



U.S. Department of Housing and Urban
Development
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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

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

Project Information

Project Name: Garrison Gardens

Responsible Entity: Kentucky Department for Local Government (DLG)

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

State/Local Identifier:

Preparer: Jennifer Peters, Public Facilities Branch Manager

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: 1221 Crewdson Drive Bowling Green, Warren Co., Kentucky (36.99898460535842, -86.46818635713595)

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

Wabuck Development Group has applied for federal funding for the new construction of 120-unit low-income housing tax credit (LIHTC) project. The site requires acquisition, and the development will be a family-oriented LIHTC apartment complex consisting of one-, two-, and three-bedroom units located in Bowling Green, Warren County, Kentucky 42101. No project-based rental assistance is available. This project is part of KHC's Western Kentucky Disaster Response initiative. Affordable Housing of Hopkinsville, Inc. and Wabuck Development Company, Inc. will be co-developers. The site is located at 1221 Crewdson Drive Bowling Green, Kentucky. (36.99898460535842, -86.46818635713595). The site has never been developed and was primarily used as farmland (corn). There are no structures at the site. The site is currently grass/trees and will require ground disturbance and tree removal (2.98-acres of trees removed). This development will be a family-oriented affordable apartment complex in Warren County, Kentucky to fill the need for affordable housing that was exacerbated by the December 2021 tornados.

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. This need was exacerbated by the December 2021 tornados and this project is part of the Western Kentucky Disaster Relief Initiative. Wabuck Development Group has applied for federal funding for the new construction of 120-unit low-income housing tax credit (LIHTC) project. This development will be a family-oriented LIHTC apartment complex consisting of one-, two-, and three-bedroom units located in Bowling Green, Warren County, Kentucky 42101. No project-based rental assistance is available. This project is part of KHC's Western Kentucky Disaster Response initiative. Affordable Housing of Hopkinsville, Inc. and Wabuck Development Company, Inc. will be co-developers. The site is located at 1221 Crewdson Drive Bowling Green, Kentucky. (36.99898460535842, -86.46818635713595). The site has never been developed and was primarily used as farmland (corn). There are no structures at the site. The site is currently grass/trees. This development will be a family-oriented affordable apartment complex in Warren County, Kentucky to fill the need for affordable housing that was exacerbated by the December 2021 tornados.

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

There is a need for safe, decent, and affordable housing in Warren County, Kentucky and the surrounding areas. This need was exacerbated by the December 2021 tornados. This development will be a family-oriented LIHTC apartment complex consisting of one-, two-, and three-bedroom units located in Bowling Green, Warren County, Kentucky 42101. The subject will be a 120-unit LIHTC property that does not have project-based rental subsidies available for tenants such as would be available in a typical Section 8 or Rural Development property. Since the minimum qualifying income for the subject's tenants is higher than the income of the vast majority of Section 8 tenants, Section 8 properties do not compete directly with the subject. Other family oriented LIHTC properties comprise the primary competition for the subject's units. According to the published KHC list of affordable properties, there are ten family oriented LIHTC developments in the subject's defined PMA. The property manager of eight of the ten properties responded to our survey and are located on the map below and followed by detailed comp sheets. Please note: Though rents and occupancy levels were updated since the July 2023 surveys, updated waiting list data was not available. However, we are aware that virtually all 8 LIHTC properties described have a waiting list. According to the market study completed by Valbridge Property Advisors on March 13, 2024, Generally, in an economically stable market, a capture rate of up to 20% is considered typical and

highly feasible, and 20% to 30% is achievable, but above that level is generally considered marginal. In a rapidly growing market, or a small market with limited competition, higher (in some cases significantly higher) capture rates are achievable. As shown, the total capture rate in the PMA is 4.6% indicating very good demand for the subject's units. None of the capture rates for the separate qualifying income bands exceeds 7.9%. Based on the above calculations, there is very good overall demand in the PMA for the subject's units. The property's location that is predominantly comprised of low household incomes. Though serving lower income households is the purpose of the project, the median household income in the neighborhood is just above the minimum income required for income qualification. So, there will be families located in the subject's neighborhood which will not have sufficient income to qualify unless they have a Section 8 housing voucher. This underscores the need for the developer to lay a wide net for attracting tenants throughout the entire PMA. According to the 2020 American Community Survey (ACS) The number of households in the PMA increased 2.19% annually from 2000 to 2010, with the number of households projected to increase 1.09% annually from 2023 to 2028. Median household income is projected to increase 2.31% annually in the PMA from 2023 to 2028. As illustrated, average household size and median age is projected to increase. Construction of these 120 affordable multi-family housing units will help meet the need for affordable housing in Warren County that was exacerbated by the December 2021 tornados and meet the goal of the of the Western Kentucky Disaster Response initiative.

