



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: Harper Village

Responsible Entity: Kentucky Department for Local Government (DLG)

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

State/Local Identifier:

Preparer: Jennifer Peters

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: Approximately 445 Browning Street Madisonville, Hopkins County, Kentucky (37.33696960617201, -87.51274145227886)

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

Affordable Housing of Hopkinsville, Inc. and Wabuck Development Company, Inc. as co-developers have applied for federal funding for the new construction of a 32-unit family-oriented property at the project is located at approximately 445 Browning Street, Madisonville, Kentucky 42431. The site will require acquisition. The site has never been developed and was primarily used as farmland. There are no structures at the property. The site is currently grass with some surrounding trees to the north and west. All residential buildings will be constructed in tax parcel number M-21-3-3 and ground disturbance will occur. The subject site is 5.08 acres of a 10.79-acre parcel. The project includes the new construction of 32 affordable multi-family housing units and the installation of infrastructure that connects the project to existing resources such as utilities, sidewalks, parking lots, and roadways. This development will be a family-oriented apartment complex consisting of one-, two-, and three-bedroom units located in Madisonville, Hopkins County, Kentucky 42431.

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

Wabuck Development Group has applied for federal funding for the new construction of a 32-unit low-income housing tax credit (LIHTC) project consisting of modular construction for all 32 units. This development will be a family-oriented apartment complex consisting of one, two, and three-bedroom units located in Madisonville, Hopkins County, KY 42431. Affordable Housing of Hopkinsville, Inc. and Wabuck Development Company, Inc. are co-developers.

The site is located at approximately 445 Browning Street Madisonville, Kentucky (37.336946984840004, -87.51253127564551). 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 Hopkins County, Kentucky as part of KHC's Western Kentucky Disaster Response initiative following the December 2021 tornados. There was a need for affordable housing prior to December 2021 and the tornados in the area exacerbated this need.

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

There is a need for safe, decent, and affordable housing in Hopkins County, Kentucky and the surrounding areas. This need was exacerbated by the December 2021 tornados. This development will be a family-oriented LIHTC modular site consisting of one-, two-, and three-bedroom units located in Madisonville, Hopkins County, Kentucky. The subject will be a 32-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. Therefore, other family-oriented LIHTC properties comprise the primary competition for the subject's units. There is very good overall demand in the primary market area (PMA) for the subject property's units. According to the published KHC list of affordable properties, there are only two LIHTC apartment developments in Hopkins County that do not have rental subsidies.

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. The total capture rate in the PMA is 8.4% indicating very good demand for the subject's units. The one and two-bedroom 60% units, which in the capture rate table include the RHTF units since they use the same minimum and maximum incomes, are the highest capture rate, and they are still only 10.1% and 10.7%, respectively, again indicating very good demand. According to Ms. Ashyia McFarland, the Section 8 Coordinator who oversees Housing Choice Vouchers in Hopkins County, there is a housing crisis in Madisonville due to a shortage of HCVs being utilized by displaced tenants in Dawson Springs who are taking precedent for usage. She stated a lot of Dawson Springs renters moved to Madisonville and quite a few were voucher holders.

Construction of these 32 affordable modular 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-023	Community and Development (CPD) – Community Development Block Grants (Disaster Recovery)	\$3,400,000

Estimated Total HUD Funded Amount:
\$3,400,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:
\$9,600,315

- To include: \$4,800,000 in Tax Exempt Bonds
- \$360,073 in Tax Credits
- \$1,500, 000 Rural Housing Trust Fund

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		

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

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 nearest airport is the Madisonville Regional airport (a civilian airport) and it is approximately 31,000 feet from the project site. The nearest military airports are in Louisville, Kentucky, Fort Knox, Kentucky, and Fort Campbell, Kentucky. All are outside of 15,000 feet (see map). Louisville International airport is over 100 miles from the project site. Fort Knox is over 90 miles from the project site. Fort Campbell is over 45 miles from the project site. The project is in compliance with Airport Hazards requirements. 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. 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 per the EPA Greenbook Hopkins County does not have any non-attainment areas. https://www.epa.gov/green-book . The project is in compliance with the Clean Air Act. See Enclosure D
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

