

**Environmental Assessment  
Determinations and Compliance Findings  
for HUD-assisted Projects  
24 CFR Part 58**

**Project Information**

**Project Name:** DO-Hall-Business-Center-Expansion

**HEROS Number:** 900000010375579

**Responsible Entity (RE):** Guernsey County, Cambridge OH,

**RE Preparer:** William Arnett

**State / Local Identifier:**

**Certifying Officer:** Jack Marlin

**Grant Recipient (if different than Responsible Entity):** Appalachian Partnership, Inc.

**Point of Contact:** Dr. Glenda Bumgarner

**Consultant (if applicable):** Ohio Mid-Eastern Governments Association

**Point of Contact:** Kevin Buettner

**Project Location:** 1125 Utica Dr, Cambridge, OH 43725

**Additional Location Information:**

The project is on 44 acres immediately west of 1125 Utica Drive (Utica Way). The project is bounded on the south by CR 433, Reitler Road, on the west and north by the City of Cambridge Corporation Line, and to the east by DK Eubanks, LLC (dba Plastic Compounders) and American Energy-Utica, LLC (dba Ascent Resources).

**Direct Comments to:** [ewright@omegadistrict.org](mailto:ewright@omegadistrict.org)

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

The proposed project is on a 44-acre lot, which is part of the DO Hall Business Center. The proposed project will have 23.91 acres of disturbed earth, as determined by initial engineering judgment. This project is an extension of Utica Way approximately 1,300 ft west of the intersection of Utica Way and Gander Road. The project consists of resurfacing 500 feet of existing roadway and construction of a new 1,700 ft roadway which will serve future light industrial buildings. Groundwork will include trenching and backfill for underground utilities that may include: storm sewer, natural gas, sanitary sewer, water lines, electric, and telecommunications. The portion of the site being developed (Utica Way extension and related right of way) will need to be stripped of vegetation and the vegetation disposed of. The site will require areas of cut and fill to construct to subgrade and will be relatively flat. The project site is currently owned by the Community Industrial Association, administered by the Guernsey County Community Improvement Corporation. No acquisition will be needed for this project.

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

Guernsey County is located in east central Ohio, and is considered to be one of the 32 Appalachian counties. Topographically, Guernsey County consists of rolling hills typical of the foothills of the Appalachian Mountains. This region has historically hosted an economy based on mining and resource extraction, as well as manufacturing. Over the past 20 years, the regional economy has faced declines as large manufacturers shuttered or moved operations. Remaining industries have faced challenges in expanding operations, due to the lack of available sites. Most of the flatter land has already been developed, is contained within state parks/wildlife areas, or is not suitable for large scale industrial development due to the presence of abandoned coal mines underneath. This project will prepare approximately 24 acres (of a 44 acre lot) for industrial development adjacent to an existing industrial park. This industrial park is located just south of the City of Cambridge's corporation limit and northwest of the Village of Byesville, the two largest population centers in the county. The project is less than two miles southwest of the interchange of Interstates 70 & 77 which connects the region directly to the markets on the East Coast, Great Lakes, and the southeastern US. The growth of logistics and light manufacturing in neighboring counties (supporting the growing Columbus metropolitan area) has increased the need for available sites along this heavily traveled corridor. The area is also home to the developing Utica/Marcellus shale formation, producing significant amounts of oil and natural gas for the US energy sector.

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

The project site is currently undeveloped. Immediately east of the project location are the first development phases of the DO Hall Business Center. Plastic Compounders and Ascent Resources are situated along Utica Way. Further east are hubs for Detroit Diesel, Ridge Tool, and FedEx. Colgate-Palmolive has a factory less than a mile southeast of the project location, on the east side of Cambridge Municipal Airport. The project location features gently rolling hills and a lack of major water bodies or floodplains. The land needs minimal work to make suitable locations ready for new industrial development. The extension of Utica Way and earthwork to cut and fill a few low lying (non-wetland) areas on the 44 acres will provide additional opportunities for Guernsey County to attract and retain new businesses.

**Maps, photographs, and other documentation of project location and description:**

**Determination:**

✓	Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.13] The project will not result in a significant impact on the quality of human environment
	Finding of Significant Impact

**Approval Documents:**

[EA\\_Certification\\_1\\_31\\_24.pdf](#)

**7015.15 certified by Certifying Officer on:**

**7015.16 certified by Authorizing Officer on:**

**Funding Information**

Grant / Project Identification Number	HUD Program	Program Name	Funding Amount
B-22-CP-OH-0729	Other	Congressionally Directed Spending	\$2,100,000.00

