



Environmental Review Standards for OHTF Funded Projects

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OHFA ENVIRONMENTAL REVIEW STANDARDS FOR OHTF FUNDED PROJECTS

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Section I

Introduction and Overview of Process

The following document lists environmental review items pertaining specifically to successful projects/applicants of Housing Credits that are scheduled to receive HDAP/OHTF (aka "Ohio Housing Trust Funds"). These projects will be required to complete an "Environmental Review (ER) Light."

In general terms, these standards go beyond the ASTM E1527-13 Phase I Environmental Site Assessment (Phase I ESA) standards. They are designed to help ensure the safe living environment of the future residents of the planned community and those of the surrounding area. The goal is that projects comply with these standards and work with OHFA's Environmental Review Contractors to achieve OHFA's environmental clearance and completion of the "ER Light" process in the most expeditious manner possible.

Below is an overview of the OHTF "ER Light" process as administered by OHFA staff:

1. Projects are notified by OHFA that they are scheduled to receive OHTF funds.
2. OHFA's contractor will conduct an initial review of the Phase I ESA report and any other submitted reports. Based on review of provided reports and OHFA's contractor's internal review, if insufficient information is available to satisfy the environmental review items, then the project contact will be provided with a "Needs List" of any deficient items or additional items that are site-specific and required to complete the "ER Light" review. In the event that OHFA's ER contractor discovers items of concern after the initial needs list is responded to, a project could receive additional needs list(s).
3. OHFA's Contractor will coordinate with the project contact to schedule a site visit.
4. Once all of the required and requested items are supplied to OHFA's ER contractor, the contractor will complete the environmental review and provide OHFA with a final copy of the "ER Light" report including a list of required mitigations.
5. OHFA will issue an "Environmental Release" letter to the project contact, which will include the required mitigations. It is then, and only then that construction can commence.

The above outlined process can take about 4 to 6 weeks from start to finish. This time frame relies on a resolution of RECs or other concerns, if applicable and a motivated developer. Should either of these two things be missing the process may take longer, so please plan accordingly.

Section II

Environmental Review Items

1. A Phase I Environmental Site Assessment (Phase I ESA) in accordance with the ASTM E1527-13 standard.
 - a. The Phase I ESA should be conducted within six (6) months prior to the date of funding notification.

As per the scope of the Phase I ESA, the following ASTM required items shall be included:

2. United States Geological Survey (USGS) Topographic map of the site with the site boundary drawn to scale
3. Environmental liens and activity and use limitations (AULs) information
4. Interviews with local government officials (Health Department and Fire Department) and interview with key site manager (owner, or owner representative)
5. Adequate historical documentation for the site and adjacent properties, identifying the site's first use or back to 1940, whichever is earlier
6. Interior inspection of all on-site structures
7. Search of government database records to the ASTM required approximate minimum search distances
 - a. Shall include an evaluation of the significance of the database listings
8. Conclusion statement regarding the presence or absence of recognized environmental conditions (RECs)
9. Environmental professional statement
10. Environmental professional qualifications

Should the Phase I ESA identify recognized environmental conditions (RECs) or other concerns, the following item will need to be satisfied:

11. If RECs or other concerns are identified, they should be resolved

The following requirements are in addition to the ASTM E1527-13 Phase I ESA:

12. A "reliance" statement/letter to the Ohio Housing Finance Agency
13. A site plan
 - a. Must show prominent site features including any identified concerns and identify adjacent land use, including the names of any commercial or industrial businesses.
14. Color photographs scaled to print at no smaller than 3"x5" on a full-sized printout.

