

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

Project Information

Project Name: Brighton-Supportive-Housing

HEROS Number: 900000010437484

Start Date: 11/08/2024

Responsible Entity (RE): KENTUCKY HOUSING CORPORATION, 1231 Louisville Rd
Frankfort KY, 40601

RE Preparer: Jennifer Oberlin

State / Local Identifier:

Certifying Officer: Winston Miller

Grant Recipient (if different than Responsible Entity):

Point of Contact:

Consultant (if applicable): CMec

Point of Contact: Suzanne Arnzen

40 CFR 1506.5(b)(4): The lead agency or, where appropriate, a cooperating agency shall prepare a disclosure statement for the contractor's execution specifying that the contractor has no financial or other interest in the outcome of the action. Such statement need not include privileged or confidential trade secrets or other confidential business information.

- ✓ By checking this box, I attest that as a preparer, I have no financial or other interest in the outcome of the undertaking assessed in this environmental review.

Project Location: , Newport, KY 41071

Additional Location Information:

Within the City of Newport, Kentucky, Brighton Properties Inc. plans to build 8 single-family and duplex style houses that will contain 12 units. The specific addresses and their coordinates are as follows: 118 West 7th Street: 39.08867, -84.49592 710/712 Ann Street: 39.08834, -84.49594 722 Ann Street: 39.08813, -84.49571 730 Ann Street: 39.08793, -84.49557 732/734 Ann Street: 39.08788, -84.49553 733 Ann Street: 39.08802, -84.49524

Direct Comments to: Kentucky Housing Corporation, Attention: Winston Miller, Executive Director, 1231 Louisville Road. Frankfort, KY 40601 or via email at environmentalreview@kyhousing.org.

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

The proposed Brighton Supportive Housing project, located at scattered sites on Ann Street, Roberts St, and Brighton St, in Newport, Cambell County, Kentucky, will consist of twelve units, including 1BR, 2BR, and 3BR units. The units will be in either single-family or duplex style houses located at the vacant parcels of 118 West 7th Street,710/712 Ann Street, 722 Ann Street, 730 Ann Street, 732/734 Ann Street, and 733 Ann Street. All houses will be brick exterior cladding with a pitched roof and either single- or two-story following KHC's Minimum Design Standards for New Construction of Single-Family Dwelling Units. This configuration will accommodate its broad target population of families or individuals who are homeless or at risk of homelessness, with some units set aside specifically for veterans. The Case Manager of this project is Brighton Center, which serves Northern Kentucky with a wide range of programs and services, including meeting basic needs, adult and early childhood education, youth services, housing and financial wellness, workforce development, substance use recovery for women, and neighborhood-based programs. As such, the project will also provide a wide range of supportive services for residents. The Center's local experience serving the community indicates an urgent need for affordable housing units and additional housing assistance.

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

The proposed Brighton Supportive Housing project, located at scattered sites on Ann Street, Roberts St, and Brighton St, in Newport, Campbell County, Kentucky, will consist of twelve units, including 1BR, 2BR, and 3BR units. This configuration will accommodate its broad target population of families or individuals who are homeless or at risk of homelessness, with some units set aside specifically for veterans. In

October, November, and December 2023 Brighton Center, which serves Northern Kentucky with a wide range of programs and services, received 21 calls from individuals who needed help with finding shelter and 45 individuals who requested assistance with a rental deposit so they could obtain housing. The regional United Way of Greater Cincinnati also tracks housing data and reported that from January through November 2023, they received 191 housing request calls to their emergency line from residents of Campbell County, where the project will be located. In addition, the Coordinated Entry list for Northern Kentucky indicated that as of January 10, 2024, they had 189 individuals looking for housing. This includes 146 individuals out of which 81 scored for permanent supportive housing (PSH), 29 families out of which 24 scored for PSH, and 14 veterans. There is a need for safe and affordable housing in Newport.

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

If these 12 units were not built on the vacant parcels, the areas would likely remain vacant with minimal use or improvements. It is possible that other single-family houses would be built. This Brighton Supportive Housing project configuration will accommodate its broad target population of families or individuals who are homeless or at risk of homelessness, with some units set aside specifically for veterans, which there is a need for in Newport. The Case Manager of this project, Brighton Center, serves Northern Kentucky with a wide range of programs and services, including meeting basic needs, adult and early childhood education, youth services, housing and financial wellness, workforce development, substance use recovery for women, and neighborhood-based programs. These and other health-based, safety, and educational resources are readily available throughout Newport and surrounding counties. Without affordable housing being constructed, the continued need of such housing will likely continue in the absence of the project.

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

[700 Block of Ann St site location.pdf](#)

[636 Roberts St site location.pdf](#)

[1028 Brighton St site location.pdf](#)

[Brighton Scattered - Combined Photolog - 7th and Ann St.pdf](#)

[Brighton Scattered - 1028 Brighton Ave - Photolog.pdf](#)

[Brighton Scattered - 636 Roberts St - Photolog.pdf](#)

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:

[BrightonSH_SigPage_Signed.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
tbd	Community Planning and Development (CPD)	HOME Program	\$4,026,014.00

Estimated Total HUD Funded, Assisted or Insured Amount: \$4,026,014.00

Estimated Total Project Cost [24 CFR 58.2 (a) (5)]: \$4,600,000.00

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

Compliance Factors: 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)
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.6		
Airport Hazards 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 nearest airports are the Cincinnati/Northern Kentucky International Airport which is 8.27 miles (43,665 feet) from the nearest edge of the property and Lunken Airport which is 3.40 miles (17,952 feet). Both airports are outside of the 15,000-foot proximity to both civilian and military airports.

		The project is in compliance with Airport Hazards requirements.
Coastal Barrier Resources Act 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 located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.
Flood Insurance 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	The structure or insurable properties are not located in a FEMA-designated Special Flood Hazard Areas. All properties are on FEMA FIRM Panel 21037C0028F for Newport, Kentucky (Campbell County). Two revalidations for FEMA FIRM maps exist (20-04-0005V-210039 and 20-04-0005V-210041). These Revalidations are attached. Neither revalidation files are associated with the subject properties. 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.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §50.4 & § 58.5		
Air Quality 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 non-attainment status for the following: Sulfur dioxide, Ozone. This project does not exceed de minimis emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.
Coastal Zone Management Act Coastal Zone Management Act, sections 307(c) & (d)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.
Contamination and Toxic Substances 24 CFR 50.3(i) & 58.5(i)(2)]	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. No RECs were found onsite or

		<p>nearby for the parcels of land at 1028 Brighton St., 710-712 Ann St., 722-734 Ann St., and 733 Ann St. At 636 Roberts St., a historic auto filling station was identified up gradient from site. Due to the use and storage of petroleum products and other hazardous chemicals in filling station / auto repair operations, and the potential for spills / releases to the environment, a Phase II was completed by Specialized Environmental Sampling on January 20, 2025. The Phase II did not find any toxics on the subsurface and the REC was not confirmed in the Phase II ESA. No further mitigation is needed. On-site or nearby toxic, hazardous, or radioactive substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. Radon analysis indicated consideration of radon will occur following construction. If elevated radon is found, the property will be mitigated in accordance with current NRPP standards and post mitigation testing will occur to document radon is acceptable. Adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. A passive radon reduction venting system will be required in all units. Prior to occupancy all units will be tested for radon by a professional certified to meet American National Standards Institute/ American Association of Radon Scientists and Technologists (ANSI/AARST) radon testing for single-family buildings. If testing shows 4 .0pCi/L or more, mitigation measures shall be completed according to the most current version of American National Standards</p>
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		<p>Institute/American Association of Radon Scientists and Technologists CCAH Reducing Radon in New Construction of 1 & 2 Family Dwellings and Townhouses (ANSI/AARST CCAH). Mitigation measures must be installed by a professional certified for radon mitigation.</p>
<p>Endangered Species Act Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project May Affect, but is Not Likely to Adversely Affect, listed species, and informal consultation was conducted. The FWS concurred with the determinations that "no effect" or "not likely to adversely effect" for the endangered species at the project locations in communication dated 2/12/2025. Additionally, the FWS stated, "There is no requirement to request concurrence with "no effect" determinations; however, the KFO acknowledges these determinations and has no additional comments or concerns regarding these species. The KFO has also evaluated the "not likely to adversely affect" determinations and has no further comments on these species. The consistency letters generated by the determination keys serve as documentation of your consideration of listed species and critical habitat for the proposed projects and should be retained for your records." This project is in compliance with the Endangered Species Act without mitigation.</p>
<p>Explosive and Flammable Hazards Above-Ground Tanks)[24 CFR Part 51 Subpart C</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. A tank was noted during site reconnaissance and utilizing aerial photography at "Arts Rental" and "River City Metals Recycling". Both sites are within one mile of the subject properties. Per the attached backup, the Separation Distance from the project from both sites is acceptable. The</p>

