



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

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

**This is a suggested format that may be used by Responsible Entities to document completion of an
Environmental Assessment.**

Project Information

Project Name: LifeWorks Annex

Responsible Entity: Kentucky Department for Local Government

Grant Recipient (if different than Responsible Entity): Wabuck Development Company

State/Local Identifier:

Preparer: Jennifer Peters, Public Facilities Branch Manger

Certifying Officer Name and Title: Matt Sawyers, Commissioner

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): Suzanne Arnzen, CMec

Direct Comments to: Jennifer Peters; Jennifer.Peters@ky.gov

Project Location: 1176 Adams St, Bowling Green, Warren County Kentucky 42101 (36.993618322920796, -86.44916362586638).

Additional Location Information:

Lifeworks Annex is located at 1176 Adams Street which is an existing address of one of the three parcels as shown on PVA records. The Market Study refers to the address as 12 E. 12th Street which corresponds to the address of the entrance proposed off of 12th Street. Please note that both addresses refer to the same development. The difference in the reference is only due to existing addresses vs. an anticipated address. One parcel is currently vacant land. The project site at 1176 Adams Street, Warren County, Bowling Green, Kentucky 42101 (36.993618322920796, -86.44916362586638). The property consists of three adjacent parcels on Adams Street, optioned from the same owner. There are currently single-family dwellings located on two of the three parcels. These dwellings are currently in a state of disrepair and will be razed and removed as part of the project. Access to the site will be from Adams Street, which is a two-lane asphalt paved and publicly maintained road.

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

Wabuck Development Company Inc. has applied for federal funding for the acquisition and subsequent new construction of one, 8-unit affordable housing complex located at 1176 Adams Street in Bowling Green, Kentucky intended to serve the low to moderate income population. The purpose of the housing is to provide preference to post "graduation" independent housing for those individuals on the autism spectrum that have completed the LifeWorks program at Western Kentucky University (WKU). However, these units will be available to all other populations. This is an urban project located within the city limits of Bowling Green, Kentucky. The property is currently zoned properly for this project and will require site acquisition. This site consists of three adjacent parcels on Adams Street, optioned from the same owner. There are currently single-family dwellings located on two of the three parcels. These dwellings are currently in a state of disrepair and will be torn down and removed as part of the project. Access to the site will be from Adams Street, which is a two-lane asphalt paved and publicly maintained road. The site will have good accessibility and good visibility and will be constructed in one phase. Ground disturbance will occur for building footers and utilities.

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

There is a need for safe, decent and affordable housing in Warren County, Kentucky and the surrounding areas. Warren County was affected by the December 2021 tornados the recovery funding has targeted. This development will be an 8-unit, new construction affordable housing complex located at 1176 Adams Street in Bowling Green, Kentucky and has HOME, CDBG funds, and LIHTCs for the site as part of the Western Kentucky disaster recovery bonds. The purpose of the housing is to provide preference to post "graduation" independent housing for those individuals on the autism spectrum that have completed the LifeWorks program at Western Kentucky University (WKU). However, these units will be available to all other populations. Affordable Housing of Hopkinsville, Inc and Wabuck Development Company, Inc are co-developers. The only property located in the market area that targets tenants on the autism spectrum is LifeWorks @ WKU Randell Living and Learning Center located at 1312 Adams Street, just one block south of the subject. However, Ransdell is exclusively for autism spectrum clients who are enrolled in the 2-year LifeWorks program. Once a client graduates from the 2-year program they must leave the Ransell facility and seek independent housing. The proposed subject's units provide preference to this independent housing. This project does not have project-based rental subsidies available for tenants such as would be available in a typical Section 8 or Rural Development property. Consequently, the minimum qualifying income for the subject's tenants is higher than the income of the vast majority of Section 8 tenants. Therefore, Section 8 properties do not compete directly with the subject. Other family

oriented LIHTC properties that do not offer rental assistance comprise the primary competition for the subject's units. According to the published KHC list of affordable properties, there are 11 family oriented LIHTC developments in the subject's defined PMA. The property managers of 9 of 11 properties responded to our survey and are located on the map below and followed by detailed comp sheets. Since the supply of available units is so tight, please note that we surveyed several properties that do not offer one-bedroom units, but only two and three-bedroom units. The subject will be superior in terms of age and condition compared to the other competing properties, with both similar, inferior, and superior amenities, and similar utility structure. The subject's proforma rents after adjusting for age and condition, location, and utilities are competitive with these competing properties.

