



Calfee Community and Cultural Center
Honoring the Past, Planning for the Future
Town of Pulaski, Virginia



ENVIRONMENTAL REVIEW RECORD

GRANT NUMBER:	Virginia ARC #19-PG-19
PROJECT NAME:	Calfee Training School Adaptive Reuse Project Town of Pulaski, VA
PREPARED BY:	Wide Angle Strategies
DATE:	February 1, 2021

Environmental Review Record Checklist

COMPONENTS	YES	NO	N/A	COMMENTS
1. Brief Project Description	✓			
2. Explanation of Exemption or Categorical Exclusion Determinations (as relevant)			✓	
3. Statutory Checklist: Environmental Requirements Other Than NEPA.	✓			
4. Environmental Assessment Document	✓			
5. Environmental Assessment Checklist	✓			
6. Notice of Finding of No Significant Impact as posted/published				Mitigation required prior to FONSI.
7. Notice of Intent to Request a Release of Funds as posted/published				Pending FONSI.
8. Combined FONSI/RROF as posted/published				Pending FONSI.
9. Distribution Lists (as relevant) <ul style="list-style-type: none"> a. FONSI b. RROF c. FONSI/RROF 				Pending FONSI.
10. Any comments received and recipient responses				Pending FONSI.
11. Certification of Environmental Review, Request for Release of Funds submitted				Pending FONSI.
12. Notice of Removal of Grant Condition/Release of Funds (as relevant)				Pending FONSI.
13. Post-Review Revisions and Changes, Written Decisions, Amendments, and Supplements (as relevant)				Pending FONSI.
14. Continuing Project (58.47) Determination (as relevant)				Pending FONSI.
15. EIS documentation required by 58.55-60 (as relevant)				Pending FONSI.

PROJECT ABSTRACT

NAME OF GRANTEE: TOWN OF PULASKI, VIRGINIA

APPLICATION / GRANT NUMBER: VIRGINIA DHCD (ARC) #19-PG-19

FROM: TOWN OF PULASKI TO: DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

NAME AND TITLE OF ENVIRONMENTAL CERTIFYING OFFICER: DARLENE BURCHAM, TOWN MANAGER
TOWN OF PULASKI
PO Box 660
PULASKI, VA 24301
PHONE: 540/994-8601

PROJECT NAME: CALFEE TRAINING SCHOOL ADAPTIVE REUSE PROJECT

The project area consists of a 2.66-acre property which is geographically bounded by Magnox Drive on the South, Tract Fork on the West, and the property line on the East. The property contains the historic African American Calfee Training School, a small storage shed, and a water pump station. This adaptive reuse project proposes to renovate the property into a community and cultural center which will house a childcare program, a museum commemorating local African American history, a community kitchen, multiple event and office spaces, a computer lab, two natural outdoor play spaces and a half basketball court. Physical improvements to the property will include interior renovations, addition of a small two-story addition to the rear of the building, a repositioned parking area (including a half-basketball court), external ramps for building accessibility, two natural outdoor play spaces, and a half basketball court.

LEAD AGENCY: TOWN OF PULASKI
ADDRESS: PO Box 660, PULASKI VA 24301

PROJECT REPRESENTATIVE: DARLENE BURCHAM, TOWN MANAGER
TOWN OF PULASKI
PO Box 660
PULASKI, VA 24301
PHONE: 540/994-8601

PROJECT INFORMATION: JILL WILLIAMS, PRINCIPAL
WIDE ANGLE STRATEGIES
1117 PROSPECT AVE.
PULASKI, VA 24301
PHONE: 540/509-0808

PROJECT SUMMARY DESCRIPTION:	CDBG FUNDS	\$1,000,000	OTHER	\$1,389,300
	ARC FUNDS	\$ 500,000		

PROJECT DATA

The 2.66-acre property at 1 Magnox Drive in the Town of Pulaski is geographically bounded by Magnox Drive on the South, Tract Fork on the West, and the property line on the East and is the location of the historic African American Calfee Training School. Three structures stand on this property: the school building is a classical T-shape with the front of the structure (formerly including classrooms and administrative areas) facing Magnox Drive. An additional storage shed and a small water pump station, owned by the Pulaski County Public Service Authority, sits on the eastern corner of the property. A paved parking lot abuts the building on the Tract Fork side.

PURPOSE OF THE PROJECT

The purpose of the project is to assist low- and moderate-income (LMI) residents with affordable and accessible quality childcare services enabling parents to obtain and maintain full time jobs with local employers. Additional facility improvements will provide food security through access to fresh and local foods, and small business recovery support.

These benefits will be achieved through adaptive reuse of the historic African American Calfee Training School located at 1 Magnox Drive in the Town of Pulaski. This will be achieved through transformation of the disused property into the Calfee Community and Cultural Center which will house a childcare program, a museum commemorating local African American history, a community kitchen, multiple event and office spaces, a computer lab, two natural outdoor play spaces and a half basketball court. Physical improvements to the property will include interior renovations, the construction of a small two-story addition on the back of building, a repositioned parking lot, external ramps for building accessibility, two natural outdoor play spaces and a half basketball court.

Community Development Block Grant (CDBG) funds will be used to renovate the portions of the building which will be used for the Harmon Learning Center and the Dorothy Venable Digital Learning Lab. Appalachian Regional Commission (ARC) funds will be used to renovate the portions of the building which will be used for the Lena Huckstep Community Kitchen and Broadneaux-Baker Hall to support the Learning Center and Lab.

STATUS OF THE PROJECT

The Town of Pulaski received a planning grant from ARC to complete a feasibility study of the proposed adaptive reuse. The Town plans to submit an ARC grant application in February 2021 and a CDBG grant application in April 2021 requesting funds to carry out the proposed project activities.

PROJECT AND AREA DESCRIPTION

The 2.66-acre property at 1 Magnox Drive in the Town of Pulaski is geographically bounded by Magnox Drive on the South, Tract Fork on the West, and the property line on the East and is the location of the historic African American Calfee Training School. Three structures stand on this property: the school building is a classical T-shape with the front of the structure (formerly including classrooms and administrative areas) facing Magnox Drive. This area is approximately 13,250 square feet. An additional storage shed (960 square feet) sits to the side of the building opposite the creek. Finally, a small water pump station, owned by the Pulaski County Public Service Authority, sits on the eastern corner of the property. A paved parking lot (11,800 square feet) currently abuts the building on the Tract Fork side.