		<p>project is in compliance with explosive and flammable hazard requirements.</p>
<p>Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>This project does not include any activities that could potentially convert agricultural land to a non-agricultural use. All project sites are in Urban Development per the U.S. Census Bureau Map. See attached. Secondly, none of the site contain Prime Farmland per the USDA Soil Surveys attached. Lastly, per the Phase I ESA, these properties have been developed as single-family residences for over 50 years and were not found to be forestland, pastureland, or cropland. The project is in compliance with the Farmland Protection Policy Act.</p>
<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>For the proposed construction at 1028 Brighton Street, this address falls within the FFRMS floodplain per the FVA; however, this site is landward of an accredited levee, which is shown in the National Flood Hazard Layer FIRMette for Newport, City of Campbell County, 210039. Within the HUD guidance on unique floodplain areas on FEMA maps, "HUD will accept the protection of an accredited levee (marked as Zone X "Area with reduced flood risk due to levee") and consider the Federal Flood Risk Management Standard (FFRMS) floodplain behind accredited levees to be limited to areas defined using the 0.2 Percent-Annual-Chance Flood Approach (PFA) or the Freeboard Value Approach (FVA) using the 1 percent annual chance floodplain landward of the levee." Additionally, it is noted that, "this approach does not align with the approach used by the Federal Flood Standard Support Tool (FFSST), which may show areas protected by levee to be within the FFRMS floodplain." 1028 Brighton Street is in the shaded 'X' zone as being landward of an accredited levee. And thus no mitigation is needed</p>

		<p>to be implemented. The other Brighton Scattered sites at the 700 block of Ann Street and 636 Roberts Street are outside of the FFRMS floodplain. This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on Section 106 consultation there is No Adverse Effect. A certificate of Appropriateness for 1028 Brighton from the City of Newport is attached approving the design. Final project design activities must be provided to the Kentucky Heritage Council per the letter for final designation and approval. KHC notes "We conditionally concur with the determination of No Adverse Effect for the 8 undertakings at the locations listed above for the purpose of obtaining federal funding through HUD for this project: Please note that this conditional concurrence is for planning purposes only. We look forward to continued consultation on this undertaking. Once your project plans have been finalized, please forward those final plans to our office for further review. Moreover, if further locations are added to these scattered sites new housing construction projects please submit that documentation to our office as well." If any additional comments are provided by the Kentucky Heritage Council, they will be addressed. The conditional approval of "No Adverse Effect" is attached. The project is in compliance with Section 106.</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Noise Assessments were conducted. The noise level was acceptable at all sites. At the 700 block of Ann St, comprised of 118 W 7th, 710 / 712 Ann St, 722 Ann St, 730 Ann St, 732 / 734 Ann St, the noise level was 56 dB. At 636 Roberts St the noise level was 57 dB. At 1028 Brighton St the noise level</p>

		was 62 dB. See the separate noise analyses. All project sites are in compliance with HUD's Noise regulation.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	The project is not located on a sole source aquifer area. The project is in compliance with Sole Source Aquifer requirements.
Wetlands Protection 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 is in compliance with Executive Order 11990.
Wild and Scenic Rivers Act 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 nearest NWSRS is in Ohio. There are no study rivers in Kentucky (see attached). The site is not in the proximity to an NRI river body. The nearest NRI river is The Great Miami River, which is located in Ohio. See maps attached. The project is in compliance with the Wild and Scenic Rivers Act.
HUD HOUSING ENVIRONMENTAL STANDARDS		
ENVIRONMENTAL JUSTICE		
Environmental Justice 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 with the exception of radon testing which will occur following building construction. All radon impacts can appropriately be mitigated if present. The project is in compliance with Executive Order 12898.