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

The subject property consists of three parcels, two of which are developed with two single family housing units that are vacant and in disrepair. The property is generally rectangular in shape with the southeast corner not included in the three parcels. A small shed is located behind one property near the adjacent alley. The property is not wooded and does not contain any fencing. The subject properties are currently accessed from Adams Street or the southern adjoining alleyway. The site will be accessed following redevelopment from 12th Street. The property is situated in an older residential area of Bowling Green. One parcel of the subject property is currently vacant (the center parcel) and the other two parcels have single family homes in disrepair that are vacant. In the absence of this project these houses would likely remain vacant and fall further into disrepair. Alternatively, these houses may be demolished, and the sites would likely not be reconstructed. The adjacent properties are residential and commercial (child development center, gasoline station, barber shop). Per the July 2022 Census QuickFacts, the estimated population of Warren County is 134,558. The educational attainment level (bachelor's degree or higher) for Warren County is 32.9%, which is higher than Kentucky's level of 26.5%. The majority of the population is white (80.6%) with 9.9% Black. Warren County has a higher median household income of \$63,074 than Kentucky (\$60,183). Warren County has a higher poverty rate (18.4%) than the state of Kentucky (16.5).

Funding Information

Grant Number	HUD Program	Funding Amount
21D-018	Community Development Block Grant Program – Disaster Recovery Assistance Program	\$800,000

Estimated Total HUD Funded Amount:
\$1,300,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:
\$2,564,108 to include:

- \$ 1,275,000 Tax Exempt Bonds
- \$ 104,611 Tax Credits – 4%
- \$ 500,000 HOME

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"/>	<p>The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The nearest airport is the Bowling Green Warren County Regional Airport that is approximately 12,000 feet from the site, outside of the area of concern for a civilian airport. There are no military airports within 15,000 feet. Military airports in the general vicinity of Bowling Green / Kentucky include: Louisville International airport (over 90 miles from the site); Fort Knox (over 60 miles from the site); Nashville International Airport (over 60 miles from the site), and Fort Campbell (over 60 miles from the site). The project is in compliance with Airport Hazards requirements.</p> <p>See Enclosure A</p>
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"/>	<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>See Enclosure B</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]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. 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>See Enclosure C</p>

STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5

<p>Clean Air</p> <p>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 project's county or air quality management district is in attainment status for all criteria pollutants. See attached list from EPA's green-book (https://www.epa.gov/green-book). The project is in compliance with the Clean Air Act.</p> <p>See Enclosure D</p>
<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.</p> <p>See Enclosure E</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. There were no Recognized Environmental Conditions (RECs), Historic RECs (HREC), or Controll RECs (CRECs) found during the Phase I Environmental Site Assessment. As such, a Phase II was not required or recommended. Radon analysis indicated elevated levels of radon or consideration of radon will occur following construction. To ensure compliance with HUD CPD Notice 23 103 as of April 11, 2024, Kentucky Housing Corporation has adopted the following Radon Policy. A passive radon reduction venting system is required for all newly constructed single-family units. The radon vent pipe shall pass through a heated portion of the structure and an accessible attic space and chase which will allow adequate working space to possibly install an inline fan. Electrical provisions shall be roughed in, in an accessible attic or chase, for possible future installation of an inline fan. Post-construction: radon testing must occur post construction but before occupancy. The University of Kentucky Geologically Based Indoor Radon Potential Map for the project site documents that it is in the 16.01-25.30 pCi/L zone, therefore testing will be required upon completion of construction to determine if radon levels exceed 4.0 pCi/L, which would require further radon mitigation measures installed by a National Radon</p>

		<p>Proficiency Program (NRPP)-certified professional. If testing shows levels below 4.0 pCi/L, mitigation is not required. Adverse radon impacts can be mitigated. The structures onsite will be built with active radon mitigation systems. Post construction testing will occur and if additional radon mitigation activities are warranted, they will be conducted. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements.</p> <p>See Enclosure F</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>This project May Affect, but is Not Likely to Adversely Affect, listed species, and informal consultation was conducted. On October 2, 2024 the US Fish and Wildlife Service, Kentucky Ecological Services Field Office responded in a letter to the Kentucky Housing Corporation following their request for concurrence (Summary, full letter attached): "Summary KHC has determined that the proposed project would have "no effect" on the clubshell, fanshell, longsolid, orangefoot pimpleback, pink mucket, rabbitsfoot, ring pink, rough pigtoe, round hickorynut, Kentucky cave shrimp, gray bat, Indiana bat, and Indiana bat critical habitat. The KFO agrees that the proposed action "may affect but is not likely to adversely affect" the Price's potato bean. If the proposed action is subsequently modified or new information indicates that the proposed action may affect listed species or their habitat in a manner not previously considered, additional coordination with our office may be necessary." Full correspondence with the Field Office is attached. This project is in compliance with the Endangered Species Act without mitigation.</p> <p>See Enclosure G</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>There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. Tanks at Valor oil are approximately 3,317 feet from the project. The acceptable separation is 2,345 feet. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements.</p> <p>See Enclosure H</p>

