**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

# 8-STEP DECISION-MAKING PROCESS

--Crites Industrial Park Project in Moorefield, Hardy County, West Virginia, USA

The proposed project, Crites Industrial Park Project, includes construction of an industrial park and the project involves extending water and sewer utilities to the project site.

--Decision-Making Process for E.O. 11990

## Step 1

***Determine whether the action is located within wetlands.***

This project proposes the construction of an industrial park in an existing agricultural area where water and sewer utility services will be installed to the project area. According to the United States Fish and Wildlife Service – National Wetland Inventory Mapper, palustrine wetlands exist within the project area. The wetlands drain into the South Branch River just outside the property boundary.

None of the exceptions at 55.12 or 55.13 apply, so the 8-step process is required, including an evaluation of direct and indirect impacts associated with construction, occupancy, and modification of wetland resources.

## Step 2

***Notify the public for early review of the proposal and involve the affected and interested public in the decision-making process.***

A public notice was published on the Hardy County Rural Development Authority website at https://hardycountywv.com/ and on social media on April 16, 2025. The website details the project and this wetland 8-step decision-making process is also posted on the website and social media. Public comments will be accepted through May 2, 2025.

The notice included the project name, proposed location, and description of the activity; the total number of acres of wetland involved; the related natural and beneficial functions and values of the floodplain or wetland that may be adversely affected by the proposed activity; the name of the Certifying Officer (Mallie Combs, Executive Director, Hardy County Rural Development Authority); and the phone number to call for information. The notice included the hours of the Hardy County Rural Development Authority’s office as well. Copies of the notices are included in the environmental review record.

## Step 3

***Identify and evaluate practicable alternatives.***

The following parameters were considered by the Hardy County Rural Development Authority in selecting a site:

1. The project cannot cause current residents to become displaced,
2. The project must have some existing utilities on site,
3. The project must have existing access to the site, and
4. The project must be developable for purposes of industrial use.

The Hardy County Rural Development Authority considered several alternative sites and actions in terms of the goals identified in the project description and reviewed or considered through the lenses of natural, social, and economic values explained at 24 CFR 55.20(c)(2):

1. Locate the Project Outside of the Wetlands
2. To locate the project outside of the National Wetland Inventory Wetlands, the site would not likely be feasible to develop. Wetlands appear to run along a center location of the eastern portion of the property. Complete avoidance would significantly reduce the developable space on the property.
3. No Action or Alternative Actions that Serve the Same Purpose

A no action alternative was also considered and rejected because of the preferred site, owned by the Hardy County Rural Development Authority, was the only site to be economically feasible and had existing access to the site.

## Step 4

***Identify potential direct and indirect impacts associated with wetland development.***

The Hardy County Rural Development Authority considered the natural and beneficial values of the wetlands. The natural resources of the wetlands include water, biological, and societal resources.

By developing the industrial park in areas to avoid the majority of the wetlands, the construction will have minimal effects on the wetlands and other water resources. Impacts will be limited to access road crossings and utility rights-of-way wetland crossings. Scientists and engineers will be consulted to design the site plan in such a way as to preserve natural flood and erosion control, water quality, and groundwater recharge as much as practical.

No state- or federally-listed threatened or endangered species will be impacted by the project (see Section 7 consultation under Endangered Species Act and correspondence with the West Virginia Division of Natural Resources. According to consultation with U.S. Fish and Wildlife Service’s National Wetlands Inventory, wetlands occur within the project site. The project will incorporate best management practices to minimize any potential direct or indirect wetland impacts. The project design will complement the natural features of the area and offer an aesthetically pleasing structure that blends with its natural surroundings.

## Step 5

***Where practicable, design or modify the proposed action to minimize the potential adverse impacts to wetlands.***

The project will limit direct and indirect impacts to the wetlands on site as much as practical. The Hardy County Rural Development Authority will utilize scientists and engineers to develop a site plan to avoid impacts to the wetlands as much as practical. If necessary, wetland impacts that are deemed to be unavoidable will be mitigated for based upon the United States Army Corps of Engineers and West Virginia Department of Environmental Protection guidelines via purchase of credits from a certified wetland mitigation bank or the West Virginia Department of Environmental Protection In-Lieu Fee Program.

## Step 6

***Reevaluate the alternatives.***

The proposed site is the only location that satisfies the Hardy County Rural Development Authority’s criteria for the project without being cost-prohibitive.

The no action alternative is also impracticable because it will not satisfy the need to assist the County in the construction of a much needed industrial park. The no action alternative was not selected since the proposed site’s impacts on wetlands can be mitigated and minimized.

## Step 7

***Determination of no practicable alternative and publication of final notice.***

The Hardy County Rural Development Authority determines that there is no practicable alternative for partially locating the project within the wetlands. This is due to the need to construct an economically feasible project, and the ability to mitigate and minimize impacts on wetlands.

A final notice was published in the Hardy County Rural Development Authority website at https://hardycountywv.com/ on April 16, 2025, detailing the reasons why the modified project must be located within the wetland, a list of alternatives considered, and mitigation measures taken to minimize adverse impacts and preserve natural and beneficial wetland values. Public comments will be accepted from April 16, 2025 through May 2, 2025.

## Step 8

***Implement the proposed action.***

Hardy County Rural Development Authority will ensure that this plan, as modified and described above, is executed and includes language in all agreements with participating parties necessary to ensure implementation. Hardy County Rural Development Authority will also take an active role in monitoring the construction process to ensure no unnecessary impacts occur or unnecessary risks are taken.