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
LAND DEVELOPMENT			
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	Comprehensive planning and zoning regulations are available for the city of Newport. The Planning & Development Department oversees code enforcement, planning and zoning, historic preservation, and the building department. The planning and zoning commission meet at 5 pm on the 4th Tuesday of every month at the Newport Municipal Complex. Zoning maps for the city of Newport have the addresses along the 700 block of Ann St (118 W 7th, 710/712 Ann St, 722 Ann St, 730 Ann St, 732/734 Ann St, and 733 Ann St), 636 Roberts St, and 1028 Brighton St. (R3 zone not currently reflected on map, but will be updated) zoned as R-3 Residential Three: Single Family and Two Family. Surrounding properties are similarly zoned and currently used for single- and multi-family residences. 1028 Brighton zoning was finalized 2/22/2025 and the final documentation is attached. The project will be beneficial in that it is improving the urban design of Campbell County and the city of Newport and meeting affordable housing needs.	
Soil Suitability / Slope/ Erosion / Drainage and Storm Water Runoff	2	All sites are entirely comprised of a single type of soil, Urban Land. This soil type is not prime farmland and does not have a drain classification. The surrounding areas are currently used for residential purposes, so the placement of single and duplex housing is suitable, and even preferred to a vacant lot with no active operations on it. The proposed project will not create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Due to the changes to the soil and land composition and the potential water runoff impact on the environment, the project has included shrubbery within the	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		side yards with options for garden beds within the back yards. The project has implemented an erosion control plan.	
Hazards and Nuisances including Site Safety and Site-Generated Noise	2	This project involves new construction, therefore, there is no opportunity for lead-based paint or asbestos to be encountered. While there are two aboveground storage tanks including one propane tanks within the one-mile radius of the sites, they are further than the Acceptable Separation Distance threshold requirement. These are not expected to pose a problem during the construction of the 12 units. All project sites are under the acceptable threshold of 65 dB set by the National Transportation Noise Map. The project sites at the 700 Block of Ann St are at a noise level of 59 dB. The project site at 636 Roberts St has a noise level of 58 dB. The project site at 1028 Brighton St has a noise level of 61 dB. Efforts will be made to reduce noise exposure as much as possible during construction.	
SOCIOECONOMIC			
Employment and Income Patterns	2	Referring to the Newport, KY city profile on Data USA, in 2022, the economy of Newport, KY employed 6.71k people. The largest industries in Newport, KY are Professional, Scientific, & Technical Services (962 people), Health Care & Social Assistance (889 people), and Manufacturing (846 people), and the highest paying industries are Professional, Scientific, & Technical Services (\$82,679), Professional, Scientific, & Management, & Administrative & Waste Management Services (\$68,307), and Public Administration (\$68,142). Number of employees is not tracked county wide, but several large employers include St. Elizabeth Healthcare, Comfort Suites, EGC, Executive Transportation, Intrinzic marketing, and the Newport Aquarium. Additionally, the Newport school system and city government provide many job	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>opportunities. The median household income is \$50,278 which is about two-thirds of the amount in the Cincinnati, OH-KY-IN Metro Area of \$76,24. However, 23% of the population is below the poverty line about double the rate in the Cincinnati, OH-KY-IN Metro Area of 11.6%. This information makes the addition of 12 affordable housing units a positive endeavor for the community, as affordable housing is a need here. This configuration will accommodate its broad target population of families or individuals who are homeless or at risk of homelessness, with some units set aside specifically for veterans. The project will also provide a wide range of supportive services for residents, including counseling, health services, financial services, workforce development, child care and early childhood education, afterschool programming for youth, and a food pantry.</p>	
<p>Demographic Character Changes / Displacement</p>	<p>2</p>	<p>The population of Newport in 2022 was approximately 14,190 and decreased 1.31% from the year prior. It is expected that the population will continually minimally decrease at a rate of 0.81% annually. The lots are currently vacant, causing no displacement of any individuals who live or work in the area. According to the Needs Analysis - Brighton Supportive Housing Project, On the night of the 2023 annual point-in-time count in Campbell County, 70 individuals were experiencing literal homelessness, and 42 individuals were unsheltered. In addition, the Coordinated Entry list for Northern Kentucky indicated that as of January 10, 2024, they had 189 individuals looking for housing. This includes 146 individuals out of which 81 scored for permanent supportive housing (PSH), 29 families out of which 24 scored for PSH, and 14 veterans. The new construction of 12 affordable housing units in Newport will</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>have a positive impact on Campbell County as the land is currently vacant, and there is a need for affordable housing in the area, with the low-income levels. The project will have a positive effect on Newport's demographic character by allowing those who are homeless and those at risk of homelessness, including veterans, to have safe, new, energy efficient, and affordable housing designed for their needs.</p>	
<p>Environmental Justice EA Factor</p>	<p>2</p>	<p>No adverse environmental impacts were identified in the project's total environmental review. The project is in compliance with Executive Order 12898. The project will be the highest and best use of land as it utilizes a tract of land for affordable, safe, and resilient housing that would otherwise be vacant. The Phase I Environmental Site Assessments prepared by Specialized Environmental Sampling completed on June 28, 2024 revealed no evidence of environmental conditions (REC), Historic RECs (HREC), or Controlled (CREC) identified for the site during their assessment for 1028 Brighton St., 118 W. 7th St, 710-712 Ann St., 722-734 Ann St., and 733 Ann St. The Phase I Environmental Site Assessments prepared by Specialized Environmental Sampling completed on June 28, 2024, revealed evidence of a historic auto repair and filling station that constituted as a REC at 636 Roberts St. Following results of the Phase I, a Phase II Limited Subsurface Assessment was completed on January 20, 2025, by Specialized Environmental Sampling. Laboratory analytical results for the soil samples resulted in non-detectable concentrations of all chemical analytes and thus soil sample results were all well below any applicable regulatory standard. The nearby former auto repair and filling station activities have not adversely affected the</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		subsurface conditions at the project site. No further action or assessment was recommended.	
COMMUNITY FACILITIES AND SERVICES			
Educational and Cultural Facilities (Access and Capacity)	2	<p>The school district within Newport, KY consists of 5 schools, Newport High School, Newport Intermediate School, Newport Primary School, Newport Regional School, and the Newport School of Innovation. The Newport Independent School District consists of a total enrollment of roughly 1,400 students, and a 10/1 Student to teacher ratio. Additionally, there is a Montessori preschool, private K-8, and a private high school within Newport. All of these are within 1.25 miles of the subject sites. The closest college is the Interactive College of Technology, which is about a mile from all sites. It offers associates programs in Business and Technology, Medical, Trades, and ESL. The University of Cincinnati and Northern Kentucky University are both about 5 miles away. The project scope is contained and small in nature and will not negatively impact educational facilities. The Newport Aquarium within Newport is home to thousands of the world's most exotic aquatic creatures as you waddle with playful penguins, meet rare white alligators, be surrounded by sharks and surprised by smiling stingrays. Campbell County contains the NKU Art gallery which serves as an exhibition forum for the community and region to view the work of traditionally underrepresented groups and individuals who have contributed to the richness and diversity of the region. Campbell County Log Cabin Museum showcases the agricultural history of the region featuring 2 log cabins and over 40 pieces of antique farm equipment. Cincinnati contains the Cincinnati Art Museum and Taft Art Museum, which house a variety of art</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		mediums throughout history and highlights multiple cultures. The National Underground Railroad Freedom Center brings to life the importance and relevance of struggles for freedom around the world and throughout history.	
Commercial Facilities (Access and Proximity)	2	Within a 0.5-mile radius of the sites at W 7th St / Ann St and 636 Roberts St, there are a dozen local restaurants and cafes. These include Newport Pizza Company, La Mexicana Restaurant (Mexican), Pompilio's (Italian), Beards & Bellies Barbecue, Dixie Chili and Deli, and Collective Espresso (Coffee House). There are more chain restaurants including IHOP, Chick-Fil-A, Buffalo Wild Wings, and LaRosa's about a mile away near I-471 and the Newport Pavilion Shopping Mall. All of these are within a 1.0-mile radius of the site at 1028 Brighton St. The closest grocery store to 1028 Brighton St is Marco's Market, which is 0.25 miles away. The closest grocery store to the sites at W 7th St / Ann St is Marco's Market, which is 0.4 miles away. The closest grocery store to 636 Roberts St is Aldi, which is 0.5 miles away. The Newport Pavilion Shopping Mall, within a mile radius of all the subject sites, contains Target, Kroger, Michaels, Famous Footwear, and Fresh Thyme Market.	
Health Care / Social Services (Access and Capacity)	2	There are two hospitals, St Elizabeth Covington Hospital and St Elizabeth Ft. Thomas Hospital, within a 3-mile radius of all sites. Newport Ovation Primary Care - St. Elizabeth Physicians is 0.4 miles from the 700 block of Ann St. There is a chiropractor (Dr. Mark Schuler) within 450-ft of 636 Roberts St. There is a mental health clinic (Mental Health America) within 0.5 miles of all sites. Additionally, there are several urgent cares and hospitals within Campbell and Kenton County. The development of single and duplex houses will provide	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		affordable and reliable housing resources for the community which will ultimately help sustain the demand for existing medical and social services in Campbell County.	
Solid Waste Disposal and Recycling (Feasibility and Capacity)	2	The subject site, located within Newport city limits, has access to adequate solid waste services provided by Rumpke. Weekly trash pickup is provided for the area and curbside recycling is also available. For those without recycling services, a recycling bin is in Newport and can be used by the public. The size and scope of the project will not negatively impact or overwhelm Rumpke.	
Waste Water and Sanitary Sewers (Feasibility and Capacity)	2	The project will connect to existing wastewater/sanitary sewer connections provided by Sanitation District No. 1 serving Northern Kentucky. Best Management Practices (BMPs) should be utilized to control storm water runoff and sediment damage to water quality and aquatic habitat. For technical assistance on the kinds of BMPs most appropriate for housing and related construction, the Campbell County Conservation District should be contacted. These BMPs will be incorporated into the project plans to ensure conformation to requirements.	
Water Supply (Feasibility and Capacity)	2	The subject sites are located within Newport city limits and have access to an adequate water supply provided by Northern Kentucky Water District. Northern Kentucky Water District (NKWD) is the largest water district and the third largest water utility in the state of Kentucky. NKWD serves approximately 300,000 people in Campbell and Kenton counties and portions of Boone, Grant and Pendleton counties. NKWD operates three water treatment plants. They are Taylor Mill, Fort Thomas, and Memorial Parkway. The Taylor Mill treatment plant's water source is the Licking River while the Fort Thomas and Memorial Parkway treatment plants draw water from	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		the Ohio River. NKWD's drinking water meets all of the Environmental Protection Agency's (EPA) health standards.	
Public Safety - Police, Fire and Emergency Medical	2	Newport has two police offices, the Campbell County Sheriff's Office and Newport City Police. The Newport Police Department is slightly closer to the subject sites, at 0.50 miles from the 700 block of Ann St and 636 Roberts St and 0.60 miles from 1028 Brighton St. Newport City Police consists of forty-four officers. The Fire Department is 0.6 miles away from the 700 block of Ann St. and 636 Roberts St and 0.8 miles from 1028 Brighton St. There are two fire stations within Newport city limits. The nearest Emergency Rooms are within St Elizabeth Covington Hospital and St Elizabeth Ft. Thomas Hospital, both are within a 2-mile radius of all sites.	
Parks, Open Space and Recreation (Access and Capacity)	2	Newport has 12 parks dispersed throughout the city with a diverse range of facilities and activities including Baseball and Softball Fields, Tennis and Pickleball Courts, Volleyball, Basketball, Dirt Bike track, Skate Park, Fishing, Playgrounds, Recreational Shelters, Dog Park, Festival Area, and Public Pool. The closest park to all the subject sites is Freudenberg Park, which houses a playground, park benches, and walking paths. It is a block over from the sites along 7th St / Ann St, 0.6 miles from 636 Roberts St, and 0.5 miles from 1028 Brighton St. Additionally, there are several parks within a 3-mile radius in Cincinnati and the surrounding Northern Kentucky suburbs including Devou Park, Highland Hills Park, and Eden Park and Krohn Conservatory and Botanical Gardens. The addition of these single and duplex homes will not overwhelm the recreation in Newport and the surrounding area.	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
Transportation and Accessibility (Access and Capacity)	2	<p>Newport is well connected with Cincinnati and other Northern Kentucky suburbs with several highways and interstates. I-471, running north-to-south out of the city in both directions, borders the east side of Newport. The primary roads through Newport are 3rd and 11th streets, which run parallel east-to-west from I-475 to Covington. Additionally, I-71, which runs north through Columbus, OH and south through Louisville, KY, passes through Covington approximately 1.5 miles from the subject sites. Uber and Lyft services are available in Campbell County. The Transit Authority of Northern Kentucky (TANK) has numerous bus routes throughout Northern Kentucky. Two routes, Route 16 and 25, have stops within several blocks of the W 7th St / Ann St. and Brighton St. sites. Additionally, TANK provides door-to-door service for seniors over the age of 67 and for individuals who are unable to ride, board or disembark from a regular service bus. The Cincinnati Municipal Airport is 3.8 miles from the subject sites, and the Cincinnati / Northern Kentucky International Airport is 8.2 miles from the sites. This project is small in size and scope and will not negatively impact transportation and accessibility for Campbell County. The project site is within a 1-mile drive to commercial, educational, cultural, medical, and social service amenities available in Newport, KY.</p>	
NATURAL FEATURES			
Unique Natural Features /Water Resources	2	<p>The project will not have an impact on water resources or unique natural features. The proposed project will not create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage system or provide substantial additional sources of polluted runoff. The project will connect to existing wastewater/sanitary sewer connections</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>provided by Sanitation District No. 1. Construction plans completed on July 1, 2024, by Hub + Weber Architects, PLC include specific construction design methods at each site that ensure that the projects do not create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. Design of the projects and construction methods employed will ensure that the projects do not negatively affect slope or erosion of the surrounding neighborhoods. For specific design techniques used during construction, the construction plans should be consulted. The project will have an erosion control plan. Erosion control practices during construction and seeding and stabilizing all areas after grading will protect the watershed.</p>	
Vegetation / Wildlife (Introduction, Modification, Removal, Disruption, etc.)	2	<p>The United States Department of the Interior has decided that no species in the area will be effected. There were no obvious areas of stressed vegetation or wildlife observed on-site. The current vacant lot is comprised of manicured grass and several sparse trees. The current landscaping will be disturbed; however, within the design of the new buildings, new landscaping will be included. The proposed project will not create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage system or provide substantial additional sources of polluted runoff. The project will connect to existing wastewater/sanitary sewer connections provided by Sanitation District No. 1.</p>	
Other Factors 1			
Other Factors 2			
CLIMATE AND ENERGY			
Climate Change	2	<p>The FEMA National Risk Index Community Report for Campbell County, KY finds that</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>the Risk Index score of 58.8 is 'Relatively Low' when compared to the rest of the US and the community has a 'Relatively Low' Expected Annual Loss Score of 62.4. However, the Community Report also finds that Campbell County has a Social Vulnerability score of 24.8, which demonstrates 'Relatively Low' susceptibility to the adverse impacts of natural hazards.' Plus, the Community Report also states that "Communities in Campbell County, KY have a Very High ability to prepare for anticipated natural hazards, adapt to changing conditions, and withstand and recover rapidly from disruptions when compared to the rest of the U.S." with a Community Resilience score of 80.2. The FEMA National Risk Index Community Report for Campbell County, KY also rates historic loss ratios by hazard type as follows: very low (cold wave, drought, hail, heat wave, hurricane, ice storm, landslide, lightning, riverine flooding, and winter weather); relatively low (strong wind, wildfire); relatively moderate (earthquake), and relatively high (tornado). The report also states that "in Campbell County, KY, expected loss each year due to natural hazards is Relatively Low when compared to the rest of the US" with an expected annual loss score of 62.43. Utilizing the climate projection tool from the Global Historical Climatology Network-Daily (GHCN-D) database. These data are accessed via the NOAA Regional Climate Centers' Applied Climate Information System (ACIS) data server. to estimate changes in heat and precipitation given either higher projected emissions (RCP8.5) or lower projected emissions (RCP4.5). Under the higher emission model, Campbell County is expected to experience 7 more days of about 95 degrees and a 1 degree increase in average annual temperature by</p>	