<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>This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. This site is already in urban development. The project is identified as "urbanized area" (UA) on the Census Bureau Map which is attached. Secondly, per the United States Department of Agriculture Natural Resources Conservation Service Custom Soils Report for the Project site (attached) there is no prime farmland that occurs on the site. The project is in compliance with the Farmland Protection Policy Act.</p> <p>See Enclosure I</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>This project does not occur in the FFRMS floodplain. The FFRMS tool (Beta version recognized by HUD at the time of this ERR) was used and the full report is attached. The report states "Based on the user-defined location and non-critical designation, the proposed action is not in the FFRMS floodplain." The project is in compliance with Executive Orders 11988 and 13690.</p> <p>See Enclosure J</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 checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Based on Section 106 consultation the project will have an Adverse Effect on historic properties. With mitigation, as identified in the MOA or SMMA, the project will be in compliance with Section 106. Satisfactory implementation of the mitigation should be monitored.</p> <p>See Enclosure K</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>A Noise Assessment was conducted. The noise level was acceptable: 65.0 db. Three roads with KY AADT counts were within the 1000-foot threshold including Clay Street north of the site (DNL for this road calculated at 47 dB); Adams Street north of the site (DNL calculated for this road at 62 dB); and Kentucky Street south of the site (DNL for this road calculated at 55dB). One railroad was within 3000 feet - CSX north west of the site. The nearest crossing (343721X) was utilized and the DBL for this railroad was calculated at 59 dB. The Bowling Green Woodhurst Airport is within the threshold distance; however, noise is not expected to be generated beyond the airport boundaries as the annual air carrier operations, annual air taxi</p>

		<p>operations, annual military operations, and annual general aviation operations are below the HUD indicated thresholds that would result in noise beyond the airport boundaries. The combined noise per the HUD DNL calculator was 65 dB. See noise analysis. The project is in compliance with HUD's Noise regulation.</p> <p>See Enclosure L</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>The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.</p> <p>See Enclosure M</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>The project will not impact on- or off-site wetlands. The USFWS National Wetlands Inventory map shows there are no wetlands on or adjacent to the property site. Secondly, CETCO conducted a site reconnaissance on August 5, 2024 including soil sampling. Their letter attached indicated "It is our option that the site does not contain wetland areas. The site and adjacent areas have minimal topographic relief and are part of urban residential areas with highly disturbed site soil conditions. Further, the site lacks any wetland hydrology. Vegetation on-site is mostly mowed grasses with some perimeter small bushes and small to mature trees, with no obvious wetland type vegetation. The surface soils sampled were mostly brown and reddish brown lean to fat clay residual soils with no hydric soil indicators (no oxidization markings and minimal mottling)." The project is in compliance with Executive Order 11990.</p> <p>See Enclosure N</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>Per ArcGIS the project site is over 100 miles from Kentucky's only Wild and Scenic River, segments of the Red River. Per the Nationwide Rivers Inventory Map, the site is not in the proximity of a Nationwide River. There are no Study Rivers in Kentucky. See attached lists and maps. The project is in compliance with the Wild and Scenic Rivers Act. This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.</p> <p>See Enclosure O</p>
<p>ENVIRONMENTAL JUSTICE</p>		

<p>Environmental Justice</p> <p>Executive Order 12898</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>No adverse environmental impacts that cannot be successfully mitigated were identified in the project's total environmental review. Radon mitigation will be designed into the structures and post construction sampling will be conducted. All activities detailed in the Memorandum of Agreement for historic mitigation will be conducted. The project is in compliance with Executive Order 12898. The project will be the best use of land for affordable, safe, and resilient housing that would otherwise be vacant. The Phase I Environmental Site Assessment for the site revealed no evidence of environmental conditions (RECs), HRECs, or CRECs identified for the site during their assessment. The EPA EJScreen Community Report is attached. This report provides environmental and socioeconomic information for the user-defined areas and combines the data into environmental justice and supplemental indexes.</p> <p>See Enclosure P</p>
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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.**

Backup Documentation for all Environmental Assessment Factors is included in Enclosure Q