**Estimated Total HUD Funded, Assisted or Insured Amount:** \$2,100,000.00

**Estimated Total Project Cost [24 CFR 58.2 (a) (5)]:** \$4,150,300.00

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

<b>Compliance Factors:</b> Statutes, Executive Orders, and Regulations listed at 24 CFR §50.4, §58.5, and §58.6	Are formal compliance steps or mitigation required?	Compliance determination (See Appendix A for source determinations)
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.6</b>		
<b>Airport Hazards</b> Clear Zones and Accident Potential Zones; 24 CFR Part 51 Subpart D	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.
<b>Coastal Barrier Resources Act</b> Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.
<b>Flood Insurance</b> Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 &amp; § 58.5</b>		
<b>Air Quality</b> Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act.
<b>Coastal Zone Management Act</b> Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The

		project is in compliance with the Coastal Zone Management Act.
<b>Contamination and Toxic Substances</b> 24 CFR 50.3(i) & 58.5(i)(2)]	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Site contamination was evaluated as follows: None of the above. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.
<b>Endangered Species Act</b> Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	This project May Affect, but is Not Likely to Adversely Affect, listed species, and informal consultation was conducted. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act.
<b>Explosive and Flammable Hazards</b> Above-Ground Tanks)[24 CFR Part 51 Subpart C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.
<b>Farmlands Protection</b> Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.
<b>Floodplain Management</b> Executive Order 11988, particularly section 2(a); 24 CFR Part 55	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.
<b>Historic Preservation</b> National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106.
<b>Noise Abatement and Control</b> Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation.
<b>Sole Source Aquifers</b> Safe Drinking Water Act of 1974, as	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is not located on a sole source aquifer area. The project is in

amended, particularly section 1424(e); 40 CFR Part 149		compliance with Sole Source Aquifer requirements.
<b>Wetlands Protection</b> Executive Order 11990, particularly sections 2 and 5	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project will not impact on- or off-site wetlands. The project has been designed to avoid wetland impacts by restricting the location of the road and development areas. The project is in compliance with Executive Order 11990.
<b>Wild and Scenic Rivers Act</b> Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.
<b>HUD HOUSING ENVIRONMENTAL STANDARDS</b>		
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b> Executive Order 12898	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. The land is undeveloped and is located outside of a Historically Disadvantaged or Area of Persistent Poverty Census Tract. It is not a part of the Opportunity Zone (immediately south).

**Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27]**

**Impact Codes:** An impact code from the following list has been used to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement.

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
<b>LAND DEVELOPMENT</b>			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	The development of the DO Hall Business Park is aligned with the plans of the City of Cambridge, as well as the larger Guernsey County community. This development is using suitable land that is removed from large residential areas, and is in close	None Needed

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		proximity to the existing highways to reduce impacts from increased traffic. The development will increase the number of available jobs in the region and reduce the need for people to travel outside the city/county for employment. Adjacent land is already used for light industrial development. Developers will be encouraged to use native plants in their landscaping to further reduce impacts.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	Soils in the project area are suited for development. Land immediately adjacent to the project site is already developed and there have been no reports of issues with slope, erosion, drainage, or storm water runoff.	None Needed
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	The project location is in an area zoned for light industrial development. Residences are not forecast to be located within this zone, mitigating impacts from site generated noise.	None Needed
<b>SOCIOECONOMIC</b>			
Employment and Income Patterns	1	Development of the project site will provide suitable development space for light industrial or commercial activities. This will increase the number of available jobs locally and reduce the need for people to travel outside of the city/county for employment opportunities.	None needed
Demographic Character Changes / Displacement	2	The development of the DO Hall Business Park is aligned with the plans of the City of Cambridge, as well as the larger Guernsey County community. This development is using suitable land that is removed from large residential areas, and is in close proximity to the existing highways to reduce impacts from increased traffic. The development will increase the number of available jobs in the region and reduce the need for people to travel outside the city/county for employment. Adjacent land is already used for light industrial development.	None needed

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Environmental Justice EA Factor	1	Development of the project site will provide suitable development space for light industrial or commercial activities. This will increase the number of available jobs locally and reduce the need for people to travel outside of the city/county for employment opportunities. This development is using suitable land that is removed from large residential areas, and is in close proximity to the existing highways to reduce impacts from increased traffic.	None needed
<b>COMMUNITY FACILITIES AND SERVICES</b>			
Educational and Cultural Facilities (Access and Capacity)	2	Development at the project site will not have a meaningful impact on educational or cultural facilities. New jobs created by development will likely be filled by local city or county residents. Net immigration into the city or county is considered to be negligible. The site is located away from school campuses.	None needed
Commercial Facilities (Access and Proximity)	2	Development at the project site will not have a meaningful impact on commercial facilities. Existing facilities north and southeast of the project area (in Cambridge and Byesville) retain capacity and truck/commuter traffic growth is not expected to strain capacity.	None needed
Health Care / Social Services (Access and Capacity)	2	Development at the project site will not have a meaningful impact on medical facilities or social services. Existing facilities north and of the project area (in Cambridge) retain capacity and any population growth is not expected to strain capacity. Taxes paid by developers/tenants will increase the amount of potential funding for social services.	None needed
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	Development at the project site will not have a meaningful impact on solid waste and/or recycling services. Three solid waste firms service the Cambridge/Guernsey County area, and all have capacity for increased development.	None needed