15. Floodplains
 - a. Complete a review of the Federal Emergency Management Agency (FEMA) map and determine whether the Site is located within the 100-year floodplain.
16. Wetlands
 - a. Provide consideration of the presence of wetlands on the site. This should include site observations, review of the USFWS National Wetland Inventory map, and review of NRCS county soil survey information for the presence of hydric soils.
 - b. If a study has already been performed, it can be used to meet this requirement.
17. Noise
 - a. Provide consideration of the presence of major roadways within 1,000 feet, railroads within 3,000 feet, and airports within five (5) miles of the site.
18. Air Quality consideration
 - a. Determine whether the Site is located in an Air Quality Non-Attainment Area
 - b. Determine whether there are any AIRS facilities or TRI facilities having air releases within 1,000 feet of the Site
19. Visible mold consideration
20. Farmland protection consideration
 - a. Determine whether the Site is included in any existing farmland preservation agreements or areas
21. Environmental justice consideration
 - a. Include a “printable standard report” for the site and a one-mile buffer from USEPA’s EJScreen online tool
22. Radon consideration: See Attachment A
23. Traffic hazard consideration for vehicles and pedestrians
24. Explosion hazards consideration
 - a. Determine the presence or absence of high-pressure gas transmission lines (i.e., at least four inch diameter or 400 psi) within 220 yards of the site. This may include review of the U.S. DOT National Pipeline Mapping System. Determine the presence of above ground storage tanks (ASTs) visible from the project site; if present, provide capacity and contents. Determine the presence of oil and gas wells in the vicinity of the site using the ODNR oil and gas well GIS website.
25. Underground mines, sink holes, or tunnels
 - a. Include a review of the Ohio Department of Natural Resources (ODNR) Abandoned Underground Mine Locator Map and any relevant local sources
26. Zoning code consideration

- a. Identify zoning classification and obvious violations
27. Soil suitability
- a. Determine whether the onsite soils are suitable for construction of the proposed development using NRCS classifications.
 - b. If a geotechnical study of the site has been performed, it can be used to meet this requirement.
28. Steep slopes, lakes, ponds, or culverts consideration
- a. Slip, trip, fall or other safety hazard
29. Lead-based paint (LBP) consideration: See Attachment B
30. Asbestos-containing materials (ACMs) consideration: For rehab and adaptive reuse projects, a survey of areas to be disturbed by the proposed work is required but may be delayed until just prior to the start of construction.

OHFA has set the following standards to protect residents at OHTF projects from exposure to high levels of radon. Radon is a cancer-causing, radioactive gas. It comes from the natural (radioactive) breakdown of uranium in rock, soil and water. Radon can get into the air in buildings by traveling through the ground and through seams, joints, utility penetrations and cracks in building foundations and slabs.

New Construction

1. All new construction will require a radon mitigation system.

Rehabilitation and Adaptive Reuse

1. Test according to OAC 3701-69-07; testing may be delayed until after construction.
2. If any result is 4 pCi/L or higher, a radon mitigation system is required project-wide.
3. If the highest result of testing conducted before construction is between 2 and 4 pCi/L, the project can install a radon mitigation system project-wide or test again after construction is complete.
4. If all results are less than 2 pCi/L before construction or less than 4 pCi/L after construction, no mitigation system is required.

As provided by OHFA's QAP, OHTF rehabilitation projects must comply with ODSA's Residential Rehab Standards (RRS) and therefore must also comply with the HUD Lead Safe Housing Rule (24 CFR 35, specifically subpart J) and the Ohio Department of Health's regulations (OAC 3701-32). Although HUD exempts certain projects (including those prohibiting children as co-tenants), it is OHFA's intention to ensure that ALL projects constructed prior to 1978 include an evaluation of lead-based paint. OHFA has prepared this OHTF Lead-Based Paint Investigation Policy as a quick reference resource.

General Rehabilitation Projects

Includes housing for the elderly and disabled where the lease does not prohibit children as co-tenants.

These projects must comply with the HUD Lead Safe Housing Rule.