		<p>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. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. Additionally, active radon mitigation systems will be installed during construction. Post-construction confirmation sampling for radon will occur to document the system is functioning as designed. If elevated radon is indicated at the time of the post-construction testing, additional mitigation and confirmation sampling activities will be conducted. See Enclosure F</p>
<p>Endangered Species Endangered Species Act of 1973, particularly section 7, 50 CFR Part 402</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>This project has been determined to have No Effect on listed species. On September 23, 2024 Seth Bishop with US Fish and Wildlife responded noting "...Based on your answers, the determination keys concluded the project is unlikely to have any detrimental effects to these species. Therefore, you determined that the proposed project will have "no effect" on these species. There is no requirement to request concurrence with "no effect" determinations; however, the KFO (Kentucky Field Office) acknowledges these determinations and has no additional comments or concerns regarding these species. The consistency letters generated by the determination keys service as documentation of your consideration of listed species and critical habitat for the proposed project and should be retained for your records. No further coordination with the Service is necessary at this time. Additional coordination may be necessary if: (1) new information reveals that the proposed project may affect listed species or critical habitat in a manner or to an extent not considered, (2) the proposed action is subsequently modified to include activities which were not considered, or (3) new species are listed or critical habitat designated." IPaC determination keys results in "no effect" and are attached. Correspondence with Seth Bishop with the Kentucky Field Office of the US Fish and Wildlife is attached. This project is in compliance with the Endangered Species Act without mitigation. 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. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements. A search of Google Earth Pro aerial maps found various grain bins, water tanks, etc. within a one-mile radius of the site. The only flammable liquids located within 1-mile of the site are located at a machine shop at 555 Brown Lane where two gravity-fed tanks are located. Each tank is estimated at 300-gallons. The tanks are located approximately 3,375 feet from the project site and the acceptable separation distance is approximately 223.55 feet. Additionally, the Phase I ESA did not identify any above ground storage tanks during the scope of the assessment. 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>The project site's land is already in urban development and is identified as "urbanized area" (UA) on the Census Bureau Map. See attached. As the project includes activities that could convert agricultural land to a non-agricultural use additional consideration was given. "Prime farmland", "unique farmland", or "farmland of statewide or local importance" regulated under the Farmland Protection Policy Act occurs on the project site. Form AD-1006, "Land Evaluation and Site Assessment" has been completed. The project may proceed without mitigation and be in compliance with the Farmland Protection Policy Act. The USDA Web Soil Survey Map for the project site shows it is comprised of: 0.5% Belknap silt loam, 0 to 2% slopes, occasionally flooded (prime farmland); 0.2% Hosmer silt loam 0 to 6% slopes (prime farmland); 74.3% Hosmer silt loam 2 to 6% slopes, eroded (prime farmland); 0.5% Belknap silt loam 0 to 2% slopes, occasionally flooded (not prime farmland); and Hosmer silt loam 2 to 6% slopes, eroded (not prime farmland). USDA State Soil Scientist Perri Brown provided USDA data on the Form AD-1006 on August 19, 2024 and found that the site's total score was 100.9 points and per 7 CFR 658.4(c)(2) "sites receiving a total score of less than 160 need not be given further consideration for protection and no additional sites need to be evaluated". The project is in compliance with the</p>

		Farmland Protection Policy Act. See Enclosure I
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	Harper Village is not located in an FFRMS floodplain. The BETA tool recognized by HUD at the time of this evaluation was utilized and states "Based on the user-defined location and non-critical designation, the proposed action is not in the FFRMS floodplain". Full report attached. This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690. See Enclosure J
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"/>	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. The project is in compliance with Section 106. In a letter dated August 7, 2024, the Kentucky Heritage Council (Kentucky's State Historic Preservation Office [SHPO]) stated "Thank you for your recent submission of the above referenced archaeology report pertaining to this undertaking. We understand that this investigation covered approximately 8.2 acres with archaeological survey methods including pedestrian survey and supplemental shovel testing. No cultural resources were identified during this investigation. We would concur with a finding of No Historic Properties Affected and accept this report without revisions." On August 20, 2024 Kentucky Housing Corporation sent letters inviting the three tribes identified in the TDAT search for Hopkins County, KY to become consulting parties on the Section 106 review for the project: Cherokee Nation, Eastern Band of Cherokee Indians, and Osage Nation. The letters were sent via email. The Cherokee Nation responded on 9/17/2024 stating that the "Nation does not foresee this project imparting impacts to Cherokee cultural resources at this time." None of the remaining tribes responded within the 30-day threshold specified by HUD CPD Notice 12-006. The compilation of the Tribal Response to Section 106 Consultation Letter from Kentucky Housing Corporation dated October 22, 2024 is attached and includes the backup for THPO consultation. See Enclosure K
Noise Abatement and Control	Yes No	A Noise Assessment was conducted. The noise level was acceptable: 50.0 db. See noise analysis.

