



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

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Washington, DC 20410
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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Affordable Housing Alliance, LLC Smart Move

Responsible Entity: New Jersey Department of Community Affairs (DCA)

Grant Recipient (if different than Responsible Entity): Affordable Housing Alliance, LLC

State/Local Identifier: New Jersey

Preparer: Dewberry Engineers Inc

Certifying Officer Name and Title: Samuel Viavattine, Deputy Commissioner, Division of Disaster Recovery and Mitigation, New Jersey Department of Community Affairs

Grant Recipient (if different than Responsible Entity): Affordable Housing Alliance, LLC

Consultant (if applicable): Dewberry Engineers Inc

Direct Comments to:
NJDCA Project Website

Project Location: Block 21, Lot 27.03 in Robbinsville, NJ 08691

Description of the Proposed Project [24 CFR 50.21 & 58.32]:

Affordable Housing Alliance, LLC (AHA), with funding from the Department of Housing and Urban Development (HUD) through the NDCA's Smart Move (SM) program proposes to newly construct six (6) detached single-family residential homes on an approximately 2.01-acre vacant parcel (B: 21, L: 27.03) located along Gordon Road in Robbinsville Township, Mercer County, New Jersey. Once completed, the project will provide affordable homeownership opportunities in Mercer County, NJ.

The 2.01-acre site is proposed to be subdivided into seven separate lots connected by a new street. Of the seven new lots, six will be improved with a three-bedroom detached single-family home with 1,400 square feet. Two of the six single-family homes will be one-story units while the remaining four homes will be two-story. Each home will have an attached one-car garage and a driveway with its own entrance from the proposed street. Of the six total homes, two will be restricted to 50% of the Area Median Income (AMI), three will be restricted to 80% of the AMI, and the last home will be restricted to 120% of the AMI. Five of the six homes will be two-story homes with an attached one-car garage. The sixth home will be a one-story ranch home, with an attached one-car garage, to meet the combined Section 504 accessibility requirements for both mobility and hearing/visual requirements. Existing vegetation on-site will need to be cleared prior to construction. The project will also install a stormwater basin with pipes leading to existing stormwater management facilities underground.

Statement of Purpose and Need for the Proposal:

The proposed 2.01-acre project site is located in Robbinsville Township, a suburban community in Mercer County. The Township owned site is level and has frontage and access from Gordon Road. Per a letter from the Mayor of Robbinsville Township, Affordable Housing Alliance will be helping the Township implement and manage their settlement with the Fair Share Housing Center during their third-round affordable housing implementation period.

AHA and the Township of Robbinsville have executed a Developer's Agreement, which legally binds AHA to develop 5 income restrictive, affordable housing units on Block 21 Lot 27.03. Therefore, there is a documented need for affordable units in the Township of Robbinsville.

The purpose of this proposed project is to provide affordable housing to meet the Township's mandate. The Township has identified the use of township owned vacant land as their preferred priority for implementing their affordable housing requirements. The proposed project site is located near several major roads that provide access to public schools, retail, and typical neighborhood amenities. This proposed project is needed to assist Robbinsville in receiving credit towards the Township's fourth-round affordable housing obligation.

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

The proposed home site is located in Robbinsville Township, a suburban community in Mercer County, and is located adjacent to public schools, retail, typical neighborhood amenities, municipal parkland and numerous major roadways. The site is level, cleared, and has front and access from Gordon Road. The site is currently owned by Robbinsville Township and has clear title. All utilities are located adjacent to the site along and/or under Gordon Road. The site was formerly used for agricultural purposes. The most recent municipal zoning map for Robbinsville Township indicates that the proposed project site is on land in the "MU / ARCD" zoning district for Mixed Use/Age-Restricted Conservation Development. This zone permits residential uses, meaning the project is in compliance with existing

zoning.

The proposed project site is across from an approved mixed-use development. Construction of the mixed-use development is underway. This proposed development is consistent with Robbinsville's land use plan.

Views from the site consist of wooded land to the east and south, and existing residential uses in above-average condition to the west. Views to the north are currently the above-referenced construction site.

Funding Information

Grant Number	HUD Program	Funding Amount
B-22-DF-34-0001	CDBG-DR	\$4,710,410

Estimated Total HUD Funded Amount:

- \$4,710,410

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:

- **HUD Funds:** \$4,710,410
- **Non-HUD Funds:** 1,514,651
- **Total Project Cost:** \$6,225,061

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
Airport Hazards 24 CFR Part 51 Subpart D	Yes No ☐ ☒	Block 21, Lot 27.03 is not located within 15,000 feet of a military airport or 2,500 feet of a civilian airport. There is one civilian airport located in Robbinsville, known as the Trenton-Robbinsville Airport, but it is a small privately owned, airport that does not have any commercial service. It is located approximately 1.15 miles (or 6,020 feet) from the site and falls outside the applicable distance.

