PROJECT NAME: ABCAP Housing Renovations II  
Grant Number: N-B-19-9AA-19-0031  
OHFA Tracking Number: 19-0031

PROJECT LOCATION: 1520 Dorsey Road, Winchester and 91 Simmons Avenue, Peebles  
Adams County, Ohio

TYPE OF PROJECT: Acquisition and Renovation of Two Existing Senior Apartment Complexes Providing 43 Units of Affordable Housing

TYPE OF REVIEW: Full Environmental Assessment

APPROXIMATE COST:  
$4,695,130  Low-Income Housing Tax Credits  
750,000  FHLB AHP Grant  
96,750  Deferred Developer Fee  
59,775  General Partner Loan  
601,000  State of Ohio HOME Funds  
-------------  
$6,202,655  TOTAL

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PREPARED BY:  
CRAWFORD, MURPHY & TILLY, INC.  
84 REMICK BOULEVARD  
SPRINGBORO, OHIO 45066
# ABCAP HOUSING RENOVATIONS II

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ABCAP Housing Renovations II will involve the acquisition and renovation of two affordable senior housing complexes for a total of 43 units of housing. Joshua Manor provides 13 units of senior housing in one building on 1.40 acres located at 91 Simmons Avenue in northwest Peebles. Village Garden provides 30 units of senior housing in seven buildings with a separate office/commons building on 3.42 acres located at 1520 Dorsey Road in southwest Winchester. Peebles and Winchester are located in northeast and northwest Adams County, respectively; the county is located in southern Ohio along the Ohio River. Location maps and site plans follow this discussion area.

This housing credit rental project will offer 12 units at 30% of the area median gross income (AMGI), four at 50% of the AMGI, and the remaining 27 units at 60% AMGI. All units will be restricted to heads of household 55 years of age or older.

Joshua Manor is a one-story building originally constructed in 1990, with community space and offices located in the center of two L-shaped wings containing a total of ten 1-bedroom and three efficiency units. One 1-bedroom unit is designed as accessible and another will be equipped as a hearing and visually impaired unit. Amenities at this site will include an on-site office, community room with kitchenette, laundry room and new outdoor fitness area and landscaping.

Village Garden includes seven 1-story apartment buildings and a 1-story commons/office building and was constructed in 1985. Buildings A and C include five 1-bedroom apartments and Buildings D through G each contain four 1-bedroom apartments. Building B includes three 1-bedroom and one 2-bedroom apartments, of which one 1-bedroom and the 2-bedroom units are designed as accessible and another 1-bedroom unit will be equipped as a hearing and visually impaired unit. Amenities at this site will include on-site management and supportive service offices, community room with accessible kitchen, laundry room, maintenance garage and new outdoor fitness area and landscaping.

Amenities in each project unit will include vinyl flooring, window blinds, intercoms and emergency pull cords. All new appliances will be provided. Air conditioning will be provided via new ductless mini-split units.

The Project Architect has certified that the project will meet the requirements of the Americans with Disabilities Act. Additionally, the project will meet the Fair Housing Accessibility Guidelines and Section 504 of the Rehabilitation Act, as well as the Ohio Basic Building Code.

The Project Sponsor and ownership entity for the project is ABCAP Housing Renovations Limited Partnership II, a to-be-formed partnership. The managing partner for the ownership entity will be ABCAP Housing Associates II GP, LLC, which will be managed by Adams and Brown Counties Economic Opportunities, Inc. (ABCEOI). Rural Appalachian Housing, Inc. will be a minority member with no ownership stake in the managing partner. ABCEOI is part of Adams Brown Community Action Partnerships (ABCAP), which is a non-profit social service agency and an IRS designated 501(c)(3) established in 1965. The agency works to increase self-sufficiency of individuals and families in Adams and Brown Counties through education and supportive services, and provides a diverse range of services to low- and moderate-income
residents of these counties. ABCEOI has over 30 years of experiencing in owning, managing and serving the senior housing community in rural areas. The Adams County Commissioners serve on the ABCAP Board of Directors.

Model Property Development, LLC will be the Project Developer, Model Construction, LLC will be the General Contractor and ABCEOI will be the Property Manager and Supportive Service Coordinator. The Project Architect will be ATA Beilharz Architects, LLC.

A professional feasibility study was prepared by Vogt Strategic Insights, which has certified that a market exists for the proposed development.

The State of Ohio has granted federal HOME funds to ABCAP Housing Renovations Limited Partnership II. The project financing is provided by $4,695,130 in tax credit equity through OCCH LIHTC Equity, $750,000 as a FHLB Affordable Housing Program grant, $96,750 in deferred fees from The Model Group and ABCEOI, $59,775 as a General Partner loan from ABCEOI and $601,000 in federal HOME funds through the Ohio Development Services Agency.
On behalf of the to-be-formed ABCAP Housing Renovations Limited Partnership II, a for-profit organization, Adams Brown Community Economic Opportunities, Inc. (ABCEOI) submitted an application for Ohio Housing Finance Agency (OHFA) Gap Financing funded with HOME Investment Partnership (HOME) funds on February 21, 2019. The assistance has been approved. The federal HOME funds require the preparation of an environmental review record, consistent with the requirements of Title 24 of the Code of Federal Regulations (CFR) Part 58.

No public hearings are required for the financial assistance and none are anticipated. An informational meeting and renovation preferences survey have been provided to the residents of each project site, with project scope informed to the extent possible by resident responses to the survey. The project team continues to hold meetings with Adams County and the Villages of Winchester and Peebles to inform local officials about the project.

The HOME funds have been awarded to a non-governmental entity and 24 CFR Part 58 does not authorize the State to pass its environmental review responsibilities to non-governmental entities. The State of Ohio is responsible for conducting the environmental review, decision-making, and actions. OHFA contracted with CMT to conduct the environmental review and prepare the record.

This environmental review was completed on March 6, 2020. Lydia L. Mihalik, Director of Ohio Development Services Agency (ODSA), is the certifying officer for the State of Ohio’s Development Services Agency and assumes responsibility for the accuracy and completeness of the record. The Office of Community Development (OCD) administers the HOME funds for ODSA. The record is a public record and is open for review. The record for this project is available for review in two locations:

Ohio Development Services Agency
Office of Community Development
Training and Technical Assistance Section
77 South High Street, P. O. Box 1001
Columbus, Ohio 43216-1001

Peebles Public Library
157 High Street
Peebles, Ohio 45660
Hours: M-Th 10 AM-7 PM
        F-Sa 10 AM-5 PM
Phone: 937-587-2085

North Adams Public Library
2469 Moores Road
Seaman, Ohio 45679
Hours: M-Th 10 AM-7 PM
        F-Sa 10 AM-5 PM
Phone: 937-386-2556

ODSA OCD is making this record and its documentation available for public review and comment by advertising in the Clermont Sun (Phone: 513-732-2511). The State plans to publish a combined Notice to the Public of a Finding of No Significant Impact on the environment (FONSI) and a Notice of Intent to Request a Release of Funds (NOI/RROF) on or about ________________.
The State will receive comments and objections until (approximately) _________________. Any comments received will be evaluated and incorporated in the record, as appropriate. On or about ________________, the State will submit to its grantor agency, the U.S. Department of Housing and Urban Development (HUD), a Request for Release of Funds (RROF). (HUD-Columbus, 200 North High Street, Columbus, Ohio 43215.) Upon receipt of the RROF, HUD will wait 15 calendar days to receive any objections to the release of funds. Any objections will be responded to by the State of Ohio and to the satisfaction of HUD. The effect of HUD releasing funds is that the State (and the non-profit) may then (and then only) obligate any of the project funds (private and public).

The Project Sponsor is responsible for monitoring the implementation of the project in conjunction with findings and mitigation measures identified in this record.
The ABCAP Housing Renovations II project consists of affordable senior housing at Joshua Manor in Peebles, Ohio and Village Garden Apartments in Winchester, Ohio. Village Garden Apartments was originally constructed in 1985 under the USDA Rural Development 515 program, and Joshua Manor was originally developed in 1990 under the HUD Section 202 program. Both now operate under the HUD Section 8 program with a Housing Assistance Payment (HAP) contract on all units. The current owners are non-profits and have adequately maintained the property, but many essential building features have now exceeded their expected useful life. Budget constraints have prohibited renovation to the project buildings. The Capital Needs Assessment prepared by Creative Housing Solutions, Inc. found that the project buildings are in fair condition, with accessibility deficiencies and with multiple deferred maintenance items but no Critical Needs. The Property Manager reports in both the Capital Needs Assessment and the project’s Market Study that the two complexes have low turnover and a waiting list of approximately 2 years.

The proposed new construction of the ABCAP Housing Renovations II project is intended to accomplish the following goals:

- Provide quality, affordable senior housing in an area that has a shortage of senior housing.
- Provide residents with a comprehensive support services plan that ensures residents will be able to maintain a high quality of life and maximum independence.
- Provide housing that will allow elderly persons to remain in their community, even when they are unable, physically or financially, to maintain their own home.
- Improve the quality of existing rental units for seniors within a complex that has been adequately maintained but that requires renovation and will benefit from the addition of site amenities.
SECTION 4 - EXISTING CONDITIONS AND TRENDS

The ABCAP Housing Renovations II project will involve the acquisition and renovation of 43 units of affordable senior housing in a total of eight buildings at two sites located in Peebles and Winchester, Adams County. Peebles is located in northeast Adams County and Winchester is located in northwest Adams County. In 2018, Peebles had an estimated population of 1,732 and Winchester had an estimated population of 1,006. West Union Village serves as the county seat. The local government, trade, transportation and utilities, and education and health services sectors are the largest employers in the county while the professional and business services sector experienced the largest percentage growth in 2017.