<p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project is in compliance with HUD's Noise regulation. Noise Sources - Road or Highway, there is one road (West Noel Avenue) within the 1,000-foot threshold of the site to the south. The project site is 958 feet from W. Noel Avenue which has a projected FY34 AADT of 3,687 which is the same as the most recent AADT (2019) Note: Negative year over year projections required the most recent AADT count be used. A standard assumption of night volume of 15% was used. The average road grade of the segment of roadway, measured approximately 1000 feet either side of a perpendicular line between the project site and West Noel Avenue was determined to be 1.001% (1% used). The speed limit is 35 and 45 MPH, averaged to 40 MPH. There are no stop signs or intersections within 600 feet on either side of the site. The HUD DNL Calculator was used to calculate a total of 48 dB for this roadway. The roadway course was included in the combined DNL total for all noise sources at the site. One railroad is located within 3000 feet of the site - CSX North of the project site approximately 1,875 to the north. The crossing information for the nearest crossing was included in the calculations. The HUD DNL Calculator was used to calculate a total of 46 dB for this rail line. The rail sources DNL calculation was included in the combined total DNL calculation for all noise sources. Lastly, one airport - Madisonville Regional Airport (2I0) is within the search distance. HUD's Airport Noise Worksheet was utilized, and it was determined that "the noise attributed to the airplanes will not extend beyond the boundaries of the airport" as Annual air carrier operations were less than 9000; annual air taxi operations were less than 18,000; annual military operations were less than 18,000; and annual general aviation operations were less than 72,000. The combined DNL for this site is 50dB and considered acceptable. Backup documentation noise survey is attached. See Enclosure L</p>
<p>Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No <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 Kentucky. See attached. The project is in compliance with Sole Source Aquifer requirements. 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 project is in compliance with Executive Order 11990. The USFWS National Wetlands Inventory map shows there are no wetlands on or adjacent to the project site. Additionally, CETCO provided a wetlands assessment letter noting "We (CETCO) conducted a site reconnaissance on August 5, 2024 and also provided soil sampling as part of our services. It is our opinion that the site does not contain wetland areas. The site area contains two swale areas. Formerly, the site was part of a small lake (1960's mapping) and the swale areas were impounded by a small dam. The dam was removed, the area re-graded and the area has since free drained. During our site visit there were large scale "erosion rills" at the swale bottoms, indicative of rapid water flow with minimal to no water ponding during rain events. Further, the soil areas retained minimal to no vegetation directly at the swale bottoms (bare soil was exposed over much of the area). The remaining plant growth was commonly bush-hogged and mowed with only mostly open field grasses remaining. The soil sampled were brown lean clay residual soils with a small amount of oxide staining, but no mottling or large-scale oxidation markings and were not hydric soils." 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. Per ESRI GIS the project site is not within the proximity of the portion of the Red River designated as Wild and Scenic (over 50 miles away). The Red River is the only Wild and Scenic River in Kentucky. See the attached. The site is approximately 34 miles from the Ohio River, the nearest Nationwide Rivers Inventory body. There are no study rivers in Kentucky. https://www.rivers.gov/study.php. See the attached list from the HUD Exchange (https://www.rivers.gov/study.php). The project is in compliance with the Wild and Scenic Rivers Act. 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 were identified in the project's total environmental review. Radon mitigation will be designed into the structures and post construction sampling</p>

		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. 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	Comprehensive planning and zoning regulations are available for Madisonville. The Planning and Zoning Commission is responsible for all matters relating to zoning and planning, including rezoning, conditional use permits, master plans, ordinance revision, plats, annexations, and vacations and dedications for street, alley, and easements. Per the Market Study prepared by Valbridge Property Advisors dated March 13, 2024, and Madisonville Zoning, the zoning jurisdiction is the