<b>Environmental Assessment Factor</b>	<b>Impact Code</b>	<b>Impact Evaluation</b>	<b>Mitigation</b>
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The City of Cambridge has excess capacity and is able to provide the site with water and wastewater supply.	None needed
Water Supply (Feasibility and Capacity)	2	The City of Cambridge has excess capacity and is able to provide the site with water and wastewater supply.	None needed
Public Safety - Police, Fire and Emergency Medical	2	Development at the site is not expected to strain the resources of the Public Safety Department of Cambridge. Development is forecast to be single level warehousing (or similar buildings). Existing equipment is available to protect structures such as these.	None needed
Parks, Open Space and Recreation (Access and Capacity)	2	The project location is in an area zoned for light industrial development. Residences are not forecast to be located within this zone. The land is privately owned and is not currently used for recreation. Numerous parks in Cambridge or Byesville would be available by workers at this site.	None needed
Transportation and Accessibility (Access and Capacity)	2	The development of the DO Hall Business Park is aligned with the plans of the City of Cambridge, as well as the larger Guernsey County community. This development is using suitable land that is removed from large residential areas, and is in close proximity to the existing highways to reduce impacts from increased traffic.	None needed
<b>NATURAL FEATURES</b>			
Unique Natural Features /Water Resources	2	There are no unique natural features at the project site. Water resources for the City of Cambridge and Village of Byesville are not located in or near the site. Existing streams will be undisturbed by the development of this project area.	None needed.
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	Vegetation will be removed during construction, and replanted once construction is complete. Developers will be encouraged to plant native species on their sites, to reduce impacts to the wildlife of the area. Wildlife may be disrupted during construction due to vegetation removal, but	None needed

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		in areas adjacent to the site, wildlife returned after construction.	
Other Factors 1			
Other Factors 2			
<b>CLIMATE AND ENERGY</b>			
Climate Change	2	The development of the project site is not expected to have an impact on climate change, due to the size of the project area and minimal development footprint. Developers will be encouraged to use native plantings in their landscaping to reduce their reliance on artificial chemicals or increased water usage for irrigation.	None needed
Energy Efficiency	2	The development of the project site is not expected to have an impact on energy efficiency, due to the size of the project area and minimal development footprint. Developers will be encouraged to use native plantings in their landscaping to reduce their reliance on water usage for irrigation. New construction in the area is encouraged to use energy efficient systems (HVAC, lighting, etc.). LEED accredited personnel are available in the region to assist developers with meeting energy efficiency standards.	None needed.

**Supporting documentation**

[16050 FINAL Phase I 11\\_27\\_2023.pdf](#)

[HistoricallyDisadvantaged\(1\).pdf](#)

[Utility\\_email.pdf](#)

[Wetlands\\_HULL\\_2016.pdf](#)

[Threatened Endangered HULL\\_2017\(1\).pdf](#)

[ODNR Comments\(1\).pdf](#)

[DOW\\_email\\_12-11-23\(1\).pdf](#)

[Scott 2023 Survey Recommended for IBAT and NLEB - NETO 2024\\_0018353\(1\).pdf](#)

[DO Hall Stage 1 Plans.pdf](#)

**Additional Studies Performed:**

Surface Water Delineation Report, January 2024 Phase I Environmental Site Assessment, November 2023

[16050 FINAL Phase I 11\\_27\\_2023\(1\).pdf](#)

[16050 DO Hall SW Delin Report.pdf](#)

**Field Inspection [Optional]:** Date and completed  
by:

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

Ohio Dept. of Natural Resources, Mike Pettigrew & Eileen Wyza, and ODNR  
Wild/Scenic Rivers Map US Fish & Wildlife Service, Scott Hicks & the USFWS Costal  
Barrier Resource System/National Wetlands Inventory Cambridge Engineer's Office,  
Nick Cunningham, P.E. Google Earth & ESRI (proximity mapping) US EPA Green Book  
US EPA Sole Source Aquifer Mapping Tool

**List of Permits Obtained:**

**Public Outreach [24 CFR 58.43]:**

To date, there has not been any public outreach on this project. A public meeting will be scheduled during the review process to allow for public comment. Due to the existing light industrial development and current ownership of the site by the Guernsey County CIC, it is reasonable for the community to expect a second phase of development at the business park. Regardless, the county wants the input of the community to ensure there is fair and equitable opportunity for all members of the community to express their opinions both for and/or against the project. All comments will be documented and addressed.

**Cumulative Impact Analysis [24 CFR 58.32]:**

The proposed project will have minimal impacts on the surrounding environment. Many of the potential impacts are potentially positive and the one potentially negative impact (endangered species) is able to be mitigated by following guidance given by the US Fish and Wildlife Service. The access road has been adjusted to avoid impacts to potential wetland areas within the larger project area. Utilities will also be brought into the project area utilizing the roadway's right of way. Noise pollution would be present during construction, but would abate immediately thereafter. There are no social justice impacts forecast due to the rural nature of the surrounding area.

