



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

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

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

Project Information

Project Name: Tracey Terrace

Responsible Entity: Kentucky Department for Local Government

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

State/Local Identifier:

Preparer: Jennifer Peters

Certifying Officer Name and Title: Matt Sawyers

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): Suzanne Arnzen, CMec

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

Project Location: 1525 Cuba Road Mayfield, Graves County, Kentucky 42066

Additional Location Information:

1525 Cuba Road Mayfield, Graves County, Kentucky (36.7206730019956, -88.63533139051316). The Property is currently vacant and undeveloped land comprised of one parcel. The property is a 'flag' lot that, other than the access drive, is generally rectangular in shape. The property is grass and other vegetation covered. At the time of the site inspection the property had been mowed/tractor-cut. There is a wooded tree line along the northern and western adjoining properties and a row of trees near the eastern border - see diagram and photolog. The subject Property is accessed from the northern portion of the property off Cuba Road by the unpaved access drive. It is currently undeveloped. The Property is situated in an urban area of Mayfield, Kentucky that is primarily residential and commercial use but includes agricultural land and undeveloped agricultural land type parcels in the general vicinity. The Property is adjacent to Cuba Road with an agricultural field directly adjoining to the north; a park to the south developed in approximately 2007; a behavior center to the east developed in approximately 1995, a YMCA to the southeast developed in approximately 1995; and residential neighborhoods/structures to the north and west since approximately 1965.

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

Wabuck Construction has applied for federal funding for the new construction of an affordable housing complex containing one-bedroom units, 32 two- bedroom units, and 4 three- bedroom units intended to serve the low-to-moderate income population. The property will be acquired by Wabuck as part of the project. The site is properly zoned for the proposed project. Tracey Terrace will be utilizing modular manufactured housing units for all fifty-six units in the project. Tracey Terrace will be constructed on conditioned crawl space foundations; all roads and parking areas will be asphalt. There will be a mixture of 4- and 6-foot concrete sidewalks throughout the project. The address of the project is 1525 Cuba Road Mayfield, Kentucky (36.7206730019956, -88.63533139051316). The site has never been developed and was primarily used as farmland. The site is currently grass with some surrounding trees. This development will be a family-oriented apartment complex.

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

The city of Mayfield was severely impacted by a tornado in December of 2021. Prior to the tornado there was a great need for safe, decent, and affordable housing in Graves County, Kentucky. The tornados exacerbated this need. In June of 2024 the governor of Kentucky announced that the Commonwealth of Kentucky and the Kentucky Housing Corporation (KHC) will work together to build 953 affordable rental units in communities impacted by the 2021 tornados. Wabuck Development was a chosen developer, and this is one of the projects funded by this "Western Kentucky Disaster Recovery". This project is to address an immediate housing need following the December 2021 tornados. 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 20-30% is achievable, but above that level is considered marginal. The total capture rate for the scenario in the PMA is 17.4%. Based on the Valbridge calculations, there is good demand for the PMA for the subject's units without rental assistance. Valbridge also notes "However, as discussed, based on conversations with the Mayfield Housing Authority and property managers, it is anticipated the

subject will have Housing Choice Voucher usage of at least 20%. Assuming this level of HCV usage, the total KHC capture rate decreases to 13.9% further supporting demand for the proposed project."

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

The Property is currently vacant and undeveloped land comprised of one parcel. The property is a "flag" lot that, other than the access drive, is generally rectangular in shape. The property is grass and other vegetation covered. At the time of the site inspection the property had been moved/tractor-cut. There is a wooded tree line along the northern and western adjoining properties and a row of trees near the eastern border - see diagram and photolog. The subject Property is accessed from the northern portion of the property off Cuba Road by the "flag-lot" drive. It is currently undeveloped. The Property is situated in an urban area of Mayfield, Kentucky that is primarily residential and commercial use but includes agricultural land and undeveloped agricultural land type parcels in the general vicinity. The Property is adjacent to Cuba Road with an agricultural field directly adjoining to the north; a park to the south developed in approximately 2007; a behavior center to the east developed in approximately 1995, a YMCA to the southeast developed in approximately 1995; and residential neighborhoods/structures to the north and west since approximately 1965. The adjacent properties were all noted to have been undeveloped or agricultural farms fields historically. Per the July 2022 Census QuickFacts, the estimated population for Graves County is 36,461. The percentage of the population with a bachelor's degree or higher is 18.6%. The majority of the population's ethnicity is White (91.7%) with 4.2% Black. The Hispanic community is 8.2%. Graves County has a lower median household income \$52,526, and a higher poverty rate (18.8%) than Kentucky (\$60,183 and 16.5% respectively).