While this resource is historically important and impactful, it is not part of an existing Historic District; however, it is located directly adjacent to the Pulaski Historic Residential District. The Department of Historic Resources (DHR) has indicated that this project will have no adverse impact but reserve the right to comment on exterior improvements.

The project area encompasses 2.66 acres and has an open-space easement agreement with Virginia Outdoors Foundation limiting impervious surfaces to 36,000 square feet.

EXISTING CONDITIONS AND TRENDS

The building is in good condition throughout: it is structurally sound and requires primarily interior modifications to achieve the project goals and benefits. In 1990 the Calfee Training School was renovated for use as an office space. The former gym/multipurpose area was divided into two floors and used as a storage and warehouse facility. The entrance

area to the building from the front door was enlarged, taking space from four classrooms, and adding a built-in reception desk.

This project seeks to convert the building's interior to meet the identified purposes of the future center. Most original classroom walls will remain intact. Three children's bathrooms will be added in the learning center. The original bathrooms in the middle of the building will be converted into an infant classroom and an administrative office for the learning center. One classroom at the front of the building will be divided into an office, kitchenette, bathrooms, and storage closets. Original footprints of the four classrooms adjacent to the entry that were modified in the Magnox renovation will be restored.

The only new construction to the building will be a small two-story addition on the back which will add space for storage and bathrooms on both the first and second floors. A passenger elevator will be added at the rear of the building to make the second floor accessible. On the building's exterior, the major changes will be (1) the addition of a wheelchair accessible ramp on the front of the building wrapping around to an entrance on the side of the building, (2) on the creek side of the building, the entryway to the childcare center and event space will change in appearance somewhat to accommodate a ramp and an outdoor space, and (3) external doors will be added to each of the six childcare classrooms for ease of access to the outdoor play spaces.

PROJECT AND AREA MAPS AND PLANS [See attachment list on final page of Environmental Review Record]



Calfee Community and Cultural Center
Honoring the Past, Planning for the Future
Town of Pulaski, Virginia



ENVIRONMENTAL REVIEW RECORD PART 1

STATUTORY CHECKLIST

Statutory Checklist for Compliance with 24 CFR §58.5

NEPA Related Federal Laws and Authorities

(Must be completed for each individual addressed included under overall project description)

Use this worksheet for projects that are Categorical Excluded Subject to 24 CFR §58.5 listed at 24 CFR §58.35(a) and for projects that require an Environmental Assessment.

Project Name: Calfee Training School Adaptive Reuse Project

ERR FILE # _____

Definitions: **A:** The project is in compliance.

B: The project requires an additional compliance step or action.

Statue, Authority, Executive Order Cited at 24 CFR §58.5	A	B Date Compliance Achieved	COMPLIANCE FINDING	SOURCE DOCUMENTATION
1. 58.5(a) Historic Properties [36 CFR 800]		✓ Intensive-level survey for VLR/NRHP eligibility requested by DHR Complete pre-award Post-Design Review of land disturbance Requested by DHR Complete post-design	The African American Calfee Training School (DHR ID #125-0034; <i>School</i>) was constructed ca. 1939 and is a well-preserved example of Public Works Administration design. The School has the potential to be eligible for the Virginia Landmarks Register (VLR) and National Register of Historic Places (NRHP) as it is over 50 years old. DHR's File 2020-4640 response requests an intensive-level survey for VLR/NRHP eligibility evaluation. Furthermore, DHR requested opportunity to review and comment on the nature and extent of any ground disturbance. The project area adjoins Pulaski's identified Residential Historic District and is close to the Commercial Historic District. Tribal consultation is not required.	Photographs of the school with approximate date of construction is attached. The Project Area Map, USGS Topographic Map, Project Review Application Form (ePIX), Project Summary, VCRIS Search, and Archives Information are attached. DHR Response letter dated November 20, 2020 is also attached.

<p>2. 58.5(b)(1)</p> <p>Floodplain Management</p> <p>[24 CFR 55, Executive Order 11988]</p>		<p>✓</p> <p>Agency Letters issued 2/1/2021</p> <p>Early Floodplain Notice published 2/7/2021</p> <p>Final Comment Period Complete 3/15/2021</p>	<p>A 100-year floodplain has been located within the proposed project boundaries. All appropriate agencies will be contacted, and the public will be informed. Project alternatives have been considered. Early and Final Public Notices are attached. Compliance will be achieved March 15, 2021.</p>	<p>FEMA and local GIS maps are attached.</p> <p>Early Notification letters are attached.</p>
<p>3. 58.5(b)(2)</p> <p>Wetland Protection</p> <p>[24 CFR 55, Executive Order 11990]</p>	<p>✓</p>		<p>The project area is adjacent to Track Fork, a 17.18-acre riverine habitat classified as R3UBH (Riverine/Upper Perennial/Unconsolidated Bottom/Permanently Flooded) which flows into Peak Creek, a 7.40-acre riverine habitat R2UBH (Riverine/Lower Perennial/Unconsolidated Bottom/Permanently Flooded) per the National Wetlands Inventory Map. No work will be performed in this wetland and care will be taken to ensure all local Erosion and Sedimentary Controls are in place to avoid impact to the habitat.</p>	<p>National Wetlands inventory map is attached.</p> <p>Early Notification letters are attached.</p>
<p>4. 58.5(c)</p> <p>Coastal Zone Management</p> <p>[Coastal Zone Management Act sections 307(c) & (d)]</p>	<p>✓</p>		<p>Neither the Town of Pulaski nor the project area is within an area covered by a federally approved CZM Program. The project area is located approximately 166 miles west of the western boundary of the Virginia Coastal Zone at Chesterfield County.</p>	<p>Virginia Coastal Zone Management Program map, NEPA Assist Map, showing distance from nearest CZM boundary, and list of Virginia's Coastal Cities, Towns, and Counties is attached.</p>