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
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No ☐ ☒	According to the US Fish and Wildlife Service Coastal Barrier Resources map for NJ, the Study Area is not located within or near a Coastal Barrier Resource System (CBRS) unit.
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No ☐ ☒	The study area is mapped on FEMA's Flood Insurance Rate Maps Panel No. 34021C0252F, effective July 20, 2016. This map does not show the Study Area located in a floodplain or floodway. The closest mapped feature is a 100-yr (Zone AE) floodplain associated with Assumption Creek, about 1000ft to the east. Similarly, the project is not within a 500-yr floodplain either. The proposed development is not within a 100-year floodplain, and therefore flood insurance is not required.
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No ☐ ☒	The proposed project includes new construction of six dwelling units. The project falls under the jurisdiction of the NJ Department of Environmental Protection, who administers the State Implementation Plan for all of New Jersey. The State of New Jersey is in nonattainment under the 8-hour Ozone National Ambient Air Quality Standards (NAAQS) and Mercer County is in Maintenance of the 2006 24-hour PM2.5 NAAQS. Per a letter from the Bureau of Evaluation and Planning dated 4/8/26, the scope of this project would result in emission levels that are below the General Conformity de minimis levels (40 CFR93.153). Temporary adverse impacts to air quality during construction will be mitigated by implementing mitigation measures for fugitive dust control, construction equipment, and vehicle idling using the best practices listed under N.J.A.C. 7:27. Therefore, in accordance with the United States Environmental Protection Agency's General Conformity regulations, this project is considered as conforming to the New Jersey State Implementation Plan.

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Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No ☐ ☒	A review of the NJDEP Coastal Area Facilities Review Act Boundary Map does not show any designated coastal zones within or near the project site.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No ☐ ☒	An ASTM E1527-21 Phase I Environmental Site Assessment (ESA) dated July 22, 2026 was prepared by Dewberry on the IDA Affordable Housing Alliance (AHA) property located at 255 Gordon Road, Trenton, NJ (the “Project Area”). The Project Area consists of one lot measuring approximately 2.01 acres. Access to the Project Area is via Gordon Road to the west. A residential development is located west of Gordon Road. The Project Area has remained undeveloped and/or used for agricultural use. Based on the due diligence activities performed during the July 2026 assessment, no recognized environmental conditions (RECs) that would represent an environmental risk were identified in or around the Project Area. <u>Radon</u> In 2024, HUD required that testing must be done to determine radon and they no longer allow the reliance of the EPA zone maps to determine radon levels. However, HUD allows for a review of science-based testing as an alternative option to testing. New Jersey DEP has municipal level data which qualifies as science-based testing that can be relied on for the purposes of this EA. Per NJDEP’s Radon lookup tool, River Vale has been identified as “Tier 2 — moderate radon potential”. Mitigation is not required under HUD’s guidance for a tier 2 level municipality as long as the reviewed data is considered science based. River Vale’s tier 2 determination was assigned based on the data from 2,021 tested homes in the municipality. However, NJDEP still recommends testing. Indoor testing is not required under the HUD’s radon policy, but mitigation is required when

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		radon levels are above 4.0 pCi/L. In the absence of best available testing data, it is recommended that testing be done should radon levels exceed 4.0 pCi/L at the project site. Soil testing is not required as the results would not accurately reflect indoor radon levels. Instead, indoor testing is recommended as a requirement post construction of the residential units. Further, should levels at or above this threshold be measured prior to the inhabitation of these units, it will become necessary to enact mitigation measures on-site.
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No ☒ ☐	According to the USFWS IPaC consultation, there are four threatened and endangered species that may be within the Study Area. These species include the northern long-eared bat (NLEB) (<i>Myotis septentrionalis</i>, endangered), tricolored bat (<i>Perimyotis subflavus</i>, proposed endangered), bog turtle (<i>Glyptemys muhlenbergii</i>, threatened), and monarch butterfly (<i>Danaus plexippus</i>, proposed threatened). Work done in the Study Area may need to comply with conditions under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act (MBTA), as the IPaC also identified the presence of Bald and/or Golden Eagles and 17 migratory bird species within the Study Area. As per the concurrence letter dated May 28, 2026 from Nicholas Smith-Herman to Sarah Crestol (USFWS), the project will adhere to the following conditions to minimize the impacts to the NLEB: 1. No cutting, trimming, knocking down, or bringing down of any trees ≥3 inches diameter at breast height (DBH) will occur from April 1 through September 30. 2. To the extent practicable, the project will use downward-facing, full cut-off lens lights when installing new permanent lighting within 1000 feet of forested areas (northern long-eared bat suitable habitat). The same letter states that there are no known

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
		occurrences of bog turtles within 4 miles of the project site. Robinsville township in Mercer County is not on the official NJDEP known locations of bog turtles in New Jersey list. An official bog turtle statement has been drafted that states there are no bog turtles within the study area. Given the project scope and the distance from any potential bog turtle habitat, or watercourses leading to such habitat, any hydrologic changes in the surrounding watershed resulting from construction and stormwater management are not expected to cause any significant indirect effects to bog turtles. The NJ GeoWeb Piedmont habitat landscape layer lists the bobcat (<i>Lynx rufus</i>, state threatened), wood turtle (<i>Glyptemys insculpta</i>, state threatened), and big brown bat (<i>Eptesicus fuscus</i>, special concern) as previously identified within the study area. This layer also lists bobcat (state threatened), wood turtle (state threatened), and big brown bat (state special concern) as previously identified immediately adjacent to the study area. Additional required conservation methods will be identified during NJDEP Land Use permitting. Lighting restrictions and timing restrictions for vegetation removal will be adhered to protect federally and state listed bat species. However, tree removal is not anticipated to be necessary for this project. Please see the attached memo from a qualified biologist on the potential for impacts to Bald Eagles.
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes No ☐ ☒	The proposed HUD-assisted project does not involve the development of a hazardous facility (i.e., a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries). However, the proposed project will increase the existing residential density on-site. Based on a