Unless otherwise demonstrated, it is assumed that all projects are receiving assistance of more than \$5,000 per unit; therefore, the following HUD regulations apply:

1. Options for evaluation:
 - a. Complete a Lead Inspection per OAC 3701-32-06 (D) or 3701-32-07 (E). If the property is found not to have lead-based paint, it is considered exempt and no further assessment is necessary.
 - b. Conduct a Lead Risk Assessment per OAC 3701-32-07 (G) including paint testing of all painted surfaces to be disturbed or replaced during rehabilitation activities. Due to the potential for unnecessary costs, the RRS does not recommend that projects assume the presence of lead-based paint. A combination Lead Inspection and Lead Risk Assessment is also acceptable.
 - c. In lieu of a Lead Risk Assessment, a Lead Hazard Screen Risk Assessment per OAC 3201-32-07 (F) may be conducted (generally for projects in good physical condition and constructed in the 1960s-1970s). If the screen indicates the need for a full risk assessment, then a Lead Risk Assessment shall be conducted.
2. Any identified lead-based paint shall be managed per ODH and HUD hazard reduction requirements.

Age-Restricted Rehabilitation Projects

This includes OHTF rehabilitation projects where the lease prohibits children as co-tenants.

These projects are exempt from the HUD Lead Safe Housing Rule; however, it is OHFA's policy that an evaluation of lead-based paint be included.

1. Lead-based paint testing (not swabs) should be conducted, at minimum, of all painted surfaces to be disturbed or replaced during rehabilitation activities. A Lead Inspection and/or Lead Risk Assessment are acceptable.

2. To satisfy the testing requirement, a Lead Hazard Screen Risk Assessment may be conducted (generally for projects in good physical condition and constructed in the 1960s-1970s). If the screen indicates the need for a full risk assessment, then a Lead Risk Assessment shall be conducted.
3. Any lead-based paint that is identified should be managed by using best management practices. Options include:
 - a. Comply with EPA's 2008 Lead-Based Paint Renovation, Repair, and Painting (RRP) Rule.
 - b. Perform hazard reduction requirements per the HUD Safe Housing Rule including: interim controls of lead-based paint hazards, implementing safe work practices during rehabilitation, and repairing any paint that is disturbed and known to be lead-based paint.
 - c. Other method approved by OHFA and OHFA's ER Contractor.

Attachment C

Checklist for OHTF/“ER Light” Review

Prepared within 6 months prior to funding notification?

Date of Site Visit _____
Date of Report _____

Date of Database Search _____
Date of notification _____

✓	Item	Standard ¹	Comments
	Phase I ESA in accordance with ASTM E1527-13 Standard	ASTM	
	USGS topographic map	ASTM 8.2.4	
	Environmental lien/AUL information	ASTM 6.2	
	Adequate historic documentation for site and adjacent properties	ASTM 8.3	
	Interior inspection of all on-site structures	ASTM 9.2.2	
	Search of government database records to the ASTM required approximate minimum search distances and evaluation of significance	ASTM 8.2.1 and 8.1.10 ²	
	Conclusion statement regarding RECs	ASTM 12.8	
	Environmental Professional statement	ASTM 12.13	
	Environmental Professional qualifications	ASTM 12.14	
	Resolution of RECs or other concerns, if applicable	OHFA	
	Reliance statement to OHFA	OHFA	
	Site plan	OHFA	
	Color photographs	OHFA	
	Floodplain consideration	OHFA	
	Wetland consideration	OHFA	
	Noise consideration	OHFA	
	Air Quality consideration	OHFA	
	Visible mold consideration	OHFA	
	Farmland protection consideration	OHFA	
	Environmental justice consideration	OHFA	
	Radon consideration	OHFA	
	Traffic hazard consideration	OHFA	
	Explosion hazard consideration	OHFA	
	Underground mines, sink holes, or tunnels consideration	OHFA	
	Zoning consideration	OHFA	
	Soil suitability	OHFA	
	Steep slopes, lakes, ponds, or culverts	OHFA	
	Lead-based paint (LBP)	OHFA	
	Asbestos containing materials (ACMs)	OHFA	

¹OHFA Environmental Review Standards for OHTF Funded Projects and ASTM E1527-13.

²Based on the purpose of approximate minimum search distances as presented in ASTM 8.2.1, evaluation of significance and removal of database sites from consideration as an REC cannot rely solely on distance from subject property.

Checked items indicate that the information is in compliance with the OHFA and ASTM standard and no additional information is needed; items with an “X” indicate information is missing and details of required information will often be provided in the comments column.