Environmental Assessment Factor	Impact Code	Impact Evaluation	Mitigation
		<p>2049. The model also shows that Gallatin County will see only 0.8 more days of heavy precipitation annually and a 1.0" increase in annual average precipitation by 2049. Given these risk analyses, Campbell County, KY faces lower climate risks than most of the nation. The new construction of 12 affordable housing units in Campbell County will have a positive impact on the county and will help minimize the impact of climate risk to the renters. The project site has minimal risk. It is a flat site in an area of minimal flood hazard. Units will be constructed to meet energy-efficiency standards. They must meet Kentucky Housing Corporation's Minimum Design Standards for New Construction of Multifamily Housing Units, which require that the building envelope meets or exceeds the 2012 IECC requirements.</p>	
Energy Efficiency	2	<p>The state of Kentucky requires developments to meet the KY Residential Building Code and encourages the use of Green Building Techniques and Energy Efficient Design Components. The 2020 Kentucky Housing Corporation Minimum Design Standards for Multifamily Housing Units states that projects must be energy efficient with a design that exceeds the 2012 International Energy Conservation Code.</p>	

Supporting documentation

- [2025-02-16_Brighton Center Supportive Housing_Construction Drawings\(1\).pdf](#)
- [EJScreen Community Report\(1\).pdf](#)
- [W 7th and Ann St - Day_Night Noise Level \(DNL\) Calculator - HUD Exchange\(1\).pdf](#)
- [1028 Brighton St - Day_Night Noise Level Calculator\(1\).pdf](#)
- [636 Roberts St - Day_Night Noise Level \(DNL\) Calculator - HUD Exchange\(1\).pdf](#)
- [Trash Recycling Collection_Newport KY.pdf](#)
- [Newport KY_Data USA_Demographics.pdf](#)
- [Newport Fire_EMS Department_Newport KY.pdf](#)
- [Community Report - Campbell County Kentucky_National Risk Index.pdf](#)
- [About Newport_Newport KY.pdf](#)
- [Fire Police Hospitals Map.pdf](#)

[Zoning Map \(PDF\).pdf](#)
[Schools.pdf](#)
[Parks.pdf](#)
[Musuems Webpage.pdf](#)
[Commercial Facilities.pdf](#)
[Campbell County Police.pdf](#)
[Bus Routes Newport.pdf](#)

Additional Studies Performed:

Market Study

[Market Study Needs Analysis.pdf](#)

Field Inspection [Optional]: Date and completed

by:

Suzanne Arzen

12/11/2024 12:00:00 AM

[Brighton Scattered - Combined Photolog - 7th and Ann St.pdf](#)
[Brighton Scattered - 1028 Brighton Ave - Photolog.pdf](#)
[Brighton Scattered - 636 Roberts St - Photolog.pdf](#)

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

US EPA; USDA Service Center; Phase I Environmental Site Assessment prepared for the property; FEMA; US Fish and Wildlife; US Army Corps of Engineers; City of Newport Planning and Inspections; City of Newport Historic Preservation; Sanitation District No. 1; Rumpke; Campbell County Health Department; Kentucky Heritage Council; US Fish and Wildlife Service National Wetlands Inventory; FEMA Flood Map Service Center; National Wild and Scenic Rivers System; Nationwide Rivers Inventory; EPA Sole Source Aquifers for Drinking Water Interactive Map; USDA Web Soil Survey; Federal Aviation Administration Airport Master Record; Federal Railroad Administration; Kentucky Transportation Cabinet; EPA Greenbook; EPA NEPAAssist Tool; Google Maps; arcGIS

List of Permits Obtained:

Other than local building permits, the structure at 1028 Brighton St. was approved by the local historic preservation. 1028 Brighton St. sits within the Buena Vista Historic District and is in compliance with their design requirements. Additionally, all units funded with KHC dollars require adherence to KHC's Minimum Design Standards for New Construction of Single-Family Dwelling Units and must be inspected by KHC Design and Construction Review staff a minimum of three times each. These

inspections will be at the following stages: 1) Footing (after excavation of footings and before footing concrete is poured); 2) Interim (any time between completion of wall insulation and hanging of drywall); and 3) Completion (100% complete including landscaping and site work and before move-in).

Public Outreach [24 CFR 58.43]:

The public was notified about the Combined Notice of Finding of No Significant Impact (FONSI) and Notice of Intent to Request Release of Funds (NOIRROF) via publication on <<website>> **** on *****, 2024. Public comment was accepted for 15 days following the publication of the classified ads with the public comment period ending *****, 2025. The Environmental Review Record (ERR) for this project was made available for public review during the comment period via a physical copy at the offices of Brighton Properties Inc. at 741 Central Avenue Newport, Kentucky and the Kentucky Housing Corporation at 1231 Louisville Road Frankfort, Kentucky. The physical copy was made available for public examination and copying, upon request, between the hours of 9 A.M. and 4 P.M. An electronic version will be posted on the HUD Environmental Review Records website at <https://cpd.hud.gov/cpd-public/environmental-reviews> for the duration of the public comment period. <<No>> comments were received during the public comment period.

Cumulative Impact Analysis [24 CFR 58.32]:

There are no mitigating environmental factors resulting from the proposed project, except for the potential risk of radon in the structures. Building plans include vapor barriers and post-construction testing will occur. If mitigation is needed, a mitigation system will be installed. The project will benefit Newport, Kentucky by allowing those who are homeless and those at risk of homelessness, including veterans, to have safe, new, energy efficient, and affordable. Construction of 12 units at the 700 block of Ann St, 636 Roberts St, and 1028 Brighton St are all covered by this environmental assessment. No cumulative effects are anticipated as a result of the project.

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

No action - leave the areas as they are, vacant lots with no improvement. It is possible that the properties would remain vacant with minimal use without this project. There is a need for affordable housing in Newport, KY. Acquire a different piece of property - the locations are ideal for the project as they are vacant, zoned for residential use, and in locations where additional affordable housing is in need. Proceed with Project. This is the best use of the project site.

No Action Alternative [24 CFR 58.40(e)]

In the absence of this project the project sites will likely remain vacant. Without affordable housing being constructed, the continued need of such housing will likely continue in the absence of the project.

Summary of Findings and Conclusions:

Beneficial impacts include the increased access to affordable housing for those who are homeless and those at risk of homelessness, including veterans. No changes are anticipated to be required to the proposal to avoid significant impacts as no significant impacts were identified.

