



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

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Washington, DC 20410

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Environmental Assessment

Determinations and Compliance Findings for HUD-assisted Projects

24 CFR Part 58

Project Information

Project Name: The Berkshire - Ashwaubenon

Responsible Entity: GenCap Ashwaubenon 75, LLC

Grant Recipient (if different than Responsible Entity): (same)

State/Local Identifier:

Preparer: The Sigma Group, Inc.

Certifying Officer Name and Title:

Grant Recipient (if different than Responsible Entity): (same)

Consultant (if applicable): The Sigma Group, Inc.

Direct Comments to: General Capital Acquisitions, LLC

6938 N. Santa Monica Blvd

Fox Point, WI 53217

Project Location:

The project site comprises an approximately 2.51-acre parcel at 680 Mike McCarthy Way in the Village of Ashwaubenon, Brown County, Wisconsin. The project site is located on the south side of Mike McCarthy Way and extends south to Borvan Avenue, between Holmgren Way and S. Ashland Avenue, West Church Street and extends to North Ashwaubenon Road, between St. Johns Avenue and West Fairview Avenue, within an area of Ashwaubenon that is composed of a mix of residential, commercial, and industrial properties.

The project site is presently unimproved.

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

General Capital proposes to develop the Berkshire – Ashwaubenon, a multifamily housing development. The project will include 70 independent senior apartments restricted to households with at least one member aged 55 or older, located within a multistory apartment building. The project will also include 15 units serving those with a permanent developmental, physical, sensory, medical or mental health disability that makes them eligible for support services. Additionally, the project will include 15 workforce housing units (townhomes) with no age restrictions, targeting families with incomes less than 50% of the Area Median Income. All townhome units will have three bedrooms. Unit amenities will include high efficiency appliances, in-unit washer/dryer systems (for an additional charge), central air conditioning, window treatments, ceiling fans, and in-unit internet included in rent. Project amenities include controlled entry with intercom, key fob access, security lighting, on-site management, a community room, a fitness center, a business center, a common laundry room, exterior storage for each unit, and carport parking (for an additional charge). In addition, residents will have access to a variety of supportive services and counseling through a referral network between the local Aging and Disability Resource Center and the Brown County Veterans Service Office. The property will also include a Community Serving Facility on the ground floor, with numerous programs offering job skills and continuing education opportunities offered by Family Services of Northeast Wisconsin.

To achieve maximum scoring under this year's WHEDA HTC scoring criteria for Energy Efficiency and Sustainability, the project has been designed to achieve certification through the Wisconsin Environmental Initiative's Green Built Home™ program with a minimum of 200 points. The project will include extensive energy efficiency measures including super-efficient furnaces and high efficiency central hot water heaters. Recycled content materials and sustainable building components will be used where appropriate. The building windows will have a U-value value less than or equal to 0.35 (NFRC label), and LED lighting will be installed in all common area interiors. Clothes dryers, dishwashers, refrigerators and microwaves will be Energy Star™ and will perform in the top 50% of its Energy Guide rating.

The project is located on Mike McCarthy Way, in close proximity to Lambeau Field and Packer's practice facilities. The project contains 103 surface parking space, enough for all residents as well as guest parking on game days. Signage, and if necessary temporary barriers, will be placed at entries on game day clearly indicating that parking is for residents and their guests only and any illegally parked vehicles will be towed. The presence of Lambeau Field is a draw to residents and a source of excitement and pride on game days. Residents will be able to enjoy game days without being negatively impacted by parking or traffic.

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

According to the HUD LIHTC database, there currently is no dedicated affordable tax credit senior housing project in Ashwaubenon. According to the 2020 American Communities Survey by the United States Census Bureau, 2,276 of the 7,697 households in the Village of Ashwaubenon include at least one person aged 65 years or older. Therefore, at least 30% of households in Ashwaubenon will qualify for apartments at the Berkshire Ashwaubenon.