<p>5. 58.5(d) Sole Source Aquifers [40 CFR 149]</p>	<p>✓</p>		<p>The project area is not located within a sole source aquifer (SSA). The project area is located approximately 204 miles from the nearest SSA, Prospect Hill SSA near Winchester VA.</p>	<p>NEPAssist map is attached.</p>
<p>6. 58.5(e) Endangered Species [50 CFR 402]</p>	<p>✓</p>		<p>Project activities will have no effect on the species listed on the Official Species Lists, there is no critical habitat located in or within approximately 39 miles of the project area, and no Eagle Act permit is required.</p>	<p>The USFWS/Virginia Field Office Online Consultation Letter, official species list from IPaC, VDGIF and VDCR-DNH database review results, Critical Habitat Map, Eagle Nest Buffer and Bald Eagle Concentration Area maps, and the Species Conclusion Table are attached.</p>
<p>7. 58.5(f) Wild and Scenic Rivers [36 CFR Part 297]</p>	<p>✓</p>		<p>The project area is not located within one (1) mile of a designated Wild and Scenic River, a Study River, or any rivers on the National River Inventory (NRI). There are no designated Wild and Scenic Rivers in Virginia.</p>	<p>NEPAssist maps are attached.</p> <p>The Wild and Scenic river database http://www.rivers.gov/virginia.php indicated no designated rivers in Virginia. The database http://www.rivers.gov/maps/conus.php provided detail on the Study of the New River in West Virginia and Virginia.</p> <p>The National River Inventory (NRI) for Virginia is located at http://www.nps.gov/ncrc/programs/rtca/nri/states/va.html.</p>
<p>8. 58.5(g) Air Quality [40 CFR Parts 6, 51, 61, and 93]</p>	<p>✓</p>		<p>The project area is not located within a nonattainment area.</p> <p>Project activities will have no impact on ambient air quality.</p>	<p>NEPAssist maps included were created using the EPA Green Book http://www3.epa.gov/airquality/greenbk/hindex.html.</p>
<p>9. 58.5(h) Farmlands Protection [7 CFR Part 658]</p>	<p>✓</p>		<p>The project area is zoned for general residential use (R-2). Public Service facilities are permitted by Special Exception. Project activities will have no</p>	<p>Project area map is attached which indicates local zoning of residential, business, and industrial for the project area. Color key is included.</p>

			impact on previously undisturbed farmland.	
10. 58.5(i) Noise Abatement and Control [24 CFR Part 51B]	✓		<p>The project area is not sensitive to noise from the nearest airport, railroad, or the nearest major route or highway.</p> <p>Day/Night Noise Level for the project area was calculated the proposed project. The DNL was calculated to be less than 65 dB for the project activities.</p>	<p>The project area is not located within 1,000 feet of a major highway or busy road.</p> <p>The nearby section of the Norfolk Southern Pocahontas line is in service but will not impact the project.</p> <p>NEPAssist maps indicate distances to nearest airport, interstate, and primary road. Annual airport operations data https://airnav.com/airport/KPSK</p> <p>An excerpt of the VDOT Annual Average Daily Traffic Volume is included.</p> <p>Crossing data for the Jefferson Avenue intersection with the Norfolk Southern Pocahontas line is included.</p> <p>The DNL calculation result is attached.</p>
11. 58.5(i) Explosive and Flammable Operations [24 CFR 51C]	✓		<p>No active Above-Ground Storage Tanks (ASTs) are located in or in the line of sight of the project area.</p> <p>Nine active Above-Ground Storage Tanks are located within one mile of the project area. All tanks are further than the calculated Acceptable Separation Distances (ASDs) from the project area.</p>	<p>A NEPAssist map and table attached list the tanks located within one mile of the project area, their capacity and contents, and (ASDs) from the project area extents.</p>
12. 58.5(i) (1) Airport Hazards [24 CFR 51D]	✓		<p>The project area is not located within 5,000 feet of a civilian airport (the Runway Clear Zone RCZ) or within 15,000 feet of a military airport (the Accident Potential Zone APZ).</p>	<p>Maps created with NEPAssist are included which indicate the two nearest airport locations with the RCZ and APZ marked, as well as a distance to the project area.</p>

<p>13. 58.5(i) (2)</p> <p>Contamination and Toxic Substances</p>		<p>✓</p> <p>Complete ASTM Phase I ESA</p>	<p>There are no hazardous facilities located within the project area which could pose site contamination issues for the proposed adaptive reuse.</p> <p>The project area does not contain, within the search distances listed, any active emitters of environmental contamination sources.</p> <p>An ASTM Phase I Environmental Site Assessment (ESA) report will be completed for the project.</p>	<p>A NEPAAssist map is attached which shows the EPA Facilities within approximately 1 mile.</p> <p>Environmental Radius Report (http://environmental.netronline.com/) is attached.</p> <p>All solid wastes, hazardous wastes, and hazardous materials, including construction and demolition wastes generated by project activities will be managed in accordance with all applicable federal, state and local environmental regulations. The generation of hazardous wastes will be minimized, and solid wastes generated at the site will be reduced at the source, reused, or recycled.</p>
<p>14. 58.5(j)</p> <p>Environmental Justice (E.O. 12898)</p>	<p>✓</p>		<p>The project area does not currently have nor will the project create adverse health or environmental impacts.</p>	<p>The EJSCREEN Report indicates no statistically significant burden on any of the studied classes.</p>

DETERMINATION:

- Box "A" has been checked for all authorities.** For Categorically Excluded actions pursuant to §58.35(a) [Does not apply to EA or EIS level of review which can never convert to Exempt], the project can convert to Exempt, per §58.34(a) (12), since the project does not require any compliance measures (e.g., consultation, mitigation, permit or approval) with respect to any law or authority cited at §58.5. The project is now made Exempt and a contract may be issued by DHCD; OR
- Box "B" has been checked for one or more authority.** For Categorically Excluded actions pursuant to §58.35(a), the project cannot convert to Exempt since one or more authority requires compliance, including but not limited to consultation with or approval from an oversight agency, performance of a study or analysis, completion of remediation or mitigation measure, or obtaining of license or permit. **Complete pertinent compliance requirement(s), publish NOI/RROF, request release of funds (HUD-7105.15), and wait for DHCD to issue a formal contract before committing funds;** OR
- This project is not a Categorically Excluded action pursuant to §58.35(a), or may result in a significant environmental impact to the environment, and requires preparation of an Environmental Assessment (EA). Prepare the EA according to 24 CFR Part 58 Subpart E.