		Madisonville Zoning Department and is currently classified as "Medium Density Residential District". Single family, two-family, and multi-family uses are permitted. No more than 13 dwellings per acre are allowed for this zone designation for multi-family construction. This lot is 5.08 acres, and the proposed project contains 32 units, so the zoning classification permits the use of the land for this project. The project will be beneficial in that it improves the urban design of Hopkins County and meets affordable housing needs.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The project site is made up of four different soil types, Belknap silt loam (1.0%), Hosmer silt loam (4.6%), Hosmer silt loam eroded (67.5%). And Zanesville silt loam (26.9%). Belknap silt loam composes 1.0% of the soil on-site. This soil is prime farmland if drained, is somewhat poorly drained, and its runoff class is negligible. Hosmer silt loam makes up 4.6% of the soil on the site, and Hosmer silt loam, eroded is 67.5% of the soil makeup. Both of these soils are prime farmland, are moderately well-drained, and have medium runoff. Zanesville silt loam is the last 26.9% of the soil, and it is not prime farmland. It also has medium runoff and is moderately well-drained. While most of the site is prime farmland, having a patch of non-farmable land makes the property undesirable for such uses. Additionally, the surrounding areas are used for residential properties, making residential use the preferable option. The proposed project will not create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Due to the changes to the soil and land composition and the potential water runoff impact on the environment, the project has implemented an erosion control plan.
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 two aboveground storage tanks within one mile of the project site, but they are not within the Acceptable Separation Distance threshold requirement and are not expected to pose a problem during construction. The National Transportation Noise Map for the project site shows that it is at the 60 dB threshold. 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	The major employment industries in Madisonville are Office / Administrative Support with 11.1% and Transportation / Material Moving at 10.7%. The top employers are Baptist Health Madisonville, Alliance Resource Partners, and Hopkins County Schools, employing 2,240, 1,224, and 1,172 people, respectively. The unemployment rate in Hopkins County has been decreasing. The area used to rely heavily on mining, agriculture, and

		<p>manufacturing, but after many of these jobs were lost, the economy diversified. This can be seen in the fact that most industries have 5-10% of the population working in them, so there is no industry with a large lead. Unemployment rates did spike in 2020 with the Covid-19 pandemic, but have since decreased again, and are back to pre-pandemic levels. 52% of households make less than \$50,000 per year, higher than the county and state values of 48% and 44%, respectively. This shows that the addition of 32 affordable multi-family housing units should have a positive effect on Hopkins County since affordable housing is needed. Additionally, the construction of these homes will provide job opportunities to Madisonville and Hopkins County residents.</p>
Demographic Character Changes, Displacement	2	<p>The population of Madisonville has been decreasing, with a large decrease between 2010 and 2023, possibly due to the recession causing large employers to close and the pandemic increasing unemployment again. However, the population is only expected to decrease 0.33% over the next five years. Median household income is \$47, 820, which is lower than the county's. The neighborhood is a low-to-middle income neighborhood, making this a good site for this project. The new construction of 32 affordable multi-family housing units in Hopkins County will have a positive impact on Madisonville and Hopkins County as the land is currently vacant, and there is a need for affordable housing in the area. The project will have a positive effect on Madisonville and Hopkins County's demographic character by preventing the permanent displacement/relocation of households to other regions due to economics. This project will allow residents to have affordable, safe, and new energy-efficient housing options.</p>
Environmental Justice	2	<p>No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. The project will be the highest and best use of land as it utilizes a tract of land for affordable, safe, and resilient housing that would otherwise be vacant. The Phase I Environmental Site Assessment prepared by Linebach Funkhouser completed on July 22, 2024, revealed no evidence of environmental conditions (REC), Historic RECs (HREC), or Controlled (CREC) identified for the site during their assessment.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	<p>The project site is located within the Hopkins County School District. This district has 6 elementary schools, 3 middle schools, and 4 high schools. One of the high schools, Hopkins County Career and Technology Center, allows students to learn about their chosen career path, and even provides networking and job placement opportunities. Pride Elementary, the closest elementary</p>