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

The project site has been unoccupied for several years. In its current condition, it does not provide any services to the local community and reduces the attractiveness of the surrounding area. In the absence of this project, the property would remain unoccupied until purchased for a different project.

Currently, there is no dedicated affordable tax credit senior housing project in Ashwaubenon. In the absence of this project, this trend would likely continue, placing a financial burden on local seniors.

The US Census Bureau estimated that the fraction of the Ashwaubenon population that was comprised of seniors (persons aged 62 and older) increased from 19.4% to 23.9% between the 2011-2015 and 2016-2020 American Community Survey 5-Year Estimates, an increase of 3.5%.

Funding Information

Grant Number	HUD Program	Funding Amount
N/A	Section 8	Up to \$109,000

Estimated Total HUD Funded Amount: \$109,000

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$21,554,000

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

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	There are no airports located within 15,000 feet of the project site. Therefore, the project is not within a Clear Zone or Accident Potential Zone. Source: FAA Calendar Year 2020 Final Revenue Enplanements at All Airports, Google Earth
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is not located inside a Coastal Barrier Resource area. Source: US FWS Coastal Barrier Resources System Mapper
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The project site is located entirely within an Area of Minimal Flood Hazard. Therefore, the purchase of flood insurance is not necessary. Source: FEMA Flood Map Service Center
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	The Green Bay area within Brown County was historically designated a non-attainment area for sulfur dioxide and redesignated a maintenance area for sulfur dioxide in 1992. This area has remained in attainment since 1992. The construction of the proposed building is not expected to significantly impact attainment. Source: US EPA Greenbook

<p>Coastal Zone Management</p> <p>Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is located in the Wisconsin Coastal Management Zone; however, the Federal Consistency and Coastal Hazards Coordinator has stated that federal consistency may be presumed.</p> <p>Source: Correspondence with Federal Consistency and Coastal Hazards Coordinator</p>
<p>Contamination and Toxic Substances</p> <p>24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The project site is located on an open Environmental Repair Program (ERP) site. Planned development activities include the excavation and removal of select soils with identified impacts, installation of a cap over the site, and integration of sub-slab vapor venting systems beneath all residential structures. Following construction, groundwater and vapor monitoring will be conducted. Plans for required operation and maintenance of the cap and venting systems will be submitted to the WDNR for review and approval. Sigma anticipates that the project will receive WDNR approval for closure with continuing obligations following the completion of construction and monitoring activities.</p> <p>Brown County is in the US EPA Radon Zone 2, meaning that the predicted average indoor radon screening level for the county is 2-4 pCi/L.</p> <p>Source: 2021 Site Investigation Report/Remedial Action Plan</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Sigma requested an Endangered Resources Review through the Wisconsin Bureau of Natural Heritage Conservation. The review concluded that suitable habitat for endangered/threatened species in the vicinity of the project site is not present on the site. No further actions were recommended or required to prevent impacts on these resources from the proposed project.</p> <p>Source: Wisconsin Bureau of Natural Heritage Conservation</p>
<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>No explosive or flammable hazards with the potential to impact the project site were identified.</p> <p>Source: 2021 Site Investigation Report/Remedial Action Plan, Google Maps</p>
<p>Farmlands Protection</p>	<p>Yes No</p>	<p>The project site is located entirely inside the Green Bay Urban Area in the 2010 US Census</p>