LAND DEVELOPMENT

Both project sites are currently developed with apartments. The single U-shaped building at Joshua Manors was constructed in 1990 and the seven apartment buildings and one community building at Village Garden were constructed in 1985. The buildings have received standard maintenance but are in need of new finishes and fixtures; some of the Village Garden buildings also require structural repairs.

The Village Garden project site is zoned as a Planned Unit Residential Development by the Village of Winchester. Because the Village of Peebles has no zoning regulation code, no zoning conditions apply to the Joshua Manor project site. The Adams County Land Use Plan does not assign preferred uses to specific areas, but does identify a need for senior housing that is partially addressed by the existing Joshua Manor and Village Garden apartment complexes.

The project sites are each located in primarily residential neighborhoods with nearby community recreation properties. Joshua Manor is located near a number of older houses identified on the Ohio Historic Inventory but not currently listed on the National Register of Historic Places. With the exception of the OHI-listed homes, structures are generally one- or 1½-story structures with gabled roofs.

Foundation cracks and settling were noted at the Village Garden site, attributed to the soil types present on the site and the amount of moisture in the soils. Both sites show signs of minor drainage problems such as bare patches in the lawn. No contamination or safety hazards were identified at either site, and no environmental concerns are known to the Adams County Health Department. The sites are both in EPA Radon Zone 1 and indoor air requires evaluation for the presence of radon. Indoor mold has been reported at both project sites in the past. Ambient noise at each site is within HUD’s acceptable range.

Energy consumption at each project site is expected to be similar to that at other typical apartment buildings constructed in the mid- to late-1980s.

SOCIOECONOMIC

The project sites serve low-income persons aged 55 and older, many of whom are retired. A number of the existing residents also have physical disabilities. Together, the project sites provide 30% of the total available senior housing in Adams County. Because both sites are fully
occupied, any temporary or permanent change in service of the project units could result in displacement.

**COMMUNITY FACILITIES & SERVICES**

The Adams County Ohio Valley School District serves project area residents, and provides preschool classes. Adult education classes are available through Southern State Community College; the nearest campus is located in Mount Orab, 17 miles northwest of Village Garden and 30 miles west-northwest of Joshua Manor. The Peebles Public Library is located at 157 High Street in Peebles, approximately 0.2 mile from the Joshua Manor project site. The North Adams Public Library is located at 2469 Moores Road in Seaman, approximately 4.3 miles from the Village Garden project site. Multiple other cultural facilities are located in the project area.

The Village of Peebles and the Village of Winchester each maintain their own police and fire departments that provide emergency services in the project area. Emergency medical service and transportation can be summoned by calling 911. Adams County Regional Medical Center is located in Seaman, approximately five miles east of the Village Garden site and 15 miles west of the Joshua Manor site, and provides a full range of services including 24-hour emergency care. ABCAP is the main service provider in the area, in conjunction with local churches, Helping Hands and Saint Vincent DePaul.

The Villages of Peebles and Winchester both purchase potable water from Adams County Water District and provide services to the project sites, and both villages maintain their own wastewater treatment plants and provide sanitary sewer service. The Property Managers contract with a private hauler, currently Rumpke, for solid waste disposal.

Limited commercial facilities are available near each project site; additional facilities used by current project residents are located in Seaman. Each project site has a community space with associated kitchenette and restrooms. Area parks and recreational facilities include Jacksonville Park, Shoemaker State Nature Preserve, Davis Memorial State Nature Preserve, Chalet Nivale Nature Preserve, Chaparral Prairie State Nature Preserve and Johnson Ridge State Nature Preserve. Area senior centers include the Rarden Senior Community located 11 miles east of Joshua Manor and Adams County Senior Citizens located 15 miles southeast of Village Garden.

Limited transportation services are available to current project site residents through ABCAP and through Medicaid, but no public transit is available in Adams County. Based on the rural nature of the community, most residents are expected to have transportation.

**NATURAL FEATURES**

Both project sites are located near surface water resources. Joshua Manor is located approximately 875 feet north of Shimer Run, which drains west into Brush Creek. Several wetlands have been mapped in the area. Village Garden is located between Elk Fork of Brush Creek and Winchester Lake, which feeds into Turkey Run. There are a number of wetlands mapped in the area, including an adjacent man-made pond mapped in the National Wetlands Inventory. Based on a report prepared by Civil & Environmental Consultants, there are no wetlands or jurisdictional streams present on the site. Groundwater in the project area is meager.
As part of an ODNR environmental review of the project, an Ohio Biodiversity Database records search was conducted for the project area. The records search identified no records of rare or endangered species within one mile of the project site. ODNR did not comment specifically on whether there are records of Indiana bat capture locations or hibernacula in the project area, but recommended conservation of trees and limitation of tree removal to the period between October 1 and March 31. The project will be required to comply with this date restriction or to contact USFWS to discuss surveying possibilities for Indiana bat and northern long-eared bat.

The USFWS Federally Listed Species List indicates that ten listed species’ known or historic range includes Adams County: Indiana bat (*Myotis sodalis*, endangered), northern long-eared bat (*Myotis septentrionalis*, proposed endangered), running buffalo clover (*Trifolium stoloniferum*, endangered), fanshell (*Cyprogenia stegaria*, aka *Cyprogenia irrorata*, endangered), rayed bean (*Villosa fabalis*, endangered), pink mucket pearlymussel (*Lampsilis abrupta*, endangered), sheepnose (*Plethobasus cyphyus*, endangered), snuffbox (*Epioblasma triqueta*, endangered), timber rattlesnake (*Crotalus horridus*, species of concern) and bald eagle (*Haliaeetus leucocephalus*, species of concern). ODNR identified 29 State-listed species with known or historic range near the project sites, including seven that are also on the federal list.
Description of the Statutory Checklist

The Statutory Checklist covers statutes, regulations, and Executive Orders, other than NEPA, to which every project must respond, unless it is exempt. The required statutes, regulations and Executive Orders are listed in 24 CFR 58.5 and 58.6. These statutes, regulations, and Executive Orders have been organized in a format that allows for systematic and consistent review and compliance.

Each section includes a summary box indicating which statutes, regulations and Executive Orders apply to the topic and whether additional compliance steps or project mitigation actions are required in order to comply with the statutes, regulations and Executive Orders.

Supporting documentation such as maps, notes and correspondence is included immediately following the discussion within each section. Larger technical reports are included in Section 7. The discussion within each section will indicate the location of relevant technical reports.
COMPLIANCE AREA 1 - CLEAN AIR

| Compliance Steps or Mitigation Required [Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93] | ☒ Yes | ☐ No |

Adams County has not been identified as an Air Quality Non-Attainment Area by the USEPA and is in attainment for the following areas of air quality: 1-hour ozone standard, 8-hour ozone standard, particulate matter (particles <10 microns), sulfur dioxide, nitrous oxide, lead, and carbon monoxide. Portions of Adams County have been identified as in maintenance for the particulate matter (particles <2.5 microns) standard, but the project sites are not located in the maintenance area and are considered in attainment for this standard.

**Fugitive Dusts** - The project may result in a temporary increase of dust and fumes from construction activities. Best Management Practices should be employed during renovation to control fugitive dust. No long-term impact on ambient air quality is anticipated.

**Post-Construction Sources** - Plans call for the proposed units to be heated with electric HVAC equipment. The units will not use fireplaces, gas-burning appliances or heating oil. No stationary sources of air pollution will be created by the project.

Each unit will be equipped with an air-conditioning system, which can help reduce exposure to ambient air pollution during the summer months.

**Mitigation** - Best Management Practices and Reasonably Available Control Measures [OAC Rule 3745-17-08 (B)] shall be employed by the Contractor to control fugitive dusts during construction activities.

All units shall be equipped with air-conditioning systems.
### COMPLIANCE AREA 2 - COASTAL ZONE MANAGEMENT

| Compliance Steps or Mitigation Required [Coastal Zone Management Act sections 307(c) & (d)] | ☐ Yes | ☒ No |

**Documentation** - The project sites are not within an area designated for regulation by the Coastal Zone Management Act or the Ohio Shore Erosion Laws. The only Coastal Areas within Ohio are located along Lake Erie. Adams County does not border Lake Erie.

A map of Ohio’s Coastal Areas follows this discussion area.

**Mitigation** - No mitigation is required.
COMPLIANCE AREA 3 - CONTAMINATION AND TOXIC SUBSTANCES

Compliance Steps or Mitigation Required [24 CFR Part 50.3(i) & 58.5(i)(2)]

| ☒ Yes | ☐ No |

Documentation - The Field Notes Checklist, provided in Section 8, documents field observations concerning safety issues.

Environmental Investigations - A Phase I Environmental Site Assessment for each project site was prepared by Specialized Environmental Sampling (SES). SES’s investigation identified no recognized environmental conditions in connection with either project site. The Phase I Environmental Site Assessments are provided in Section 7.

Maps of area AIRS and TRI facilities were generated by USEPA’s Enviromapper utility. No such air release sources were identified within approximately 1,000 feet of either project site. The Adams County Health Department was not aware of any air contaminant concerns in the project area.

Radon – The project sites are located within US EPA’s Radon Zone 1: counties with predicted average indoor radon screening levels greater than 4 pCi/L. EPA’s radon action level (the level at which mitigation is recommended) is 4 pCi/L. Radon sampling has been conducted at the project sites indicating the need for the installation of radon mitigation systems. After construction, sampling will be repeated to confirm the system’s proper operation.