Construction of these 32 affordable multi-family housing units will help meet the need for affordable housing in Graves 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-024	Community Planning and Development – Community Development Block Grants (Disaster Recovery Assistance)	\$3,900,000

Estimated Total HUD Funded Amount:
\$3,900,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:
\$15,749,590

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

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The 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 Mayfield Graves County Airport, a civil airport, which is over four miles from the site. Fort Knox (military airport) is over 150 miles from the site, and Fort Campbell (military airport) is over 60 miles from the 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. Graves County, Kentucky is in attainment status for all criteria pollutants. See EPS's Green Book county list found at

		<p>https://www.epa.gov/airquality/greenbook/ancl.html#KY. The printout of Kentucky Counties is also attached showing that Graves County is not in "non-attainment" status. The project is in compliance with the Clean Air Act.</p> <p>See Enclosure D</p>
<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.</p> <p>See Enclosure E</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Vapor Encroachment Screening. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. Radon testing indicated radon levels below 4.0 pCi/L. The project is in compliance with contamination and toxic substances requirements. Per the University of Kentucky Geologically Based Indoor Radon Potential map, a science-based data source cited by HUD in the February 27, 2024, "HUD's Departmentwide Radon Policy Notice" webinar, the project site is in an area where the indoor radon potential is between 0.0-2.7pCi/L, well below the EPA suggested radon action level of 4.0 pCi/L. Therefore, radon testing is not required for this project site under CPD Notice 23-103 section III(A)(ii)(3).</p> <p>See Enclosure F</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Determination Keys within iPaC were conducted. An official species list is attached. Per Seth Bishop, Kentucky Field Supervisor with the U.S. Fish and Wildlife on digitally signed on 11/4/24 "Significant impacts to federally listed species are not likely to results from this project as currently proposed. Project re-coordination is needed if the project changes or if new species or critical habitats are listed that could be impacted by the project." This project is in compliance with the Endangered Species Act without mitigation.</p> <p>See Enclosure G</p>

<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. A search of Google Earth Pro, ArcGIS, and onsite reconnaissance indicated water tanks and various farm grain bins within the one-mile radius of the site. There is also one 1000-gallon propane AST within the search distance at "True Value" 1776 KY-121 Mayfield, and one 1000-gallon propane AST within the search distance at "Tractor Supply" 1111 Paris Road Mayfield. It is unknown if they meet the requirements of the 2017 or later version of the National Fire Protection Association (NFPA) Code 58, and the personnel in each store were also unaware. As such, the Separation distance calculator was used on both tanks. The largest separation distance minimum was 277 feet (ASD for Thermal Radiation for People [ASDPPU]). The project site is 1806 feet from the Tractor Supply at 1111 Paris Road and 2682 feet from the True Value at 1776 KY-121. The project is in compliance with explosive and flammable hazard requirements. The Separation Distance from the project is acceptable. The project is in compliance with explosive and flammable hazard requirements.</p> <p>See Enclosure H</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project includes activities that could convert agricultural land to a non-agricultural use. "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 USDA Web Soil Survey Map for the project site shows it is comprised of: 95.7% Grenada silt loam (2 to 6% slopes, eroded) and 4.3% Purchase-Loring complex (6 to 12% slopes, severely eroded). The Grenada silt loam is considered Prime Farmland. USDA State Soil Scientist Perri Brown provided USDA data on the Form AD-1006 on August 19, 2024. Suzanne Arnzen of CMec Environmental, completed the form AD-1006 on August 19, 2024 and found that the site's total score was 122. Because this score is less than 160 points, "it need not be given further consideration for protection and no other sites need to be evaluated" per 24 CFR 7part 658.4(c)2. The project may proceed</p>