Funding Information

Grant Number	HUD Program	Funding Amount
21D-017	Community and Development (CPD) – Community Development Block Grants (Disaster Recovery)	\$5,000,000

Estimated Total HUD Funded Amount:

\$10,500,000 to include:

- \$18,000,000 Tax Exempt Bonds
- \$ 1,728,718 Tax Credits – 4%
- \$ 5,500,000 HOME

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

\$36,007,635

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	Compliance determinations
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	mitigation required?	
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements. The nearest airport, the Bowling Green-Woodhurst civil airport is approximately 17,848 feet from the site, which is beyond the 2,500-foot threshold for civil airports. The military airports generally near Kentucky and Warren County include the Louisville International Airport (over 80 miles away), Fort Knox (over 60 miles away) and Fort Campbell (over 60 miles away). See Enclosure A
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"/>	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. See Enclosure B
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"/>	The structure or insurable property is not located in a FEMA-designated Special Flood Hazard Area. The entirety of the property is located within "Zone X" Area of minimal flood hazard. See attached FIRMette. 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. See Enclosure C
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project's county or air quality management district is in attainment status for all criteria pollutants. Warren County, Kentucky is not in maintenance or non-attainment for any criteria pollutants per the EPA Greenbook (see attached). The project is in compliance with the Clean Air Act. See Enclosure D

Commented [SA1]: Final determination by the RE. Only recommendations are included

Commented [JP2R1]: Accepts

Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	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. See Enclosure E
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	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. Radon analysis indicated elevated levels of radon or consideration of radon will occur following construction. Adverse radon impacts can be mitigated. An active radon mitigation system will be designed into all structure(s) at the site. The system will be designed and installed to the current AARST standards. Wabuck Development Group (Anthony Elmore) is responsible for ensuring the design is included, appropriate, and installed during construction. Post construction radon testing will occur and will be contracted through Mr. Elmore with Wabuck Development Group to ensure the active radon mitigation system installed is operating as designed. If sample results indicate additional radon mitigation is warranted, Mr. Elmore with the Wabuck Group will ensure this is conducted and additional confirmation testing will occur. Post construction testing results will be kept on file at the Wabuck Development Group office at 100 Wabuck Drive Leitchfield, Kentucky 42754. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. See Enclosure F
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes No <input checked="" type="checkbox"/> <input type="checkbox"/>	This project was found Likely to Adversely Affect listed species (Indiana Bat only), and an informal consultation was conducted. In an email with Taylor Fagin, U.S. Fish and Wildlife Biologist with the KY Ecological Services Field Office on October 28, 2024 "Given there are Primary Maternity Roost Trees (PMRTs) to be cleared, we cannot concur with a "not likely to adversely affect" for the Indiana bat but there are multiple other options to complete Section 7