		<p>school, is approximately 0.46 miles from the project site and the closest middle school, Browning Springs Middle School, is 0.41 miles away. The Hopkins County Career and Technology Center is the nearest high school, 2.24 miles away. There is also a preschool 1.05 miles from the site, and two colleges, Madisonville Community College and Madisonville Beauty College within 2.20 miles of the site. If residents prefer private schools, there is a preschool, elementary, and high school option about 3 miles from the project site. The project scope is contained and small in nature and will not negatively impact educational facilities.</p> <p>There are several historical landmarks in Madisonville, including the Glema Mahr Center for the Arts, offering performances, art exhibits, and educational programs. The Ruby Laffoon Birthplace is where the 43rd governor of Kentucky was born and offers tours. The Hopkins County Courthouse is another historical site. The Hopkins County Historical Society Museum is also nearby for the history of the area. Plus, Madisonville Community college and Hopkins County-Madisonville Public Library both offer programs and cultural events throughout the year. Madisonville also has a performing arts center and an art guild with exhibits, workshops, and classes. This project will not negatively impact the educational or cultural facilities of Hopkins County and will help sustain their implementation.</p>
Commercial Facilities	2	<p>This project site is located in Hopkins County, near Lake Peewee. The closest grocery store, Sureway Food Store, is 1.00 miles from the property. Shopping amenities located in Madisonville include various home good stores, clothing stores, boutiques, convenience stores and discount stores. Well-known businesses include Lowe's, Dollar General, Kroger, Maurice's, Rally's, and Bealls. There are several restaurants including Starbucks and Cracker Barrel, and various local coffee shops. These are all within a 2-mile radius of the site. The development of this 32-unit multifamily housing project will provide affordable and reliable housing resources for the community which will ultimately help sustain the demand for commercial facilities.</p>
Health Care and Social Services	2	<p>Medical services in Madisonville include Baptist Health Deaconess Madisonville, located 0.94 miles from the project site. Several doctors are housed here, but there are also some at Owensboro Health Urgent Care in Madisonville, 1.79 miles from the site. Additionally, there are a couple at Bridgewater Medical Center, 2.14 miles away. Finally, 1.4 miles away is an emergency care physician, William T McClure, MD. There are multiple physical therapy centers, mental health clinics, rehabilitation centers, nursing homes, dentists, and eye doctors within 2 miles of the site. The development of this 32-unit multifamily housing project will provide affordable and reliable housing resources for the community which will ultimately help sustain the demand for existing medical and social services in Hopkins County.</p>

Solid Waste Disposal / Recycling	2	The project is located within Madisonville city limits with access to adequate solid waste services. The Madisonville Public Works Department, and specifically, the Sanitation Department offers solid waste pickup and disposal services for single- and multifamily residences, including large apartment complexes. This service is provided for a fee. The city also offers their recycling program, iRecycle, to all members of their Sanitation department. This service also offers curbside pickup and is provided for an additional fee. The size and scope of the project will not negatively impact or overwhelm the Public Works or Sanitation Departments.
Waste Water / Sanitary Sewers	2	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 Waste Water Treatment Department. Madisonville has a wastewater treatment plant that services Madisonville, Hanson, and Earlington. It currently treats about 5.2 million gallons daily, with a daily capacity of 6.0 million gallons. This 32-unit apartment complex will not overwhelm the Waste Water Treatment Department and will provide needed affordable housing options for residents.
Water Supply	2	The project is located within Madisonville city limits with access to adequate municipal water supply supplied by the Water Distribution Department. This department serves 10,000 residential and commercial customers. Their fees are cheaper for customers within the city, as this property would be, and the website lists water prices for up to and over 20,000 gallons. Madisonville has 4 water storage tanks. This project will not overwhelm the Madisonville Water Distribution Department and will provide needed affordable housing. Per the Kentucky Intergovernmental Review Process and Department for Environmental Protection; 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. DOW cannot permit connections to water servers under tap-on bans, Agreed Orders, or Court Orders. DOW may not give approval to connections to water systems operating near, at, or over capacity. If a new water source is to be utilized, ascertain the source's (stream's or well's) low flow ability to serve the proposed housing. Prior approval from DOW is required for water withdrawals of over 10,000 gallons per day and for all public drinking water. Final plans and specifications are subject to review by DOW.
Public Safety - Police, Fire and Emergency Medical	2	The Madisonville Police Department services in this area in partnership with Crime Stoppers. The police department also offers text updates on weather, traffic, and other emergencies,