		<p>without mitigation and be in compliance with the Farmland Protection Policy Act.</p> <p>See Enclosure I</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>This project does not occur in the FFRMS floodplain. The project is not located in the 100-year floodplain nor the 500-year floodplain. The site is not in "Zone X" which includes areas of 0.2% annual chance of flood; areas of 1% annual chance flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from '0% annual chance flood. Attached is the FEMA FIRMETTE and FEMA Firm Panel (Map Number 21083C0232C dated December 3, 2009). The project is in compliance with Executive Orders 11988 and 13690.</p> <p>See Enclosure J</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. A Section 106 was initiated by Wabuck/Environment & Archaeology. On March 12, 2024 the Kentucky Heritage Council (KY SHPO) indicated in a letter "Based on the documentation provided, an archaeological survey is warranted for all areas where ground disturbing activities are to take place. The archaeological survey should be conducted by a qualified archaeologist." The report "Abbreviated Archaeological Report for the Phase I Survey of the Wabuck Development Company Tracey Terrace Apartment Complex Project Graves County, Kentucky" was prepared by Environment and Archaeology and submitted to the Kentucky Heritage Council. On July 30, 2024, the Kentucky Heritage Council indicated in a letter "Thank you for your recent submission of the above referenced archaeology report pertaining to this undertaking. We understand that this investigation covered approximately 12.4 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." Additionally, tribal consultation request letters were sent to tribes indicated on the HUD Tribal Directory (TDAT) for Graves County, Kentucky including the Cherokee</p>

		<p>Nation, Chickasaw Nation, Delaware Nation, Osage Nation, and Quapaw Nation. These requests were sent November 11, 2024, by the Kentucky Department for Local Government (DLG). On November 18, 2024, the Quapaw Nation responded noting ..."The Quapaw Nation Historic Preservation Program (QNHPP) has received and reviewed the information you have provided. Based upon the information you provided we believe that the PROPOSED PROJECT Tracey Terrace in Graves County, Kentucky will have no effect on known properties of cultural or sacred significance to the Quapaw Nation. In accordance with the National Historic Preservation Act, (NHPA) [16 U.S.C. 470 s.s. 470-470w-6] 1966, undertakings subject to the review process are referred to in S101 (d) (6)(A), which clarifies that historic properties may have religious and cultural significance to Indian tribes. Additionally, Section 106 of NHPA requires Federal agencies to consider the effects of their actions on historic properties (36 CFR Part 800) as does the National Environmental Policy Act (43 U.S.C. 4321 and 4331-35 and 40 CFR 1501.7(a) of 1969). The Quapaw Nation has vital interests in protecting its historic and ancestral cultural resources. We do not anticipate that this project will adversely impact any cultural resources or human remains protected under the NHPA, NEPA, or the Native American Graves Protection and Repatriation Act. If, however, artifacts or human remains are discovered during project construction, we ask that work cease immediately and that you contact the Quapaw Nation Historic Preservation Office." This correspondence is attached. On December 2, 2024 the Chickasaw Nation responded indicating "Thank you for your inquiry. We have reviewed the data you provided and determined that we do not request government-to-government consultation on this specific proposed project as it is outside of our area of interest. While the Chickasaw Nation has no objection to the undertaking, we respectfully defer to the federally recognized First American tribe(s) that have identified a connection to the project area. We appreciate your efforts to preserve and protect significant historic properties. If you have any questions, please contact Ms. Karen Brunso, tribal historic preservation officer, at</p>
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		<p>(580) 272-1106 or by email at hpo@chickasaw.net." This correspondence is attached. As of December 12, 2024, no additional responses were received. 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: 50.0 db. See noise analysis report including diagrams, AADT for roads, and DNL calculations for the project site. The project is located 893 feet from Cuba Road which has a projected FY34 AADT of 5815. A standard night volume of 15% was used. The average road grade of the segment of roadway, approximately 1000 feet either side of a perpendicular line between the project site and Cuba Road, was determined to be 0.30 (0% was used). The speed limit on Cuba Road at the project site is 45 MPH. There are no stops signs or intersections within 600 feet on either side of the site. The HUD DNL Calculator was used to calculate a total of 50 dB for this roadway. The individual source's DNL calculation was included in the combined total DNL calculation for all noise sources of 50dB. There are no railroads within the threshold distance of 3000 feet. There are two airports within 15-miles of the project site. The project site is located 21,253 feet from the nearest edge of the Mayfield Graves County Airport and 14.97 miles (79,024 feet) from the Kyle Oakley Field (KCEY). The HUD Airport Noise Worksheet for the airport documents that noise is not expected to be generated beyond the airport boundaries as the combined annual operations total (all types includes) is 970 which does not exceed any threshold values individually, i.e. air carrier operations does not exceed 9000; the annual air taxi operations at the airport do not exceed 18,000; the annual military operations at the airport do not exceed 18,000; and the annual general aviation operations do not exceed 72,000. The project is in compliance with HUD's Noise regulation.</p> <p>See Enclosure L</p>
<p>Sole Source Aquifers</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 if Kentucky. Map attached. The project is in</p>