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	The Land Use Management Ordinance (LUMO) and Map are joint ordinances utilized by Bowling Green. The city map divides all land into zones: residential, commercial, industrial, or agricultural. The ordinance details allowable uses in each zone, minimum lot size requirements, sign regulations, map and text amendment procedures. The subject site has a RM-4 Multifamily Residential zoning classification, and the permitted uses of the subject site are single-family, two-family, multifamily with 8 units or more, group living, and park and permitted uses of RS-1B, RM-2, and RM-3.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The dominant soil composition in the vicinity of the subject site is classified as Pembroke (Crider-Urban), a well-drained silt loam according to the United States Department of Agriculture (USDA) Soil Conservation Service (SCS) that is not prime farmland soil and has a low runoff classification. The direction of surface and groundwater flow is interpreted to be northeast with the local topographic gradient towards Barren River located approximately 1.5-mile northeast. The project will not create or contribute to runoff water that would exceed the current stormwater drainage system. During construction the project will implement an erosion control plan to ensure the project will not adversely affect slope or erosion of the surrounding neighborhood.
Hazards and Nuisances including Site Safety and Noise	2	This project involves new construction, therefore, there is no opportunity for lead-based paint or asbestos to be encountered. There are five aboveground storage tanks within a one-mile radius of the project site. However, they are within the Acceptable Separation Distance threshold requirement, and there are no EPA-monitored facilities within a 3,000-foot radius of the project site that could be sources of pollution. The National Transportation Noise Map for the project site shows that it is beyond the 60 dB threshold and the combined Day/Night Level (DNL) is 65 dB. Although in the acceptable category, efforts will be made to reduce noise exposure as much as possible during and from construction.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	Several of the major employers in the Bowling Green area are manufacturing companies specializing in various materials and automotive parts. Houchens Industries operates more than 300 retail grocery, convenience, and neighborhood market stores across 14 states and includes a variety of companies/franchises in diverse fields, including insurance, manufacturing, contracting and restaurants. With over 15,000 employees corporate-wide, Houchens Industries is one of the largest 100% employee-owned companies in the world. Distribution warehousing is becoming more prominent in the area due to the I-65 access. Western

		<p>Kentucky University also has a significant impact on both the education and employment levels for the community, being one of the largest employers. Other top employers include Med Center Health, Warren County Public Schools, and Dart Container Corporation. The median household income is \$45,812, which is less than the statewide median household income of \$55,880. The presence of WKU and the higher student population plays a factor in the difference. The project would positively affect employment as it provides affordable housing within Bowling Green for individuals to work within the city. The addition of the 8-unit affordable housing development will have a positive impact on the Warren County workforce and economy by providing homes for individuals who would work within the county.</p>
Demographic Character Changes, Displacement	2	<p>According to the Market Study completed by Valbridge Property Advisors on March 13, 2024 (attached), the city is anticipated to have much higher population growth than the state. The area is considered highly desirable because of the presence of WKU, several strong employers, and its location along I-65 between Louisville, KY and Nashville, TN. The new construction of an 8-unit affordable housing development will have a positive impact on Bowling Green as the land currently is comprised of two single-family houses and vacant land. This project will positively influence demographics by allowing preferential affordable, safe, and new housing options for individuals that have completed the LifeWorks program at WKU.</p>
Environmental Justice	2	<p>No adverse environmental impacts were identified in the project's total environmental review with the exception of the need for radon testing post-construction and mitigation efforts for historic components. Each of these impacts can be appropriately mitigated. The structure will be designed with an active radon mitigation system. Post-construction radon testing will be conducted, and any additional mitigation activities will be undertaken if required. Historic effects will be mitigated as described in the Memorandum of Agreement (MOA) prepared by the applicable project parties detailing mitigation efforts. These efforts will be undertaken, and Kentucky Housing Corporation will track the efforts associated with this project to ensure they are properly executed and documented. The project would provide affordable, safe, and resilient housing with preference to individuals on the spectrum which utilizes a tract of land located within an area with access to all basic city amenities. The Specific Phase I Environmental Site Assessment prepared completed on July 24, 2024, by Linebach Funkhouser, Inc. revealed no evidence of environmental conditions (RECs), HRECs, or CRECs identified for the site during their assessment.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
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COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	<p>The Bowling Green Independent School District (BGISD) serves approximately 4,600 students in preschool through 12th grade in eight schools: T. C. Cherry Elementary, Dishman McGinnis Elementary, Parker-Bennett-Curry Elementary, Potter Gray Elementary, and W. R. McNeill Elementary, Bowling Green Junior High, Bowling Green High School, and the Bowling Green Learning Center. BGISD has a majority-minority student population that is 20% multilingual, and with more than 55 different languages spoken. The closest school to the subject site is Dishman McGinnis Elementary located .44 miles away. Higher education is provided by six local colleges and universities with a total enrollment of over 26,000 students. The largest of these is Western Kentucky University which is the state's third largest university with a student population of 20,171, which was founded in 1906 and currently provides curriculums in numerous fields of study with both undergraduate and graduate degrees available. There are several venues in Bowling Green that support Arts & Entertainment in the area including the Southern Kentucky Performing Arts Center, the Public Theatre of Kentucky, and the Downing Museum. Additionally, the minor league baseball team, the Bowling Green Hot Rods, brings entertainment to the local downtown ballpark. Bowling Green is also home to the National Corvette Museum and the NCM Motorsports Park. This project will positively impact the educational or cultural facilities of Warren County by helping sustain the demand for arts and entertainment.</p>
Commercial Facilities	2	<p>The subject site located Northwest of WKU in central Bowling Green has access to several local restaurants within one block. Commercial development is primarily located along parts of US 68, University Drive, US and 31W (Nashville Road). Development includes regional and national retail chains such as Dollar General, Zaxby's, Chick Fil A, with Papa John's, McDonald's, and Waffle House located just outside the southwest border of the neighborhood. The Greenwood mall is located 3.5 miles south of the subject site, which can be accessed by car or bus. This project will introduce more individuals into the community which will help sustain the demand for commercial facilities.</p>
Health Care and Social Services	2	<p>Bowling Green is a growing regional medical district served by two major hospitals. The Medical Center at Bowling Green is a 490-bed complex offering both inpatient and outpatient services and a 24-hour emergency room. Greenview Regional Hospital is a 211-bed acute care facility. Greenview is a Hospital Corporation of America facility and offers accredited chest pain care services. There are also several handicapped children's and mental health clinics, as well as extended care nursing homes.</p>
Solid Waste Disposal / Recycling	2	<p>The subject site, located within Bowling Green city limits, has access to adequate solid waste services provided by Scott Waste Services, LLC.</p>