MITIGATION MEASURES AND CONDITIONS FOR PROJECT APPROVAL: *(If Box B is checked, provide details regarding further consultation, mitigation, permit requirements or approvals required to be incorporated into public notices and project requirements such as contracts, grants, loan conditions, etc. as described in the Statutory Worksheet). Ensure required measures are included in 7015.15 Project Description Section.*

PREPARER:



Preparer's Signature

February 1, 2021

Date

Jill Williams

Preparer's Name (printed)

Principal, Wide Angle Strategies

Title (printed)

AUTHORIZED RESPONSIBLE ENTITY OFFICIAL:



Authorized Responsible Entity Signature

February 1, 2021

Date

Darlene Burcham

Authorized Responsible Entity Name (printed)

Town Manager, Town of Pulaski, VA

Title (printed)

ADDITIONAL STUDIES PERFORMED

No additional studies were performed.

MITIGATION MEASURES NEEDED

Intensive-level survey for VLR/NRHP eligibility as requested by the Virginia Department of Historic Resources (DHR).

Post-Design Review of land disturbance as requested by DHR

Erosion and Sediment control for all construction. All construction within the 100-year floodplain will comply with the local Floodplain ordinance.

ASTM Phase I Environmental Site Assessment will be performed through the Town of Pulaski's Brownfields grant from the Environmental Protection Agency. Further Mitigation Plans will be developed as informed by the study.

SUMMARY OF FINDINGS AND CONCLUSIONS

Statutory checklist review found that the property is historically significant, floodplains are present, and ASTM Phase I Environmental Site Assessment is necessary.

Virginia DHR has requested an intensive-level survey for VLR/NRHP eligibility be performed.

Virginia DHR has requested a post-design review of any expected land disturbance.

Alternatives were considered to mitigate the impact on floodplains and the public was given an opportunity to comment on the proposals. All construction will be done in accordance with Pulaski's Floodplain and Erosion and Sediment Control Ordinances.

No adverse impact is anticipated by the Calfee Training Center Adaptive Reuse Project.



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ENVIRONMENTAL REVIEW RECORD PART 1

STATUTORY CHECKLIST

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NEPA Related Federal Laws and Authorities

(Must be completed for each individual addressed included under overall project description)

Use this worksheet for projects that are Categorically Excluded Subject to 24 CFR §58.5 listed at 24 CFR §58.35(a) and for projects that require an Environmental Assessment.

Project Name: Calfee Training School Adaptive Reuse Project

ERR FILE # _____

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B: The project requires an additional compliance step or action.

Statue, Authority, Executive Order Cited at 24 CFR §58.5	A	B Date Compliance Achieved	COMPLIANCE FINDING	SOURCE DOCUMENTATION
1. 58.5(a) Historic Properties [36 CFR 800]		✓ Intensive-level survey for VLR/NRHP eligibility requested by DHR Complete pre-award Post-Design Review of land disturbance Requested by DHR Complete post-design	The African American Calfee Training School (DHR ID #125-0034; <i>School</i>) was constructed ca. 1939 and is a well-preserved example of Public Works Administration design. The School has the potential to be eligible for the Virginia Landmarks Register (VLR) and National Register of Historic Places (NRHP) as it is over 50 years old. DHR’s File 2020-4640 response requests an intensive-level survey for VLR/NRHP eligibility evaluation. Furthermore, DHR requested opportunity to review and comment on the nature and extent of any ground disturbance. The project area adjoins Pulaski’s identified Residential Historic District and is close to the Commercial Historic District. Tribal consultation is not required.	Photographs of the school with approximate date of construction is attached. The Project Area Map, USGS Topographic Map, Project Review Application Form (ePIX), Project Summary, VCRIS Search, and Archives Information are attached. DHR Response letter dated November 20, 2020 is also attached.

<p>2. 58.5(b)(1)</p> <p>Floodplain Management</p> <p>[24 CFR 55, Executive Order 11988]</p>		<p>✓</p> <p>Agency Letters issued 2/1/2021</p> <p>Early Floodplain Notice published 2/7/2021</p> <p>Final Comment Period Complete 3/15/2021</p>	<p>A 100-year floodplain has been located within the proposed project boundaries. All appropriate agencies will be contacted, and the public will be informed. Project alternatives have been considered. Early and Final Public Notices are attached. Compliance will be achieved March 15, 2021.</p>	<p>FEMA and local GIS maps are attached.</p> <p>Early Notification letters are attached.</p>
<p>3. 58.5(b)(2)</p> <p>Wetland Protection</p> <p>[24 CFR 55, Executive Order 11990]</p>	<p>✓</p>		<p>The project area is adjacent to Track Fork, a 17.18-acre riverine habitat classified as R3UBH (Riverine/Upper Perennial/Unconsolidated Bottom/Permanently Flooded) which flows into Peak Creek, a 7.40-acre riverine habitat R2UBH (Riverine/Lower Perennial/Unconsolidated Bottom/Permanently Flooded) per the National Wetlands Inventory Map. No work will be performed in this wetland and care will be taken to ensure all local Erosion and Sedimentary Controls are in place to avoid impact to the habitat.</p>	<p>National Wetlands Inventory map is attached.</p> <p>Early Notification letters are attached.</p>
<p>4. 58.5(c)</p> <p>Coastal Zone Management</p> <p>[Coastal Zone Management Act sections 307(c) & (d)]</p>	<p>✓</p>		<p>Neither the Town of Pulaski nor the project area is within an area covered by a federally approved CZM Program. The project area is located approximately 166 miles west of the western boundary of the Virginia Coastal Zone at Chesterfield County.</p>	<p>Virginia Coastal Zone Management Program map, NEPAassist Map showing distance from nearest CZM boundary, and list of Virginia's Coastal Cities, Towns, and Counties is attached.</p>