		<p>review: (1) The applicant can make a voluntary contribution to the Imperiled Bat Conservation Fund (IBCF) at a total of \$5300 per acre of tree clearing. The multiplier for the project depends on the time of year the trees will be removed so any time of year would be a multiplier of 2, avoiding June and July would be a multiplier of 1, and during the unoccupied timeframe would be a multiplier of 0.5 (See page 27 of the Conservation Strategy for multiplier breakdown). For example, if you are clearing 3.0 acres of trees the payment would be \$5300 X 3.0 acres X 2.0 multiplier (clearing anytime of year) for a total contribution of \$31,800. More information about this voluntary contribution can be found in the Conservation Strategy for Forest Dwelling Bats attached, page 27. (2) The applicant can perform a mist-net survey or acoustics survey following the Rangewide Survey Guidance (also attached).; or (3) Or we can take this project through formal consultation. Wabuck has committed to tree removal prior to March 31, 2025 and will pay a voluntary contribution to the Imperiled Bat Conservation Fund (IBCF) as tree removal will occur during the unoccupied timeframe on 2.98-acres of the site (prior to March 31, 2025) for a total of \$7,897.00. Correspondence of this amount from the US F&W Service is attached. Wabuck will also follow all General Project Design Guidelines per the attached US Fish and Wildlife Service document Generated October 31, 2024. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act.</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 are no current or planned stationary aboveground storage containers of concern within 1 mile of the project site other than containers 100 gallons or less in capacity containing common liquid industrial fuels or LPG of 10000 gallons or less meeting the NFPA code. 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</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project includes activities that could convert agricultural land to a non-agricultural use, but "prime farmland", "unique farmland", or "farmland of statewide or local importance"</p>

1504(b) and 1541; 7 CFR Part 658		<p>regulated under the Farmland Protection Policy Act does not occur on the project site. The subject site is in 'urban development'. The subject site is identified as "urbanized area" (UA) on the Census Bureau Map. Secondly, a Custom Soil Resource Report for Warren County Kentucky - Garrison Gardens 1221 Crewdson Drive Bowling Green, Kentucky" indicates that site is comprised of 48.3% Fredonia-Bertrees-Urban land complex, 2 to 6% slopes, rocky (not prime farmland) and 51.7% Fredonia-Vertrees-Urban land complex, 6 to 12% slopes, eroded, rocky (not prime farmland). Web soil survey attached. The project is in compliance with the Farmland Protection Policy Act. The project is in compliance with the Farmland Protection Policy Act.</p> <p>See Enclosure I</p>
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>This project does not occur in the FFRMS floodplain. The FVA was used via the beta program for the FFRMS floodplain evaluation tool recognized by HUD. The FFRMS Freeboard Value Approach report created 7/20/2024 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>
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<p>Based on Section 106 consultation, there are No Historic Properties Affected because the project will have no effect on the historic properties that are present. Per a letter from the Kentucky Heritage Council (KY SHPO) dated March 11, 2024, an archaeological study was warranted (letter attached <<SHPO Letter.pdf>>). A Phase I archaeology report was prepared and dated August 2024. The findings of the abbreviated archaeological report for the Phase I survey of the Wabuck Development Company Garrison Gardens I Apartment Complex Project in Warren County, Kentucky was accepted by the Kentucky SHPO without revision (see attached letter). Their finding of "No Historic Properties Affected" was received August 6, 2024. Tribes, as identified in the Tribal Directory Assessment Information (TDAT) included three tribes for Warren County, Kentucky including the Cherokee Nation, Eastern Band of Cherokee</p>

		<p>Indians, and Osage Nation. All tribes were invited to be consulting parties on August 8, 2024. The Cherokee Nation responded on September 11, 2024 stating that the Nation does not foresee this project imparting impacts to Cherokee cultural resources as this time. No response was received from the Eastern Band of Cherokee Indians as of October 22, 2024. No response was received from the Osage Nation as of October 22, 2024. The project is in compliance with Section 106.</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: 51.0 db. The site is approximately 3.4 miles from the Bowling Green-Woodhurst airport. Noise is not expected to be generated beyond the airport boundaries as annual air carrier operations, annual air taxi operations, annual military operations, and annual general aviation operations are below the threshold, and it is assumed, per HUD, that the noise attributed to the airplanes will not extend beyond the boundaries of the airport. One road with KY AADT traffic counts was within the 1000-foot threshold, Glen Lily Road south of the site. The project site is 295 feet from Glen Lily Road which has a FY34 projected AADT of 2878. The standard assumption of 15%-night volume was used, and the road gradient was calculated at 1%. The HUD DNL calculator indicated a total of 51 dB for this roadway. 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. There are no sole source aquifers in the state of Kentucky. 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 project site. CETCO also provided a site reconnaissance on August 5, 2024 including soil sampling. The site contains only one "lowland" area of potential wetland hydrology observed. This is a very limited wet</p>