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

A no-build option was considered. Guernsey County faces a shortage of suitable land for development. Due to the existing light industrial development to the east of the project area, the location of the project were considered preferable.

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

A no-build option was considered. Guernsey County faces a shortage of suitable land for development. Due to the existing light industrial development to the east of the project area, the location of the project were considered preferable.

**Summary of Findings and Conclusions:**

After analyzing the project area, it is determined there would be no substantial impact to the area. Caution will be taken to ensure all mitigation actions are taken to reduce any impact on potential endangered species in the area. Only necessary trees will be removed, and the work will be done between October and March to comply with the guidance from the US Fish and Wildlife Service. All other impacts are temporary in nature, or potentially beneficial to the surrounding community (new jobs, increased tax revenue for social services, etc.).

**Mitigation Measures and Conditions [CFR 1505.2(c)]:**

Summarized below are all mitigation measures adopted by the Responsible Entity to reduce, avoid or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure or Condition	Comments on Completed Measures	Mitigation Plan	Complete
Endangered Species Act	Clearing trees between October and March to avoid disturbing bat habitats.	N/A	Trees needing cut will only be cut between October and March, in accordance with USFWS guidance.	
Conformance with Plans /	None Needed	N/A		

Compatible Land Use and Zoning / Scale and Urban Design				
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	None Needed	N/A		
Hazards and Nuisances including Site Safety and Site-Generated Noise	None Needed	N/A		
Employment and Income Patterns	None needed	N/A		
Demographic Character Changes / Displacement	None needed	N/A		
Environmental Justice EA Factor	None needed	N/A		
Educational and Cultural Facilities (Access and Capacity)	None needed	N/A		
Commercial Facilities (Access and Proximity)	None needed	N/A		
Health Care / Social Services (Access and Capacity)	None needed	N/A		
Solid Waste Disposal and Recycling	None needed	N/A		

(Feasibility and Capacity)				
Waste Water and Sanitary Sewers (Feasibility and Capacity)	None needed	N/A		
Water Supply (Feasibility and Capacity)	None needed	N/A		
Public Safety - Police, Fire and Emergency Medical	None needed	N/A		
Parks, Open Space and Recreation (Access and Capacity)	None needed	N/A		
Transportation and Accessibility (Access and Capacity)	None needed	N/A		
Unique Natural Features /Water Resources	None needed.	N/A		
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	None needed	N/A		
Climate Change	None needed	N/A		
Energy Efficiency	None needed.	N/A		

**Project Mitigation Plan**

William Arnett, Director of the Guernsey County Community Improvement Corporation will instruct any and all contractors to avoid cutting down any trees between March and October. His office is within a mile of the proposed project site, allowing for close monitoring of progress throughout the project timeline.

**Supporting documentation on completed measures**

## APPENDIX A: Related Federal Laws and Authorities

### Airport Hazards

General policy	Legislation	Regulation
It is HUD's policy to apply standards to prevent incompatible development around civil airports and military airfields.		24 CFR Part 51 Subpart D

1. To ensure compatible land use development, you must determine your site's proximity to civil and military airports. Is your project within 15,000 feet of a military airport or 2,500 feet of a civilian airport?

No

Based on the response, the review is in compliance with this section. Document and upload the map showing that the site is not within the applicable distances to a military or civilian airport below

Yes

### Screen Summary

#### Compliance Determination

The project site is not within 15,000 feet of a military airport or 2,500 feet of a civilian airport. The project is in compliance with Airport Hazards requirements.

#### Supporting documentation

[AirportProximity.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No



### Coastal Barrier Resources

General requirements	Legislation	Regulation
HUD financial assistance may not be used for most activities in units of the Coastal Barrier Resources System (CBRS). See 16 USC 3504 for limitations on federal expenditures affecting the CBRS.	Coastal Barrier Resources Act (CBRA) of 1982, as amended by the Coastal Barrier Improvement Act of 1990 (16 USC 3501)	

**1. Is the project located in a CBRS Unit?**

No

Document and upload map and documentation below.

Yes

#### Compliance Determination

This project is not located in a CBRS Unit. Therefore, this project has no potential to impact a CBRS Unit and is in compliance with the Coastal Barrier Resources Act.

#### Supporting documentation

[CBRS.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

## Flood Insurance

General requirements	Legislation	Regulation
Certain types of federal financial assistance may not be used in floodplains unless the community participates in National Flood Insurance Program and flood insurance is both obtained and maintained.	Flood Disaster Protection Act of 1973 as amended (42 USC 4001-4128)	24 CFR 50.4(b)(1) and 24 CFR 58.6(a) and (b); 24 CFR 55.1(b).