<p>5. 58.5(d) Sole Source Aquifers [40 CFR 149]</p>	<p>✓</p>		<p>The project area is not located within a sole source aquifer (SSA). The project area is located approximately 204 miles from the nearest SSA, Prospect Hill SSA near Winchester VA.</p>	<p>NEPAssist map is attached.</p>
<p>6. 58.5(e) Endangered Species [50 CFR 402]</p>	<p>✓</p>		<p>Project activities will have no effect on the species listed on the Official Species Lists, there is no critical habitat located in or within approximately 39 miles of the project area, and no Eagle Act permit is required.</p>	<p>The USFWS/Virginia Field Office Online Consultation Letter, official species list from IPaC, VDGIF and VDCR-DNH database review results, Critical Habitat Map, Eagle Nest Buffer and Bald Eagle Concentration Area maps, and the Species Conclusion Table are attached.</p>
<p>7. 58.5(f) Wild and Scenic Rivers [36 CFR Part 297]</p>	<p>✓</p>		<p>The project area is not located within one (1) mile of a designated Wild and Scenic River, a Study River, or any rivers on the National River Inventory (NRI). There are no designated Wild and Scenic Rivers in Virginia.</p>	<p>NEPAssist maps are attached.</p> <p>The Wild and Scenic river database http://www.rivers.gov/virginia.php indicated no designated rivers in Virginia. The database http://www.rivers.gov/maps/conus.php provided detail on the Study of the New River in West Virginia and Virginia.</p> <p>The National River Inventory (NRI) for Virginia is located at http://www.nps.gov/ncrc/programs/rtca/nri/states/va.html.</p>
<p>8. 58.5(g) Air Quality [40 CFR Parts 6, 51, 61, and 93]</p>	<p>✓</p>		<p>The project area is not located within a nonattainment area.</p> <p>Project activities will have no impact on ambient air quality.</p>	<p>NEPAssist maps included were created using the EPA Green Book http://www3.epa.gov/airquality/greenbk/hindex.html.</p>
<p>9. 58.5(h) Farmlands Protection [7 CFR Part 658]</p>	<p>✓</p>		<p>The project area is zoned for general residential use (R-2). Public Service facilities are permitted by Special Exception. Project activities will have no</p>	<p>Project area map is attached which indicates local zoning of residential, business, and industrial for the project area. Color key is included.</p>

			impact on previously undisturbed farmland.	
10. 58.5(i) Noise Abatement and Control [24 CFR Part 51B]	✓		<p>The project area is not sensitive to noise from the nearest airport, railroad, or the nearest major route or highway.</p> <p>Day/Night Noise Level for the project area was calculated the proposed project. The DNL was calculated to be less than 65 dB for the project activities.</p>	<p>The project area is not located within 1,000 feet of a major highway or busy road.</p> <p>The nearby section of the Norfolk Southern Pocahontas line is in service but will not impact the project.</p> <p>NEPAssist maps indicate distances to nearest airport, interstate, and primary road. Annual airport operations data https://airnav.com/airport/KPSK</p> <p>An excerpt of the VDOT Annual Average Daily Traffic Volume is included.</p> <p>Crossing data for the Jefferson Avenue intersection with the Norfolk Southern Pocahontas line is included.</p> <p>The DNL calculation result is attached.</p>
11. 58.5(i) Explosive and Flammable Operations [24 CFR 51C]	✓		<p>No active Above-Ground Storage Tanks (ASTs) are located in or in the line of sight of the project area.</p> <p>Nine active Above-Ground Storage Tanks are located within one mile of the project area. All tanks are further than the calculated Acceptable Separation Distances (ASDs) from the project area.</p>	<p>A NEPAssist map and table attached list the tanks located within one mile of the project area, their capacity and contents, and (ASDs) from the project area extents.</p>
12. 58.5(i) (1) Airport Hazards [24 CFR 51D]	✓		<p>The project area is not located within 5,000 feet of a civilian airport (the Runway Clear Zone RCZ) or within 15,000 feet of a military airport (the Accident Potential Zone APZ).</p>	<p>Maps created with NEPAssist are included which indicate the two nearest airport locations with the RCZ and APZ marked, as well as a distance to the project area.</p>

<p>13. 58.5(i) (2)</p> <p>Contamination and Toxic Substances</p>		<p>✓</p> <p>Complete ASTM Phase I ESA</p>	<p>There are no hazardous facilities located within the project area which could pose site contamination issues for the proposed adaptive reuse.</p> <p>The project area does not contain, within the search distances listed, any active emitters of environmental contamination sources.</p> <p>An ASTM Phase I Environmental Site Assessment (ESA) report will be completed for the project.</p>	<p>A NEPAssist map is attached which shows the EPA Facilities within approximately 1 mile.</p> <p>Environmental Radius Report (http://environmental.netronline.com/) is attached.</p> <p>All solid wastes, hazardous wastes, and hazardous materials, including construction and demolition wastes generated by project activities will be managed in accordance with all applicable federal, state and local environmental regulations. The generation of hazardous wastes will be minimized, and solid wastes generated at the site will be reduced at the source, reused, or recycled.</p>
<p>14. 58.5(j)</p> <p>Environmental Justice (E.O. 12898)</p>	<p>✓</p>		<p>The project area does not currently have nor will the project create adverse health or environmental impacts.</p>	<p>The EJSCREEN Report indicates no statistically significant burden on any of the studied classes.</p>

DETERMINATION:

- Box "A" has been checked for all authorities.** For Categorically Excluded actions pursuant to §58.35(a) [Does not apply to EA or EIS level of review which can never convert to Exempt], the project can convert to Exempt, per §58.34(a) (12), since the project does not require any compliance measures (e.g., consultation, mitigation, permit or approval) with respect to any law or authority cited at §58.5. The project is now made Exempt and a **contract may be issued by DHCD; OR**
- Box "B" has been checked for one or more authority.** For Categorically Excluded actions pursuant to §58.35(a), the project cannot convert to Exempt since one or more authority requires compliance, including but not limited to consultation with or approval from an oversight agency, performance of a study or analysis, completion of remediation or mitigation measure, or obtaining of license or permit. **Complete pertinent compliance requirement(s), publish NOI/RROF, request release of funds (HUD-7105.15), and wait for DHCD to issue a formal contract before committing funds; OR**
- This project is not a Categorically Excluded action pursuant to §58.35(a), or may result in a significant environmental impact to the environment, and requires preparation of an Environmental Assessment (EA). Prepare the EA according to 24 CFR Part 58 Subpart E.