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
		desktop aerial review of the project location using NearMap and Google Maps, there are no existing stationary above ground storage containers covered under 24 CFR 51C within one mile of the proposed development. HUD updated the definition of “hazard” in 24 CFR 51.201 to exclude all containers that are 1,000 gallons or less in water volume capacity and comply with the National Fire Protection Association Code 58, in the 2017 edition (NFPA 58 (2017)) from mandatory separation distance requirements in 24 CFR part 51, subpart C. Per HUD guidance, in jurisdictions where NFPA 58 (2017) has been adopted into law, HUD relies on enforcement by the jurisdiction. Therefore, all propane tanks of 1,000 gallons or less in those locations are excluded from compliance with HUD’s ASD requirements. New Jersey adopted the Liquefied Petroleum Gas Code, "NFPA 58-2017" under N.J.A.C. 5.18-3.1, therefore, this project is in compliance with HUD’s Explosive and Flammable Hazards requirements under 24 CFR Part 51 Subpart C. 24 CFR Part 51 only applies to above-ground containers and none were found within 1 mile. Furthermore, should any new above ground containers be proposed within a mile of the project site, they will be in compliance with N.J.A.C. 5.18-3.1.

Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes No ☐ ☒	Per the response letter from USDA dated 04/09/2026, the project area contains Matapeake and Bertie soils, that are classified as prime farmland and farmland of local importance soils. After USDA's review of the documentation provided for this proposed project, it was determined that the proposed project creates an irreversible change in land use to a current condition or for potential farming in the future. However, 440-V-CPM, Part 523.10, Section B(1), indicates that land receiving a combined score of less than 160 points from the LESA criteria is not subject to FPPA provisions. Furthermore, since the total of points according to the LESA criteria is less than 220, other alternatives do not need to be evaluated.
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
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No ☐ ☒	The study area is mapped on FEMA's Flood Insurance Rate Maps Panel No. 34021C0252F, effective July 20, 2016. This map does not show the Study Area located in a floodplain or floodway. The closest mapped feature is a 100-yr (Zone AE) floodplain associated with Assumption Creek, about 1000ft to the east. The project site is similarly not located within the 500-yr (Shaded Zone X) floodplain.
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No ☐ ☒	Dewberry conducted a screening using NJHPO's Look Up Cultural resources for Yourself (LUCY) tool and no above-ground historic properties were found within the Area of Potential Effect (APE). The APE consists of the entire 2.01-acre parcel of Block 21, Lot 27.03 along Gordon Road. No known archaeology sites were found within 500 feet of the APE and there is a low potential for archaeological resources to be in the area. The interested party letter received one response, but no further follow up was received prior to the deadline. Please find the response attached.

		SHPO provided signed concurrence on 5/5/2026 which agrees that there are no historic properties affected within the project area of potential effects. Therefore, no impacts to historic, archaeological, or cultural resources are anticipated.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes No ☐ ☒	In accordance with HUD's noise regulations, Affordable Housing Alliance was analyzed to determine potential nearby large noise generators and noise site acceptability standards using HUD's Day/Night Noise Level (DNL) Calculator. Google maps was utilized to determine the project site's distance to major roads, rail roads, and airports, and NJDOT Traffic Count Map and Traffic Count (TCDS) platform was used to determine Annual Average Daily Traffic (AADT), breakdown by passenger vehicles (FHWA Class 1-3) and business/commercial vehicles (FHWA Class 4 and above), and hourly volumes to determine night fraction of ADT. Distances from property to roadways were measured from the closest proposed window line to the center of the traffic lanes. In lieu of publicly available speed data, the speed limit was used. The Project Site is not within 3,000' from a railroad or 15 miles from an airport but is within 1,000' of Route 130 which is a major road. NJDOT data was pulled for both Gordon Road and Route 130. Gordon Road contains a total AADT of 2,549 and Route 130 contains an AADT of 30,191. Due to vehicular classification data being unavailable for both roadways, NJDOT Public Roadway Mileage and Vehicle Miles Travelled 2024 reporting was used to determine vehicle percentages by roadway functional classification. Using this data, Route 130, which is a functional class 3 roadway (other principal arterial) has approximately 91% passenger vehicles and approximately 9% business / commercial vehicles. Gordon Road, functional class 5 (major arterial) has approximately 93% passenger vehicles and approximately 7% business/commercial vehicles. A nighttime fraction of 14% for Gordon Road and 15% for Route 130 was taken from NJDOT hourly vehicular counts. The effective distance from the nearest building façade to the middle of the travel lanes for Gordon Road and Route 130 was measured at 50 feet and 980 feet respectively.

		The DNL calculator projected a 24-hour noise level of 59 dBA which falls within the acceptable noise level and requires no special approvals and requirements. Local noise ordinances will be adhered to during construction.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes No ☐ ☒	The Study Area is located within the New Jersey Coastal Plain Sole Source Aquifer. This is an active aquifer system in EPA Region 2 per EPA's interactive Map of Sole Source Aquifer Locations. HUD has a Memorandum of Agreement (MOA) in place with the EPA excluding construction of individual new residential structures containing from one to four units from review. Since the project contains 6 single family homes, attachment 2.B of the MOA was consulted to determine if consultation with EPA would be necessary. The project is not located in a Wellhead protection area for public community water supply wells in New Jersey or a water supply critical area. The project is not located within a one half mile radius of a current or proposed public water supply well or wellfield. According to the latest plan set, less than or equal to 65% of impervious surface is proposed in the final condition. This is below the threshold established by attachment 2.B (75%). The project site is 2.01 acres, far below the 30-acre threshold under the MOA attachment. The proposed density of the project will be significantly less than 150 units per acre. This project will not involve construction or expansion of water supply facilities (i.e., treatment plant, pumphouse, etc.), construction or expansion of on-site wastewater treatment plants, construction or expansion of sewage trunk lines greater than 1320 feet in length, or construction or expansion of gas or petroleum trunk lines greater than 1320 feet. There will be no gas service as the homes will be all electric. Further, the sewage main is approximately 211 feet in length. The project will not include the storage or handling of any hazardous constituents mentioned in attachment 4 of the MOA. The project does not include bulk storage of petroleum in underground

