shelf provides a week’s supply of groceries to local families and individuals experiencing food insecurity; the hot meal program provides a hot meal every day to anyone in need.

Funding Information

Grant Number	HUD Program	Funding Amount
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B-24-MC-50-0001	CDBG	\$200,000
B-24-CP-VT-2242	Community Project Funding/Congressional Directed Spending	\$1,500,000

Estimated Total HUD Funded Amount: \$1,700,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$2,357,474

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

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The subject property is not located within an airport clear zone assessment area for any Part 139 civilian airport (>2,500 feet from the runway) or military airfield (>15,000 feet from the runway). The Burlington International Airport is the nearest Part 139 civilian airport located approximately 2 miles from the subject property. Though National Guard jets are stationed at the airport, it is not considered by HUD to be a military installation. Source: SRW map of Part 139 airports and military airfields.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The subject property is not located within a coastal barrier zone. Source: U.S. Fish and Wildlife Service Coastal Barrier Resources System Mapper.
Flood Insurance	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The subject property is not located in the Federal Flood Risk Management Standard (FFRMS)

<p>Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>		<p>floodplain and flood insurance is not required. The FFRMS is based on the 500 year floodplain which has been mapped on the appropriate FEMA panel, but it does not exist at the subject property. Source: Flood Insurance Rate Map (FIRM) 50007C0252D, dated July 18, 2011.</p>
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STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5

<p>Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The subject property is not located in any nonattainment area and compliance is achieved. Source: NEPAssist Air Quality Map.</p>
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<p>Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The property is not located in a coastal zone and the project is in compliance with Coastal Zone Management. Source: US Fish and Wildlife Service Coastal Barrier Resources System Mapper.</p>
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<p>Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>A Phase I Environmental Site Assessment (ESA) was completed by KAS dated July 30, 2024. The ESA identified two recognized environmental conditions, including impacted soil, groundwater and vapors from past on-site use activities; and impacted soil, groundwater and vapors from off-site activities. Vapor impacts to site users are theoretically possible, but sub-slab vapors have never tested higher than non-residential action levels, and concentrations of volatile organic compounds in soil and groundwater at the site are below levels that are expected to result in elevated vapor concentrations. Further, indoor air testing has previously been completed and results are below non-residential indoor air standards. Even so, an active sub-slab depressurization system has been installed voluntarily on the current building. Based on correspondence with Richard Spiese, Project Manager at VTDEC, the new building will also be protected by a sub-slab depressurization system, which will operate passively, unless post-construction chemical testing shows that elevated levels of contaminated vapors exist in the piping.</p> <p>During excavation for the new building foundation, it is anticipated that urban soils may</p>
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		<p>be encountered, and those will be managed in accordance with a 2018 soil management plan. Post-construction groundwater sampling of existing wells is also required by VTDEC.</p> <p>Because radon test data from labs for properties in Chittenden County has averaged less than 4.0 picocuries per liter (pCi/l) county-wide over the past 10 years, according to the U.S. Center for Disease Control, compliance with HUD’s current radon policy is not required to achieve compliance. That having been said, the active SSDS and the one to be installed with the new building will minimize the intrusion radon, and other vapors into the building. Source: KAS Phase I ESA dated 7/30/2024; KAS Subsurface Investigation and Testing Report dated November 10, 2017; KAS Soil Management Plan dated January 19, 2018; email correspondence with VTDEC dated May 11, 2023; CDC Radon Test Result GIS</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There is one federally listed endangered species, the Northern Long-eared Bat (NLEB), one proposed endangered species, the Tricolored Bat, and one candidate species, the Monarch Butterfly, with potential to be found within the vicinity of the subject property. SRW completed the USFWS Determination Key for the NLEB and a determination of no effect was made. While no determination key is available for the Tricolored Bat at this time, USFWS has unofficially indicated it will follow the NLEB determination key once it is officially designated as endangered. The project is not located within the jurisdiction of the National Oceanic and Atmospheric Administration. Source: USFWS Official Species List; NLEB determination key; NOAA jurisdiction map.</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>No propane Aboveground Storage Tanks (ASTs) over 1,000 gallons in volume were visible from the subject property boundaries. Also, using the most current satellite imagery, the subject property is located beyond the Acceptable Separation Distance (ASD) of any bulk ASTs in the vicinity of the site. The closest bulk tank is located over 2000 feet northeast of the site, and based on the size of the containment dike it sits in,</p>