Indoor Mold – No indoor mold was identified during the phase I ESAs or the CMT site visits. Records of the Adams County Health Department indicate past reports of mold in units at both project sites. Project plans include bathroom exhaust fans which will help to prevent development of indoor mold concerns. Due to the past reports of indoor mold, the project will be required to examine each unit for indoor mold during renovation and to address any identified concern.

Asbestos – The Joshua Manor project site is currently developed with one 1-story, 13-unit apartment building. The Village Gardens project site is currently developed with seven 1-story, 4- or 5-unit apartment buildings and a community building. An asbestos survey was performed at each site by ATC. None of the twelve homogeneous materials sampled at the Joshua Manor project site or the 18 homogeneous materials sampled at the Village Garden site contained any amount of asbestos. The ATC reports are located in Section 7. Asbestos-containing building materials will not be utilized in the rehabilitation.

Lead-Based Paint – The Joshua Manor apartment complex was constructed in 1991 and the Village Gardens apartment complex was constructed in 1985. Properties constructed after January 1, 1978 are exempt from the compliance requirements of 24 CFR Part 35 - “Lead-Based Paint Poisoning Prevention in Certain Residential Structures.” Lead-based paint will not be utilized in the rehabilitation.

Mr. Jason Work, MPH, R.S. with the Adams County Health Department indicated that his office has no record of environmental concerns in the vicinity of the project site.
Mitigation - Project personnel shall be notified, both verbally and through notations on the final construction drawings, that work shall be halted if indicators of contamination (fill other than “clean hard fill,” discolored soils or chemical/petroleum odors) are identified during construction to allow for a qualified environmental professional to inspect the site and make recommendations regarding appropriate actions.

The planned radon mitigation system must be designed to prevent the infiltration of subsurface radon into the airspace of each unit at the project site protected by the radon mitigation system. If the system is designed for passive (i.e., convective flow) removal of vapors, it shall be assembled such that it may be converted to active removal in the future if conditions are determined to require active removal. Best practices shall be used to seal penetrations in the building slabs. Between one and six months following completion of installation of the radon mitigation system, radon testing shall be repeated in all project units served by the system. If a radon level of 4 pCi/L or greater is detected in any sample, the Project Developer shall consult with a radon mitigation specialist licensed by the State of Ohio to revise the radon removal system to reduce radon levels in all units below 4 pCi/L. Confirmatory sampling following system revisions that shows all results below 4 pCi/L is required to confirm that radon removal system revision has been completed successfully.

During construction, all project units and common areas shall be examined for indoor mold to the extent that surfaces are exposed by the project scope of work. The cause of any identified mold shall be determined and corrected as part of construction, and all mold shall be remediated.

Construction drawings/specifications shall be modified to include the following statement: “The Contractor shall at no time incorporate any materials that are composed of or contain any amount of asbestos. The substitution of materials that contain any amount of asbestos will in no circumstances be acceptable. Upon completion of the project, the Contractor and Project Architect shall submit written statements or certifications asserting that no asbestos containing materials were used in any portion of the construction.”
**COMPLIANCE AREA 4 - ENDANGERED SPECIES**

| Compliance Steps or Mitigation Required [Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402] | ☒ Yes | ☐ No |

**Documentation** - Both project sites are fully developed with buildings and pavement. Each site’s landscaping includes mature trees, lawn, shrubs and planting beds. The Joshua Manor site had two trees with potential bat habitat, both located along the southern property line. The Village Garden site had four trees with potential bat habitat, located in the northwestern part of the project site. Mr. Jim Myers, maintenance manager for both properties, stated that no tree removals were planned unless the trees had died, but that trimming was likely.

As part of an ODNR environmental review of the project, an Ohio Biodiversity Database records search was conducted for the project area. The records search identified no records of rare or endangered species within one mile of the project site. ODNR did not comment specifically on whether there are records of Indiana bat capture locations or hibernacula in the project area, but recommended conservation of trees and limitation of tree removal to the period between October 1 and March 31. The project will be required to comply with this date restriction or to contact USFWS to discuss surveying possibilities for Indiana bat and northern long-eared bat.

The USFWS Federally Listed Species List indicates that ten listed species' known or historic range includes Adams County: Indiana bat (Myotis sodalis, endangered), northern long-eared bat (Myotis septentrionalis, proposed endangered), running buffalo clover (Trifolium stoloniferum, endangered), fanshell (Cyprogenia stegaria, aka Cyprogenia irrorata, endangered), rayed bean (Villosa fabalis, endangered), pink mucket pearlymussel (Lampsilis abrupta, endangered), sheepnose (Plethobasus cyphyus, endangered), snuffbox (Epioblasma triquetra, endangered), timber rattlesnake (Crotalus horridus, species of concern) and bald eagle (Haliaeetus leucocephalus, species of concern).

Since this project will create no impacts to any natural habitat of listed species and will only impact relatively low quality habitat, this project will not have an effect on any federally listed, threatened or endangered species or designated Critical Habitat. The only designated Critical Habitat in Ohio is within Sheldon Marsh and Headlands Dunes, both of which are adjacent to Lake Erie. In accordance with US Fish and Wildlife Service (USFWS) Section 7 Consultation procedures, no concurrence with the USFWS is required when a proposed action will not affect listed species or Critical Habitat.

The response received from the ODNR Environmental Review program follows Section 6, Impact Area 4.

**Mitigation** - No dead or live trees with a diameter at breast height (dbh) of 3 inches or greater shall be removed from the project site between April 1 and September 30. If such trees must be removed, the project must first contact USFWS to discuss surveying possibilities for Indiana bats, and must complete consultation to the satisfaction of USFWS before proceeding with tree removal.
COMPLIANCE AREA 5 - EXPLOSIVE AND FLAMMABLE HAZARDS

| Compliance Steps or Mitigation Required [24 CFR Part 51 Subpart C] | ☐ Yes | ☒ No |

**Documentation** – The project involves rehabilitation of housing on the existing sites with no increase in number of dwelling units. Therefore, 24 CFR Part 51, Subpart C does not apply and no review of Acceptable Separation Distances from explosive and flammable hazards is required.

**Mitigation** - No mitigation is required.
**COMPLIANCE AREA 6 - FARMLAND PROTECTION**

| Compliance Steps or Mitigation Required [Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658] | ☐ Yes | ☒ No |

**Documentation** – The project sites have a development density equivalent to more than 30 structures per 40-acre area. Under the provisions of the Farmland Protection Policy Act (FPPA) they are considered already committed to urban development and do not meet the definition of farmland. Under 7 CFR 658.3, land that does not meet the definition of farmland is exempt from review under the FPPA.

**Mitigation** - No mitigation is required.
## COMPLIANCE AREA 7 - FLOODPLAIN MANAGEMENT

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<tr>
<th>Compliance Steps or Mitigation Required [Executive Order 11988, particularly section 2(a); 24 CFR Part 55]</th>
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**Documentation** – Both ABCAP Housing Renovations II project sites are located within flood zone designation “X” and are considered to be outside the 1% and 0.2% annual chance (100- and 500-year) floodplains. Flood hazards in this zone are considered minimal. There are no local or federal flood regulations that apply to rehabilitation or construction outside of designated floodways.

Relevant portions of the National Flood Insurance Rate Map for the project sites follow this discussion.

**Mitigation** - No mitigation is required.
## COMPLIANCE AREA 8 - HISTORIC PRESERVATION

Compliance Steps or Mitigation Required [National Historic Preservation Act of 1966, particularly section 106 and 110; 36 CFR Part 800]

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**Documentation** – A request for Section 106 Review of the project site was submitted to Ohio’s State Historic Preservation Office (SHPO) on September 13, 2019. On October 17, 2019, Ms. JoLayne Morneau, Architecture Development Reviews Manager with SHPO determined that the proposed project will not affect historic properties at either project site.

Correspondence and supporting documents follow this discussion.

**Mitigation** - Any proposed changes to the project must be conveyed to OCD and OHFA promptly. The Environmental Review must be reevaluated by OCD and OHFA prior to initiation of any proposed changes.

Project personnel shall be notified, both verbally and through notations on the final construction drawings, that work shall be halted and OCD and OHFA notified immediately if archaeological resources or human remains are discovered during construction. All work with the potential to disturb soil at the project site must remain stopped until OCD, OHFA, OHPO and local law enforcement officials, as applicable, are satisfied that all appropriate actions have been taken.

If an additional phase or affiliated project is proposed by a member of the current project team, this additional work must be coordinated with OHPO, prior to initiation and regardless of the funding source.
COMPLIANCE AREA 9 - NOISE ABATEMENT AND CONTROL

Compliance Steps or Mitigation Required [Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B]

| ☒ Yes | ☐ No |

Documentation – Construction activities will result in a temporary increase in area noise levels.

HUD regulations require that noise be evaluated if any of the following conditions are present: (1) major roads within 1,000 feet, (2) railroads within 3,000 feet, or (3) major airports within 15 miles.

Joshua Manor – There were no major roads within 1,000 feet or major airports within 15 miles of the Joshua Manor project site. While a rail track owned by Norfolk Southern Corporation is located within 1,000 feet south of the project site, both the Federal Rail Authority and Public Utilities Commission of Ohio report that the at-grade crossing nearest the project site experiences no train traffic. Therefore, no further evaluation is required.

Village Gardens – In the vicinity of the Village Gardens project site, the following noise sources were present:

- James A. Rhodes Appalachian Highway (State Route 32) approximately 1,000 feet south
- Norfolk Southern rail track approximately 1,000 feet northwest.

No major airports were located within 15 miles. CMT prepared a noise assessment for the project site using HUD’s Noise Assessment Guidelines and online DNL Calculator. The calculated day-night average sound level for the project site is approximately 64 dB, within HUD’s acceptable range. No further evaluation is required.