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
Historic Preservation	Final project design activities must be provided to the Kentucky Heritage Council per the letter for final designation and approval. KHC notes "We conditionally concur with the determination of No Adverse Effect for the 8 undertakings at the locations listed above for the purpose of obtaining federal funding through HUD for this project: Please note that this conditional concurrence is for planning purposes only. We look forward to continued consultation on this undertaking. Once your project plans have been finalized, please forward those final plans to our office for further review. Moreover, if further locations are added to these scattered site new housing construction projects please submit that documentation to	N/A	Final construction plans were communicated to the Kentucky Heritage Council 2/21/25. Substantial changes to the projects were not made. The final letter from KHC will be communicated to KHC by Brighton Properties via email by Stephanie Stiene.	

	<p>our office as well." If any additional comments are provided by the Kentucky Heritage Council, they will be addressed. The conditional approval of "No Adverse Effect" is attached.</p>			
<p>Contamination and Toxic Substances</p>	<p>No RECs were found onsite or nearby for the parcels of land at 1028 Brighton St., 710-712 Ann St., 722-734 Ann St., and 733 Ann St.</p> <p>At 636 Roberts St., a historic auto filling station was identified up gradient from site. Due to the use and storage of petroleum products and other hazardous chemicals in filling station / auto repair operations, and the potential for spills / releases to the environment, a Phase II was completed by Specialized Environmental Sampling on January 20, 2025. The Phase II did not find any toxics on the subsurface and the REC was not confirmed in the Phase II ESA. No further mitigation is needed.</p>	<p>N/A</p>	<p>Post construction radon testing will occur and will be contracted through Brighton Properties / Model Group to ensure acceptable radon levels. If sample results indicate a radon mitigation is warranted, Brighton Properties Model Group will ensure a mitigation system is designed and implemented in accordance with the NRPP and additional confirmation testing will occur. Post construction testing results will be kept on file at the Brighton Properties Model Group</p>	

			office at 741 Central Avenue Newport, KY 41071. Results will be communicated to KHC by Brighton Properties via email by Stephanie Stiene.	
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Project Mitigation Plan

Post construction radon testing will occur and will be contracted through Brighton Properties / Model Group to ensure acceptable radon levels. If sample results indicate a radon mitigation is warranted, Brighton Properties Model Group will ensure a mitigation system is designed and implemented in accordance with the NRPP and additional confirmation testing will occur. Post construction testing results will be kept on file at the Brighton Properties Model Group office at 741 Central Avenue Newport, KY 41071. Results will be communicated to KHC by Brighton Properties via email by Stephanie Stiene. Units will not be occupied until Radon levels are within acceptable range. Final construction plans were communicated to the Kentucky Heritage Council 2/21/25. Substantial changes to the projects were not made. The final letter from KHC will be communicated to KHC by Brighton Properties via email by Stephanie Stiene.

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 nearest airports are the Cincinnati/Northern Kentucky International Airport which is 8.27 miles (43,665 feet) from the nearest edge of the property and Lunken Airport which is 3.40 miles (17,952 feet). Both airports are outside of the 15,000-foot proximity to both civilian and military airports. The project is in compliance with Airport Hazards requirements.

Supporting documentation

[Airport Hazards.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)	

This project is located in a state that does not contain CBRA units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Compliance Determination

This project is located in a state that does not contain CBRS units. Therefore, this project is in compliance with the Coastal Barrier Resources Act.

Supporting documentation

[Coastal Barrier Maps.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.

✓ Yes

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

[FIRMETTE_1028 Brighton Street Newport KY\(1\).pdf](#)
[FIRMETTE_733 Ann Street Newport KY\(1\).pdf](#)
[FIRMETTE_732 734 Ann Street Newport KY\(1\).pdf](#)
[FIRMETTE_722 Ann Street Newport KY\(1\).pdf](#)
[FIRMETTE_710 Ann Street Newport KY\(1\).pdf](#)
[FIRMETTE_710 712 Ann Street Newport KY\(1\).pdf](#)
[FIRMETTE_636 Roberts Street Newport KY\(1\).pdf](#)
[FIRMETTE_118 West 7th Street Newport KY\(1\).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. Provide FEMA/FIRM floodplain zone designation, panel number, and date within your documentation.

Is the structure, part of the structure, or insurable property located in a FEMA-designated Special Flood Hazard Area?

✓ No

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

The structure or insurable properties are not located in a FEMA-designated Special Flood Hazard Areas. All properties are on FEMA FIRM Panel 21037C0028F for Newport, Kentucky (Campbell County). Two revalidations for FEMA FIRM maps exist (20-04-0005V-210039 and 20-04-0005V-210041). These Revalidations are attached. Neither revalidation files are associated with the subject properties. 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

[FIRMETTE_1028 Brighton Street Newport KY\(2\).pdf](#)
[FIRMETTE_733 Ann Street Newport KY\(2\).pdf](#)
[FIRMETTE_732 734 Ann Street Newport KY\(2\).pdf](#)
[FIRMETTE_722 Ann Street Newport KY\(2\).pdf](#)
[FIRMETTE_710 Ann Street Newport KY\(2\).pdf](#)
[FIRMETTE_710 712 Ann Street Newport KY\(2\).pdf](#)
[FIRMETTE_636 Roberts Street Newport KY\(2\).pdf](#)
[FIRMETTE_118 West 7th Street Newport KY\(2\).pdf](#)
[FEMA FIRM 21037C0028F Revalidations.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ 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):

Carbon Monoxide

Lead

Nitrogen dioxide

Sulfur dioxide

- ✓ Ozone
- Particulate Matter, <2.5 microns
- Particulate Matter, <10 microns

3. What are the *de minimis* emissions levels (40 CFR 93.153) or screening levels for the non-attainment or maintenance level pollutants indicated above

Sulfur dioxide 75.00 ppb (parts per billion)
 Ozone 0.07 ppb (parts per million)

Provide your source used to determine levels here:
<https://www.epa.gov/criteria-air-pollutants/naaqs-table>

4. Determine the estimated emissions levels of your project. Will your project exceed any of the *de minimis* or threshold emissions levels of non-attainment and maintenance level pollutants or exceed the screening levels established by the state or air quality management district?

- ✓ No, the project will not exceed *de minimis* or threshold emissions levels or screening levels.

Enter the estimate emission levels:

Sulfur dioxide 75.00 ppb (parts per billion)
 Ozone 0.07 ppb (parts per million)

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

Yes, the project exceeds *de minimis* emissions levels or screening levels.

Screen Summary

Compliance Determination

The project's county or air quality management district is in non-attainment status for the following: Sulfur dioxide, Ozone. This project does not exceed *de minimis* emissions levels or the screening level established by the state or air quality management district for the pollutant(s) identified above. The project is in compliance with the Clean Air Act.

Supporting documentation

[NAAQS Table _ US EPA.pdf](#)

[Sulfur Dioxide \(2010\) Designated Area _ State Information _ Green Book _ US EPA.pdf](#)

[De Minimis Tables _ US EPA.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

This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.

Screen Summary

Compliance Determination

This project is located in a state that does not participate in the Coastal Zone Management Program. Therefore, this project is in compliance with the Coastal Zone Management Act.

Supporting documentation

[Coastal Zone Management.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)
Reference		
https://www.onecpd.info/environmental-review/site-contamination		

1. How was site contamination evaluated?* Select all that apply.

ASTM Phase I ESA

ASTM Phase II ESA

Remediation or clean-up plan

ASTM Vapor Encroachment Screening.

None of the above

* HUD regulations at 24 CFR § 58.5(i)(2)(ii) require that the environmental review for multifamily housing with five or more dwelling units or non-residential property include the evaluation of previous uses of the site or other evidence of contamination on or near the site.

For acquisition and new construction of multifamily and nonresidential properties HUD strongly advises the review include an ASTM Phase I Environmental Site Assessment (ESA) to meet real estate transaction standards of due diligence and to help ensure compliance with HUD's toxic policy at 24 CFR §58.5(i) and 24 CFR §50.3(i). Also note that some HUD programs require an ASTM Phase I ESA.

2. Were any on-site or nearby toxic, hazardous, or radioactive substances* (excluding radon) 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?)

Provide a map or other documentation of absence or presence of contamination** and explain evaluation of site contamination in the Screen Summary at the bottom of this screen.

No

Explain:

✓ Yes

* This question covers the presence of radioactive substances excluding radon. Radon is addressed in the Radon Exempt Question.

** Utilize EPA's Enviromapper, NEPAAssist, or state/tribal databases to identify nearby dumps, junk yards, landfills, hazardous waste sites, and industrial sites, including EPA National Priorities List Sites (Superfund sites), CERCLA or state-equivalent sites, RCRA Corrective Action sites with release(s) or suspected release(s) requiring clean-up action and/or further investigation. Additional supporting documentation may include other inspections and reports.