Waste Water / Sanitary Sewers	2	The project will connect to existing wastewater/sanitary sewer connections provided by Bowling Green Municipal Utilities (BGMU). BGMU's Wastewater Plant can treat up to 12 million gallons of wastewater per day. The system is comprised of over 270 miles of sewer mains and serves approximately 20,000 customers. BGMU indicated that Best Management Practices (BMPs) should be utilized to control storm water runoff and sediment damage to water quality and aquatic habitat. For technical assistance on the kinds of BMPs most appropriate for housing and related construction, the local Soil and Water Conservation District or the Division of Conservation should be contacted. For Bowling Green, Kentucky, this is the Warren County Conservation District. These BMPs will be incorporated into the project plans to ensure conformation to requirements.
Water Supply	2	This subject site is located within Bowling Green city limits and has access to adequate water supply provided by Bowling Green Municipal Utilities (BGMU). BGMU pumps river water into the Water Treatment Plant where the water is treated and then pumped to five elevated water storage tanks through more than 290 miles of water mains. The Water Treatment Plant can treat up to 30 million gallons per day. BGMU produces water for both wholesale and retail customers, serving approximately 120,000 people.
Public Safety - Police, Fire and Emergency Medical	2	The Bowling Green Fire Department serves the community within the Bowling Green city limits while also assisting surrounding counties as needed. Their department currently consists of 7 fire stations. The closest fire department is 1 mile from the subject site. There are three police stations, the Bowling green Police Department, Warren County Sheriff, and WKU Police Department, within three quarters of a mile from the subject site. There are two hospitals with operating emergency rooms and several urgent cares within Bowling Green. The closest to the subject site is 1.5 miles away at the Medical Center Hospital.
Parks, Open Space and Recreation	2	Bowling Green has over 20 public parks and 2 pools/aquatic centers managed by Bowling Green Parks and Recreation. The closest park is 1.2 miles from the subject site and consists of a playground, picnic tables, open grill, benches, and a paved sanctuary. Other parks throughout the city have various baseball and softball fields, basketball courts, tennis courts, playground areas, picnic shelters, and trails. Trails include walking, hiking, and biking. The recreation department provides year-round programming for youth activities and seasonal adult recreational sports leagues.
Transportation and Accessibility	2	The subject site within the city limits of Bowling Green has access to primary highways. The subject site is 3.5 miles from I-65, which serves as the major north south highway corridor connecting the upper Midwest Great Lakes region of the US to the southern states of Tennessee and Alabama. I-65 travels through the eastern portion of Bowling Green, and provides the