<p>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>and is not considered farmland under the Farmland Protection Policy Act.</p> <p>Source: US Census TIGERweb Decennial mapping application.</p>
<p>Floodplain Management</p> <p>Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is located entirely within an Area of Minimal Flood Hazard and is not considered to be in a floodplain.</p> <p>Source: FEMA Flood Map Service Center</p>
<p>Historic Preservation</p> <p>National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The Wisconsin Historic Preservation Database did not identify any buildings or features of historical, architectural, or archaeological significance on the project site or which would be impacted by the project.</p> <p>The HUD Tribal Directory Assessment Tool (TDAT) identified nine tribes with interests in Brown County. Consultation with these tribes will be conducted by Brown County Development Authority or General Capital at a later date.</p> <p>Source: Wisconsin Historic Preservation Database, HUD TDAT mapping application</p>
<p>Noise Abatement and Control</p> <p>Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The noise level calculated for the project site using the HUD Day/Night Noise Level (DNL) calculator was 65 decibels, equal to the 65 decibel threshold for noise-impacted areas.</p> <p>Source: Wisconsin DOT, Federal Highway Administration, Google Maps, Brown County GIS, HUD DNL calculator</p>
<p>Sole Source Aquifers</p> <p>Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is not located near any Sole Source Aquifers.</p> <p>Source: USEPA Sole Source Aquifers GIS map.</p>

<p>Wetlands Protection</p> <p>Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The National Wetland Inventory (NWI) has not identified any wetlands on the project site. Poygan series soils, which are hydric, constitute approximately 4% of the map unit. While hydric soils are an indicator of potential wetlands, no other potential wetland indicators, such as wetland-type plants, have been identified in that section of the project site. Given that the site has been paved since the 1990s, development activities are not expected to impact wetlands.</p> <p>Source: US FWS NWI Mapper, USGS Soil Report, 2021 SIR/RAP</p>
<p>Wild and Scenic Rivers</p> <p>Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site is not located within one mile of any designated national wild or scenic rivers.</p> <p>Source: National Wild and Scenic Rivers mapper.</p>
<p>ENVIRONMENTAL JUSTICE</p>		
<p>Environmental Justice</p> <p>Executive Order 12898</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The project site and the area in a one-mile radius around the project site rank above the 50th percentile for some measured environmental justice indices for the state, EPA Region, and/or USA as determined through the EJScreen tool. Further review of environmental justice criteria did not indicate that environmental justice issues are a concern for the project site.</p> <p>Source: US EPA EJScreen</p>

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

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

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	<p>The proposed project will transform an underutilized property close to the Titledown Development and Lambeau Field into affordable housing for seniors and working families, and is consistent with the housing priorities established by the Village of Ashwaubenon.</p> <p>The site is currently zoned as Sports and Entertainment (SE). The proposed project may require a change in zoning; however, it is consistent with Village of Ashwaubenon plans for this area.</p> <p>Source: 2016 Ashwaubenon Comprehensive Plan Update</p>

Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	<p>Site investigation activities revealed that the project site is covered with a layer of concrete/asphalt with is up to one foot thick and underlain by a sand and gravel basecourse. Underlying the base course is medium to high density reddish brown silty clay with trace gravel observed to the maximum depth investigated (20 feet below ground surface). The site topography is relatively flat. While a geotechnical report has not been reviewed as part of this assessment, the site soil is expected to be suitable for the proposed project.</p> <p>Other than short-term construction impacts, the proposed project is not anticipated to have a significant impact on site erosion. Best management practices, such as silt fences, will be utilized to reduce and control runoff and erosion during the construction period. Overall, the proposed project is not anticipated to have a significant impact on site erosion, drainage or runoff.</p>
Hazards and Nuisances including Site Safety and Noise	3	<p>The project site is located on an open Environmental Repair Program site. Impacted soil and groundwater is present on the project site. The proposed project will include a direct contact cap and sub-slab vapor venting systems to protect residents from residual impacts.</p> <p>The proposed project is not anticipated to create new hazards, nuisances, safety issues, or excess noise beyond the construction period.</p>
Energy Consumption	2	<p>The majority of potential residents in the Berkshire-Ashwaubenon will be from Ashwaubenon, so a significant change in energy consumption is not anticipated. Additionally, the proposed project is designed to achieve maximum scoring under this year's WHEDA HTC scoring criteria for Energy Efficiency and Sustainability, minimizing the demand for energy.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	The development of the project site is expected to generate income for local construction workers during the construction period and provide affordable workforce housing.
Demographic Character Changes, Displacement	2	The majority of potential residents of the Berkshire-Ashwaubenon will be current residents of Ashwaubenon, so significant changes in area demographics are not expected. Additionally, since the project site is currently unimproved land, no displacement of residents is anticipated.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	The majority of potential residents of the Berkshire-Ashwaubenon will be current residents of Ashwaubenon, so significant impacts to educational or cultural facilities are not anticipated as a result of the proposed project.
Commercial Facilities	2	The majority of potential residents of the Berkshire-Ashwaubenon will be current residents of Ashwaubenon, so significant impacts to commercial facilities are not anticipated as a result of the proposed project.
Health Care and Social Services	1	<p>The majority of potential residents of the Berkshire-Ashwaubenon will be current residents of Ashwaubenon, so major impacts to local healthcare and social services are not anticipated as a result of the proposed project.</p> <p>The Berkshire-Ashwaubenon development may create an opportunity for targeted healthcare and social services initiatives for the older adult population in Ashwaubenon.</p>
Solid Waste Disposal / Recycling	2	<p>Solid waste from the removal of the current pavement and basecourse and construction waste from the building expansion are expected during the construction period of this project. The assigned general contractor would be responsible for the management and disposal of the demolition and construction waste.</p> <p>Household waste from the apartments and townhouses will be collected centrally. Since the majority of potential residents of the Berkshire-Ashwaubenon will be current residents of Ashwaubenon, a significant change in the volume of solid waste is not anticipated as a result of the proposed project.</p>
Waste Water / Sanitary Sewers	2	<p>The proposed project will include the construction of on-site utilities, including sanitary sewer lines. The on-site utilities will be designed and installed in accordance with local and state regulations, as well as industry standards. Additionally, clay plugs will be installed along utility lines within the area of residual groundwater impacts to prevent preferential migration of impacted groundwater.</p> <p>The majority of potential residents of the Berkshire-Ashwaubenon will be current residents of Ashwaubenon, so significant impacts to Ashwaubenon wastewater conveyance and treatment systems are not anticipated as a result of the proposed project.</p>

Water Supply	2	<p>The proposed project will include the construction of on-site utilities, including drinking water lines. The on-site utilities will be designed and installed in accordance with local and state regulations, as well as industry standards. Additionally, clay plugs will be installed along utility lines within the area of residual groundwater impacts to prevent preferential migration of impacted groundwater.</p> <p>The majority of potential residents of the Berkshire-Ashwaubenon will be current residents of Ashwaubenon, so significant impacts to the local water supply are not anticipated as a result of the proposed project.</p>
Public Safety - Police, Fire and Emergency Medical	2	The majority of potential residents of the Berkshire-Ashwaubenon will be current residents of Ashwaubenon, so calls to emergency services, such as police, fire, and emergency medical services, are not expected to increase.
Parks, Open Space and Recreation	2	The proposed project will involve constructing three new buildings and planting trees and shrubs on what is currently a paved lot. The project will reduce the amount of open space, but will increase the amount of greenspace.
Transportation and Accessibility	2	Post-construction, the proposed project is not expected to significantly increase vehicle traffic or public transit usage in the surrounding area.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	Impacts to unique natural features or farmland are not expected from this project. The project site has been a paved commercial property since at least the 1970s.
Vegetation, Wildlife	2	With the exception of a strip of unmowed grass along the eastern edge of the project site and any vegetation which may grow between cracks, vegetation is not present on the project site. Potential wildlife habitat on the project site is minimal. Sigma requested an Endangered Resources Review from the WDNR, which determined that no actions are required to prevent impacts on endangered or threatened natural resources.
Other Factors	2	The project site is not located near any mines documented in USGS Topographic maps Source: USGS Topoview

Additional Studies Performed:

Endangered Resources Review, completed by the Wisconsin Department of Natural resources on Marh 29, 2022.