<p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>		<p>compliance with Sole Source Aquifer requirements. See Enclosure M</p>
<p>Wetlands Protection Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No <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 showing the project site shows there are no wetlands on or adjacent to the project site. Additionally, CETCO in a letter dated September 1, 2024, indicated "CETCO is providing this wetlands assessment letter for the project site in Mayfield, Kentucky. We 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 is mostly gently rolling topography with only one "swale" area for typical wetlands type hydrology. The swale area drains very well and contained no ponding water or wet/muddy conditions and no indication of water staining/long-term water ponding. The soils sampled were brown shades of silty lean clay soils with no obvious staining, oxidation markings or mottling (i.e., non-hydric soils). The areas are annually "bush-hogged" and no bushy or tree growth has occurred. The grassy cover is mostly "weeds" of Johnson Grass or foxtail varieties as well as common horse weed, bent grass plantain and thistle varieties. These are not usually considered dominant wetland type species. See Enclosure N</p>
<p>Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>This project is not within proximity of a NWSRS river. There are no study rivers in Kentucky. The full list of study rivers can be found at https://www.rivers.gov/study-rivers and the list, as of August 2, 2024, is attached. The project site is over 100 miles from the nearest segment of Kentucky's only Wild and Scenic River - the Red River. The site is over 15 miles from the nearest river on the Nationwide Rivers Inventory. See diagram indicating both Wild and Scenic Rivers and Nationwide Rivers as compared to the project site. The project is in compliance with the Wild and Scenic Rivers Act. See Enclosure O</p>
<p>ENVIRONMENTAL JUSTICE</p>		

Environmental Justice Executive Order 12898	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No adverse environmental impacts were identified in the project's total environmental review. 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	Comprehensive planning and zoning regulations are available for Mayfield. The Mayfield Planning Commission consists of nine citizen members and its primary function is to provide long-term planning for the city. The commission hears and approves rezoning cases, minor plans and site plans. The commission is also instrumental in the adoption and implementation of the Mayfield Comprehensive Plan. Tracey Terrace zoning jurisdiction is the "Mayfield Planning and Zoning". The site is currently classified as Zone R-2, Multi-Family Residential, which is appropriate for the location and use. The subject site will not have any frontage on Cuba Road, with access provided via an ingress/egress access easement from an adjacent medical facility. The project will be beneficial in that it is improving the urban design of Graves County and the city of Mayfield and meeting affordable housing needs.

Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	The majority of the soil is Grenada silt loam, which has medium runoff and is moderately well-drained. While this is prime farming land, the surrounding areas are used for residential properties, making this area also well-suited for the proposed project activities. Grenada silt loam is the soil for about 90% of the property, with the other 10% being Purchase-Loring complex. This soil is not fit for farming but has very high runoff rates and is moderately well-drained. 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. While there are some aboveground storage tanks including some propane tanks within the one-mile radius of the site, they are further than the Acceptable Separation Distance threshold requirement. These are not expected to pose a problem during construction of the 56-unit apartment complex. 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	Referencing the Market Study conducted by Valbridge Property Advisors for this site on March 13, 2024, the leading employment industry in Mayfield is production, employing 15% of the population. Transportation / Material Moving follows with 13.6%. The top two employers in the area are Pilgrim's Pride Corporation and Jackson Purchase Medical Facility, employing 1,328 and 615 people, respectively. Additional large employers are city and county government and the city and county school systems. Mayfield serves as the financial and retail centers for the market area with majority of the manufacturing sector located in Mayfield. Graves County is also heavily influenced by agriculture. The county contains nearly 275,000 acres of farmland, over 137,500 acres of which is crop land. There are several large developments being developed to provide additional employment opportunities in the area, offering opportunities to those who move into this apartment complex. The addition of 56 affordable multi-family housing units provides affordable housing to local employees and encourages the arrival of potential employees to sustain the workforce. 37% of Mayfield households earn \$50,000 per year, which is low compared to Kentucky's and Grave County's averages. The largest income bracket is under \$15,000 per year, at 26%, making the affordable

		housing project a positive endeavor. The addition of 56 affordable multi-family housing units should also have a positive effect on the Graves County workforce and economic conditions following the tornados in 2021 when many Mayfield residents were forced to relocate outside of the city limits due to limited housing availability. It will allow residents to remain and/or return to the community and reside in new affordable safe housing. Additionally, the construction of these homes will provide job opportunities to Mayfield and Graves County residents.
Demographic Character Changes, Displacement	2	The population of the county has been decreasing after the recession in the 2000's, the tornado, and the Covid-19 pandemic. They have also caused employment issues, but new developments seem promising to increase employment opportunities in Mayfield in the near future. Mayfield's population is 87% white, 92% not Hispanic or Latino, and 4% black or African American. The lot is currently vacant, causing no displacement of any individuals who live or work in the area. The new construction of 56 affordable multi-family housing units in Graves County will have a positive impact on Mayfield and Graves County as the land is currently vacant, and there is a need for affordable housing in Mayfield and Graves County which was exacerbated by the 2021 tornados. The project will have a positive effect on Mayfield and Graves County's demographic character by allowing residents to return and by preventing the permanent displacement/relocation of households to other regions that was necessary following the tornados. This project will allow residents that want to return to have affordable, safe, new and energy efficient housing options.
Environmental Justice	2	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 revealed no evidence of environmental conditions (REC), Historic RECs (HREC), or Controlled (CREC) identified for the site during their assessment.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	Mayfield City Schools includes one elementary school, one middle school, and one high school. All three of these and a preschool are located within 2 miles of the project area, with the closest school being Mayfield High School, 1.0 miles away. Mayfield/Graves County also has one "Area Technology Center" with accounting, carpentry, computer programming, electricity, health sciences, machine tool, office technology, and welding technical programs. Graves County schools are also nearby and

		provide an additional education option. The project scope is contained and small in nature and will not negatively impact educational facilities. The community also has a performing arts center and the "Ice House," which displays and sells local artwork, offering solo and group shows, and offers guidance and workspace for artists who need/seek it. This project will positively impact the educational or cultural facilities of Graves County by helping to sustain their implementation.
Commercial Facilities	2	This project site is located in Graves County adjacent to the Land between the Lakes recreation area. Shopping amenities located in Mayfield include the Pear Tree Mall, Falders (independent Farm and Home Improvement store), Bealls, multiple thrift stores, boutique and gift shops, as well as grocery stores (Aldi, Food Giant, Ruler Foods, Mayfield Creek Market, Save A Lot, Wal-Mart, etc.). The nearest grocery store, Walmart, is 0.23 miles away, right across the street. Other national brands not previously listed include Lowe's, Arby's, KFC, Goodwill, Hardee's, O'Reily Auto Parts, Popeyes, McDonald's, Walgreens, Dollar General, and others. The development of this 56-unit multifamily housing project will provide affordable and reliable housing resources for the community which will ultimately help sustain the demand for commercial facilities.
Health Care and Social Services	2	The closest hospital is Jackson Purchase Medical Center, which offers a full range of services from primary care to emergency services, to maternity, sleep, and behavioral services among many others. It is located 2.75 miles away. The Jackson Purchase Southside Walk-In Clinic is 0.42 miles away. A pharmacy is located adjacent to the property. Baptist Health Medical Group, Western KY Family Healthcare, Green Acres Healthcare, Fast Pace Healthcare, and various nursing and rehabilitation centers are also in the area. Each of these sites is within a few miles of the project site. Additionally, larger health facilities are located in Paducah, Kentucky which is 25 miles North of Mayfield. The development of this 56-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 Graves County.
Solid Waste Disposal / Recycling	2	The project is located within a semi-rural area within the Mayfield city limits with access to adequate solid waste services provided by the Mayfield Public Works Department. Trash is collected weekly, and recycling is collected twice per month. The size and scope of the project will not negatively impact or overwhelm the Public Works Department. This project will provide housing needs that were previously available but were eliminated by the tornado in 2021.
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 Mayfield