	<p>primary means of traveling to other larger cities such as Louisville, KY and Nashville, TN. I-165, only 3 miles from the subject site, is the main connector traveling northwest to Evansville, Indiana. The Cumberland Parkway, US-68, which intersects I-65 is approximately 17 miles northeast of Bowling Green serves as a major eastbound connector to the eastern part of Kentucky. Private air service is available through the Bowling Green/Warren County Airport. The nearest commercial air service is located approximately 64 miles southwest of Bowling Green at Nashville International Airport. Bowling Green also has a public transportation system. There are three different bus stops within three blocks of the subject site that lead to three different bus routes throughout Bowling Green.</p>
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Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	There are no unique natural features or water resources present on the project site. The project will have no impact on water resources or unique natural features. The soil is not prime farmland. The proposed project will not create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage system or provide substantial additional sources of polluted runoff. The project will connect to existing wastewater/sanitary sewer connections provided by the Bowling Green Municipal Utilities Water/Wastewater Division. Design of the project and construction methods employed will ensure that the project does not negatively affect slope or erosion of the surrounding neighborhood. The project will implement an erosion control plan to ensure no adverse potential water runoff impacts on the surrounding neighborhood.
Vegetation, Wildlife	2	The current parcel exists of a manicured grass yard with two existing single-family houses. There is no unique vegetation or wildlife on the site, and there were no obvious areas of stressed vegetation or wildlife observed on-site. The current residential landscaping will be disturbed; however, within the design of the new building, new landscaping will be included. The project will have no impact on native or unique vegetation or wildlife.
Other Factors		

Environmental Assessment Factor	Impact Code	Impact Evaluation
CLIMATE AND ENERGY		
Climate Change Impacts	2	The FEMA National Risk Index Community Report for Warren County, KY is 83.0 correlating to 'relatively moderate' when compared to the rest of the U.S. The Community Report also

		states that "Communities in Warren, KY have a Relatively High ability to prepare for anticipated natural hazards, adapt to changing conditions, and withstand and recover rapidly from disruptions when compared to the rest of the U.S." with a Community Resilience score of 65.0. The social vulnerability rating largely stems from the high poverty and low median income rates for the county. Additionally, the FEMA National Risk Index Community Report for Warren County, KY also rates hazard type in Warren County as follows: very low (wildfire, drought); relatively low (earthquake, landslide, lightning, riverine flooding); relatively moderate (cold wave, hail, heat wave, strong wind, winter weather), and relatively high (ice storm, tornado). The report also states that 'in Warren County, KY, expected loss each year due to natural hazards is Relatively Low when compared to the rest of the US' with an expected annual loss score of 82.5. The new construction of 120 affordable multi-family housing units in Bowling Green will have a positive impact on the city and will help minimize the impact of climate risk to the renters. First, the project site has minimal risk. It is a flat site in an area of minimal flood hazard. Second, multifamily units will be constructed to meet energy-efficiency standards. They must meet Kentucky Housing Corporation's Minimum Design Standards for New Construction of Multifamily Housing Units, which require that the building envelope meets or exceeds the 2012 IECC requirements.
Energy Efficiency	2	The state of Kentucky requires developments to meet the KY Residential Building Code and encourages the use of Green Building Techniques and Energy Efficient Design Components. The 2020 Kentucky Housing Corporation Minimum Design Standards for Multifamily Housing Units states that projects must be energy efficient with a design that exceeds the 2012 International Energy Conservation Code.

Backup Documentation for all Environmental Assessment Factors is included in Enclosure Q

Additional Studies Performed:

Phase 1 Environmental Site Assessment dated July 24, 2024 by Linebach Funkhouser, Inc; Market Study completed by Valbridge Property Advisors dated March 13, 2024.

Field Inspection (Date and completed by):

July 18, 2024 by Gregory Bailey CMec Senior Environmental Scientist
Photolog included in **Enclosure R**

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

Kentucky Heritage Council; Cherokee Nation; Eastern Band of Cherokee Indians; Osage Nation; US Fish and Wildlife Service Kentucky Field Office; US Fish and Wildlife Service IPaC; US Fish and Wildlife Service National Wetlands Inventory; FEMA Flood Map Service Center; National Wild and Scenic Rivers System; Nationwide Rivers Inventory; EPA Sole Source Aquifers for Drinking Water Interactive Map; Kentucky Transportation Cabinet Functional Class Mapping Tool; USDA Web Soil Survey;