		<p>ponded water season (likely less than 5% of the year). The soils in this area have been re-graded (several times based on observations). Soils sampled indicated the ground is a mixture of gravelly fill and red and brown lean to fat clay soils with no hydric soil indicators (no oxidization markings and no mottling). Vegetation included greater than 70% ground cover of "winter creeper" or similar invasive species of non-wetland types and at least half of the area contained dense Japanese honeysuckle or similar bushy growth. These are not usually considered dominant wetland type species. As such CETO indicated that "it is our opinion that the site does not contain wetland areas. 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>This project is not within proximity of a NWSRS river. There are no study rivers or eligible suitable rivers in Kentucky. The full list of study river and eligible / suitable rivers is attached. The project is in compliance with the Wild and Scenic Rivers Act.</p> <p>See Enclosure O</p>
ENVIRONMENTAL JUSTICE		
<p>Environmental Justice</p> <p>Executive Order 12898</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Adverse environmental impacts are not disproportionately high for low-income and/or minority communities. The mitigating factors associated with the proposed project includes Endangered Species (details below) and Contamination and Toxic (details below). Both of these factors can be appropriately mitigated and are not disproportionately high for low-income and/or minority communities. There are no additional mitigating environmental factors resulting from the proposed project, which is in compliance with all remaining related laws and authorities. The site will impact the Indiana but and, as such, a voluntary contribution to the Imperiled Bat Conservation Fund (IBCF) and commitment to remove the trees during the unoccupied (by bats) season prior to March 31, 2025. There is no evidence of contamination or toxic substances that would pose a threat to the residents at the project site as verified in the Phase I Environmental Site Assessment. Post construction radon testing and mitigation (if</p>

		required) will occur. As radon is naturally occurring it does not disproportionately affect low-income and/or/minority communities. Post construction is the only reliable method to measure for radon concentration. The project is in compliance with Executive Order 12898. See Enclosure 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 both governments. The maps, one for the City and one for the County, divide 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-3 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. According to the Market Study completed by Valbridge Property Advisors on March 13, 2024 (attached), zoning comments include townhomes, condominiums, apartments permitted containing 3-8 units per building. Two-family residential unit types in RM-2 also permitted. According to the

		zoning department the site would allow for a maximum of 285 units.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The dominant soil composition in the vicinity of the subject site is classified as Grellton (Fredonia-Vertrees-Urban), a well-drained silt loam according to the United States Department of Agriculture (USDA) Soil Conservation Service (SCS) that is prime farmland soil and has a very high runoff classification. The direction of surface and groundwater flow is interpreted to be north with the local topographic gradient towards Barren River located approximately 1.5-miles north. 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 no aboveground storage tanks within the vicinity of the project that 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 project site is at the 60 dB threshold set by the National Transportation Noise Map. Efforts will be made to reduce noise exposure as much as possible during 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 the I-65 access. Western 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 120-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.
Demographic Character Changes, Displacement	2	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 a 120-unit low-income housing tax credit apartment complex will have a positive impact on Bowling Green as the land currently is vacant. This project will positively influence demographics by allowing affordable, safe, and new housing options for individuals.
Environmental Justice	2	No adverse environmental impacts were identified in the project's total environmental review. 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.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	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 2/3rd of a mile 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.
Commercial Facilities	2	The subject site is located within a residential area but has access to Family Dollar and a local thrift store one block from the project. 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 Walmart located south-southwest of the neighborhood. The Greenwood mall is located 4.5 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.
Health Care and Social Services	2	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.
Solid Waste Disposal / Recycling	2	The subject site, located within Bowling Green city limits, has access to adequate solid waste services provided by Scott Waste Services, LLC.
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 .85 miles from the subject site. The Bowling Green Police Department is 1.3 miles 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 2 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 .6 miles from the subject site and consists of a playground, picnic tables, tennis and basketball courts, and soccer and baseball fields. 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 4.5 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 primary means of traveling to other larger cities such as Louisville, KY and Nashville, TN. I-165, only 2 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. Additionally, there are Uber/Lyft services available. 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. The closest bus stop is one block from the subject site.