Mitigation - Noise-producing construction activities should be avoided during the designated noise sensitive period (10:00 pm to 7:00 am).
COMPLIANCE AREA 10 - SOLE SOURCE AQUIFERS

| Compliance Steps or Mitigation Required [Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149] | □ Yes | ☒ No |

**Documentation** - The project site is not located within a designated sole source aquifer nor has a petition been submitted to the USEPA to designate the area as a sole source aquifer.

A copy of the Ohio EPA’s Sole Source Aquifers In Ohio map follows this discussion.

**Mitigation** - No mitigation is required.
COMPLIANCE AREA 11 - WETLANDS PROTECTION

<table>
<thead>
<tr>
<th>Compliance Steps or Mitigation Required [Executive Order 11990, particularly sections 2 and 5]</th>
<th>□ Yes</th>
<th>□ No</th>
</tr>
</thead>
</table>

**Documentation** - A site must possess all of the following characteristics in order to be classified as a jurisdictional wetland: hydric soils, hydrophytic vegetation, and wetland hydrology.

**Joshua Manor** - The NRCS Web Soil Survey classifies soils on this project site as Bratton silt loam, 2 to 8 percent slopes (BnB). The Adams County NRCS classifies the BnB soil type as hydric. The National Wetland Inventory map shows no identified wetlands on the project site; the nearest wetland is located 1,000 feet to the south.

The project site is generally covered by lawn and upland vegetation. A rip rap-filled ditch with two enclosed segments originates from a culvert on the south property line and crosses the project site from south to north between the project buildings. It exits the site on the north property line, draining to a man-made pond north of the project site. A second rip rap-filled ditch enters the site on the northeast from two culverts; the two legs merge within approximately 100 feet and flow along the property’s north border to merge with the north-south ditch. In the vicinity of the fork of the northeastern ditch, wetland vegetation was observed both within the rip rap channel and spreading up the sides and into the adjacent lawn.

Civil & Environmental Consultants, Inc. (CEC) prepared a jurisdictional waters assessment for the project site. CEC identified no wetlands or streams on the project site, only stormwater conveyance features. Since no wetlands or streams were identified, no further actions are required.

**Village Gardens** - The NRCS Web Soil Survey classifies soils on this project site as Jonesboro-Rossmoyne silt loams, 2 to 6 percent slopes (JoR1B1) and Westboro-Schaffer silt loams, 0 to 2 percent slopes (WsS1A1). The Adams County NRCS classifies the JoR1B1 soil type as hydric, and indicates that the WsS1A1 soil type can have hydric inclusions of Clermont soils on till plains. The National Wetland Inventory map shows no identified wetlands on the project site; the nearest wetland is a pond located directly north of the project site.

The project site showed no signs of wet or seasonally wet areas with the exception of one area of surface erosion caused by a downspout overflow. There were no areas of wetland vegetation and no further investigation is required.

Documentation follows this discussion area.

**Mitigation** - No mitigation is required.
**COMPLIANCE AREA 12 - WILD AND SCENIC RIVERS**

| Compliance Steps or Mitigation Required [Wild and Scenic Rivers Act of 1968, particularly sections 7(b) and (c)] | ☒ No |

**Documentation** - There are no State-designated wild or scenic rivers, study rivers or Nationwide Rivers Inventory (NRI) rivers located within 1,000 feet of the project site. Documentation from the Ohio Scenic Rivers program and the Nationwide Rivers Inventory program follows this discussion.

**Mitigation** - No mitigation is required.
Documentation – The USEPA states:

**Environmental justice** is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations and policies.

**Fair treatment** means no group of people should bear a disproportionate share of the negative environmental consequences resulting from industrial, governmental and commercial operations or policies.

Under HUD guidance, if there are adverse effects on low-income or minority populations then community residents must be meaningfully informed and involved in a participatory planning process to address the adverse effects.

An evaluation of the project area using USEPA's EJSCREEN online screening application found no indication of potential environmental quality concerns. The project sites are located in rural population centers and are surrounded by residences, parks and undeveloped land. No industrial facilities, landfills or obvious pollutant sources are located in close proximity to the project site.

Adams County has been identified as in attainment for all air quality pollutants monitored by the USEPA Region V. The Adams County Health Department has no records of air quality concerns in the project area.

The Phase I Environmental Site Assessment prepared by SES did not identify any recognized environmental conditions in connection with the project site.

**Mitigation** - The Property Manager shall notify prospective tenants that the unit was constructed as part of a federally funded project and that an environmental review of the project was completed as required under the National Environmental Policy Act. The Property Manager shall advise tenants that the review will be maintained on file by the Project Sponsor throughout the tax credit period and is available for review by the prospective tenant.
COMPLIANCE AREA 14 - AIRPORT HAZARDS

| Compliance Steps or Mitigation Required [24 CFR Part 51 Subpart D] | ☐ Yes | ☒ No |

**Documentation** – The Joshua Manor project site is located over one mile from the nearest airport, Lewis Airport, a privately operated grass strip. The next closest airport for both project sites, Alexander Salamon Airport, is located over seven miles from Village Gardens and over ten miles from Joshua Manor. Neither project site is located within an airport clear zone or accident potential zone.

**Mitigation** – No mitigation is required.
### COMPLIANCE AREA 15 - COASTAL BARRIER RESOURCES

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<tr>
<th>Compliance Steps or Mitigation Required [Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990; 16 USC 3501]</th>
<th>☒ Yes</th>
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</table>

**Documentation** - The project is not within a Coastal Barrier Resource System (CBRS) unit. The only Coastal Areas within Ohio are located along Lake Erie. Adams County does not border Lake Erie.

A map of Ohio’s CBRS units follows this discussion area.

**Mitigation** - No mitigation is required.
## COMPLIANCE AREA 16 - FLOOD INSURANCE

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<tr>
<th>Compliance Steps or Mitigation Required [Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994; 42 USC 4001-4128 and 42 USC 5154a]</th>
<th>☐ Yes</th>
<th>☒ No</th>
</tr>
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</table>

**Documentation** – The ABCAP Housing Renovations II project sites are both located within flood zone designation “X” and outside all FEMA Special Flood Hazard Areas. Flood insurance is not required.

Relevant portions of the National Flood Insurance Rate Map for the project area follow this discussion.

**Mitigation** – No mitigation is required.
In addition to compliance with the laws and authorities of the Statutory Checklist, environmental assessments must consider an array of additional potential impacts of the project. The Environmental Assessment Checklist covers four major impact areas and 18 specific impact categories that constitute the natural and human environment, developed by HUD in 24 CFR 58.40 in response to 40 CFR 1508.8 and 1508.27. For each category, determinations have been made relating to potential impacts, needed study, and mitigation or modification.

Each section includes a summary box indicating whether additional compliance steps or project mitigation actions are required in order to prevent or minimize adverse impacts to the environment.

Supporting documentation such as maps, notes and correspondence is included immediately following the discussion within each section. Larger technical reports are included in Section 8. The discussion within each section will indicate the location of relevant technical reports.
Documentat – The Village of Winchester has responsibility for zoning review and approval of the Village Garden project site. On January 4, 2019, Mr. Mike Swackhammer, Street Superintendent for the village, indicated that the project site is zoned as a Planned Unit Residential Development. Mr. Swackhammer stated that there are no significant building or zoning code violations on record and that the proposed rehabilitation is permitted and conforms to the Village of Winchester zoning regulation code.

On January 9, 2019, Mr. Daniel E. Pertuset, Administrator for the Village of Peebles, indicated that the village has no zoning regulation code. There are no village requirements that would impose conditions on the proposed rehabilitation.

The Adams County Land Use Plan identifies senior housing as a need for the county, and identifies Joshua Manor and Village Garden as existing senior apartment housing. While preservation and/or enhancement of this housing is not specifically prioritized, the two sites together represent nearly 30% of the senior housing in the county at the time the plan was prepared in 2011.

The zoning documentation and land use plan excerpts follow this Impact Area discussion.

The project sites are located in rural villages. Joshua Manor is located on the inside of a block that includes older homes, some of which are listed on the Ohio Historic Inventory, and single-family subsidized homes. Village Garden is located adjacent to a community park, single-family homes including subsidized homes, and apartments. Most of the buildings are small one- or 1½-story structures with gabled roofs. The project buildings are compatible with the surrounding area in terms of design and scale.
SOIL SUITABILITY
SLOPE
EROSION
DRAINAGE
STORM WATER RUNOFF

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**Documentation** – The NRCS Web Soil Survey classifies soils on the Joshua Manor project site as Bratton silt loam, 2 to 8 percent slopes (BnB). NRCS indicates this soil type is somewhat limited for use for dwellings without basements due to shrink-swell capacity, and very limited for pavement construction and stability due to low strength, shrink-swell capacity and frost action. Erosion is not anticipated to be a concern.

The Web Soil Survey classifies soils on the Village Garden project site as Jonesboro-Rossmoyne silt loams, 2 to 6 percent slopes (JoR1B1) and Westboro-Schaffer silt loams, 0 to 2 percent slopes (WsS1A1). The Jonesboro component of the JoR1B1 soil type is rated as very limited for use for dwellings without basements due to shrink-swell capacity, while the Rossmoyne component of this soil type is only somewhat limited due to its depth to saturated zone. Both components of the JoR1B1 soils are rated as very limited for use for local roads and streets due to frost action, low strength and shrink-swell capacity. The Westboro and Schaffer components of the WsS1A1 soil type are each described as very limited for use for dwellings without basements and for use for local roads and streets, but the WsS1A1 soils are mapped only on the southern border of the Village Garden project site. Erosion is not anticipated to be a concern for either JoR1B1 or WsS1A1 soils.