**1. Does this project involve financial assistance for construction, rehabilitation, or acquisition of a mobile home, building, or insurable personal property?**

- ✓ No. This project does not require flood insurance or is excepted from flood insurance.

Based on the response, the review is in compliance with this section.

Yes

**4. While flood insurance is not mandatory for this project, HUD strongly recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). Will flood insurance be required as a mitigation measure or condition?**

Yes

- ✓ No

### Screen Summary

#### **Compliance Determination**

Based on the project description the project includes no activities that would require further evaluation under this section. The project does not require flood insurance or is excepted from flood insurance. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the National Flood Insurance Program (NFIP). The project is in compliance with Flood Insurance requirements.

#### **Supporting documentation**

[Floodplain.pdf](#)

#### **Are formal compliance steps or mitigation required?**

Yes

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Expansion

Cambridge, OH

900000010375579

✓ No

### Air Quality

General requirements	Legislation	Regulation
The Clean Air Act is administered by the U.S. Environmental Protection Agency (EPA), which sets national standards on ambient pollutants. In addition, the Clean Air Act is administered by States, which must develop State Implementation Plans (SIPs) to regulate their state air quality. Projects funded by HUD must demonstrate that they conform to the appropriate SIP.	Clean Air Act (42 USC 7401 et seq.) as amended particularly Section 176(c) and (d) (42 USC 7506(c) and (d))	40 CFR Parts 6, 51 and 93

**1. Does your project include new construction or conversion of land use facilitating the development of public, commercial, or industrial facilities OR five or more dwelling units?**

Yes

No

#### Air Quality Attainment Status of Project’s County or Air Quality Management District

**2. Is your project’s air quality management district or county in non-attainment or maintenance status for any criteria pollutants?**

No, project’s county or air quality management district is in attainment status for all criteria pollutants.

Yes, project’s management district or county is in non-attainment or maintenance status for the following criteria pollutants (check all that apply):

#### Screen Summary

##### **Compliance Determination**

The project's county or air quality management district is in attainment status for all criteria pollutants. The project is in compliance with the Clean Air Act.

##### **Supporting documentation**

[AirQuality.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

### Coastal Zone Management Act

General requirements	Legislation	Regulation
Federal assistance to applicant agencies for activities affecting any coastal use or resource is granted only when such activities are consistent with federally approved State Coastal Zone Management Act Plans.	Coastal Zone Management Act (16 USC 1451-1464), particularly section 307(c) and (d) (16 USC 1456(c) and (d))	15 CFR Part 930

**1. Is the project located in, or does it affect, a Coastal Zone as defined in your state Coastal Management Plan?**

Yes

No

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

**Screen Summary**

**Compliance Determination**

This project is not located in or does not affect a Coastal Zone as defined in the state Coastal Management Plan. The project is in compliance with the Coastal Zone Management Act.

**Supporting documentation**

[Coastal.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

## Contamination and Toxic Substances

General requirements	Legislation	Regulations
It is HUD policy that all properties that are being proposed for use in HUD programs be free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances, where a hazard could affect the health and safety of the occupants or conflict with the intended utilization of the property.		24 CFR 58.5(i)(2) 24 CFR 50.3(i)

**1. How was site contamination evaluated? Select all that apply. Document and upload documentation and reports and evaluation explanation of site contamination below.**

- American Society for Testing and Materials (ASTM) Phase I Environmental Site Assessment (ESA)
- ASTM Phase II ESA
- Remediation or clean-up plan
- ASTM Vapor Encroachment Screening

None of the Above

**2. Were any on-site or nearby toxic, hazardous, or radioactive substances found that could affect the health and safety of project occupants or conflict with the intended use of the property? (Were any recognized environmental conditions or RECs identified in a Phase I ESA and confirmed in a Phase II ESA?)**

No

**Explain:**

The project location is undeveloped land.

Based on the response, the review is in compliance with this section.

Yes

### Screen Summary

#### **Compliance Determination**

Site contamination was evaluated as follows: None of the above. On-site or nearby toxic, hazardous, or radioactive substances that could affect the health and safety of

project occupants or conflict with the intended use of the property were not found. The project is in compliance with contamination and toxic substances requirements.

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

✓ No



**Endangered Species**

General requirements	ESA Legislation	Regulations
Section 7 of the Endangered Species Act (ESA) mandates that federal agencies ensure that actions that they authorize, fund, or carry out shall not jeopardize the continued existence of federally listed plants and animals or result in the adverse modification or destruction of designated critical habitat. Where their actions may affect resources protected by the ESA, agencies must consult with the Fish and Wildlife Service and/or the National Marine Fisheries Service (“FWS” and “NMFS” or “the Services”).	The Endangered Species Act of 1973 (16 U.S.C. 1531 <i>et seq.</i> ); particularly section 7 (16 USC 1536).	50 CFR Part 402

**1. Does the project involve any activities that have the potential to affect species or habitats?**

No, the project will have No Effect due to the nature of the activities involved in the project.