Federal Railroad Administration Pop Up Viewer; Federal Aviation Administration Airport Master Record; EPA Greenbook; EPA NEPAAssist Tool; EPA FINDS; Phase I ESA; Kentucky Emergency Management; EPA Facility Reports; US Census Bureau; FEMA National Risk Index Community Report; Headwaters Institute; Google Earth Pro; and Google Maps; ArcGIS; Microsoft Edge

List of Permits Obtained:

See attached Kentucky Clearinghouse Comments (SAI# KY202401050024) Don Newberry with the Department of Housing Buildings and Construction notes "The Department of Housing Buildings and Construction, Division of Building Code Enforcement, has no comments concerning this proposed project. A building permit from the Local Jurisdiction will be required, prior to construction. Louanna Aldridge with the Kentucky Department of Environmental Protection provided feedback included in the Clearinghouse letter attached. She noted that the following is required prior to project construction - all will be followed and obtained: 401 KAR 63:010, Fugitive Emissions; 401 KAR 63:005 states that open burning shall be prohibited except as specifically provided; All solid waste generated by this project must be disposed at a permitted facility. If underground storage tanks are encountered they must be properly addressed; Utility line projects that cross a stream will require a Section 404 permit from the US Army Corps of Engineers and a 401 Water Quality Certification from DOW; Best Management Practices (BMPs) should be utilized to control storm water runoff and sediment damage to water quality and aquatic habitat.; WATER SUPPLY - If an existing water server is to be utilized for new water tap-ons (rehabilitations, new constructions), ascertain the capacity and operating condition of the originating water treatment plant and of the server (if different) in comparison to the water needs of the proposed housing; WASTEWATER TREATMENT - If an existing wastewater server is to be utilized for new wastewater tap-ons (rehabilitations, new construction), ascertain the capacity and operating conditions of the receiving wastewater treatment facility (wastewater treatment plant or package sewage treatment plant) and of the server (if different) in comparison to the wastewater needs of the proposed housing; DOW notes the requirements of onsite sewage disposal statutes, KRS 211.350 to 211.380, and administrative regulations, 902 KAR 10:060 to 10:110, must be met; Prior approval from DOW is required for all discharges into streams and for all wastewater treatment facilities; and DOW reminds the applicant to seal abandoned wastewater service connections. Additional permits will be required as part of the construction and the plans and specifications for the project will reflect all permits and approvals required for construction onsite. [See Enclosure S](#)

Public Outreach [24 CFR 50.23 & 58.43]:

Public Outreach [24 CFR 50.23 & 58.43]:

The public was notified about the Combined Notice of Finding of No Significant Impact (FONSI) and Notice of Intent to Request Release of Funds (NOIRROF) via posting on the DLG website, December 12, 2024, Public comment was accepted for 17 days following the posting with the public comment period ending December 30, 2024. The Environmental Review Record (ERR) for this project was made available for public review during the comment period via a physical copy at the offices of the Wabuck Development Group office at 100 Wabuck Drive Leitchfield, Kentucky 42754. The physical copy was made available for public examination and copying, upon request, between the hours of 9 A.M. and 4 P.M. An electronic version will be posted on the HUD website at: <https://dlg.ky.gov/grants/federal/DR/2021DR/Pages/default.aspx> for the duration of the public comment period. *No* comments were received during the public comment period.

Cumulative Impact Analysis [24 CFR 58.32]:

There are no mitigating environmental factors resulting from the proposed project with the exception of radon testing requirements and historic mitigation as detailed in the executed Memorandum of Agreement (MOA) between the Kentucky Housing Corporation, Kentucky Department for Local

Government, Western Kentucky Recovery, LLC, and the Kentucky Heritage Council - State Historic Preservation Office. The structures at the site will be razed and radon testing will occur on the structure once it is completed. The onsite structure will also be designed with active radon mitigation system. The project will benefit Warren County by creating 8 new one-bedroom affordable housing units within one structure that will help address the community's need for additional affordable housing and will also provide housing preference to post "graduation" independent housing for those individuals on the autism spectrum that have completed the LifeWorks program at Western Kentucky University (WKU). These units will be available to all other populations as well.

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

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

The no action alternative is not ideal as there is a need for affordable housing in Warren County that this project will address. This project will also address the desire to provide preference housing to post "graduation" independent housing for those individuals on the autism spectrum that have completed the LifeWorks program at WKU. These units will also be available to all other populations. This project is part of the disaster recovery program by the governor of Kentucky and was designed to address housing needs following the December 2021 tornado that impacted the area of the subject site and project. The no action alternative would not address this need.