		<p>which can be tailored to the information a specific person wants to receive. Additionally, the city has an "exchange zone" where people can pickup online purchases or do child custody exchanges. The area is under 24-hour surveillance. The sheriff's office is 0.85 miles from the site and the police department is 0.77 miles away.</p> <p>The fire department received 1,724 calls last year, 1,270 being for EMS and 454 due to fires. The average response time was 4 minutes and 28 seconds, better than the state average. The Madisonville Fire Department is 0.45 miles from the site. The closest Emergency Room is at Baptist Health Deaconess Madisonville Emergency Care 1.02 miles from the site.</p>
Parks, Open Space and Recreation	2	<p>Madisonville has over a dozen parks, with several close to the project site. The closest one is Cherry Park, 0.60 miles from the site. Cherry Park has a playground, pickleball courts, and plentiful parking. Other parks in the area offer skating; boating; hiking; biking; picnic areas; fishing; basketball courts; baseball, soccer, and football fields; splash parks; summer programs; and rental spaces. Madisonville City Park offers many of the amenities listed below in addition to golf, mini golf, disc golf, tennis courts, an amphitheater, stage, and a swimming pool. They also have a dog park, Arboretum, and Lake Peewee nearby for outdoor recreation. The project will not negatively impact the capacity of these services and may attract new residents and families to sustain them.</p>
Transportation and Accessibility	2	<p>Madisonville is connected to areas north and south via US-41 and I-69. To the south, I-69 heads west, and Western Kentucky Parkway heads east. Pennyriple Parkway continues south, as does US-41. Both I-69 and US-41 continue north up to the Ohio River and out of the state. West Noel Avenue turns into Rose Creek Road and runs west, parallel to Nebo Road. Both roads eventually end near Providence, Kentucky. Rose Creek Road connects to other roads that continue west, or head north and south. Nebo Road turns into US-41 and heads north. Nebo Road is the main road heading east, and turns into Island Ford Road after intersecting I-69. This road continues northeast. The county is serviced by all regional and national freight carriers, and FedEx, UPS, and USPS are all within a couple miles of the project site. The Madisonville Regional Airport is 7.7 miles away from the project site. The two closest international airports are the Louisville International Airport, 150 miles away to the northeast and the St. Louis Lambert International Airport, 230 miles to the northwest. Hopkins County does have a Greyhound bus station about 8 miles south of the site. Uber and Lyft services are available. This project is small in size and scope and will not negatively impact transportation and accessibility for Madisonville/Hopkins County. The project site is a 1-to-3-mile drive to commercial, educational, cultural, medical, and social service amenities available in Madisonville, KY.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	This project will not have an impact on water resources or unique natural features. 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 Madisonville Waste Water Treatment Department. A geotechnical report is in progress and will include specific construction design methods to ensure that the project does not create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. 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 have an erosion control plan. Erosion control practices during construction and seeding and stabilizing all areas after grading will protect the watershed.
Vegetation, Wildlife	2	The United States Department of the Interior has made the determination that there will be no effect on any potential threatened or endangered species at the site. There were no obvious areas of stressed vegetation or wildlife observed on-site. The current vacant lot is comprised of manicured grass and several trees along property lines. The current landscaping will be disturbed; however, within the design of the new building, new landscaping will be included. 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 Madisonville Waste Water Treatment Department.
Other Factors		

Environmental Assessment Factor	Impact Code	Impact Evaluation
CLIMATE AND ENERGY		
Climate Change Impacts	2	The FEMA National Risk Index Community Report for Hopkins County, KY finds that the Risk Index score of 75.4 is "Relatively Low" when compared to the rest of the US and that they community has a "Relatively Low" Expected Annual Loss Score of 73.8. However, the Community Report also finds that Hopkins County has a Social Vulnerability score of 64.4, which