No, the project will have No Effect based on a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office

- ✓ Yes, the activities involved in the project have the potential to affect species and/or habitats.

**2. Are federally listed species or designated critical habitats present in the action area?**

No, the project will have No Effect due to the absence of federally listed species and designated critical habitat

- ✓ Yes, there are federally listed species or designated critical habitats present in the action area.

**3. What effects, if any, will your project have on federally listed species or designated critical habitat?**

No Effect: Based on the specifics of both the project and any federally listed species in the action area, you have determined that the project will have absolutely no effect on listed species or critical habitat. in the action area.

- ✓ May Affect, Not Likely to Adversely Affect: Any effects that the project may have on federally listed species or critical habitats would be beneficial, discountable, or insignificant.

Likely to Adversely Affect: The project may have negative effects on one or more listed species or critical habitat.

**4. Informal Consultation is required**

Section 7 of ESA (16 USC. 1536) mandates consultation to resolve potential impacts to endangered and threatened species and critical habitats. If a HUD-assisted project may affect any federally listed endangered or threatened species or critical habitat, then compliance is required with Section 7. See 50 CFR Part 402 Subpart B Consultation Procedures.

**Did the Service(s) concur with the finding that the project is Not Likely to Adversely Affect?**

- ✓ Yes, the Service(s) concurred with the finding.

Based on the response, the review is in compliance with this section. Document and upload the following below:

- (1) A biological evaluation or equivalent document
- (2) Concurrence(s) from FWS and/or NMFS
- (3) Any other documentation of informal consultation

Exception: If finding was made based on procedures provided by a letter of understanding, memorandum of agreement, programmatic agreement, or checklist provided by local HUD office, provide whatever documentation is mandated by that agreement.

No, the Service(s) did not concur with the finding.

**6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to mitigate for the impact or effect, including the timeline for implementation. This information will be automatically included in the Mitigation summary for the environmental review. If negative effects cannot be mitigated, cancel the project using the button at the bottom of this screen.**

✓ Mitigation as follows will be implemented:

Clearing trees between October and March to avoid disturbing bat habitats.

No mitigation is necessary.

#### **Screen Summary**

##### **Compliance Determination**

This project May Affect, but is Not Likely to Adversely Affect, listed species, and informal consultation was conducted. With mitigation, identified in the mitigation section of this review, the project will be in compliance with the Endangered Species Act.

##### **Supporting documentation**

[USFWS\\_updateJan2024.pdf](#)

[DOW\\_email\\_12-11-23.pdf](#)

[ODNR Comments.pdf](#)

[Threatened\\_Endangered\\_HULL\\_2017.pdf](#)

[Scott 2023 Survey Recommended for IBAT and NLEB - NETO 2024\\_0018353.pdf](#)

**Are formal compliance steps or mitigation required?**

✓ Yes

No

### Explosive and Flammable Hazards

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C

1. Is the proposed HUD-assisted project itself the development of a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

Yes

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

Based on the response, the review is in compliance with this section.

Yes

### Screen Summary

#### Compliance Determination

Based on the project description the project includes no activities that would require further evaluation under this section. The project is in compliance with explosive and flammable hazard requirements.

#### Supporting documentation

Are formal compliance steps or mitigation required?

Yes

No

**Farmlands Protection**

General requirements	Legislation	Regulation
The Farmland Protection Policy Act (FPPA) discourages federal activities that would convert farmland to nonagricultural purposes.	Farmland Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.)	<a href="#">7 CFR Part 658</a>

**1. Does your project include any activities, including new construction, acquisition of undeveloped land or conversion, that could convert agricultural land to a non-agricultural use?**

Yes

No

If your project includes new construction, acquisition of undeveloped land or conversion, explain how you determined that agricultural land would not be converted:

The land is currently undeveloped and is not used for agriculture.

Based on the response, the review is in compliance with this section. Document and upload all documents used to make your determination below.

**Screen Summary**

**Compliance Determination**

This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. The project is in compliance with the Farmland Protection Policy Act.

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

No

## Floodplain Management

General Requirements	Legislation	Regulation
Executive Order 11988, Floodplain Management, requires federal activities to avoid impacts to floodplains and to avoid direct and indirect support of floodplain development to the extent practicable.	Executive Order 11988	24 CFR 55

**1. Do any of the following exemptions apply? Select the applicable citation? [only one selection possible]**

- 55.12(c)(3)
- 55.12(c)(4)
- 55.12(c)(5)
- 55.12(c)(6)
- 55.12(c)(7)
- 55.12(c)(8)
- 55.12(c)(9)
- 55.12(c)(10)
- 55.12(c)(11)
- None of the above

**2. Upload a FEMA/FIRM map showing the site here:**

[FIRMETTE DO Hall.pdf](#)

The Federal Emergency Management Agency (FEMA) designates floodplains. The FEMA Map Service Center provides this information in the form of FEMA Flood Insurance Rate Maps (FIRMs). For projects in areas not mapped by FEMA, use **the best available information** to determine floodplain information. Include documentation, including a discussion of why this is the best available information for the site.