		<p>Electric and Water System, a publicly owned utility. The Mayfield Public Works Department 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 Mayfield, Kentucky, this is the Mayfield Public Works Department. These BMPs will be incorporated into the project plans to ensure conformation to requirements.</p>
Water Supply	2	<p>The project is located within a semi-rural area with access to adequate municipal water supply supplied by Mayfield Electric and Water System, a publicly owned utility. 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.</p>
Public Safety - Police, Fire and Emergency Medical	2	<p>The project has access to adequate municipal policing services, fire services, and emergency services from the Mayfield police department and fire department. The police station is located 1.34 miles from the project site. There are three fire stations, the closest one being 1.21 miles away. There is an urgent care facility 0.67 miles away, and an emergency room in the Jackson Purchase Medical Center, 2.75 miles away. The development of this 56-unit multifamily housing project will provide affordable and reliable housing resources for the community which will ultimately help sustain the demand for existing public safety services in Mayfield following the tornado and relocation of people away from Mayfield and Graves County. The Mayfield Police Department is composed of 27 sworn Police Officers, each of whom has been certified through the Department of Criminal Justice Training at Eastern Kentucky University in Richmond, Kentucky. Officers spend twenty-two weeks completing training in areas such as firearms, physical fitness, patrol tactics, defensive driving, ethics, and Kentucky Revised Statutes. Within the department are special forces that, in addition to their regular patrol duties, are committed to Investigations and a specialized Drug Task Force. An additional officer is the canine force of the Mayfield Police Department. This canine unit gives the Mayfield Police Department the added tool it needs in the fight against drugs within the City of Mayfield. The Mayfield Police</p>