MITIGATION MEASURES AND CONDITIONS FOR PROJECT APPROVAL: *(If Box B is checked, provide details regarding further consultation, mitigation, permit requirements or approvals required to be incorporated into public notices and project requirements such as contracts, grants, loan conditions, etc. as described in the Statutory Worksheet). Ensure required measures are included in 7015.15 Project Description Section.*

PREPARER:

	<u>February 1, 2021</u>
Preparer’s Signature	Date
<u>Jill Williams</u>	<u>Principal, Wide Angle Strategies</u>
Preparer’s Name (printed)	Title (printed)

AUTHORIZED RESPONSIBLE ENTITY OFFICIAL:

	<u>February 1, 2021</u>
Authorized Responsible Entity Signature	Date
<u>Darlene Burcham</u>	<u>Town Manager, Town of Pulaski, VA</u>
Authorized Responsible Entity Name (printed)	Title (printed)

ADDITIONAL STUDIES PERFORMED

No additional studies were performed.

MITIGATION MEASURES NEEDED

Intensive-level survey for VLR/NRHP eligibility as requested by the Virginia Department of Historic Resources (DHR).

Post-Design Review of land disturbance as requested by DHR

Erosion and Sediment control for all construction. All construction within the 100-year floodplain will comply with the local Floodplain ordinance.

ASTM Phase I Environmental Site Assessment will be performed through the Town of Pulaski's Brownfields grant from the Environmental Protection Agency. Further Mitigation Plans will be developed as informed by the study.

SUMMARY OF FINDINGS AND CONCLUSIONS

Statutory checklist review found that the property is historically significant, floodplains are present, and ASTM Phase I Environmental Site Assessment is necessary.

Virginia DHR has requested an intensive-level survey for VLR/NRHP eligibility be performed.

Virginia DHR has requested a post-design review of any expected land disturbance.

Alternatives were considered to mitigate the impact on floodplains and the public was given an opportunity to comment on the proposals. All construction will be done in accordance with Pulaski's Floodplain and Erosion and Sediment Control Ordinances.

No adverse impact is anticipated by the Calfee Training Center Adaptive Reuse Project.



Calfee Community and Cultural Center
Honoring the Past, Planning for the Future
Town of Pulaski, Virginia



ENVIRONMENTAL REVIEW RECORD PART 1

STATUTORY CHECKLIST WORKSHEET

Worksheet for Preparing 24 CFR §58.5 Statutory Checklist

1. §58.5(a) Historical Properties [36 CFR Part 800]

Historic Properties

Does the project include the type of activity that would have the potential to affect historic properties such as acquisition, demolition, disposition, ground disturbance, new construction or rehabilitation?

Yes No

If Yes, continue.

If No, the project is not the type of activity that has the potential to affect historic properties. Compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Does the RE and State Historic Preservation Office (SHPO) have a Programmatic Agreement (PA) that does not require consultation for this type of activity?

Yes No

If Yes, document compliance with the PA. Compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

If No, continue.

Is the project located within or directly adjacent to a historic district?

Yes No

Is the structure or surrounding structures listed on or eligible for listing on the National Register of Historic Places (e.g. greater than 45 years old)?

Yes No

Were any properties of historical, architectural, religious or cultural significance identified in the project's Area of Potential Effect (APE)?

Yes No

If Yes to any of the questions above, continue.

If No to all of the questions above, the project will not affect historic properties. A concurrence from the SHPO that "no historic properties will be affected" is required. Compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Have you consulted through a "Finding of Effect" with the SHPO to determine whether the project will have "No Adverse Effect on Historic Properties?"

Yes No

If Yes, continue.

If No, consultation with the SHPO through a "Finding of Effect" is required.

Does the SHPO concurrence letter received for this project require mitigation or have conditions (always does in an "Adverse Effect" or "No Adverse Effect" determination)?

Yes No

If Yes, continue.

If No, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Have the SHPO and RE agreed on required mitigation or conditions?

Yes No

If Yes, include mitigation requirements and/or conditions from the SHPO in the mitigation section of the Statutory Checklist. Mark box "B" on the Statutory Checklist for this authority.

If No, continue with consultation until resolved.

Historic properties of religious and cultural significance to tribes and Native Hawaiian organizations

Does the project include the types of activities such as those listed below that have the potential to affect historic properties of religious and cultural significance to tribes?

- **Ground disturbance (digging);**
- New construction in undeveloped natural areas;
- Incongruent visual changes – impairment of the vista or view-shed from an observation point in the natural landscape;
- Incongruent audible changes – increase in noise levels above an acceptable standard in areas known for their quiet, contemplative experience;
- Incongruent atmospheric changes – introduction of lights that create sky-glow in an area with a dark night sky;
- Work on a building with significant tribal association;
- Transfer, lease or sale of a historic property of religious and cultural significance.

Yes No

If Yes, continue.

If No, tribal consultation is not required.

Does HUD's Tribal Directory Assessment Tool or other appropriate reference indicate that tribes have an interest in the location where the project is sited? (<http://eqis.hud.gov/tdat/Tribal.aspx>)

Department of the Interior Bureau of Indian Affairs

(<http://www.bia.gov/WhoWeAre/BIA/OIS/TribalGovernmentServices/TribalDirectory/index.htm>)

Native American Consultation Database

(<http://www.cast.uark.edu/home/research/archaeology-and-historic-preservation/archaeological-informatics/native-american-consultation-database.html>)

Yes No

If Yes, contact federally recognized tribe(s) and invite consultation. Continue.

If No, document the result in the ERR. Tribal consultation is not required.

Did the tribe(s) respond that they want to be a consulting party?

Yes No

If Yes, continue.

If No, (no response within 30 days or responded that they do not wish to consult), document response or lack of response in ERR. Further consultation is not required.

After consulting with the tribe(s) and discussing the project, were any properties of religious or cultural significance to the tribe(s) identified in the project's APE?

Yes No

If Yes, continue.

If No, notify tribe(s) and other consulting parties of your finding of "No Historic Properties Affected." Tribe(s) has 30 days to object to a finding.