3. Evaluate the building(s) for radon. Do all buildings meet any of the exemptions* from having to consider radon in the contamination analysis listed in CPD Notice [CPD-23-103](#)?

Yes

Explain:

✓ No

* Notes:

- Buildings with no enclosed areas having ground contact.
- Buildings containing crawlspaces, utility tunnels, or parking garages would not be exempt, however buildings built on piers would be exempt, provided that there is open air between the lowest floor of the building and the ground.
- Buildings that are not residential and will not be occupied for more than 4 hours per day.
- Buildings with existing radon mitigation systems - document radon levels are below 4 pCi/L with test results dated within two years of submitting the application for HUD assistance and document the system includes an ongoing maintenance plan that includes periodic testing to ensure the system continues to meet the current EPA recommended levels. If the project does not require an application, document test results dated within two years of the date the environmental review is certified. Refer to program office guidance to ensure compliance with program requirements.
- Buildings tested within five years of the submission of application for HUD assistance: test results document indoor radon levels are below current the EPA's recommended action levels of 4.0 pCi/L. For buildings with test data older than five years, any new environmental review must include a consideration of radon using one of the methods in Section A below.

4. Is the proposed project new construction or substantial rehabilitation where testing will

be conducted but cannot yet occur because building construction has not been completed?

✓ Yes

Compliance with this section is conditioned on post-construction testing being conducted, followed by mitigation, if needed. Radon test results, along with any needed mitigation plan, must be uploaded to the mitigation section within this screen.

No

8. Mitigation

Document the mitigation needed according to the requirements of the appropriate federal, state, tribal, or local oversight agency. If the adverse environmental impacts cannot be mitigated, then HUD assistance may not be used for the project at this site.

For instances where radon mitigation is required (i.e. where test results demonstrated radon levels at 4.0 pCi/L and above), then you must include a radon mitigation plan*.

Can all adverse environmental impacts be mitigated?

No, all adverse environmental impacts cannot feasibly be mitigated.
Project cannot proceed at this location.

✓ Yes, all adverse environmental impacts can be eliminated through mitigation, and/or consideration of radon and radon mitigation, if needed, will occur following construction.
Provide all mitigation requirements** and documents in the Screen Summary at the bottom of this screen.

* Refer to CPD Notice [CPD-23-103](#) for additional information on radon mitigation plans.

** Mitigation requirements include all clean-up requirements required by applicable federal, state, tribal, or local law. Additionally, please upload, as applicable, the long-term operations and maintenance plan, Remedial Action Work Plan, and other equivalent documents.

9. Describe how compliance was achieved. Include any of the following that apply: State Voluntary Clean-up Program, a No Further Action letter, use of engineering controls*, or use of institutional controls.**

No RECs were found onsite or nearby for the parcels of land at 1028 Brighton St.,

710-712 Ann St., 722-734 Ann St., and 733 Ann St. At 636 Roberts St., a historic auto filling station was identified up gradient from site. Due to the use and storage of petroleum products and other hazardous chemicals in filling station / auto repair operations, and the potential for spills / releases to the environment, a Phase II was completed by Specialized Environmental Sampling on January 20, 2025. The Phase II did not find any toxics on the subsurface and the REC was not confirmed in the Phase II ESA. No further mitigation is needed. The buildings will

If a remediation plan or clean-up program was necessary, which standard does it follow?

Complete removal

Risk-based corrective action (RBCA)

Other

* Engineering controls are any physical mechanism used to contain or stabilize contamination or ensure the effectiveness of a remedial action. Engineering controls may include, caps, covers, dikes, trenches, leachate collection systems, radon mitigation systems, signs, fences, physical access controls, ground water monitoring systems and ground water containment systems including, slurry walls and ground water pumping systems.

** Institutional controls are mechanisms used to limit human activities at or near a contaminated site, or to ensure the effectiveness of the remedial action over time, when contaminants remain at a site at levels above the applicable remediation standard which would allow for unrestricted use of the property. Institutional controls may include structure, land, and natural resource use restrictions, well restriction areas, classification exception areas, deed notices, and declarations of environmental restrictions.

Screen Summary

Compliance Determination

Site contamination was evaluated as follows: ASTM Phase I ESA, ASTM Phase II ESA. No RECs were found onsite or nearby for the parcels of land at 1028 Brighton St., 710-712 Ann St., 722-734 Ann St., and 733 Ann St. At 636 Roberts St., a historic auto filling station was identified up gradient from site. Due to the use and storage of petroleum products and other hazardous chemicals in filling station / auto repair operations, and the potential for spills / releases to the environment, a Phase II was completed by Specialized Environmental Sampling on January 20, 2025. The Phase II did not find any toxics on the subsurface and the REC was not confirmed in the Phase II ESA. No further mitigation is needed. On-site or nearby toxic, hazardous, or radioactive

substances were found that could affect the health and safety of project occupants or conflict with the intended use of the property. Radon analysis indicated consideration of radon will occur following construction. If elevated radon is found, the property will be mitigated in accordance with current NRPP standards and post mitigation testing will occur to document radon is acceptable. Adverse environmental impacts can be mitigated. With mitigation, identified in the mitigation section of this review, the project will be in compliance with contamination and toxic substances requirements. A passive radon reduction venting system will be required in all units. Prior to occupancy all units will be tested for radon by a professional certified to meet American National Standards Institute/ American Association of Radon Scientists and Technologists (ANSI/AARST) radon testing for single-family buildings. If testing shows 4 .0pCi/L or more, mitigation measures shall be completed according to the most current version of American National Standards Institute/American Association of Radon Scientists and Technologists CCAH Reducing Radon in New Construction of 1 & 2 Family Dwellings and Townhouses (ANSI/AARST CCAH). Mitigation measures must be installed by a professional certified for radon mitigation.

Supporting documentation

[Brighton Properties - 636 Roberts Street - Phase II Limited Subsurface Investigation Report.pdf](#)

[118 W 7th Street Phase I ESA.pdf](#)

[1028 Brighton Street Phase I ESA.pdf](#)

[733 Ann Street Phase I ESA.pdf](#)

[722-734 Ann Street Phase I ESA.pdf](#)

[710-712 Ann Street Phase I ESA.pdf](#)

[636 Roberts Street Phase I ESA.pdf](#)

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:

✓ No mitigation is necessary.

Explain why mitigation will not be made here:

The FWS concurred with the determinations that "no effect" or "not likely to adversely effect" for the endangered species at the project locations in communication dated 2/12/2025. Additionally, the FWS stated, "There is no requirement to request concurrence with "no effect" determinations; however, the KFO acknowledges these determinations and has no additional comments or concerns regarding these species. The KFO has also evaluated the "not likely to adversely affect" determinations and has no further comments on these species. The consistency letters generated by the determination keys serve as documentation of your consideration of listed species and critical habitat for the proposed projects and should be retained for your records."

Screen

Summary

Compliance Determination

This project May Affect, but is Not Likely to Adversely Affect, listed species, and informal consultation was conducted. The FWS concurred with the determinations that "no effect" or "not likely to adversely effect" for the endangered species at the project locations in communication dated 2/12/2025. Additionally, the FWS stated, "There is no requirement to request concurrence with "no effect" determinations; however, the KFO acknowledges these determinations and has no additional comments or concerns regarding these species. The KFO has also evaluated the "not likely to adversely affect" determinations and has no further comments on these species. The consistency letters generated by the determination keys serve as documentation of your consideration of listed species and critical habitat for the proposed projects and should be retained for your records." This project is in compliance with the Endangered Species Act without mitigation.

Supporting documentation

[FW_1028 Brighton Street 2_14_2025.pdf](#)

[FW_636 Roberts Street - 02_14_2025.pdf](#)

[FNL_USFWS_BrightonSt_Brighton.pdf](#)

[FNL_Brighton_RobertsSt_USFWS.pdf](#)

[Brighton_AnnSt_Species_List.pdf](#)

[2-12-25 FWS 2025-0035112 - FWS 25-0035312 - FWS 2025-0035182 - Brighton Scattered.pdf](#)

[1028 Species List_Kentucky Ecological Services Field Office.pdf](#)

[1028 Brighton St 20241223 NE Consistency TRI_CLR_BAT_RW.pdf](#)

[1028 Brighton 20241223 NE Consistency IBat.pdf](#)

[1028 Brighton 20241223 NE Consistency KY_FLD_OFFICE_SA.pdf](#)

[636 Roberts Species List_Kentucky Ecological Services Field Office.pdf](#)

[636 Roberts 20241223 NE Consistency TRI_CLR_BAT_RW.pdf](#)

[636 Roberts 20241223 NE Consistency KY_FLD_OFFICE_SA.pdf](#)

[636 Roberts 20241223 NE Consistency IBat.pdf](#)

[7th_Ann St Species List_Kentucky Ecological Services Field Office.pdf](#)

[7th_Ann 20241223 NE Consistency TRI_CLR_BAT_RW.pdf](#)

[7th_Ann 20241223 NE Consistency KY_FLD_OFFICE_SA.pdf](#)

[7th_Ann 20241223 NE Consistency IBat.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

Yes

3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers that are covered by 24 CFR 51C? Containers that are NOT covered under the regulation include:

- Containers 100 gallons or less in capacity, containing common liquid industrial fuels OR

- Containers of liquified petroleum gas (LPG) or propane with a water volume capacity of 1,000 gallons or less that meet the requirements of the 2017 or later version of National Fire Protection Association (NFPA) Code 58.