**Does your project occur in a floodplain?**

- No

Based on the response, the review is in compliance with this section.

Yes

**Screen Summary**

**Compliance Determination**

This project does not occur in a floodplain. The project is in compliance with Executive Order 11988.

**Supporting documentation**

**Are formal compliance steps or mitigation required?**

Yes

✓ No

**Historic Preservation**

General requirements	Legislation	Regulation
Regulations under Section 106 of the National Historic Preservation Act (NHPA) require a consultative process to identify historic properties, assess project impacts on them, and avoid, minimize, or mitigate adverse effects	Section 106 of the National Historic Preservation Act (16 U.S.C. 470f)	36 CFR 800 “Protection of Historic Properties” <a href="https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf">https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf</a>

**Threshold**

**Is Section 106 review required for your project?**

No, because the project consists solely of activities listed as exempt in a Programmatic Agreement (PA ). (See the PA Database to find applicable PAs.)

No, because the project consists solely of activities included in a No Potential to Cause Effects memo or other determination [36 CFR 800.3(a)(1)].

- ✓ Yes, because the project includes activities with potential to cause effects (direct or indirect).

**Step 1 – Initiate Consultation**

**Select all consulting parties below (check all that apply):**

- ✓ State Historic Preservation Offer (SHPO) Completed

- ✓ Advisory Council on Historic Preservation Completed

Indian Tribes, including Tribal Historic Preservation Officers (THPOs) or Native Hawaiian Organizations (NHOs)

Other Consulting Parties



**Describe the process of selecting consulting parties and initiating consultation here:**

In March of 2010, a Cultural Resources Management Investigation was completed for the entire 110 acre DO Hall Business Park, including the 24 acre section being reviewed for this project.

Document and upload all correspondence, notices and notes (including comments and objections received below).

**Was the Section 106 Lender Delegation Memo used for Section 106 consultation?**

Yes

No

**Step 2 – Identify and Evaluate Historic Properties**

- 1. Define the Area of Potential Effect (APE), either by entering the address(es) or uploading a map depicting the APE below:**

**In the chart below, list historic properties identified and evaluated in the APE. Every historic property that may be affected by the project should be included in the chart.**

Upload the documentation (survey forms, Register nominations, concurrence(s) and/or objection(s), notes, and photos) that justify your National Register Status determination below.

Address / Location / District	National Register Status	SHPO Concurrence	Sensitive Information
----------------------------------	-----------------------------	------------------	--------------------------

**Additional Notes:**

- 2. Was a survey of historic buildings and/or archeological sites done as part of the project?**

✓ Yes

Document and upload surveys and report(s) below.  
For Archeological surveys, refer to HP Fact Sheet #6, Guidance on Archeological Investigations in HUD Projects.

**Additional Notes:**

No

***Step 3 –Assess Effects of the Project on Historic Properties***

Only properties that are listed on or eligible for the National Register of Historic Places receive further consideration under Section 106. Assess the effect(s) of the project by applying the Criteria of Adverse Effect. (36 CFR 800.5)] Consider direct and indirect effects as applicable as per guidance on direct and indirect effects.

**Choose one of the findings below - No Historic Properties Affected, No Adverse Effect, or Adverse Effect; and seek concurrence from consulting parties.**

✓ No Historic Properties Affected

Based on the response, the review is in compliance with this section. Document and upload concurrence(s) or objection(s) below.

**Document reason for finding:**

✓ No historic properties present.

Historic properties present, but project will have no effect upon them.

No Adverse Effect

Adverse Effect

**Screen Summary**

**Compliance Determination**

Based on Section 106 consultation there are No Historic Properties Affected because there are no historic properties present. The project is in compliance with Section 106.

**Supporting documentation**

[cultural resources\\_weller\\_2010.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Noise Abatement and Control

General requirements	Legislation	Regulation
HUD's noise regulations protect residential properties from excessive noise exposure. HUD encourages mitigation as appropriate.	Noise Control Act of 1972  General Services Administration Federal Management Circular 75-2: "Compatible Land Uses at Federal Airfields"	Title 24 CFR 51 Subpart B

**1. What activities does your project involve? Check all that apply:**

New construction for residential use

Rehabilitation of an existing residential property

A research demonstration project which does not result in new construction or reconstruction

An interstate land sales registration

Any timely emergency assistance under disaster assistance provision or appropriations which are provided to save lives, protect property, protect public health and safety, remove debris and wreckage, or assistance that has the effect of restoring facilities substantially as they existed prior to the disaster

None of the above

### **Screen Summary**

#### **Compliance Determination**

Based on the project description, this project includes no activities that would require further evaluation under HUD's noise regulation. The project is in compliance with HUD's Noise regulation.