There are no mapped mines in the vicinity of either Joshua Manor or Village Garden.

At the Village Garden site, multiple buildings have experienced settling that is causing structural damage. Mr. Greg Hackett of ATA Beilharz Architects LLC, the Project Architect, stated that the settling is of interior concrete slabs caused primarily by the soil type and amount of soil moisture present. As documented in the December 23, 2019 letter from GOP Limited Structural Engineers, the settlement will be mitigated through the use of slab-jacking along with measures to reduce soil moisture in the soil around the structures.

The ODNR Mines Map indicates no known mines in the vicinity of either project site. The NRCS soil interpretations and ODNR Mines Map follow this Impact Area discussion.

At both project sites, storm water is collected via gutters and downspouts and transported to underground storm drainage piping. The same piping serves catch basins in the parking areas. At Joshua Manor, the drainage piping empties to local storm sewers. At Village Garden, a system of storm drainage ditches directs the collected water off site to the north. The drainage swales are discussed further in Section 5, Compliance Area 11.

Because the project will disturb less than one acre of ground overall, no storm water discharge permit is required. The project will be required to document exemption from the NPDES.
General Permit for Storm Water Discharges from Construction Activities and to implement best practices to control erosion from the site.

**Mitigation** – Slab jacking will be implemented at the Village Garden site to address the interior concrete slab settlement. All recommendations made by the project GOP Limited Structural Engineers in the Structural Investigation of Village Garden Apartments shall be incorporated into the construction plans.

The General Contractor must document exemption from the NPDES Construction Storm Water Permit. Best Management Practices shall be employed to control erosion during construction and until final cover is established.

### HAZARDS AND NUISANCES, INCLUDING SITE SAFETY AND NOISE

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**Site Safety** - The Contractor will follow Occupational Safety and Health Administration (OSHA) guidelines during construction activities to ensure worker and public safety. This will include safety equipment to be worn by workers and barriers to public access.

The Joshua Manor project site is relatively level, with no slopes that present fall hazards. A retaining wall constructed of approximately 8"x8" timbers adjacent to the eastern leg of the Joshua Manor building is less than two feet high and does not present a fall hazard. No water bodies are present.

The Village Garden project site contains drainage ditches as previously discussed. The ditches have shallow side slopes that do not present a fall hazard. At the headwalls where the ditches emerge from enclosure, slopes are steep but are less than two feet in height and do not present a fall hazard. The ditches drain after rain events and are not considered a water hazard. The adjacent man-made pond is separated from the project site by a tree line that screens views of the pond and deters access.

**Security** – Data provided in the Vogt Strategic Insights market study indicate crime risk at the project sites is similar to that in Adams County as a whole, and lower than the national average. Peebles Police Chief William Newland indicated that Joshua Manor is located in a safe area with very low crime. Winchester Police Chief Donnie Edgington noted the prevalence of fraud and theft calls in connection with project residents and recommended surveillance cameras. While surveillance cameras are not within the project budget, all project units have locking windows, entry doors with deadbolts, and site lighting.

**Natural Hazards** – Building codes address seismic and weather-related natural hazards occurring in the project area. There are no hazardous terrain features in the project area and the project site is not prone to flooding.

**Traffic** - The Joshua Manor project site is accessed from Simmons Avenue. No concerns with traffic were noted during the site visit. Peebles Police Chief William Newland indicated that
there are very few crashes and traffic violations in the vicinity of the project site. Chief Newland noted that traffic increases during the youth baseball season. Sidewalks are available along local streets, and a crosswalk is available to reach the park from the project site.

The Village Garden project site is accessed from Dorsey Road and Behm Road, both local low-traffic streets. No concerns with traffic were noted during the site visit. Neither the Peebles nor the Winchester police identified traffic concerns. Sidewalks are available within the project site, along Behm Road adjacent to the project site, along Cross Street between Behm Road and State Route 136 (SR 136) and along SR 136, which is the main route through Winchester. Sidewalks are not present on most local side streets, but due to the extremely low traffic, this is not expected to present a hazard for pedestrians.

**Chemical Use/Transportation/Storage/Disposal** – The ODNR Oil and Gas Well Interactive Web Map does not indicate any permitted oil or gas wells within 300 feet of either project site.

The National Pipeline Mapping System does not indicate any high-pressure gas transmission lines or liquid petroleum transportation pipelines within 220 yards of either project site.

Section 5, Compliance Area 3 discusses chemical contamination and toxic substances present at the project sites.

**Air Pollution** – No air pollutant sources were identified by the USEPA AIRS and TRIS databases in the vicinity of either project site.

**Other Man-Made Hazards and Nuisances** – No such hazards or nuisances were identified at either project site.

**Noise** – The effects of ambient noise on the project are discussed in Section 5, Compliance Area 9. Construction of the project will result in a temporary increase in community noise levels. All construction activities are expected to occur during normal daytime waking hours, avoiding the annoyance or sleep disruption that may be caused by evening or nighttime operations. As a residential project with no non-residential noise sources, the project is not expected to have a noticeable long-term impact on community noise levels.

**Mitigations** - The Project will follow Occupational Safety and Health Administration (OSHA) recommendations and guidelines during construction activities to ensure worker and public safety. This will include safety equipment to be worn by workers and barriers to public access.

Prior to move-in, management shall advise tenants, in person, of safety precautions, including use of locks and other safety features, 911 emergency service, and available neighborhood watch programs.

**ENERGY CONSUMPTION**

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</table>
Project Construction - The project will require consumption of energy for power tools and equipment used during construction.

Post Construction – The rehabilitation of the project buildings is expected to result in reduced energy consumption compared to the present due to the installation of more energy-efficient HVAC equipment, appliances and light fixtures and better-sealing windows and doors. The project may relocate energy consumers in the region but will not add significantly to the total number of energy consumers. The Project Architect has certified that the project will meet energy efficiency requirements of the Ohio Housing Finance Agency, including Enterprise Green Communities 2015 standards.

AEP will continue to provide electric service to both project sites; no natural gas is used at either site.
IMPACT AREA 2 - SOCIOECONOMIC

EMPLOYMENT AND INCOME PATTERNS

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Documentation – Because the units will be leased to persons aged 55 and older, it is anticipated that most residents will have existing employment or be retired persons.

DEMOGRAPHIC CHARACTER CHANGES

DISPLACEMENT

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Documentation - The proposed project will renovate 43 units of housing for persons aged 55 and older at existing housing sites that have been adequately maintained but are in need of improvements to features reaching their expected useful life. The project sites together provide 30% of the total available senior housing in Adams County. The housing may permit older members of the region, who are no longer able financially or physically to maintain their own homes, to remain within their community.

At both project sites, tenants will be temporarily relocated during renovation of their units by one of three methods: they may move to vacant units within a different phase of the same site, they may move to a subsidized apartment located in the project area, or they may be offered one-time compensation to move in with family or friends during renovation. The project team will be required to coordinate with OHFA in complying with the Uniform Relocation Act.

Mitigation - The Project Sponsor/Project Developer shall coordinate with OHFA regarding the compliance of the relocation plans.
IMPACT AREA 3 - COMMUNITY FACILITIES AND SERVICES

A Community Services Map showing the location of the project site relative to nearby services follows this Impact Area discussion.

EDUCATION AND CULTURAL FACILITIES

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Documentation - Residents of the apartments will be persons aged 55 years and older. However, school-age co-tenants may be present. Any school-age children residing at the Joshua Manor project site will attend Peebles Elementary and Peebles High School. Those residing at Village Garden will attend North Adams Elementary and North Adams High School. Adams County Ohio Valley School District (ACOVSD) Superintendent Richard Seas has confirmed that the district has adequate capacity for any students residing at the project site.

All project site students attending ACOVSD schools will ride the bus to school; the Joshua Manor bus stop is located on Simmons Avenue and the Village Garden bus stop is located on Dorsey Road.

ACOVSD offers preschool within its facilities. Southern State Community College is the nearest college to both project sites; its Brown County campus is located in Mount Orab, 17 miles northwest of the Village Garden site and 30 miles west-northwest of the Joshua Manor site.

The Peebles Public Library is located at 157 High Street in Peebles, 0.2 mile east of the Joshua Manor site. The North Adams Public Library is located at 2469 Moores Road in Seaman, 4.3 miles east of the Village Garden site. The Serpent Mound, an early Native American cultural and archaeological site which has been nominated to UNESCO’s World Heritage Sites list, is located north of Peebles. Historical sites include the Dr. A. C. Lewis House in Winchester and the John T. Wilson Homestead in Peebles. The Wheat Ridge Amish Community in West Union offers shops and services within a growing Amish community. The Adams County Fair is held each July at the fairground in West Union. Brushcreek Motorsports Complex is a racetrack offering a variety of races from late spring to late fall each year; it is located four miles southwest of Peebles. The Red Barn Convention Center in Winchester offers monthly concerts and other music-oriented events and festivals.

COMMERCIAL FACILITIES

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Documentation – Each project site community offers limited commercial facilities within walking distance. For Joshua Manor, nearby stores include Family Dollar and Dollar General, First
State Bank, Blake Pharmacy and Save-a-lot Grocery. For Village Garden, nearby stores include 1st Stop convenience store, Family Dollar, First State Bank, and the food pantry at Winchester Baptist Church. More substantial retail services for day-to-day needs include the Kroger grocery in Mt. Orab, the Walmart in West Union and several pharmacies located in Seaman, each of which is 15-20 miles from one or both project sites. Because of the rural nature of each site, most residents maintain vehicles. Those who do not may use the ABCAP transportation program department to identify transportation.