After consulting with the tribe(s), will the project have an adverse effect on properties of religious or cultural significance to the tribe(s)?

Yes No

If Yes, consult with tribe(s) and other consulting parties to resolve adverse effects, including considering alternatives and mitigation measures that would avoid or minimize adverse effects.

If No, notify tribe(s) and other consulting parties of your finding of "No Adverse Effects." Tribe(s) has 30 days to object to a finding.

Were any objections to a finding received from a consulting tribe?

Yes No

If Yes, continue with consultation until resolved.

If No, consultation is complete.

Comments:

Limited new construction will occur at the rear of the existing structure (footprint approximately 200 square feet) and will not impact the viewshed. Virginia Department of Historic Resources has requested intensive-level survey for VLR/NRHP eligibility and review of final design for exterior land disturbance. Tribal consultation is not required.

Further Information Resources:

National Register of Historic Places: <http://nrhp.focus.nps.gov/natreghome.do?searchtype=natreghome>

National Conference of State Historic Preservation Officers: <http://ncshpo.org/>

Map of Currently Recognized THPO's: <http://www.nathpo.org/map.html>

HUD Notice on Tribal Consultation:

<https://www.onecpd.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58/>

Historic Preservation HUD Guidance: <https://www.onecpd.info/environmental-review/historic-preservation/>

Section 106 Agreements Database: <https://www.onecpd.info/resource/3675/section-106-agreement-database/>

2. 58.5(b) (1) Floodplain Management [24 CFR Part 55]

Does the project involve minor repairs or improvements on one to four family properties that do not meet the threshold for “substantial improvement” of §55.2(b)(8), i.e., the cost does not equal or exceed 50% of the market value of the structure before improvement or repair started, or before damage occurred?

Yes No

Does the project involve the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and persons with disabilities?

Yes No

If Yes to a or b, compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

If No, continue.

Is the project located within (or have an impact on) a 100 year floodplain (Zone A) or Coastal High Hazard (Zone V) identified by FEMA maps?

Yes No

Does the project involve a “critical action,” per §55.2(b) (2) (i), located within a 500 year floodplain (Zone B) identified by FEMA maps?

Yes No

If Yes to (b) or (c), follow HUD’s Floodplain Management Regulations 8-Step/5-Step decision-making process of §55.20 to comply with 24 CFR Part 55. The 8-Step/5-Step decision-making process must show that there are no practicable alternatives to locating the project in the floodplain, and if there are no alternatives, define measures to mitigate impacts to floodplains and location of the project in the floodplain. Completion of the 8-Step decision-making process must be completed before the completion of an EA per §55.10(a). See Attachment 2 for an example of the 8-Step decision-making process. The 8-step decision-making process must be included in the ERR and summarized in Part 55 public notices, as well as Part 58 NOI/RROF and FONSI notices. Mark box “B” on the Statutory Checklist for this authority.

If No to (b) and (c), compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

Does the project involve a critical action in a coastal high hazard area or a floodway?

Yes No

If, Yes, HUD assistance may not be used for this project.

Does the project involve a non-critical action which is not a functionally dependent use that is located in a floodway?

Yes No

If Yes, HUD assistance may not be used for this project

Does the project involve a non-critical action which is not a functionally dependent use that is located in a coastal high hazard area?

Yes No

If Yes, project is allowed **only** if it is designed for a location in a coastal high hazard area **and** is processed under Section 55.20. Design requirements must be noted in Statutory Checklist and 8-Step decision-making process.

Comments:

The project area is located in a 100-year floodplain. FIRMette and FEMA maps are attached. Project alternatives have been considered. Early Public Notice is attached. The following agencies have been contacted:

- Department of the Army, Norfolk District, Corps of Engineers
- Division of Soil and Water Conservation, Virginia Department of Conservation and Recreation
- Virginia Marine Resources Commission

For more information see:

Floodplain Management HUD Guidance:

<https://www.onecpd.info/environmental-review/floodplain-management/>

FEMA Map Service Center: <http://www.msc.fema.gov>

24 CFR, Part 55

<http://www.ecfr.gov/cgi-bin/text-idx?SID=97b46ed11126c00f1796973becbdcb15&node=24:1.1.1.1.32&rgn=div5>

3. §58.5(b) (2) Wetlands Protection (E.O. 11990)

Does the project involve new construction, land use conversion, or substantial improvements as defined in 24CFR Part 55?

Yes No

If Yes, continue.

If No, compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

Is the project within or adjacent to or will it affect wetlands, marshes, wet meadows, mud flats or natural ponds per field observation and National Wetlands Inventory (NWI) maps issued by the US Fish & Wildlife Service (USFWS) or, if not available, National Soil Surveys by National Resources Conservation Service (NRCS)?

Yes No

Are there drainage ways, streams, rivers, or coastlines on or near the site?

Yes No

Are there ponds, marshes, bogs, swamps or other wetlands on or near the site?

Yes No

Does the project involve new construction and/or filling located within a wetland designated on a USFWS National Wetlands Inventory map?

Yes No

If Yes to any of b through e, comply with wetlands decision-making process of 24 CFR §55.20. (Use Part 55 reference below for wetland procedures) Continue.

If No to all of b through e, compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

Will the project require a permit from the Corps under Section 404 of the Clean Water Act and/or will USFWS require wetland mitigation?

Yes No

If Yes, ensure this is noted in Part 55 and Part 58 public notices. Include all mitigation measures and permit requirements in the mitigation section of the Statutory Checklist. Compliance with this section is complete. Mark box “B” on the Statutory Checklist for this authority.

If No, compliance with this section is complete. Mark box “B” on the Statutory Checklist for this authority.

Comments:

Attached is a copy of the National Wetlands Inventory for the project area and adjoining. No wetlands are indicated in the project area although the project area is adjacent to Tract Fork, an identified riverine habitat.

No dredging will be performed in the project area. Limited excavation for a small addition (footprint 200 square feet) and asphalt removal will be performed; no fill material will be deposited in or discharged to any navigable waterways.