		<p>demonstrates "Relatively High susceptibility to the adverse impacts of natural hazards." The Community Report also states that "Communities in Hopkins County, KY have a Relatively Moderate 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 58.31. The FEMA National Risk Index Community Report for Hopkins County, KY also rates historic loss ratios by hazard type as follows: very low (hurricane, hail, wildfire); relatively low (landslide, earthquake, drought, lightning, riverine flooding); relatively moderate (tornado, heat wave); relatively high (strong wind, winter weather); and very high (ice storm). The Headwaters Institute has developed a county-by-county climate projection tool to estimate changes in heat and precipitation given either higher projected emissions (RCP8.5) or lower projected emissions (RCP4.5). Under the higher emission model, Hopkins County is expected to experience 22 more days about 95 degrees and a 2 degree increase in average annual temperature by 2049. The model also shows that Hopkins County will see only 0.6 more days of heavy precipitation annually and a 1" increase in annual average precipitation by 2049. Given these risk analyses, Hopkins County, KY faces fewer climate risks than most of the nation. The new construction of 32 affordable multi-family housing units in Hopkins County will have a positive impact on the county 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, establish energy standards for building components and systems, and require Energy Star appliances, amongst other energy efficiency requirements.</p>
Energy Efficiency	2	<p>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.</p>

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

Additional Studies Performed:

Phase I Environmental Site Assessment dated July 22, 2024, prepared by Linebach Funkhouser
Market Study dated March 13, 2024, prepared by Valbridge Property Advisors

Field Inspection (Date and completed by):

July 8, 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; 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; FFRMS BETA Tool; 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 ECHO Report; EPA Facility Reports; US Census Bureau; FEMA National Risk Index Community Report; Headwaters Institute; Google Earth Pro; Phase I Environmental Site Assessment; Valbridge Market Study; and Google Maps

List of Permits Obtained:

See attached Office of the Governor Department for Local Government Clearinghouse letter regarding preliminary reviews from various agencies including additional requirements and information. Department for Environmental Protection; Department of Housing Buildings and Construction; Kentucky Department of Fish and Wildlife Resources; Kentucky Transportation Cabinet; KY Heritage Council; and Northern Kentucky Area Development District. **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 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 except for required radon testing and mitigation if elevated. Radon testing cannot be performed prior to building construction. The project will benefit Hopkins County by creating 32 new, safe, decent, and affordable multifamily housing units that will help address the community's need to additional affordable multi-family housing that was exacerbated by the December 2021 tornados and will help reach the goals of the Western Kentucky Disaster Relief initiative.

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

1. No action - leave the area as it is with no corrective action. It is possible that the property would remain vacant with minimal use without this project. Furthermore, Hopkins County needs quality, affordable housing. 2. Acquire a different piece of property - The location is ideal for the project as this is a centrally located relatively flat piece of vacant land within a short drive to commercial, medical, social, educational, cultural, and public safety facilities in the city of Madisonville, a mix of urban and rural area

where adequate housing is a need for the community. Additionally, the project will develop a piece of land into an affordable housing asset for the community. 3. Proceed with Project. This is the best use of the project site. This project will be a vital asset to Hopkins County residents, especially those at lower income brackets that are unable to afford rent on their own. Providing residents with affordable housing leads to an increase in economic benefits in the community because as more people have housing, they tend to also obtain jobs.

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

To "Do nothing" alternative is unacceptable as there is a critical need for affordable housing in Hopkins County following the December 2021 tornados. "Do nothing" would not allow the Commonwealth to meet the goals of the Western Kentucky Disaster Relief initiative.

Summary of Findings and Conclusions:

There are no mitigating environmental factors resulting from the proposed project, which is in compliance with all related laws and authorities except for the requirement to conduct radon testing at the completion of construction. The project site is not located in a wetland or floodplain 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 not impact endangered species. Although the land is comprised of Prime Farmland and Farmland of Statewide Importance, the attached completed AD-1006 shows a score of 100.9. Per 7 CFR 658.4 (c)(2) "Sites receiving a total score of less than 160 need not be given further consideration for protection and no additional sites need to be evaluated." The noise analysis indicated a combined DNL of 50dB, which is considered acceptable. There are no explosive or flammable hazards such as above ground storage tanks within one mile of the project site. Hopkins 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 Hopkins County's great need for safe, affordable, energy-efficient, and multi-family housing and the Western Kentucky Disaster Relief initiative.

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
Contamination and Toxic Substances	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.
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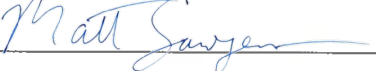
Determination:

- 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.

Commented [SA2]: Recommendation - RE makes final determination

Preparer Signature:  Date: 12/11/24

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

Certifying Officer Signature:  Date: 12/13/2024

Name/Title: Matt Sawyers, Commissioner, DLG

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).