**HEALTH CARE AND SOCIAL SERVICES**

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Documentation – The nearest hospital is Adams County Regional Medical Center, located in Seaman, five miles east of the Village Garden site and 15 miles west of the Joshua Manor site. This hospital provides 24-hour emergency care, limited surgical and diagnostic services, inpatient and outpatient care, and a growing number of specialty physicians, among other services. The affiliated Winchester Family Medicine offers family practice care approximately four blocks north of the Village Garden site. Two general practitioners, including one affiliated with Adams County Regional Medical Center, are located in Peebles near the Joshua Manor site.

ABCAP will provide a Service Coordinator who will be at each project site for four hours per week. The Service Coordinator will assist interested and eligible residents in identifying and accessing available social services. Anticipated services include:

- Meals On Wheels
- Financial literacy courses
- Light housekeeping
- Senior companionship
- Substance abuse counseling

**SOLID WASTE DISPOSAL RECYCLING**

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Documentation - Solid waste will be generated during construction and by residents of the project units.

Household wastes at each site will be collected in centrally located dumpsters. Residents will be responsible for transporting their wastes to the dumpsters. A private waste service company
paid by the project will collect wastes weekly. Assistance will be available to residents unable to move their own collection container.

Mitigation - The Project Sponsor/Developer shall ensure that contractors provide for regular removal of any solid waste generated during construction. If any special wastes or hazardous wastes are generated, contractors will be required to dispose of debris at appropriate waste facilities.

The Project Owner shall contract with a sanitation service for trash removal. The Property Manager shall ensure that trash removal is arranged for residents who are not physically capable of transporting their wastes to the collection point.

### WASTE WATER SANITARY SEWERS

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Documentation – The Joshua Manor project site is currently served by municipal sanitary sewer services provided by the Village of Peebles Water and Sewer Department, and the Village Garden project site is served by the Village of Winchester. No change in service is anticipated.

According to USEPA’s Enforcement and Compliance History Online (ECHO) database, the Peebles Wastewater Treatment Plant has been in significant noncompliance for nine of the past twelve quarters. From July 2016 through September 2017, there were issues with the treatment plant’s compliance with required work; these were resolved by the last quarter of 2017. However, since the first quarter of 2018 the plant has repeatedly failed to submit its discharge monitoring report (DMR) for 86 missing measurements from the first quarter of 2018. In addition, the plant has an open violation of the consumer confidence rule. Both the DMR violation and the consumer confidence rule violation have resulted in informal enforcement actions, in the form of a warning letter or violation reminder. Because the unresolved violations relate to reporting requirements and the data do not indicate gross violations of effluent limits, the violations are not expected to have an impact on the project.

The Winchester Wastewater Treatment Plant also has consumer confidence rule violations dating from the fourth quarter of 2018, for which the OEPA has issued a violation reminder. This plant has no other active violations and the consumer confidence rule violations are not expected to have an impact on the project.

### WATER SUPPLY

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Documentation – The Joshua Manor project site is currently served by municipal potable water services provided by the Village of Peebles Water and Sewer Department, and the Village Garden project site is served by the Village of Winchester. No change in service is anticipated.

According to USEPA’s Safe Drinking Water Information System (SDWIS), both water providers purchase their water and both have no violations in the past three years. Information from the Ohio Valley Regional Development Commission, both villages purchase their water from the Adams County system. This system also has no violations listed on SDWIS for the past three years. According to the Adams County Regional Water District’s latest drinking water quality report, in July 2018 only 20 of 25 required total coliform samples were collected due to a change in the required sampling schedule. No actual total coliform exceedances were indicated. Available information indicates no concerns with the public water supply.

PUBLIC SAFETY - POLICE, FIRE AND EMERGENCY MEDICAL

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Documentation - The Joshua Manor project site will be served by the Peebles Police Department located at 1 Simmons Avenue. Police Chief William Newland indicated that the approximate response time for emergency calls is 1 to 3 minutes.

The Village Garden project site will be served by the Winchester Police Department located at 24 West Washington Street. Police Chief Donnie Edgington indicated that response time for emergency calls depends on the officers working and ranges from one to 30 minutes.

The Joshua Manor site will be served by the Peebles Fire Department. Chief Mike Estep indicated that the approximate response time for emergency calls is ten minutes. Chief Estep indicated that Adams County EMS provides emergency medical response to the Joshua Manor site.

The Village Garden site will be served by the Winchester Fire Department. Fire Chief Donny Ryan indicated that the Winchester Community Fire Station provides an approximate response time for emergency calls at the project site of 5-7 minutes. Chief Ryan indicated that the Winchester-Wayne Life Squad provides emergency medical response to the Village Garden site.

Emergency medical service and transportation can be summoned by calling 911.

PARKS, OPEN SPACE AND RECREATION

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**Documentation** – The Joshua Manor site will include a centrally located community area with a community room with kitchenette, laundry, restrooms, office and utility room. A paved patio and outdoor fitness area will be located outside the community room. The site offers open space in the center of the U-shaped building. Floyd and Mae McCoy Memorial Park is located across Simmons Avenue from the Joshua Manor entry drive.

The Village Garden site will offer a community building with a community room with full kitchen, two offices, mechanical room, laundry and restrooms. An outdoor fitness area will be added near the community building. Memorial Park is located adjacent to the site on the northwest.

The project area is rich in natural areas open to the public, including Jacksonville Park, Shoemaker State Nature Preserve, Davis Memorial State Nature Preserve, Chalet Nivale Nature Preserve, Chaparral Prairie State Nature Preserve and Johnson Ridge State Nature Preserve. Also in the area are Winchester Reservoir, Tranquility State Wildlife Area and Adams Lake State Park.

Area senior centers include the Rarden Senior Community located 11 miles east of Joshua Manor and Adams County Senior Citizens located 15 miles southeast of Village Garden. Chillicothe, located approximately 50 miles northeast of the project area, is the nearest urban center offering a wider variety of recreational facilities.

**TRANSPORTATION AND ACCESSIBILITY**

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**Documentation** – No public transportation is provided in Adams County. ABCAP provides limited transportation services to residents of its properties, and Medicaid members can access transportation services to medical appointments.

Based on the rural nature of the community, most residents are expected to have transportation. The Joshua Manor complex will offer 15 parking spaces including two handicapped parking spaces, and the Village Garden complex will offer 28 parking spaces including four handicapped parking spaces.
## IMPACT AREA 4 - NATURAL FEATURES

### UNIQUE NATURAL FEATURES

#### WATER RESOURCES

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**Unique Natural Features** – No unique natural features were observed during the site inspection.

**Water Resources** - Neither project site is located within a designated sole source aquifer. The ODNR Ground Water Resources Map for Adams County indicates that both project sites are located in an area from which groundwater yields of less than three gallons per minute may be developed from shale, shaley sandstone and limestone bedrock overlain by thin layers of clay and silt.

Both project sites are located near surface water resources. Joshua Manor is located approximately 875 feet north of Shimer Run, which drains west into Brush Creek. Several wetlands have been mapped in the area. Village Garden is located between Elk Fork of Brush Creek and Winchester Lake, which feeds into Turley Run. There are a number of wetlands mapped in the area, including an adjacent man-made pond mapped as a palustrine, unconsolidated bottom wetland that has water throughout the year except during extreme drought, and that has been diked or impounded. Construction activities associated with this project could result in groundwater or surface water contamination without appropriate precautions. A spill response kit should be present on the site during construction activities and chemical storage on-site should be minimized.

During construction, the project will require only limited use of water. As discussed in Section 6, Impact Area 1, an OEPA NPDES General Permit for Storm Water Discharges from Construction Activities or documentation of exemption will be required. The project will be required to implement best management practices to control erosion from the site.

Following construction, the project will be served by public water and sewer. No change will be made in impermeable surfaces at either project site. There is no evidence that the completed project will damage local water quality.

The relevant portions of the ODNR Ground Water Resources Map follow this Impact Area discussion.

**Mitigation** - A spill response kit shall be present at the site during construction activities and chemical storage on-site should be minimized.
VEGETATION AND WILDLIFE

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Documentation – Each project site is fully developed and maintained as a lawn with scattered trees and shrubs and formal planting beds. Trees at the project sites may be trimmed as part of the project. Limited planting beds may be modified or added. Project landscaping will not use species identified by the Ohio Department of Natural Resources as invasive in Ohio. During construction, measures will be implemented to remove invasive species and prevent their re-establishment.

Mr. John Kessler of ODNR’s Office of Real Estate coordinated an ODNR environmental review of the project. A search of the Natural Heritage Database identified no records of State-listed species within a one-mile radius of the project sites.

ODNR noted that the project is within the range of the Indiana bat (*Myotis sodalis*, state and federally endangered) and recommended that if suitable habitat for this species exists at the project site, the habitat not be removed except between October 1 and March 31. The proposed tree removal at the project site will be limited to this date range, or surveys will be undertaken to determine the potential impacts on the species.

Information specific to the effects of the project on federally-listed species, as well as documentation and correspondence related to protected vegetation and wildlife, follows Section 5, Compliance Area 11.

**Mitigations** – Project landscaping shall not include any species identified by the Ohio Department of Agriculture or the Ohio Department of Natural Resources as invasive in Ohio. During construction, any plant species appearing on either of these lists shall be removed from all areas disturbed by the project and measures shall be taken to eradicate any plant species appearing on either of these lists that emerge in disturbed areas.

### OTHER FACTORS

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No other natural feature factors were identified.
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SITE VISITS

Ms. Jennifer Miller of CMT conducted a site visit on August 1, 2019, accompanied by Mr. Jim Myers, the maintenance supervisor for both project sites.

