



February 20, 2020

Mr. Bill Davin  
Local Oakley, LLC  
7755 Montgomery Road  
Suite 500  
Cincinnati, OH 45236

Via email at: [wdavin@cinci.rr.com](mailto:wdavin@cinci.rr.com)

Dear Mr. Davin:

Subject: Proposed Local Oakley Subdivision  
NFA Letter and Land-Use Clarification  
Cincinnati, Hamilton County, Ohio  
CEC Project 184-622

Civil & Environmental Consultants, Inc. (CEC) has prepared this letter at the request of Local Oakley LLC (Local Oakley) with regard to proposed residential development at the Local Oakley subdivision in Cincinnati, Ohio.

It is our understanding that the Oakley Community Council (OCC) has requested additional information with regard to the Hills residential development proposed for the northern portion of the Local Oakley subdivision. Specifically, OCC requested clarification regarding individual ownership versus rental of future units. As you know, we have been working on the environmental due diligence for over a year now and submitted a No Further Action (NFA) Letter for the Local Oakley subdivision to Ohio EPA in November 2019 as part of the Ohio Voluntary Action Program (VAP). The purpose of the VAP is to provide a property owner with a means to voluntarily assess the environmental condition of its property and to obtain Ohio EPA approval of a program to properly mitigate environmental issues and allow for redevelopment. Due to the former industrial nature of the property, the NFA Letter for the Local Oakley subdivision legally requires installation and maintenance of site controls and for specific land-use restrictions.

Legal documents and obligations associated with the NFA Letter are required to follow each successive owner of any part of the property. During the preparation of the NFA Letter for the Local Oakley subdivision, Ohio EPA advised *against* individual ownership due to the complicated nature of tracking the ongoing obligations for multiple owners. Therefore, the NFA Letter was prepared for proposed residential units on the Hills property that would be owned by a single entity and rented, not individually owned.

Mr. Bill Davin – Local Oakley, LLC  
CEC Project 184-622  
Page 2  
February 20, 2020

We appreciate the opportunity to be of service to you. Should you have any questions or require additional information, please do not hesitate to contact us at 614-540-6633.

Sincerely,

CIVIL & ENVIRONMENTAL CONSULTANTS, INC.



Brent R. Smith, CP  
Project Manager



Andrew G. McCorkle, CPG  
Principal

cc: Ms. Suzanne Fisher-Edwards Frost Brown Todd, LLC  
Mr. Jim Obert, Hills Properties