		or above ground tanks in excess of 10,000 gallons or permit verification. Finally, the project will not require a federal or state pollutant discharge elimination permit or modification of an existing permit Therefore, this project is not anticipated to contaminate the New Jersey Coastal Plain Sole Source Aquifer and is excluded from review.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes No ☐ ☒	There are no wetlands mapped in or near the Study Area according to NJ GeoWeb and the USFWS National Wetlands Inventory. NJ GeoWeb does not indicate that the project site contains a vernal pool or potential vernal pool. Additionally, the project site is outside of the buffer area for known vernal pools and potential vernal pools. Therefore, the project is not anticipated to impact any wetlands, vernal pools or potential vernal pools during construction.
Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes No ☐ ☒	According to the list of wild and scenic rivers provided by USFWS (https://www.fws.gov/rivers/new-jersey), there are no wild and scenic rivers in or near the Study Area. Additionally, USFWS indicates on their Study Rivers page that there are currently only two rivers or river systems under “authorized” study under Section 5(a) of the Wild & Scenic Rivers Act. Neither of these rivers are in NJ. Finally, there are no rivers on the Nationwide Rivers Inventory (NRI) within the project or study area.

Environmental Assessment Factors [24 CFR 58.40] 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	(2)	Per NJ GEOWEB, the current land use of the project site (Block 21, Lot 27.03) is “Cropland and Pastureland”. The most recent municipal zoning map (2016) for Robbinsville Township indicates that the proposed project site is on land in the “MU / ARCD” zoning district for Mixed Use/Age-Restricted Conservation Development. As the project involves the development of single-family homes, and the zoning district is not restricted to agricultural uses, no impact to zoning is expected. Further, while the project site was formerly used for agricultural purposes, it is no longer actively used as farmland. Therefore, impacts to existing land use on the site are not anticipated either. The project proposes the development of six residential single-family home units. This residential use is consistent with the development to the west of the project site and the residences to the North under construction. Thus, no impacts to urban design or scale are anticipated. The affordable units will go towards meeting the Township’s Mt. Laurel obligation.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	(2)	According to the Web Soil Survey of Mercer County, NJ provided by the United State Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS), the soils beneath the Study Area is composed of the following soils: Matapeake loam, 2 to 5 percent slopes (MbpB) and Mattapex and Bertie loams, 0 to 5 percent slopes (MBYB). MbpB is classified as well drained and identified as Hydrologic Soil Group B, which are soils having a moderate infiltration rate when thoroughly wet. MBYB is classified as moderately well drained and is identified as Hydrologic Soil Group C, which are soils having a slow infiltration rate when thoroughly wet. As currently designed, each lot will have minimal impervious surfaces to reduce stormwater runoff into local waterways. Stormwater will be captured and stored onsite using proposed lot 4. This is intended to minimize flow to Gordon Road. The planned landscaping will include native, drought-tolerant plants. The landscape approach selected is anticipated to enhance biodiversity, support pollinators, conserve water, and reduce long-term maintenance needs. Therefore, significant impacts to soil, slope, erosion, drainage and storm water runoff

Environmental Assessment Factor	Impact Code	Impact Evaluation
		are not anticipated. Attached please find a copy of the signed soil erosion and sediment control plan certification
Hazards and Nuisances including Site Safety and Noise	(2)	Based on the project's location, no impacts from natural hazards or air pollution generation facilities are anticipated. As previously mentioned, no recognized environmental conditions (RECs) that would represent an environmental risk were identified in or around the project site.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	(2)	The development of the site involves the proposed construction of 6 single-family homes with an anticipated population of approximately 24 individuals (12 adults and 12 children). The development site is located within a low density, rural/suburban residential neighborhood of Robbinsville Township. The development is approximately 8 miles from the nearest train station (Hamilton Station). Per available 2024 5-year ACS Census data, Robbinsville has a total population of 15,641. Of this population, there are 8,169 civilians in the labor force and 3,235 people not in the labor force. The majority of civilians in the labor force in Robbinsville Township are employed (94.68%) and the number of civilians employed in Robbinsville is proportionally higher than employment in Mercer County and New Jersey. Major employers in Mercer County include: Princeton University, Bristol-Myers Squibb, Bank of America, Amazon, Capital Health Systems Inc., New Jersey Manufacturers Insurance Company, Educational Testing Service (ETS), Mathematica, Rider University, The College of New Jersey. The median household income for Robbinsville Township is estimated to be \$169,450.00 per 2024 5-year ACS Census data. This estimate places the median household income of Robbinsville above that of New Jersey (\$103,556.00) and of Mercer County (\$100,645.00). Within Robbinsville, approximately 4% live below poverty level compared to approximately 10% at the County level and approximately 10% at the State level. Given the high percentage of the civilian labor force being employed, low percentage of poverty and ample employers in the