INTERVIEWS AND CORRESPONDENCE

Police Chief Donnie Edgington with the Winchester Police Department provided information regarding emergency response at the project site. (Address: 24 West Washington Street, Winchester, Ohio 45697; Phone: 937-695-5502)

Fire Chief Mike Estep with the Peebles Fire Department provided information regarding emergency response at the Joshua Manor site. (Address: 178 Elm Street, Peebles, OH 45660; Email: chiefestep@yahoo.com)

Mr. Greg Hackett of ATA Beilharz Architects LLC, the Project Architect, provided information concerning stormwater handling at the project site. (Address: ; Phone: )

Mr. John Kessler, Environmental Services Administrator, and Ms. Sarah Tebbe, Environmental Specialist with ODNR’s Office of Real Estate, provided technical assistance for coordination with the Endangered Species Act and the Fish and Wildlife Coordination Act. (Address: 2045 Morse Road, Building E-2, Columbus, Ohio 43229; Phone: 614-265-6397; Email: Sarah.Tebbe@dnr.state.oh.us)

Police Chief William Newland with the Peebles Police Department provided information regarding emergency response at the project site. (Address: 1 Simmons Avenue, Peebles, Ohio 45660; Phone: 937-587-3191; Email: Peebles762@gmail.com)

Fire Chief Donny Ryan with the Winchester Fire Department provided information regarding emergency response at the Village Garden site. (Address: 40 Washington Street, Winchester, OH 45697; Phone: 937-752-8361)

Mr. Jason Work, MPH, R.S. with the Adams County Health Department provided information on environmental concerns in the project area. (Address: 923 Sunrise Avenue, West Union, Ohio 45693; Phone: 937-544-5547; Email: Jason.work@odh.ohio.gov)

Ms. JoLayne Morneau, Architecture Development Reviews Manager with the Ohio State Historic Preservation Office assisted in the coordination of the Section 106 Review. (Address: 800 East 17th Avenue, Columbus, Ohio 43211-2474; Phone: 614-298-2042; Email: jmorneau@ohiohistory.org)

Superintendent Richard Seas with the Adams County Ohio Valley School District provided information concerning educational services for residents of the project site. (Address: 141 Lloyd Road, West Union, Ohio 45693-9237; Phone: 937-544-5586)
SECTION 9 - REFERENCE LIST OF APPLICABLE BASE DATA

Adams County (Ohio) Board of Commissioners. Adams County Land Use Plan. Adopted June 27, 2011.


Affordable Housing Funding Application for ABCAP Housing Renovations II project. February 21, 2019.


National Park Service. Nationwide Rivers Inventory. HYDRO_NationwideRiversInventory dataset. Published January 1, 2016; current as of November 7, 2018.


ODNR Division of Water (Raab). Ground Water Resources of Adams County. Published 1989.


Ohio Department of Transportation. Transportation Information Mapping System (TIMS). Aviation Facilities (Public Use), Aviation Facilities (Private Use), Rail Crossing Inventory, Railroad Inventory and Traffic AADT Datasets. Downloaded April 26, 2018.


Specialized Environmental Sampling. Phase I Environmental Site Assessment, 1520 Dorsey Road, Winchester, Ohio 45697. February 8, 2019.

Specialized Environmental Sampling. Phase I Environmental Site Assessment, 91 Simmons Avenue, Peebles, Ohio 45660. February 8, 2019, Revised August 2, 2019.


USDA NRCS. Soil Survey Geographic (SSURGO) database for Adams County, Ohio. September 13, 2018, current as of July 11, 2019.


USGS. 7.5 Minute Topographic Map of Winchester, Ohio Quadrangle and Peebles, Ohio Quadrangle. Obtained from U.S. Geological Survey through ESRI.

SECTION 10 - PARTICIPANTS IN ASSESSMENT

Ms. Jennifer Miller & Ms. Heather Lacey  
Crawford, Murphy & Tilly, Inc.  
84 Remick Boulevard  
Springboro, Ohio 45066  
Phone: 937-701-6578

Mr. Timothy Allen & Ms. Cecilia Castillo  
Ohio Development Services Agency  
Office of Community Development  
77 South High Street  
PO Box 1001  
Columbus, Ohio 43216-1001  
Phone: 614-466-2285

Mr. Sean Thomas  
Ohio Housing Finance Agency  
57 East Main Street  
Columbus, Ohio 43215  
Phone: 614-644-5772

Mr. Zach Woolard  
The Model Group, Inc.  
1826 Race Street  
Cincinnati, Ohio 45202-7720  
Phone: 513-559-5863

Ms. Shelly Spiller and Ms. Samantha Taylor  
Adams and Brown Counties Economic Opportunities, Inc.  
406 West Plum Street  
Georgetown, Ohio 45121-1056  
Phone: 937-378-6041
The Project Developer has reached out to local community officials, agencies, tenants and the general public to provide information about the project throughout the planning process. Specific components of the outreach are as follows:

- Coordination with officials in each village in which a project site is located, to ensure compliance with village procedures and standards
- Regular updates to the Adams County Commissioners, who serve on the ABCAP Board of Directors
- Coordination with emergency service providers in each village
- Communications with residents, including a notification letter concerning the renovation, a community meeting held at ABCAP headquarters on June 25, 2019 and a follow-up memo describing the results of a preference survey conducted at the community meeting. Communication going forward will include ABCAP representative availability at least once per week at each site, posting of information on site bulletin boards and weekly updates regarding rehabilitation progress.
- Involvement in ABCEOI, as the local Community Housing Development Organization, in planning, construction meetings and inspections
- Meetings with local service providers in January and July of 2019
- Information posting/publication at the local library and senior-oriented community sites, with local churches and neighborhood organizations and on social media, and planned future press releases

A copy of the Community Outreach Plan for the project is provided following this discussion.
Due to the nature of this rehabilitation project, no cumulative impacts were identified.
Alternatives considered for the ABCAP Housing Renovations II project include:

Option 1. **No Action.** The no action alternative would fail to address the need for quality, affordable senior housing in Peebles and Winchester and the larger Adams County area, as identified in the Adams County Land Use Plan.

Option 2. **Demolish the Existing Complex and Construct a New Complex.** The cumulative relocation costs, demolition costs, and new construction costs would far exceed the costs of the proposed improvements to the existing complex.

Option 3. **Renovate the Existing Apartment Complex On-Site.** The project will result in needed renovations to these senior housing project located in an area with very limited senior housing and increasing need for such housing. The project will permit elderly persons to remain within their community when they are no longer able to maintain a single-family home.
The ABCAP Housing Renovations II project will have minimal environmental impact while providing quality, affordable housing for senior citizens in Winchester, Peebles and the surrounding Adams County area. At the Village Garden site, multiple buildings have experienced settling that is causing structural damage, primarily due to the soil type and amount of soil moisture present. The settlement will be mitigated through the use of slab-jacking along with measures to reduce soil moisture in the soil around the structures. Elevated radon has been detected at the project sites and will be addressed with the installation of an active radon mitigation system. No other significant environmental concerns were identified.

The proposed plans, policies and schedules will be enforced to minimize adverse environmental impacts. Plans for the project will attempt to minimize inconvenience to neighboring properties and to enhance environmental quality.

It is the Finding of this assessment that these activities do not constitute an action having an individually or cumulatively significant effect on the human environment and therefore do not require the preparation of an environmental impact statement. The publication of a Finding of No Significant Impact and Notice of Intent to Request Release of Funds may be made on the basis of this Finding.
The Project Sponsor, ABCAP Housing Renovations Limited Partnership II, is responsible for monitoring the project to ensure that mitigation measures identified in this report are implemented. On August 1, 2019 Mr. Alvin Norris, Executive Director of Adams and Brown Counties Economic Opportunities, Inc., signed the standard mitigation measures on behalf of the project team; a copy is attached. On March 5, 2020, Mr. Zach Woolard with Model Group confirmed that the project team will comply with all mitigation measures developed specifically for the project. Procedures for implementing the mitigation measures are described below. OHFA staff will monitor the project sponsor for compliance with these responsibilities.

With respect to the mitigations, the project site is considered to include not only the physical site of the proposed development, but any areas that will be disturbed due to project activities. That is, off-site activities that are wholly or partially a result of the project are subject to the mitigations as if the activities were occurring on the development site.

The Project Sponsor shall update the review record to reflect compliance with the mitigations and shall provide these updates to OHFA as the mitigations are performed and no later than upon completion of the construction of the project.

1. Best Management Practices and Reasonably Available Control Measures [OAC Rule 3745-17-08(B)] shall be employed by the Contractor to control fugitive dusts during construction activities.

   There should be no visible dust emitted from the project activities. Written documentation of notification and compliance shall be provided to the Project Sponsor, OCD, and OHFA, and kept in file documentation with the record.

2. All units shall be equipped with air conditioning systems.

   The Project Sponsor shall confirm the presence of air conditioning systems prior to lease up. Written documentation must be maintained.

3. Project personnel shall be notified, both verbally and through notations on the final construction drawings, that work shall be halted if indicators of contamination (fill other than “clean hard fill,” discolored soils or chemical/petroleum odors) are identified during construction to allow for a qualified environmental professional to inspect the site and make recommendations regarding appropriate actions.

   The Project Sponsor/Developer shall maintain documentation of contractor notification and shall ensure that notations are included on construction drawings. The Project Sponsor/Developer shall notify OCD promptly if suspect contamination is identified on the project site.
If suspect contamination is identified, no site development activities are to occur until testing and/or remedial actions have been concluded to the satisfaction of OCD. Documentation must be maintained with the record and provided to OCD and OHFA.