		the ASD is approximately 472 feet. Source: SRW Thermal/Explosives map.
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The property is located in a federally designated urban area and is not subject to the farmland protection act. Therefore, the project is in compliance with the Farmland Protection Policy Act. Source: TigerWeb GIS 2020 Urban Area layer.</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The subject property is not located in the Federal Flood Risk Management Standard (FFRMS) floodplain and therefore the project is in compliance with HUD’s floodplain regulations. The FFRMS is based on the 500 year floodplain which has been mapped on the appropriate FEMA panel, but it does not exist at the subject property. Source: Flood Insurance Rate Map (FIRM) 50007C0252D, dated July 18, 2011.</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project was reviewed by the Vermont Division for Historic Preservation and a determination of no historic properties affected was made. No further Section 106 review is required for this project. Source: Intake form and letter with DHP concurrence.</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project location is not within the vicinity of any major noise sources except for the Burlington International Airport which is nearly 2 miles away (the closest railroad track is nearly 3,700 feet away, and no roads surrounding the site are considered to be “major” roads). The subject property is over a mile away from the 65 decibel DNL contour at the airport. Compliance with this regulation is achieved. Source: HUD Exchange.</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There are no sole source aquifers found in Vermont and this proposed project is not expected to impact any aquifer. Source: EPA Sole Source Aquifer Map.</p>
<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There are no federally mapped wetlands on or adjacent to the subject property and no impacts are anticipated. Compliance is achieved. Source: USFWS Wetlands Mapper.</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The subject property is not near any wild and scenic rivers or nationwide rivers and compliance is achieved. Source: NPS Wild and Scenic River Map; Nationwide Rivers Inventory Map; Study Rivers.</p>

ENVIRONMENTAL JUSTICE		
Environmental Justice	Yes No	According to the EJ Screen Report, there is a 18% people of color population and a 49% low income population within one mile of the subject property. The project activities will not negatively affect a minority or below poverty population. It will instead have a positive impact on low income families. The project/program is designed to benefit individuals experiencing homelessness, housing instability, and food insecurity in Burlington, Vermont. Source: EPA EJScreen General Report.
Executive Order 12898	<input type="checkbox"/> <input checked="" type="checkbox"/>	

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

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

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

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The proposed development is located in downtown Burlington, and will continue the existing mixed commercial and residential use in the area and at the property itself. It has served the same use since 1994. The project has received a zoning permit already.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	1	The property is relatively flat and not subject to excessive erosive forces or unstable slopes. Stormwater will be managed by the city’s stormwater system, as it currently is. The project includes installation of a new 3,000 gallon stormwater flow attenuation structure.

Hazards and Nuisances including Site Safety and Noise	2	The proposed addition is not subject to hazards or nuisances, site safety concerns or excessive noise.
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Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	The proposed project will create or retain jobs during construction and after completion managing the facility. The facility offers what they call Community Kitchen Academy: A culinary job training program equipping low-income students with professional and interpersonal skills for employment in the food/hospitality industries. Historically there have been 13 graduates of the academy.
Demographic Character Changes, Displacement	2	The proposed project already exists in the same use and will not result in demographic character changes. It solves the current displacement of management office space that the recent expanded use has created and it was moved to an off-site location.
Environmental Justice	1	The proposed activities do not negatively impact any environmental justice populations and is intended to help address current food security issues in Chittenden County. Feeding Chittenden currently serves over 27,000 meals and distributes more than 2 million pounds of food annually.
Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	The proposed project will not impact educational and cultural facilities in Burlington.
Commercial Facilities	2	The proposed project will not impact commercial facilities in Burlington.
Health Care and Social Services	1	The proposed project will not impact health care facilities in Burlington. The Community Resource Center (CRC) within Feeding Chittenden specifically targets people experiencing homelessness, including those on the streets, in cars, encampments, shelters, and marginally housed individuals, irrespective of age, gender, race, ethnicity, or ability.