		County, it is anticipated that there will not be a negative impact to local employment or income patterns for the area. Conversely, the addition of employed residents in this residential development is likely to maintain or improve existing employment and income patterns in the area.
Demographic Character Changes, Displacement	(2)	According to 2024 5-year ACS Census data, Robbinsville Township and Mercer County have respective populations of 15,641 and 385,864. Of the 6,033 residences available in the township, 5,869 (97.28%) are occupied. Robbinsville Township has a larger population of people aged 65+ (11%) than children under 5 years old (4%). This is consistent with the patterns observed at the County (16% v. 6%) and State (17% v. 6%) levels. The age groups with the largest population in Robbinsville are ages 45-49 and ages 40-44 in that order. Within Robbinsville Township, the majority of the population is White alone (55%). The second largest ethnic group in the township are Asian alone (30%). The remainder of the population is composed of people who are Black alone (3%), Hispanic or Latino (6%), Two or more races (5%) or Some other race alone (less than 1%). New Jersey's Law Against Discrimination (LAD) prohibits discrimination when selling or renting property. Landlords cannot choose renters or buyers based on a person's race, creed, color, national origin, ancestry, nationality, marital or domestic partnership or civil union status, sex, gender identity or expression, disability, affectional or sexual orientation, family status or source of lawful income or source of lawful rent payment (such as rental assistance from the Housing Choice Voucher Program formerly known as Section 8). This project is located in a developing residential area of the township and would not be out of character for the existing neighborhood. Displacement of existing homes or populations would not occur under the proposed project. The project would also not meaningfully change the character of the local neighborhood. As discussed under "Employment and Income Patterns" above, this project would not negatively impact local income patterns. Nor would this project create physical barriers or reduce access to local services, facilities, recreational areas and institutions. Therefore, there are no anticipated impacts to demographics or community character, and no displacements would occur as a result of this project.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	(2)	The proposed project is located within the Robbinsville Public School District. There are a total of three Montessori schools, 1 elementary school, 1 middle school, 1 high school and 1 preschool. The nearest elementary school to the project site is Sharon Elementary School, approximately 2 miles away to the southeast. The nearest middle school to the project site Pond Road Middle School, located approximately 2.5 miles northwest. The nearest high school to the project site is Robbinsville High School, approximately 2 miles northwest. Per the 2020 Master Plan Update & Land Use Plan Amendment, the township's will be implementing strategies to establish a regulatory approach which balances the production of residential projects with the township's need to limit residential growth and to alleviate the pressure from growth placed on the local school system and tax base. The township acknowledges in its master plan amendment that current educational facilities are finding it challenging to support the township's current and projected school-age population. The township and Board of Education have been tasked with projecting likely school enrollment over the next 10 years (2020-2030) and how enrollment may impact the carrying capacity of the Township's existing schools. Following this, they will ensure that development does not overwhelm the capacity of the township's educational facilities to provide a quality learning environment. According to the 5-year Census Bureau estimates for Robbinsville Township, the population has experienced an approximately 12% population increase over a 10-year period (2014-2024). The firm designing these units anticipates an addition of 24 individuals (12 adults and 12 children or four individuals per unit). The addition of 12 children is not anticipated to burden or overburden schools within Robbinsville Township School District. Given recent observed population changes through census data, it is not anticipated that the projected addition of 12 school aged children will burden or overburden schools within the school district.
Commercial Facilities	(2)	The area surrounding the project site is primarily a rural/suburban development pattern, so there are very few commercial facilities or services within a 5-to-10-minute walking distance. However, there is a Wawa within 0.5 mile (a roughly 8-minute walk) from the project site. This project will

Environmental Assessment Factor	Impact Code	Impact Evaluation
		not change access to this Wawa for the community. When traveling by car, many more commercial facilities are accessible from the project site. Many of these commercial facilities are located along the Route 130 corridor and are accessible within a 5–10-minute drive. This project will not adversely impact access to or displace existing retail and commercial services.
Health Care and Social Services	(2)	The nearest hospital to the proposed project is Hackensack Robert Wood Johnson University Hospital in Hamilton which is approximately 6 miles away. The nearest dentist is Beth Egan Lodge, DMD, PA within 2.5 miles of the site. The closest urgent care center to the project site is RWJBarnabas Health Medical Associates Robbinsville (approx. 2.5 miles away). Capital Health Primary Care – Robbinsville is the nearest medical office with primary care physicians within 3 miles of the proposed development. While most of the facilities listed above are within 3 miles of the development, there is currently no public transportation running along this section of Gordon Road or US-130. None of these facilities are within walking distance. For the average resident, these distances to medical services should not be an issue. In a medical emergency, residents could call 911 or use a rideshare service (Uber/Lyft). The Robbinsville Township Senior Center located approximately 2.6 miles away from the proposed development site, hosts community events. The Hamilton Physical Therapy Services is located in Robbinsville approximately 2 miles away. Robbinsville Township offers a meals-on-wheels program as well. Residents of this development are not anticipated to have excessive commutes to these services and are not anticipated to overburden existing facilities as there are a number of different facilities residents could go to. Therefore, no impacts to health care or social services are anticipated.
Solid Waste Disposal / Recycling	(2)	Hazardous materials are not anticipated to be generated from the site and the primary wastes associated with this site are anticipated to be trash and recyclables. The proposed development will be serviced by the municipality for waste disposal and recycling. The waste generated by the anticipated number of new residents is not expected to significantly reduce the life span of local solid waste disposal facilities, significantly overtax the existing collection systems or become too expensive for residents.