4. The planned radon mitigation system must be designed to prevent the infiltration of subsurface radon into the airspace of each unit at the project site protected by the radon mitigation system. If the system is designed for passive (i.e., convective flow) removal of vapors, it shall be assembled such that it may be converted to active removal in the future if conditions are determined to require active removal. Best practices shall be used to seal penetrations in the building slabs. Between one and six months following completion of installation of the radon mitigation system, radon testing shall be repeated in all project units served by the system. If a radon level of 4 pCi/L or greater is detected in any sample, the Project Developer shall consult with a radon mitigation specialist licensed by the State of Ohio to revise the radon removal system to reduce radon levels in all units below 4 pCi/L. Confirmatory sampling following system revisions that shows all results below 4 pCi/L is required to confirm that radon removal system revision has been completed successfully.

The Project Developer shall provide the following documentation to OCD and OHFA and maintain the documentation in the project file: Plans showing the location of all radon mitigation system components including any components added to improve system performance between sample rounds, and a sample report in conformance with O.A.C. 3701-69-07 Paragraph O for each round of radon sampling. Repeat sampling with no system revisions shall not be sufficient evidence to dispute an initial result greater than 4 pCi/L, even if the repeat sampling results are below 4 pCi/L.

5. During construction, all project units and common areas shall be examined for indoor mold to the extent that surfaces are exposed by the project scope of work. The cause of any identified mold shall be determined and corrected as part of construction, and all mold shall be remediated.

Remediation shall be in accordance with the USEPA publication “Mold Remediation in Schools and Commercial Buildings (EPA 402-K-01-001 as updated). Documentation must be maintained in the project file.

6. Construction drawings/specifications shall be modified to include the following statement: “The Contractor shall at no time incorporate any materials that are composed of or contain any amount of asbestos. The substitution of materials that contain any amount of asbestos will in no circumstances be acceptable. Upon completion of the project, the Contractor and Project Architect shall submit written statements or certifications asserting that no asbestos containing materials were used in any portion of the construction.”

The Project Sponsor/Developer shall ensure that the drawings/specifications include the required statement. Copies of the certifications from the Contractor and Project Architect shall be provided to the Property Manager, OCD, OHFA, and kept in file documentation with the record.
7. No dead or live trees with a diameter at breast height (dbh) of 3 inches or greater shall be removed from the project site between April 1 and September 30. If such trees must be removed, the project must first contact USFWS to discuss surveying possibilities for Indiana bats, and must complete consultation to the satisfaction of USFWS before proceeding with tree removal.

Construction plans shall include a restriction on the removal of trees between April 1 and September 30. In the event that the project is unable to comply with this restriction, the project shall document completed consultation with USFWS, including any evaluation by a qualified professional of the trees to be removed. Documentation of the consultation and conclusions must be provided to OHFA and OCD for review and concurrence prior to proceeding with any removal. Written documentation must be maintained and be provided to the Project Sponsor, Property Manager, OCD, and OHFA, and kept in file documentation with the record.

8. Any proposed changes to the project must be conveyed to OCD and OHFA promptly. The Environmental Review must be reevaluated by OCD and OHFA prior to initiation of any proposed changes.

The Project Sponsor/Project Developer must maintain documentation in the record that any changes to the project have been reevaluated by OCD and OHFA.

9. Project personnel shall be notified, both verbally and through notations on the final construction drawings, that work shall be halted and OCD and OHFA notified immediately if archaeological resources or human remains are discovered during construction. All work with the potential to disturb soil at the project site must remain stopped until OCD, OHFA, OHPO and local law enforcement officials, as applicable, are satisfied that all appropriate actions have been taken.

The Project Sponsor/Developer shall maintain documentation of contractor notification and shall ensure that notations are included on construction drawings. The Project Sponsor/Developer shall notify OCD and OHFA promptly if archaeological resources or human remains are discovered on the project site, and shall not resume soil-disturbing activities until appropriate actions identified by local law enforcement officials and OHPO, as appropriate, have been concluded to the satisfaction of OCD and OHFA. Documentation must be maintained with the record and provided to OCD and OHFA.

10. If an additional phase or affiliated project is proposed by a member of the current project team, this additional work must be coordinated with OHPO, prior to initiation and regardless of the funding source.

For any additional phase, the Project Sponsor/Project Developer shall provide documentation of completed coordination with OHPO to OCD, OHFA and maintain documentation with the record.

11. Noise-producing construction activities should be avoided during the designated noise-sensitive period (10:00 pm to 7:00 am).

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Contractors should be instructed to minimize noise. If complaints are received or noise-producing activity is noted during the designated noise-sensitive period, responsible action should be taken immediately. Documentation of notification must be maintained on file with the record and provided to the Project Sponsor, OCD, and OHFA.

12. The Property Manager shall notify prospective tenants that the unit was constructed as part of a federally funded project and that an environmental review of the project was completed as required under the National Environmental Policy Act. The Property Manager shall advise tenants that the review will be maintained on file by the Project Sponsor throughout the tax credit period and is available for review by the prospective tenant.

The Project Sponsor shall ensure that, prior to lease signing, prospective tenants are notified that an environmental review was prepared and is available for review. If the offices of the Project Sponsor are located outside of the community in which the unit is located, the Project Sponsor shall ensure that a complete copy of the environmental review is provided directly to a prospective tenant desiring to review the document.

13. Slab jacking will be implemented at the Village Garden site to address the interior concrete slab settlement. All recommendations made by the project GOP Limited Structural Engineers in the Structural Investigation of Village Garden Apartments shall be incorporated into the construction plans.

Construction plans shall be modified to include slab jacking along with all recommendations made by GOP Limited Structural Engineers. Documentation of the changes must be provided to OCD and OHFA.

14. The General Contractor must document exemption from the NPDES Construction Storm Water Permit. Best Management Practices shall be employed to control erosion during construction and until final cover is established.

During site inspections, erosion control measures should be observed to be in place. Run-off from the site should be minimal. There should not be extensive siltation along run-off pathways.

15. The Project will follow Occupational Safety and Health Administration (OSHA) recommendations and guidelines during construction activities to ensure worker and public safety. This will include safety equipment to be worn by workers and barriers to public access.

Work should be halted if violations of OSHA regulations and guidelines are noted and the Contractor should be required to correct the deficiency before work can resume.

16. Prior to move-in, management shall advise tenants, in person, of safety precautions, including use of locks and other safety features, 911 emergency service, and available neighborhood watch programs.
Evidence of notification shall be maintained by the Property Manager. Information regarding safety features shall be included in the New Tenant Package.

17. The Project Sponsor/Project Developer shall coordinate with OHFA regarding the compliance of the relocation plans.

*Documentation of relocation actions, including OHFA approval, must be maintained in the project files and provided to OCD and OHFA.*

18. The Project Sponsor/Developer shall ensure that contractors provide for regular removal of any solid waste generated during construction. If any special wastes or hazardous wastes are generated, contractors will be required to dispose of debris at appropriate waste facilities.

*Regular inspection of the project site is recommended. Waste should be accumulated in appropriate containers and removed from the site regularly. If debris is accumulating at the site, the contractor should be instructed to have it removed. The Project Manager shall maintain records verifying use of a solid waste company that utilizes a licensed facility.*

19. Property management shall contract with a sanitation service for trash removal. The Property Manager shall ensure that trash removal is arranged for residents who are not physically capable of removing their household wastes to the centrally located compactor.

*The Project Manager shall maintain records verifying use of a solid waste company that utilizes a licensed facility. The Project Sponsor shall confirm that residents have been screened to determine if assistance is required for trash removal. Written records must be maintained.*

20. A spill response kit should be present on the site during construction activities and chemical storage on-site should be minimized.

*The presence of a spill response kit should be verified during site inspections.*

21. Project landscaping shall not include any species identified by the Ohio Department of Agriculture or the Ohio Department of Natural Resources as invasive in Ohio. During construction, any Ohio invasive species shall be removed from all areas disturbed by the project and measures shall be taken to eradicate any Ohio invasive species that emerge in disturbed areas.

*Neither common names nor species names of plants installed as part of project landscaping should appear on the list of invasive species found at OAC 901:5-37-01 or on ODNR’s Invasive Plants in Ohio publication (Ohio’s Invasive Plant Species) available at the ODNR Invasive Plants Publications & Links website. If these species are present or emerge in disturbed areas of the project site, the Project Sponsor should consult with ODNR, with the County Extension Service and/or with a qualified invasive species management expert to determine appropriate methods of removal and control.*
SECTION 17 - SIGNATURE OF RESPONSIBLE INDIVIDUALS

ABCAP HOUSING RENOVATIONS II, PEEBLES AND WINCHESTER,
ADAMS COUNTY, OHIO
GRANT NUMBER: N-B-19-9AA-19-0031

PREPARER CERTIFICATION OF ENVIRONMENTAL REVIEW COMPLETION:

The preparers have complied with all provisions of 24 CFR Part 58, Subpart E—Environmental Review Process: Environmental Assessments, examining alternatives to the project itself, feasible ways to modify the project to eliminate or minimize adverse impacts, and based on steps (a) through (f) found in the regulations, determined the following:

1. Is the project in compliance with applicable laws and regulations? ☒ Yes ☐ No
2. Is an EIS required? ☐ Yes ☒ No
3. A finding of No Significant Impact (FONSI) can be made. Project will not significantly affect the quality of the human environment. ☒ Yes ☐ No

Prepared by:

Signature
Name  Jennifer Miller
Title  Senior Environmental Scientist
Organization  Crawford, Murphy & Tilly, Inc.

Date  March 18, 2020