Field Inspection (Date and completed by):

On June 16, 2021, Steven Kikkert of the Sigma Group conducted a limited inspection of the property.

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

Federal Agencies

- National Wild and Scenic Rivers System
- US Department of Agriculture, United States Geological Survey
- US Department of Commerce, US Census Bureau
- US Department of Homeland Security, Federal Emergency Management Agency
- US Department of Housing and Urban Development
- US Department of the Interior, Fish and Wildlife Service
- US Department of Transportation, Federal Aviation Administration
- US Department of Transportation, Federal Highway Administration
- US Environmental Protection Agency

State Agencies

- Wisconsin Department of Natural Resources
- Wisconsin Department of Transportation
- Wisconsin Housing and Development Authority

Local Agencies

- Ashwaubenon Village Government

Other Sources

- Environmental Data Resources (EDR)
- Google Earth/Maps

List of Permits Obtained:

Public Outreach [24 CFR 50.23 & 58.43]:

The project was discussed at meetings of the Ashwaubenon Village Board on January 26, 2021 and October 26, 2021.

Cumulative Impact Analysis [24 CFR 58.32]:

The 2016 Comprehensive Plan for the Village of Ashwaubenon states that the intended goal for the area around the project site is that it becomes “a vibrant, multi-story, walkable district with a mix of uses including multi-family residential, entertainment, commercial activity, and public places.” The construction of developments like the proposed project will advance this goal.

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

The building design was modified throughout the approval process to achieve a mutually acceptable final design. Due to the strength of the location and community support of the project at this location, alternative locations were not considered.

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

In the No Action Alternative, the project site would remain an unimproved parcel. The Village of Ashwaubenon would continue maintaining paved surfaces which do not provide services to the district or community. Additionally, without the proposed project, the Village of Ashwaubenon would not gain dedicated affordable tax credit senior housing project, placing a financial burden on local seniors and forcing some to seek housing in other communities.

Summary of Findings and Conclusions:

This assessment identified the following HUD/IHDA-specific conditions or potential conditions of concern:

- The project site is located on an open Environmental Repair Program (ERP) site. Planned development activities include the excavation and removal of select soils with identified impacts, installation of a cap over the site, and integration of sub-slab vapor venting systems beneath all residential structures. Following construction, groundwater and vapor monitoring will be conducted. Plans for required operation and maintenance of the cap and venting systems will be submitted to the WDNR for review and approval. Sigma anticipates that the project will receive WDNR approval for closure with continuing obligations following the completion of construction and monitoring activities.
- Brown County is in the US EPA Radon Zone 2, meaning that the predicted average indoor radon screening level for the county is 2-4 pCi/L. Radon testing is recommended for the proposed building. It is also anticipated that the sub-slab venting system installed during construction will effectively mitigate potential radon risk.
- The HUD Tribal Directory Assessment Tool (TDAT) identified eight tribes with interests in Brown County. Consultation with these tribes will be conducted by Brown County Development Authority or General Capital at a later date.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

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

Law, Authority, or Factor	Mitigation Measure
Open Environmental Repair Program Site	Planned development activities include the excavation and removal of select soils with identified impacts, installation of a cap over the site, and integration of sub-slab vapor venting systems beneath all residential structures. Following construction, groundwater and vapor monitoring will be conducted. Plans for required operation and maintenance of the cap and venting systems will be submitted to the WDNR for review and approval. Sigma anticipates that the project will receive WDNR approval for closure with continuing obligations following the completion of construction and monitoring activities.
Radon	Radon testing will be conducted, and the sub-slab venting system installed during construction will effectively mitigate potential radon risk..
Tribal Interest	Tribal consultation will be addressed by Brown County Development Authority or General Capital.

Determination:

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

Preparer Signature:  Date: 4/15/22

Name/Title/Organization: Mairead Rauch, Staff Engineer, The Sigma Group

Certifying Officer Signature:  Date: 4/15/22

Name/Title: Authorized Signatory

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).