Environmental Assessment Factor	Impact Code	Impact Evaluation
		Therefore, impacts to solid waste disposal and recycling are not anticipated.
Waste Water / Sanitary Sewers	(2)	The proposed development will be serviced by the municipality for wastewater/sewer. The will-serve letter is included as an attachment.
Water Supply	(2)	The proposed development will be serviced by Aqua NJ for potable water. The will-serve letter is included as an attachment.
Public Safety - Police, Fire and Emergency Medical	(2)	The proposed development would be served by the Robbinsville Township Police Department (3 miles southwest), the Robbinsville Township Fire Department (2 miles southwest), and Robert Wood Johnson University Hospital in Hamilton (6 miles west). The project would not impact the accessibility of these services for other residents of Robbinsville.
Parks, Open Space and Recreation	(2)	Within walking distance of the site, are two cricket grounds in Gordon-Bresnahan Park. There is also another cricket grounds adjacent to the park along Bresnahan Road. Mercer County contains a number of parks and fields that residents at this development will have access to as well. The project as proposed, is not expected to have any adverse effects on these resources or on access to these resources.
Transportation and Accessibility	(2)	The proposed development is located within proximity to high-capacity roadways including the US-130 (0.2 miles away), I-95/NJ-Turnpike (1.5 miles away) and I-195 (2.7 miles away). There are no bus stops or train stations within the immediate or surrounding area. The nearest train station is New Jersey Transit's Hamilton station located in Hamilton, NJ. This station is on the Northeast Corridor line and makes stops between Trenton and NYC. The nearest bus stop is on US-130, approximately 2.5 miles away. The NJ Transit 606 Bus that runs between Hamilton and Princeton. The development of the project site will require the permanent removal of four on-street parking spaces. The spaces will not be relocated, and the removal of these parking spaces is not expected to cause a significant impact to parking in the area. Given the fact that this is a low-density residential site, significant impacts to the existing local and regional roadways are not expected to result from this project. Therefore, this project is not anticipated to significantly impact existing transportation infrastructure and services. The project will have a positive impact on residents as they will have ease of access to major transportation routes.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	(2)	According to NJDEP GeoWeb, the Study Area is located within the Central Delaware Watershed Management Area and the Assunpink Creek (above Shipetaukin Ck) watershed. There are no wetlands mapped in or near the Study Area according to NJ GeoWeb and the USFWS National Wetlands Inventory. NJ GeoWeb does not indicate that there is a vernal pool on-site and the parcel does not intersect with any vernal pool or potential vernal pool buffers. NJ GeoWeb and the USFWS NWI mapper identify one stream about 460ft east of the Study Area, This stream is an unnamed tributary of Assumption Stream and is classified as a FW2-NTC1. The NWI classifies this stream as a 0.29 acre riverine, intermittent, streambed, seasonally flooded (R4SBC) open water The study area is mapped on FEMA's Flood Insurance Rate Maps Panel No. 34021C0252F, effective July 20, 2016. This map does not show the Study Area located in a floodplain or floodway. The closest mapped feature is a 100-yr (Zone AE) floodplain associated with Assumption Creek, about 1000ft to the east. The project is similarly not located in the 500-yr floodplain.
Vegetation, Wildlife	(2)	The NJ GeoWeb Piedmont Habitat Landscape Project layer identifies sightings for the Bobcat (Live Individual Sighting - 2008) and Wood Turtle (Occupied Habitat - 2003) any threatened or endangered species habitat within or surrounding the project area. According to the USFWS IPaC consultation, there are four federal threatened and endangered species that may be within the Study Area. These species include the Northern Long-Eared Bat (endangered), Tricolored Bat (proposed endangered), Bog Turtle (threatened), and Monarch Butterfly (proposed threatened). Work done in the Study Area may need to comply with conditions under the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act (MBTA), as the IPaC also identified the presence of Bald and/or Golden Eagles and 17 migratory bird species within the Study Area. As per the letter from the USFWS New Jersey Field Office dated May 28, 2026 to Nicholas Smith-Herman from Sarah Crestol, the project must adhere to the following conditions to

		minimize the impacts to the Northern Long-Eared Bat: 1. No cutting, trimming, knocking down, or bringing down of any trees ≥ 3 inches diameter at breast height (DBH) will occur from April 1 through September 30. 2. To the extent practicable, the project will use downward-facing, full cut-off lens lights when installing new permanent lighting within 1000 feet of forested areas (northern long-eared bat suitable habitat). Per this same letter, there are no known occurrences of bog turtles within 4 miles of the project site. Robinson township in Mercer County is not on the official NJDEP known locations of bog turtles in New Jersey list. An official bog turtle statement has been drafted that states there are no bog turtles within the study area. The project will install a stormwater basin with pipes leading to existing stormwater management facilities underground. Given the project scope and the distance from any potential bog turtle habitat, or watercourses leading to such habitat, any hydrologic changes in the surrounding watershed resulting from construction and stormwater management are not expected to cause any significant indirect effects to bog turtles. A letter dated May 5, 2026 from the NJDEP Office of Natural Lands Management identified several occurrences of any rare wildlife species or wildlife habitat on the referenced site. The NJ GeoWeb Piedmont habitat landscape layer lists the bobcat (state threatened), wood turtle (state threatened), and big brown bat (special concern) as identified within the study area. This layer also lists the northern myotis (federal), bobcat (state threatened), wood turtle (state threatened), and big brown bat (special concern) as previously identified within $\frac{1}{4}$ mile to the project site. Similar to the bog turtle, no impacts to the wood turtle are expected to result from this project. The nearest surface water feature is over 1,000 feet away from the project site and the site does not contain any watercourses leading to this feature. Best management practices will be used to prevent impacts to wood turtles including, but not limited to, the use of turtle exclusion fences. While there was a live individual Bobcat sighting in 2008, bobcats are not anticipated to use the site as a habitat. Bobcats would likely only enter the study area in search of food or mating, but they are known to prefer wooded areas for their habitat and are unlikely to create a habitat near a site with human activities taking place.
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		According to NJ GeoWeb Natural Heritage Grid Map layer, there are no documented, state-listed threatened or endangered plant species located within 1.5 miles of the project site.
Other Factors	(2)	N/A