Summary of Findings and Conclusions:

There are no mitigating environmental factors resulting from the proposed project with the exception of radon testing requirements and historic mitigation as detailed in the executed Memorandum of Agreement (MOA) between the Kentucky Housing Corporation, Kentucky Department for Local Government, Western Kentucky Recovery, LLC, and the Kentucky Heritage Council - State Historic Preservation Office. The structures at the site will be razed and radon testing will occur on the new structure once it is completed. The onsite structure will also be designed with active radon mitigation system. Other than the requirement for radon testing and the herein described historic mitigation activities, the project is in compliance with all related laws and authorities. The project site is not located in a wetland or floodplain area. The site is not located close to a Wild and Scenic River or Nationwide Rivers Inventory body. There are no sole source aquifers in Kentucky. The site will not impact endangered species. The land is already committed to urban use, as such, no farmland will be converted. There are no noise generators that exceed the 65 dB threshold nearby to the site and the cumulative noise at the site does not exceed 65dB. There are no explosive or flammable hazards such as above ground storage tanks within one mile of the project site. Warren County's air quality is in compliance with federal standards. There is no evidence of contamination or toxic substances that would pose a threat to residents at the project site as verified in the Phase I Environmental Site Assessment. This project will help meet Warren County's great need for safe, affordable, energy-efficient multi-family housing.

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
Historic Preservation	<p>A Memorandum of Agreement (MOA) between the Kentucky Housing Corporation (KHC), Kentucky Department for Local Government, Western Kentucky Recovery, LLC, and the Kentucky Heritage Council - State Historic Preservation Office regarding the LifeWorks Annex Apartment Complex in Bowling Green, Warren County, Kentucky was prepared. Mitigation includes the following: KHC will ensure that the following mitigation measures are fulfilled:</p> <p>A. Interpretive Signage:</p> <ul style="list-style-type: none"> i. The Applicant will contract with an SOI-qualified Historian or Architectural Historian to develop one interpretive sign describing the history and significance of the Adams-Kentucky Historic District. ii. Upon completion of the draft, the consultant will provide proposed design and text for the historical signage to the Applicant and shall use appropriate historical photos of the historic district. The Applicant will provide the draft proposal to KY SHPO for review and comment. A map showing the proposed location of the signage will be submitted with the proposed text. iii. KY SHPO will provide comments on the design and text within 30 days of receipt. The Applicant will ensure that its consultant incorporates the comments, as appropriate, into the revised design and provide it to the KY SHPO within thirty (30) days of receipt of comments. KY SHPO will have 30 days to comment on the final document. iv. Once constructed, the Applicant will provide KY SHPO with notification of stipulation completion and images of the final product. v. A digital component of the mitigation shall be hosted on KY SHPOs website, Discovery Kentucky History. The digital component shall include a copy of the updated KY SHPO survey forms and a digital copy of the interpretive signage. <p>Post Review Discovery:</p> <ul style="list-style-type: none"> A. If there are any changes to the activities within or the scope of the APE KHC will recontact the KY SHPO and the Cherokee Nation Tribal Historic Preservation Office of the changes. B. If during the implementation of the undertaking a previously unidentified cultural resource is encountered, the Applicant will ensure that the construction contractor stops work within 100 feet of the newly identified cultural resource and the Applicant will immediately notify the KHC. C. Upon notification of a previously unknown resource, KHC will notify the KY SHPO, and the Cherokee Nation Tribal Historic Preservation Office and consult with the KY SHPO and the Cherokee Nation Tribal Historic Preservation Office in a timely fashion to evaluate the newly identified resource and/or develop an appropriate treatment plan, as necessary, pursuant to 36 C.F.R. Part 800, and the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation and in accordance with all appropriate Kentucky state laws.

	All activities in the MOA will be executed and Jennifer Peters with the Kentucky Department for Local Government will coordinate with Kentucky Housing Corporation to ensure these activities are executed and documented appropriately and in accordance with the MOA.
Contamination and Toxic Substances	Project includes new construction. Post construction the site will undergo radon testing and mitigation if elevated. The structure will be built with an active radon mitigation system.

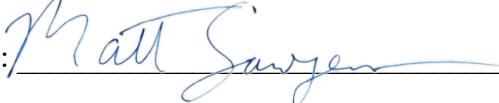
Determination:

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:  Date: 12/13/24

Name/Title/Organization: Jennifer Peters, Public Facilities Branch Manager, DLG

Certifying Officer Signature:  Date: 12/13/2024

Name/Title: Matt Sawyers, Commissioner

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).