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 classified as prime farmland; however, the site is within designed urban

		development. 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 finds that Mason County has a Social Vulnerability score of 72.7, which demonstrates 'Relatively High susceptibility to the adverse impacts of natural hazards.' 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 Mason 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 I Environmental Site Assessment dated July 2024 prepared by Linebach Funkhouser
Market Study prepared by Valbridge Property Advisors

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)]:

ArcGIS, Kentucky Heritage Council; Cherokee Nation; Eastern Band of Cherokee Indians; Eastern Shawnee Tribe of Oklahoma; 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; USDA Web Soil Survey; Federal Railroad Administration; Federal Aviation Administration; EPA Greenbook; EPA ECHO Report; EPA Facility Reports; Phase I Environmental Site Assessment; US Census Bureau; FEMA National Risk Index Community Report; Headwaters Institute; Google Earth Pro; and Google Maps

List of Permits Obtained:

See **Enclosure S**

Public Outreach [24 CFR 50.23 & 58.43]:

The public was notified about the Combined Notice of Finding of No Significant Impact (FONSI) and 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 13, 2024. Public comment was accepted for 17 days following the posting with the public comment period ending December 31, 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.
Review Records website at <https://cpd.hud.gov/cpd-public/environmental-reviews> for the duration of the public comment period. **No** comments were received during the public comment period.

Cumulative Impact Analysis [24 CFR 58.32]:

The mitigating factors associated with the proposed project includes Endangered Species (details below) and Contamination and Toxic (details below). Both of these factors can be appropriately mitigated. There are no additional mitigating environmental factors resulting from the proposed project, which is in compliance with all remaining related laws and authorities. The site will impact the Indiana but and, as such, a voluntary contribution to the Imperiled Bat Conservation Fund (IBCF) and commitment to remove the trees during the unoccupied (by bats) season prior to March 31, 2025. There is no evidence of contamination or toxic substances that would pose a threat to the residents at the project site as verified in the Phase I Environmental Site Assessment. Post construction radon testing and mitigation (if required) will occur. As the project consists of new construction, a mitigation plan for radon is included as testing for radon cannot happen until the structures are in place. The structures will have pre-emptive mitigation included in the project design including active radon mitigation system installation on all structures. Post-construction radon sampling will be conducted to ensure the mitigation system is functioning as intended. The project will benefit Warren County by creating 120 new affordable multi-family housing units that will help address the community's need for affordable housing following the 2021 tornado.

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

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

The no action alternative is not acceptable as there is a need for affordable housing in Warren County that was exacerbated by the 2021 tornado. In the absence of the project this need for replacement affordable housing will remain unmet.

Summary of Findings and Conclusions:

The mitigating factors associated with the proposed project includes Endangered Species (details below) and Contamination and Toxic (details below). Both of these factors can be appropriately mitigated. There are no additional mitigating environmental factors resulting from the proposed project, which is in compliance with all remaining related laws and authorities. The project site is not located in a wetland or flood plain area. There are no historical preservation concerns. 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 impact the Indiana but and, as such, a voluntary contribution to the Imperiled Bat Conservation Fund (IBCF) and commitment to remove the trees during the unoccupied (by bats) season prior to March 31, 2025. The site is not comprised of Prime farmland. There are no noise generators that exceed the 65 dB threshold nearby to the site. There is no explosive or flammable hazards such as above ground storage tanks within one mile of the project site within the acceptable separation distance. 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 the residents at the project site as verified in the Phase I Environmental Site Assessment. Post construction radon testing and mitigation (if required) will occur. The site is not in the flood plain or the FFRMS floodplain. The project will help meet the Western Kentucky Disaster Relief Initiative goals and will create 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
Endangered Species Act	A voluntary contribution to the Imperiled Bat Conservation Fund (IBCF) as tree removal will occur during the unoccupied timeframe on 2.98-acres of the site (prior to March 31, 2025) for a total of \$7,897.00. This contribution has been made and the receipt has been received.
Contamination and Toxic Substances	There are no structures at the site currently. Radon testing will occur on the structure(s) once they are complete. All onsite structures will be designed with active radon mitigation systems.


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: 12/12/24

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).