If all containers within the search area fit the above criteria, answer "No." For any other type of aboveground storage container within the search area that holds one of the flammable or explosive materials listed in Appendix I of 24 CFR part 51 subpart C, answer "Yes."

No

Yes

4. Based on the analysis, is the proposed HUD-assisted project located at or beyond the required separation distance from all covered tanks?

Yes

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

No

Screen Summary

Compliance Determination

There is a current or planned stationary aboveground storage container of concern within 1 mile of the project site. A tank was noted during site reconnaissance and utilizing aerial photography at "Arts Rental" and "River City Metals Recycling". Both sites are within one mile of the subject properties. Per the attached backup, the Separation Distance from the project from both sites is acceptable. The project is in compliance with explosive and flammable hazard requirements.

Supporting documentation

[Tanks and ASD Calculations_FNL.pdf](#)

[Explosive and Flammable_FNL.pdf](#)

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.)	7 CFR Part 658

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:

Utilizing the Kentucky Soils Data Viewer, all 8 prospective new construction sites are within the land capability class of Urban Land. It states that this urban land is not prime farmland.

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. All project sites are in Urban Development per the U.S. Census Bureau Map. See attached. Secondly, none of the site contain Prime Farmland per the USDA Soil Surveys attached. Lastly, per the Phase I ESA, these properties have been developed as single-family residences for over 50 years and were not found to be forestland, pastureland, or cropland. The project is in compliance with the Farmland Protection Policy Act.

Supporting documentation

[Farmlands_FNL.pdf](#)

Are formal compliance steps or mitigation required?

Yes

Brighton-Supportive-
Housing

Newport, KY

900000010437484

✓ 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 * Executive Order 13690 * 42 USC 4001-4128 * 42 USC 5154a * only applies to screen 2047 and not 2046	24 CFR 55

1. Does this project meet an exemption at 24 CFR 55.12 from compliance with HUD’s floodplain management regulations in Part 55?

Yes

(a) HUD-assisted activities described in 24 CFR 58.34 and 58.35(b).

(b) HUD-assisted activities described in 24 CFR 50.19, except as otherwise indicated in § 50.19.

(c) The approval of financial assistance for restoring and preserving the natural and beneficial functions and values of floodplains and wetlands, including through acquisition of such floodplain and wetland property, where a permanent covenant or comparable restriction is place on the property’s continued use for flood control, wetland projection, open space, or park land, but only if:

(1) The property is cleared of all existing buildings and walled structures; and

(2) The property is cleared of related improvements except those which:

(i) Are directly related to flood control, wetland protection, open space, or park land (including playgrounds and recreation areas);

(ii) Do not modify existing wetland areas or involve fill, paving, or other ground disturbance beyond minimal trails or paths; and

(iii) Are designed to be compatible with the beneficial floodplain or wetland function of the property.

(d) An action involving a repossession, receivership, foreclosure, or similar acquisition of property to protect or enforce HUD's financial interests under previously approved loans, grants, mortgage insurance,

or other HUD assistance.

(e) Policy-level actions described at 24 CFR 50.16 that do not involve site-based decisions.

(f) A minor amendment to a previously approved action with no additional adverse impact on or from a floodplain or wetland.

(g) HUD's or the responsible entity's approval of a project site, an incidental portion of which is situated in the FFRMS floodplain (not including the floodway, LiMWA, or coastal high hazard area) but only if: (1) The proposed project site does not include any existing or proposed buildings or improvements that modify or occupy the FFRMS floodplain except de minimis improvements such as recreation areas and trails; and (2) the proposed project will not result in any new construction in or modifications of a wetland .

(h) Issuance or use of Housing Vouchers, or other forms of rental subsidy where HUD, the awarding community, or the public housing agency that administers the contract awards rental subsidies that are not project-based (i.e., do not involve site-specific subsidies).

(i) Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities.

Describe:

No

2. Does the project include a Critical Action? Examples of Critical Actions include projects involving hospitals, fire and police stations, nursing homes, hazardous chemical storage, storage of valuable records, and utility plants.

Yes

Describe:

No

3. Determine the extent of the FFRMS floodplain and provide mapping documentation in support of that determination

The extent of the FFRMS floodplain can be determined using a Climate Informed Science Approach (CISA), 0.2 percent flood approach (0.2 PFA), or freeboard value approach (FVA). For projects in areas without available CISA data or without FEMA Flood Insurance Rate Maps (FIRMs), Flood Insurance Studies (FISs) or Advisory Base Flood Elevations (ABFEs), use the best available information¹ to determine flood elevation. Include documentation and an explanation of why this is the best available information² for the site. Note that newly constructed and substantially improved³ structures must be elevated to the FFRMS floodplain regardless of the approach chosen to determine the floodplain.

Select one of the following three options:

CISA for non-critical actions. If using a local tool, data, or resources, ensure that the FFRMS elevation is higher than would have been determined using the 0.2 PFA or the FVA.

0.2-PFA. Where FEMA has defined the 0.2-percent-annual-chance floodplain, the FFRMS floodplain is the area that FEMA has designated as within the 0.2-percent-annual-chance floodplain.

- ✓ FVA. If neither CISA nor 0.2-PFA is available, for non-critical actions, the FFRMS floodplain is the area that results from adding two feet to the base flood elevation as established by the effective FIRM or FIS or — if available — a FEMA-provided preliminary or pending FIRM or FIS or advisory base flood elevations, whether regulatory or informational in nature. However, an interim or preliminary FEMA map cannot be used if it is lower than the current FIRM or FIS.

¹ Sources which merit investigation include the files and studies of other federal agencies, such as the U. S. Army Corps of Engineers, the Tennessee Valley Authority, the Soil Conservation Service and the U. S. Geological Survey. These agencies have prepared flood hazard studies for several thousand localities and, through their technical assistance programs, hydrologic studies, soil surveys, and other investigations have collected or developed other floodplain information for numerous sites and areas. States and communities are also sources of information on past flood 'experiences within their boundaries and are particularly knowledgeable about areas subject to high-risk flood hazards such as alluvial fans, high velocity flows, mudflows and mudslides, ice jams, subsidence and liquefaction.

² If you are using best available information, select the FVA option below and provide supporting documentation in the screen summary. Contact your [local environmental officer](#) with additional compliance questions.

³ Substantial improvement means any repair or improvement of a structure which costs at least 50 percent of the market value of the structure before repair or improvement or results in an increase of more than 20 percent of the number of dwelling units. The full definition can be found at [24 CFR 55.2\(b\)\(12\)](#).

5. Does your project occur in the FFRMS floodplain?

Yes

✓ No

Screen Summary

Compliance Determination

For the proposed construction at 1028 Brighton Street, this address falls within the FFRMS floodplain per the FVA; however, this site is landward of an accredited levee, which is shown in the National Flood Hazard Layer FIRMette for Newport, City of Campbell County, 210039. Within the HUD guidance on unique floodplain areas on FEMA maps, "HUD will accept the protection of an accredited levee (marked as Zone X "Area with reduced flood risk due to levee") and consider the Federal Flood Risk Management Standard (FFRMS) floodplain behind accredited levees to be limited to areas defined using the 0.2 Percent-Annual-Chance Flood Approach (PFA) or the Freeboard Value Approach (FVA) using the 1 percent annual chance floodplain landward of the levee." Additionally, it is noted that, "this approach does not align with the approach used by the Federal Flood Standard Support Tool (FFSST), which may show areas protected by levee to be within the FFRMS floodplain." 1028 Brighton Street is in the shaded 'X' zone as being landward of an accredited levee. And thus no mitigation is needed to be implemented. The other Brighton Scattered sites at the 700 block of Ann Street and 636 Roberts Street are outside of the FFRMS floodplain. This project does not occur in the FFRMS floodplain. The project is in compliance with Executive Orders 11988 and 13690.