Environmental Assessment Factor	Impact Code	Impact Evaluation
ENERGY		
Energy Efficiency	(1)	This project combines Passive House design with site-specific climate strategies to cut energy use and enhance comfort. Triple-pane windows, efficient HVAC, and backup energy systems reduce grid reliance during outages. Solar-ready rooftops, EV charging, and resilient materials like fiber cement siding and impact-rated roofs boost durability. Smart home features will allow residents to monitor energy and water use. Each solar-ready home meets Passive House standards with triple-pane windows, airtight insulation, and geothermal systems for year-round comfort and low energy bills. Features include EV charging, Energy Star appliances, low-flow fixtures, backup power, stormwater capture, and native landscaping. These sustainable, resilient homes reduce utility dependence, cut carbon footprints, and support affordability for families on tight budgets. Above all, this will result in high-performance homes.

Additional Studies Performed:

- Phase I Environmental Site Assessment (ESA) dated July 17, 2026

Field Inspection (Date and completed by):

- Conducted 7/30/26 by Dewberry
 - See the attached Photolog/Field Inspection document

List of Sources, Agencies and Persons Consulted:

Federal Emergency Management Agency (FEMA) National Flood Hazard Layer (NFHL) Viewer. <https://www.arcgis.com/apps/webappviewer/index.html>. Accessed June 25, 2026.

Google Earth, 2025. Imagery Date October 10, 2024. Newark, NJ 07103. Retrieved from <https://earth.google.com/web/>. Accessed June 25, 2026.

HistoricAerials.com, Nationwide Environmental Title Research, LLC (NETR). Accessed June 25, 2026.

National Parks Service (NPS). Nationwide Rivers Inventory.
<https://www.nps.gov/subjects/rivers/nationwide-rivers-inventory.htm>

NearMap. Stuart Nixon, 2007. <https://apps.nearmap.com/> Accessed June 25, 2026.

New Jersey Department of Environmental Protection (NJDEP) 2026. Geographical Information Systems GeoWeb. Accessed June 26, 2026 at <https://dep.nj.gov/gis/>.

NJDEP – Bureau of Evaluation and Planning consultation for compliance with Clean Air Act

Robbinsville Township Municipal Website. <https://www.robbinsville.net/>. Accessed July 8, 2026.

United States Census Bureau 5-year American Community Survey (ACS) Tables. Accessed July 13, 2026 at <https://data.census.gov/table>

United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey (WSS) tool. <https://www.arcgis.com/apps/webappviewer/index.html>. Accessed June 25, 2026.

United States Environmental Protection Agency (EPA) National Environmental Policy Act (NEPA) Assist tool. Accessed July 7, 2026 at <https://nepassisttool.epa.gov/nepassist/nepamap.aspx>.

United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool. Accessed June 26, 2026 at <https://ipac.ecosphere.fws.gov/>.

United States Fish and Wildlife Service (USFWS) National Wild and Scenic Rivers System Webmap. Accessed July 3, 2026 at <https://www.fws.gov/rivers/new-jersey>.

United States Fish and Wildlife Service (USFWS) Study Rivers. <https://www.fws.gov/rivers/study-rivers>.

United States Department of Housing and Urban Development (HUD) HUD Exchange Regional Sole Source Aquifer MOUs between HUD and EPA. Accessed July 20, 2026 at <https://www.hudexchange.info/resource/5778/regional-sole-source-aquifer-mous-between-hud-and-epa/>

List of Permits Obtained:

- Construction permits and other permits as required by Robbinsville Township or the NJDEP must be obtained by the developer.

Public Outreach [24 CFR 50.23 & 58.43]:

- No public hearings were held. The NJDCA will accept comments on the environmental assessment of the proposed project through their official website.

Cumulative Impact Analysis [24 CFR 58.32]:

- Based on the latest aerials from NearMap, dated 6/14/26, construction on two parcels north of the project site is underway. These parcels make up the active construction site of the Preston Pointe multi-family townhome development. LENNAR is actively selling new builder inventory into 2026. This proposed project is independent of the Preston Pointe townhome development to the north.

The proposed project consists of six homes which will have a negligible impact on the community or township resources. The Preston Pointe development will have a higher population density that has been considered by the Township as part of their master plan and zoning approvals. The combined projects are not anticipated to have a cumulative impact on community or township resources.

Alternatives [24 CFR 58.40(e)]

- The two alternatives considered for this project were the proposed project action and a no action alternative. No other project site alternatives were considered because the project prioritized the use of township-owned vacant land as their first priority in meeting their affordable housing requirement. The No Action Alternative is described below.

No Action Alternative [24 CFR 58.40(e)]:

- Under the No Action Alternative, the proposed project would not be built and the township would have to consider other parcels or developments to meet their affordable housing goals. Other potential sites that were not Township owned or vacant would likely increase the project cost or delay the construction of the needed affordable housing. Finding suitable vacant lands, and or other development sites that could include the need for demolition could be cost prohibitive and significantly delay construction. The increased cost and delay in meeting those requirements could negatively impact the Township's ability to fully implement their mandated requirements. The proposed project site would remain undeveloped until it was approved for a different proposed development.