#### **Supporting documentation**

#### **Are formal compliance steps or mitigation required?**

Yes

DO-Hall-Business-Center-  
Expansion

Cambridge, OH

900000010375579

✓ No

### Sole Source Aquifers

General requirements	Legislation	Regulation
<b>The Safe Drinking Water Act of 1974 protects drinking water systems which are the sole or principal drinking water source for an area and which, if contaminated, would create a significant hazard to public health.</b>	Safe Drinking Water Act of 1974 (42 U.S.C. 201, 300f et seq., and 21 U.S.C. 349)	40 CFR Part 149

1. Does the project consist solely of acquisition, leasing, or rehabilitation of an existing building(s)?

Yes

✓ No

2. Is the project located on a sole source aquifer (SSA)?

A sole source aquifer is defined as an aquifer that supplies at least 50 percent of the drinking water consumed in the area overlying the aquifer. This includes streamflow source areas, which are upstream areas of losing streams that flow into the recharge area.

✓ No

Based on the response, the review is in compliance with this section. Document and upload documentation used to make your determination, such as a map of your project (or jurisdiction, if appropriate) in relation to the nearest SSA and its source area, below.

Yes

### Screen Summary

#### Compliance Determination

The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.

DO-Hall-Business-Center-  
Expansion

Cambridge, OH

900000010375579

**Supporting documentation**

[SSA.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

### Wetlands Protection

General requirements	Legislation	Regulation
Executive Order 11990 discourages direct or indirect support of new construction impacting wetlands wherever there is a practicable alternative. The Fish and Wildlife Service's National Wetlands Inventory can be used as a primary screening tool, but observed or known wetlands not indicated on NWI maps must also be processed. Off-site impacts that result in draining, impounding, or destroying wetlands must also be processed.	Executive Order 11990	24 CFR 55.20 can be used for general guidance regarding the 8 Step Process.

**1. Does this project involve new construction as defined in Executive Order 11990, expansion of a building's footprint, or ground disturbance? The term "new construction" shall include draining, dredging, channelizing, filling, diking, impounding, and related activities and any structures or facilities begun or authorized after the effective date of the Order**

No

Yes

**2. Will the new construction or other ground disturbance impact an on- or off-site wetland? The term "wetlands" means those areas that are inundated by surface or ground water with a frequency sufficient to support, and under normal circumstances does or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas such as sloughs, potholes, wet meadows, river overflows, mud flats, and natural ponds.**

**"Wetlands under E.O. 11990 include isolated and non-jurisdictional wetlands."**

No, a wetland will not be impacted in terms of E.O. 11990's definition of new construction.

Based on the response, the review is in compliance with this section. Document and upload a map or any other relevant documentation below which explains your determination

Yes, there is a wetland that be impacted in terms of E.O. 11990's definition of new construction.

### Screen Summary



**Compliance Determination**

The project will not impact on- or off-site wetlands. The project has been designed to avoid wetland impacts by restricting the location of the road and development areas. The project is in compliance with Executive Order 11990.

**Supporting documentation**

[WetlandMap.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

✓ No

## Wild and Scenic Rivers Act

General requirements	Legislation	Regulation
The Wild and Scenic Rivers Act provides federal protection for certain free-flowing, wild, scenic and recreational rivers designated as components or potential components of the National Wild and Scenic Rivers System (NWSRS) from the effects of construction or development.	The Wild and Scenic Rivers Act (16 U.S.C. 1271-1287), particularly section 7(b) and (c) (16 U.S.C. 1278(b) and (c))	36 CFR Part 297

### 1. Is your project within proximity of a NWSRS river?

No

Yes, the project is in proximity of a Designated Wild and Scenic River or Study Wild and Scenic River.

Yes, the project is in proximity of a Nationwide Rivers Inventory (NRI) River.

### Screen Summary

#### **Compliance Determination**

This project is not within proximity of a NWSRS river. The project is in compliance with the Wild and Scenic Rivers Act.

#### **Supporting documentation**

[WS Rivers.pdf](#)

#### **Are formal compliance steps or mitigation required?**

Yes

No

### Environmental Justice

General requirements	Legislation	Regulation
Determine if the project creates adverse environmental impacts upon a low-income or minority community. If it does, engage the community in meaningful participation about mitigating the impacts or move the project.	Executive Order 12898	

**HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.**

**1. Were any adverse environmental impacts identified in any other compliance review portion of this project's total environmental review?**

Yes

No

Based on the response, the review is in compliance with this section.

#### Screen Summary

##### **Compliance Determination**

No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. The land is undeveloped and is located outside of a Historically Disadvantaged or Area of Persistent Poverty Census Tract. It is not a part of the Opportunity Zone (immediately south).

##### **Supporting documentation**

[HistoricallyDisadvantaged.pdf](#)

**Are formal compliance steps or mitigation required?**

Yes

No