		Department has a total of nineteen marked cruisers and a Bike Patrol.
Parks, Open Space and Recreation	2	Mayfield has many public parks for resident use. Kess Park and Splash Park includes 37 acres, several large pavilions, restrooms, disc golf course, walking/fitness trail, mega-playground, accessible playground, kids spray park, miniature golf and a learning trail. Also near the project site are Anderson Park, Kiwanis Park, Harmon Park, Dunbar Park, Eddie Williams Park, Lions Club Park, and various dog parks and walking trails. Mayfield is home to the Mayfield/Graves County Ballparks inclusive of nine fields and a basketball court. The project will not negatively impact the capacity of these services. Additionally, this site is anticipated to facilitate the return of Mayfield residents that relocated out of the city due to the tornados.
Transportation and Accessibility	2	Mayfield and Graves County have good access by regional standards from I-69, which bisects the county traveling north / south connecting to I-24 to the west and I-65 to the east. State road 80 and 121 circle the city with agricultural land beyond. The county is serviced by all regional and national freight carriers including UPS, FedEx, and USPS. Commercial service is available at Bluegrass Airport in Lexington, approximately 250 miles northeast, the Louisville international airports, approximately 200 miles northeast, the Nashville, TN international airport approximately 145 miles to the southeast. There are Uber/Lyft services available. This project size and scope and will not negatively impact transportation and accessibility for Mayfield/Graves County. The project site is a 1-to-3-mile drive to commercial, educational, cultural, medical, and social service amenities available in the City of Mayfield, KY.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	Unique agricultural lands are present on the project site; however, the site is within designed urban development. The 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 Mayfield Public Works 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 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. 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	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 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 Mayfield Public Works 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 Graves County, KY finds that the Risk Index score of 83.3 is 'relatively moderate' when compared to the rest of the US and the community has a 'Relatively Low' Expected Annual Loss Score of 81.3. However, the Community Report also finds that Graves County has a Social Vulnerability score of 72.5, which demonstrates 'Relatively High susceptibility to the adverse impacts of natural hazards.' The Community Report also states that "Communities in Graves County, KY have a Relatively Low 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 32.6. The social vulnerability rating largely stems from the high poverty and low median income rates for the county. The FEMA National Risk Index Community Report for Graves County, KY also rates historic loss ratios by hazard type as follows: very low (hail, hurricane, wildfire); relatively low (drought, landslide, lightning, and tornado); relatively moderate (earthquake, heat wave, riverine flooding, and winter weather), and relatively high (ice storm, strong wind). The report also states that "in Graves 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 88.3. 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, Graves 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 Graves County will see only 0.5 more days of heavy precipitation annually and a 0.7" increase in annual average precipitation by 2049. Given these risk analyses, Graves County, KY faces fewer climate risks than most of the nation. The new construction of 56 affordable multi-family housing units in Graves County will have a positive impact on Graves County and will help minimize the impact of climate risk to the renters. The project site has minimal risk. It is a flat site in an area of minimal flood hazard. 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 (ASTM E 1527-21) was completed and dated August 13, 2024 by Linebach Funkhouser. A geotechnical report is in progress as of 8/23/2024, and a Market Study was completed by Valbridge Property Advisors and dated March 13, 2024

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)]:

Kentucky Heritage Council (KHC) | US Fish and Wildlife Services Kentucky Field Office | US Fish and Wildlife Service IPaC | US Fish and Wildlife Service National Wetlands Inventory | FEMA Flood Map Service Center | National Wild and Scenic Rivers System | Nationwide Rivers Inventory | EPA Sole Source Aquifers for Drinking Water Interactive Map | Kentucky Transportation Cabinet Functional Class Mapping Tool | USDA Web Soil Survey | Federal Railroad Administration Pop Up Viewer | Federal Aviation Administration Airport Master Record | EPA Greenbook | EPA NEPAssist Tool | EPA Facility

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 (NOI RROF) via publication on <https://dlg.ky.gov/grants/federal/DR/Pages/default.aspx> on January 3, 2025. Public comment was accepted for 17 days following the publication of the classified ads with the public comment period ending January 21, 2025. 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 Wabuck Development Company at 100 Wabuck Drive Leitchfield, Kentucky. The physical copies were made available for **public examination and copying, upon request, between the hours of 9 A.M. and 4 P.M.**

Cumulative Impact Analysis [24 CFR 58.32]:

There are no mitigating environmental factors resulting from the proposed project. The project will benefit Mayfield and Graves County by creating 56 new, safe, decent, affordable multifamily housing units that will help address the community's great need for additional affordable multi-family housing.

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, Graves 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 Mayfield, a mix of urban and rural area where adequate housing is a need for the community.
3. Proceed with Project. This is the best use of the project site. This project will be a vital asset to Graves County residents, especially those at lower income brackets. 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 and also reinvest into the community.

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

The "No Action" alternative is unacceptable as there is a critical need for affordable housing in Mason County. The move to an alternate site is also unacceptable as there is not a significant amount of vacant, flat land suitable for the project.

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. 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 122. 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." There are no noise generators that exceed the 65 dB threshold nearby to the site and the calculated DNL at the site is 50dB. There are no explosive or flammable hazards such as above ground storage tanks within one mile of the project site within the ASD. Graves 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. Radon is not anticipated at the site based on the University of Kentucky's geologically based radon potential map. This project will help meet Graves County's great need for safe, affordable, energy-efficient, and 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
N/A	N/A