Supporting documentation

[1028 Brighton Street - Floodplain Narrative.pdf](#)
[FFRMS-Freeboard-Value-Approach-Report_1028 Brighton Street.pdf](#)
[FFRMS-Freeboard-Value-Approach-Report_710 through 734 Ann Street.pdf](#)
[FFRMS-Freeboard-Value-Approach-Report_636 Roberts Street Newport.pdf](#)
[FFRMS-Freeboard-Value-Approach-Report_118 West 7th Street.pdf](#)
[FIRMETTE_1028 Brighton Street Newport KY.pdf](#)
[FIRMETTE_733 Ann Street Newport KY.pdf](#)
[FIRMETTE_732 734 Ann Street Newport KY.pdf](#)
[FIRMETTE_722 Ann Street Newport KY.pdf](#)
[FIRMETTE_710 Ann Street Newport KY.pdf](#)
[FIRMETTE_710 712 Ann Street Newport KY.pdf](#)
[FIRMETTE_636 Roberts Street Newport KY.pdf](#)

Are formal compliance steps or mitigation required?

Brighton-Supportive-
Housing

Newport, KY

900000010437484

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” https://www.govinfo.gov/content/pkg/CFR-2012-title36-vol3/pdf/CFR-2012-title36-vol3-part800.pdf

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)

✓ Cherokee Nation - Elizabeth Toombs Response Period Elapsed

✓ Delaware Nation, Oklahoma	Response Period Elapsed
✓ Delaware Nation, Oklahoma - Katelyn Lucas	Response Period Elapsed
✓ Eastern Band of Cherokee Indians	Response Period Elapsed
✓ Miami Tribe of Oklahoma - Logan York	Response Period Elapsed
✓ Osage Nation - Andrea Hunter	Response Period Elapsed
✓ Santee Sioux Nation - Larry Thomas	Response Period Elapsed
✓ Seneca-Cayuga Nation - William Tarrant	Response Period Elapsed

Other Consulting Parties

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

The Newport Historic Preservation Office was consulted for 1028 Brighton St, which is in the local Buena Vista Historic District. The Certificate of Appropriateness was received on January 23, 2025 after an application process. This COA is for any exterior alterations for a property. This is in the process of being approved with the architects in communication with the preservation officers with the guidelines. The other addresses are outside of local historic districts and have been approved to not need a COA. A section 106 was filled out for each address. SHPO responded with a "conditional concurrence with the determination of No Adverse Effect for the 8 undertakings at the locations listed above for the purpose of obtaining federal funding through HUD for this project." Utilizing the TDAT, a letter with photo and location attachments were sent to tribes that may have an interest in the area where the project is located. No response was received at the time of the submission of the Environmental Review, which was 30 days after correspondence.

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:

636 Roberts St, Newport, KY 39.09169, -84.49090 1028 Brighton St, Newport, KY 39.0817, -84.4968 118 W. 7th St., Newport, KY 39.08867 , -84.49592 710/712 Ann St, Newport, KY 39.08834, -84.49594 733 Ann St., Newport, KY 39.08802 , -84.49524 722 Ann St., Newport, KY 39.08813 , -84.49571 730 Ann St., Newport, KY 39.08973, -84.49557 732/734 Ann St., Newport KY 39.08788, -84.49524

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
1028 Brighton St	Not Eligible	Yes	✓ Not Sensitive
118 W. 7th St	Not Eligible	Yes	✓ Not Sensitive
636 Roberts St	Not Eligible	Yes	✓ Not Sensitive
710/712 Ann St	Not Eligible	Yes	✓ Not Sensitive
722 Ann St	Not Eligible	Yes	✓ Not Sensitive
730 Ann St	Not Eligible	Yes	✓ Not Sensitive
732/734 Ann St	Not Eligible	Yes	✓ Not Sensitive
733 Ann St	Not Eligible	Yes	✓ Not Sensitive

Additional Notes:

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

Yes

✓ 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

No Adverse Effect

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

Document reason for finding:

Based on Section 106 consultation there are No Historic Properties Affected. A certificate of Appropriateness for 1028 Brighton from the City of Newport is attached approving the design. The project is in compliance with Section 106.

Does the No Adverse Effect finding contain conditions?

Yes (check all that apply)

Avoidance

Modification of project

Other

Describe conditions here:

Final project design activities must be provided to the Kentucky Heritage Council per the letter for final designation and approval. KHC notes "We conditionally concur with the determination of No Adverse Effect for the 8 undertakings at the locations listed above for the purpose of obtaining federal funding through HUD for this project: Please note that this conditional concurrence is for planning purposes only. We look forward to continued consultation on this undertaking. Once your project plans have been finalized, please forward those final plans to our office for further review. Moreover, if further locations are added to these scattered site new housing construction

projects please submit that documentation to our office as well." If any additional comments are provided by the Kentucky Heritage Council, they will be addressed. The conditional approval of "No Adverse Effect" is attached.

No

Adverse Effect

Screen Summary

Compliance Determination

Based on Section 106 consultation there is No Adverse Effect. A certificate of Appropriateness for 1028 Brighton from the City of Newport is attached approving the design. Final project design activities must be provided to the Kentucky Heritage Council per the letter for final designation and approval. KHC notes "We conditionally concur with the determination of No Adverse Effect for the 8 undertakings at the locations listed above for the purpose of obtaining federal funding through HUD for this project: Please note that this conditional concurrence is for planning purposes only. We look forward to continued consultation on this undertaking. Once your project plans have been finalized, please forward those final plans to our office for further review. Moreover, if further locations are added to these scattered sites new housing construction projects please submit that documentation to our office as well." If any additional comments are provided by the Kentucky Heritage Council, they will be addressed. The conditional approval of "No Adverse Effect" is attached. The project is in compliance with Section 106.

Supporting documentation

[2025-02-16 Brighton Center Supportive Housing Construction Drawings.pdf](#)

[Miami Tribe Email .pdf](#)

[Seneca-Cayuga Nation Email .pdf](#)

[Santee Sioux Nation Email .pdf](#)

[Osage Nation Email .pdf](#)

[Eastern Band of Cherokees Email .pdf](#)

[Delaware Nation Email .pdf](#)

[Cherokee Nation Email .pdf](#)

[Certificate of Appropriateness26918501.pdf](#)

[250083-250090 HUD Brighton Properties Inc Campbell Brighton Scattered Sites New Construction Projects.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

NOTE: HUD assistance to new construction projects is generally prohibited if they are located in an Unacceptable zone, and HUD discourages assistance for new construction projects in Normally Unacceptable zones. See 24 CFR 51.101(a)(3) for further details.

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

4. Complete the Preliminary Screening to identify potential noise generators in the vicinity (1000’ from a major road, 3000’ from a railroad, or 15 miles from an airport).

Indicate the findings of the Preliminary Screening below:

There are no noise generators found within the threshold distances above.

- ✓ Noise generators were found within the threshold distances.

5. **Complete the Preliminary Screening to identify potential noise generators in the**

- ✓ Acceptable: (65 decibels or less; the ceiling may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Indicate noise level here: 62

Based on the response, the review is in compliance with this section. Document and upload noise analysis, including noise level and data used to complete the analysis below.

Normally Unacceptable: (Above 65 decibels but not exceeding 75 decibels; the floor may be shifted to 70 decibels in circumstances described in §24 CFR 51.105(a))

Unacceptable: (Above 75 decibels)

HUD strongly encourages conversion of noise-exposed sites to land uses compatible with high noise levels.

Check here to affirm that you have considered converting this property to a non-residential use compatible with high noise levels.

Indicate noise level here: 62

Document and upload noise analysis, including noise level and data used to complete the analysis below.

Screen Summary

Compliance Determination

Noise Assessments were conducted. The noise level was acceptable at all sites. At the 700 block of Ann St, comprised of 118 W 7th, 710 / 712 Ann St, 722 Ann St, 730 Ann St, 732 / 734 Ann St, the noise level was 56 dB. At 636 Roberts St the noise level was 57 dB. At 1028 Brighton St the noise level was 62 dB. See the separate noise analyses. All project sites are in compliance with HUD's Noise regulation.

Supporting documentation

[1028 Brighton St Noise_FNL.pdf](#)

[636 Roberts Noise_FNL.pdf](#)

[W 7th and Ann Street Noise_FNL.pdf](#)

Are formal compliance steps or mitigation required?

Yes

✓ No

Sole Source Aquifers

General requirements	Legislation	Regulation
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.	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.

Brighton-Supportive-
Housing

Newport, KY

900000010437484

Supporting documentation

[Sole Source Aquifer.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 is in compliance with Executive Order 11990.

Supporting documentation

[Wetlands.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 nearest NWSRS is in Ohio. There are no study rivers in Kentucky (see attached). The site is not in the proximity to an NRI river body. The nearest NRI river is The Great Miami River, which is located in Ohio. See maps attached. The project is in compliance with the Wild and Scenic Rivers Act.

Supporting documentation

[NWI_Map.pdf](#)

[Study Rivers _Rivers None in Kentucky.pdf](#)

[Wild and Scenic River.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 with the exception of radon testing which will occur following building construction. All radon impacts can appropriately be mitigated if present. The project is in compliance with Executive Order 12898.

Supporting documentation

[EJScreen Community Report.pdf](#)

Are formal compliance steps or mitigation required?

Yes

No