Summary of Findings and Conclusions:

- Overall, this project is anticipated to comply with all applicable Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6. Mitigation during construction is expected to be necessary during construction to comply with the Clean Air Act, Endangered Species Act and 24 CFR Parts 50.3(i) & 58.5(i)(2). This project is not anticipated to result in a significant impact to any of the Environmental Assessment Factors examined above.

Mitigation Measures and Conditions

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
Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	The project will adhere to the following conditions to minimize the impacts to the NLEB: 1. No cutting, trimming, knocking down, or bringing down of any trees ≥ 3 inches diameter at breast height (DBH) will occur from April 1 through September 30. 2. To the extent practicable, the project will use downward-facing, full cut-off lens lights when installing new permanent lighting within 1000 feet of forested areas (northern long-eared bat suitable habitat). Please refer to the attached memos from a qualified biologist for opinions on the potential for impacts to Bald Eagles. Lighting restrictions and timing restrictions for vegetation removal will be adhered to protect federally listed bat species. Further, to prevent impacts to bats: A. The project proponent will provide the contractor with educational materials describing bat use of buildings. B. During the project, if any evidence of bat occupancy (e.g., live or dead bats, guano, staining at entry points) is observed or suspected, the contractor must immediately pause work on the structure and contact the project proponent. In turn, the project proponent must contact the Service for further guidance. C. If a federally listed bat species is determined to be present, the federal action agency (or project proponent, if designated as a non-federal representative) must reinstate consultation with the Service before continuing project activities that may disturb the bats.
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Mitigation is not anticipated to be necessary unless radon levels on site are above 4.0 pCi/L. Testing post-construction is required to determine if mitigation measures are necessary to comply with HUD's radon guidance.
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	• Use water or chemical dust suppressant to control excessive dust in exposed areas. • Cover the load compartments of trucks hauling dust-

	generating materials. • Dust emissions either windblown or generated from construction activities should be controlled to prevent offsite impacts or material tracked onto the roadways. N.J.A.C. 7:27-5.2. • Air pollution including odors that are detectable offsite that are injurious to human health or would result in citizen complaints are prohibited. N.J.A.C. 7:27-5.2. • Wash heavy trucks and construction vehicles before site departure. • Reduce vehicle speed on non-paved areas and keep paved areas clean. • Retrofit older equipment with pollution controls. • Establish and follow specified procedures for managing contaminated materials discovered or generated during construction. • Obtain an air pollution control permit to construct and a certificate to operate for all equipment subject to N.J.A.C. 7:27-8.2(c). Such equipment includes, but is not limited to, the following: a. Commercial fuel combustion equipment rated with a maximum heat input of 1,000,000 British Thermal Units per hour or greater to the burning chamber (N.J.A.C. 7:27-8.2(c)1); b. Stationary storage tanks for volatile organic compounds with a capacity of 2,000 gallons and a vapor pressure of 0.02 pounds per square inch or greater (N.J.A.C. 7:27-8.2(c)9); c. Tanks, reservoirs, containers, or bins with capacity in excess of 2,000 cubic feet used for storage of solid particles (N.J.A.C. 7:27-8.2(c)10); and d. Stationary reciprocating engines with a maximum rated power output of 37 kW or greater, used for generating electricity, not including emergency generators (N.J.A.C. 7:27-8.2(c)21). (Note: One- or two-family dwellings and dwellings of six or less family units, one of which is owner occupied, are exempt pursuant to NJSA 26:2C-9.2.) e. The applicant should review the requirements of N.J.A.C. 7:27-8.2(c) 1-21 for stationary permitting requirements. This includes but is not limited to,
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	construction equipment-stationary construction equipment or emergency generators, may require air pollution permits if it is located on the site for longer than one-year N.J.A.C. 7:27-8.2(d)15. There are general permits for boilers and emergency generators (https://www.state.nj.us/dep/aqpp/gp.html) if the units can meet the prescribed requirement in the general permits. - Any vehicles involved on the project must adhere to the idling standards (less than 3 minutes) in N.J.A.C. 7:27-14 and 15. - Minimize idling and ensure that all on-road vehicles and non-road construction equipment at the project site use ultra-low sulfur fuel (<15 ppm sulfur) in accordance with the federal Non- Road Diesel Rule (40 CFR Parts 9, 69, 80, 89, 94, 1039, 1051, 1065, 1068). If possible, operate newer on-road diesel vehicles and non-road construction equipment equipped with tier 4 engines or an exhaust retrofit device.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	- Outfit all heavy equipment with operating mufflers. - If applicable, comply with local noise ordinance. - If application site is in a high noise area, then use appropriate Green Building Standard methods (see Condition 2) to attenuate.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	- Implement and maintain erosion and sedimentation control measures to prevent deposition of sediment and eroded soil in on-site and off-site wetlands and waters and to prevent erosion in onsite and off-site wetlands and waters. - Minimize soil compaction by minimizing project ground disturbing activities in vegetated areas, including lawns - Comply with the contractor and owner requirements listed in the attached Soil and Sediment Control Plan Certification.

Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1)]

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)]

The project may significantly affect the quality of the human environment.

Preparer Signature: Quinn Ruff Date: 08/28/26

Name/Title/Organization: Quinn Ruff / Senior Environmental Planner / Dewberry

Certifying Officer Signature: Samuel R. Viavattine Date: 08/31/2026

Name/Title: Samuel R. Viavattine, Deputy Commissioner, NJDCA

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).