Solid Waste Disposal / Recycling	2	The proposed project will increase waste disposal during construction activities, and may result in a very slightly higher volume of waste generated during operations. Waste management practices are not expected to change at the facility as a result of this project.
Waste Water / Sanitary Sewers	2	The wastewater system consists of three treatment plants (Main Plant on the southern waterfront, East Plant on Riverside Avenue, and North Plant at the far north end of North Avenue), 25 public pumping stations, 5 combined sewer overflow outfalls, and over 92 miles of sanitary and combined sewer lines. Approximately 25% of the city is served by a combined sewer/stormwater system. Collectively, the wastewater system could support an additional approximately 30,000 residents. The potential minor increase of wastewater treatment demand as a result of the proposed project will not overburden the existing system. Source: planBTV: Comprehensive Plan-2019 Update.
Water Supply	2	The city relies on Lake Champlain to provide its drinking water. The drinking water system consists of the Water Treatment Facility on the northern waterfront, the Main Street Reservoir, and two water towers which are connected by a system of 110 miles of distribution pipes with enough capacity to serve approximately an additional 28,000 residents. The potential minor increase of wastewater treatment demand as a result of the proposed project will not overburden the existing system. Source: planBTV: Comprehensive Plan-2019 Update.
Public Safety - Police, Fire and Emergency Medical	2	<p>The Burlington Police Department meets national standards, which recommend two officers per 1,000 residents. Fire department officials believe they have adequate facilities and equipment with which to fight fires as long as building heights do not increase significantly beyond the current maximum heights. The Department has recently begun staffing an additional ambulance to serve the city.</p> <p>The proposed development allows for adequate access by public safety personnel and equipment.</p> <p>Source: planBTV: Comprehensive Plan-2019 Update.</p>
Parks, Open Space and Recreation	2	The proposed project will not impact recreation facilities in Burlington.
Transportation and Accessibility	2	The proposed project will be accessible via public transportation and will not result in an excessive burden to the existing transportation infrastructure.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		

Unique Natural Features, Water Resources	2	There are no unique natural features at the site and the project will not impact natural features in the vicinity. Groundwater in the area has been measured at 40-70 feet below grade. The proposed development will only require a few feet of excavation and will have no impact on local groundwater. The closest surface water body to the subject property is Lake Champlain, located over 3,500 feet to the west. Stormwater ultimately flows into Lake Champlain, and after the project is completed, the site's contribution to stormwater flow should be no greater after the proposed project is completed than it is currently.
Vegetation, Wildlife	2	The project is located downtown Burlington, and in an area without habitat for vegetation or wildlife. The proposed project will have no impact on vegetation or wildlife.
Other Factors	N/A	N/A

Environmental Assessment Factor	Impact Code	Impact Evaluation
CLIMATE AND ENERGY		
Climate Change Impacts	2	Climate change impacts were assessed when reviewing floodplains in the area and the stormwater system. Climate change impacts at the subject property are considered to be minimal.
Energy Efficiency	2	The proposed project will meet Vermont Building Energy Standards.

Additional Studies Performed:

No studies that were not identified as source materials were performed during this review and during planning for the proposed project.

Field Inspection (Date and completed by): 3/14/2024, by Todd Scheffer, P.G. of SRW Environmental Consulting, LLC

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]: See sources listed in the Statutory checklist.

List of Permits Obtained: Zoning Permit from the City of Burlington

Public Outreach [24 CFR 50.23 & 58.43]: Community input is incorporated through direct interactions with service users, a thorough community needs assessment conducted by the Champlain Valley Office of Economic Opportunity (CVOEO), and collaboration with social service partners. Ongoing engagement with stakeholders and feedback from participants play a

crucial role in shaping program design, ensuring that the project meets the evolving needs of the population it serves.

Cumulative Impact Analysis [24 CFR 58.32]: The proposed project is not linked to other projects currently ongoing, and no potential projects rely on the successful completion of the proposed project. It is not part of a master plan or urban renewal project where other impacts could be combined.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9] The property is already owned and operated by Feeding Chittenden, and alternative off-site locations to expand services were not assessed. Site constraints limited the layout alternatives available for redevelopment, and no alternative would have provided additional benefit to the proposed site layout.

No Action Alternative [24 CFR 58.40(e)]: The no action alternative would leave the current facility as is, with the management offices offsite. There would continue to be inadequate floor space to house the proposed expansion of activities and offerings. Additionally, contaminants in the soil that will be mitigated during this assessment would remain in-situ as they currently are.

Summary of Findings and Conclusions:

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

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

Law, Authority, or Factor	Mitigation Measure
Site Contamination	<p>Contaminated soils that are encountered during site activities must be excavated and shipped off site in accordance with the soil management plan of 2018.</p> <p>SSDS piping shall be installed under the slab of the new building and vented passively unless elevated levels of contaminated vapors are identified in the piping post-construction, in which case the SSDS will be activated.</p> <p>Post-construction testing of existing monitoring wells is also a requirement of VTDEC.</p>
Other	<p>All applicable, local, state and federal permits and approvals shall be obtained, all conditions shall be followed, and all permits shall be closed out upon completion.</p>

Determination:

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

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

Preparer Signature: DocuSigned by: Christine Curtis 993494960347499... Date: 8/15/2024

Name/Title/Organization: Christine Curtis, Senior Community Development Specialist, Community & Economic Development Office, City of Burlington, Vermont

Certifying Officer Signature Signed by: Brian T. Pine 4F6820541B8F4FE... Date: 8/15/2024

Name/Title: Brian Pine, Director, Community and Economic Development Office, City of Burlington, Vermont

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