For more information see:

Wetlands Protection HUD Guidance:

<https://www.onecpd.info/environmental-review/wetlands-protection/>

USFWS National Wetlands Inventory – Geospatial Wetlands Digital Data:

<http://www.FWS.gov/wetlands/data/index.html>

Recognizing wetlands: http://www.usace.army.mil/Portals/2/docs/civilworks/regulatory/techbio/rw_bro.pdf

[24CFR, Part 55](#)

<http://www.ecfr.gov/cgi-bin/text-idx?SID=97b46ed11126c00f1796973becbdcb15&node=24:1.1.1.1.32&rgn=div5>

4. §58.5(c) Coastal Zone Management [Coastal Zone Management Act of 1972, Sections 307(c) & (d)]

Does the project involve new construction, land use conversion, or substantial improvements?

Yes No

If Yes, continue.

If No, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Is the project located within a Coastal Zone as defined in the Virginia Coastal Program (Virginia Coastal Zone Management (CZM) Plan)?

Yes No

If Yes, the State CZM Agency must make a finding that the project is consistent with the approved State CZM Plan. Mark box "B" on the Statutory Checklist for this authority.

If No, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Comments:

The project area is not within an area covered by a Federally-approved CZM Program. The project area is located approximately 174 miles west of the western boundary of the Virginia Coastal Zone at the edge of Chesterfield County.

The Virginia Coastal Zone Management Program map is attached, annotated to indicate the project area. Also included is the list of Virginia's coastal counties, cities, and incorporated towns which does not include the City of Galax or it's surrounding counties of Carroll or Grayson.

For additional information see:

Coastal Zone Management HUD Guidance:

<https://www.onecpd.info/environmental-review/coastal-zone-management/>

States and Territories Working with NOAA on Ocean and Coastal Zone Management:

<http://coastalmanagement.noaa.gov/mystate/welcome.html>

Virginia Coastal Program

<http://www.deq.virginia.gov/Programs/CoastalZoneManagement/DescriptionBoundary.aspx>

5. §58.5(d) Sole Source Aquifers [40 CFR Part 149]

Does the project involve new construction or land use conversion?

Yes No

If Yes, continue.

If No, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Is the project located within a U.S. Environmental Protection Agency (EPA)-designated sole source aquifer watershed area per EPA Ground Water Office?

Yes No

If Yes, consult with the Water Management Division of EPA to design mitigation measures to avoid contaminating the aquifer and implement appropriate mitigation measures. Include mitigation measures in mitigation section of Statutory Checklist. Mark box "B" on the Statutory Checklist for this authority.

If No, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Comments:

The project does not involve new construction or land use conversion.

The project area is not located within a sole source aquifer per Region 3 Sole Source Aquifer Map. The project area is located approximately 230 miles southwest of the nearest sole source aquifer location, Prospect Hill, located near Winchester, VA. NEPA Assist Map is attached indicating the project area in relation to the nearest Sole Source Aquifer.

For more information see:

Sole Source Aquifer HUD Guidance: <https://www.onecpd.info/environmental-review/sole-source-aquifers/>

Virtual Aquifers - EPA Mid-Atlantic

<http://www.epa.gov/reg3wapd/presentations/ssa/index.htm><http://www.epa.gov/reg3wapd/presentations/ssa/index.htm>

6. §58.5(e) Endangered Species [50 CFR Part 402]

Does the project involve the type of activities that are likely to have “no effect on endangered species”, such as:

- Demolition and construction or placement of a single-family residence within a developed lot, and/or any loans or mortgages affiliated with such construction, demolition or placement provided they are not within 750 feet of habitat for federally-listed species or 300 feet of mapped wetlands, wildlife refuges, fish hatcheries, wildlife management areas, or related significant fish and wildlife resources?
 Yes No
- Rehabilitation or renovation activities associated with existing structures (*e.g.*, houses, buildings), including additional structures attached to or associated with the primary structure, and/or any loans or mortgages affiliated with such rehabilitation or renovation?
 Yes No
- Acquisition of existing structures (*e.g.*, houses, buildings), including additional structures attached to or associated with the primary structure, and/or any loans or mortgages affiliated with such acquisition.
 Yes No
- Purchase and placement of playground equipment within existing parks?
 Yes No
- Resurfacing, repairing, or maintaining existing streets, sidewalks, curbs, trails, parking lots and/or any other existing paved surfaces where additional ground disturbance, outside of the existing surface is not necessary?
 Yes No

If Yes to any of the above, the project is likely to have “No Effect” on federally protected species and critical habitat. Informal consultation with the US Fish and Wildlife Service or the National Marine Fisheries Service (Services) is not necessary. The RE is required to make this finding and include a memorandum to the file supporting the finding (note that this finding should be made by the RE, and not by third party contractors and non-RE grant recipients). Compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

If No to all of the above, continue.

Has the US Fish and Wildlife Service or the National Marine Fisheries Services identified listed species or designated critical habitat in the county where the project is located?

Yes No

If Yes, continue.

If No, the project is likely to have “No Effect” on federally protected species and critical habitat. Informal consultation with the Services is not necessary. The RE is required to make this finding and include a memorandum to the file supporting the finding (note that this finding should be made by the RE, and not by third party contractors). Compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

Is the project located within 750 feet of habitat for federally-listed species or 300 feet of mapped wetlands, wildlife refuges, fish hatcheries, wildlife management areas, or related significant fish and wildlife resources?

Yes No

If Yes, conduct special studies by a qualified professional to determine whether the project may affect the species or habitat to support a “May Effect” finding.

If No, continue below

Does the project constitute a major construction activity (a major Federal action that modifies the physical environment and would normally require the preparation of an EIS)?

Yes No

If Yes, formal consultation with the Services is required in accordance with procedural regulations contained in 50 CFR Part 402. Mark box “B” on the Statutory Checklist for this authority.

If No, continue.

If federally protected species or critical habitat have been identified within the project area, has a special study been conducted by a qualified professional to determine the effects of the project on each species and critical habitat?

Yes No

If Yes, continue.

If No, a special study should be conducted to determine the effects of the project on federally protected species and critical habitat. Continue.

Has the RE made a determination based on professional findings that the project is “Not Likely to Adversely Affect” any federally protected (listed or proposed) threatened or endangered species (i.e., plants or animals, fish, or invertebrates), nor adversely modify critical habitats?

Yes No

If Yes, Service’s concurrence with findings is required. Mark box “B” on the Statutory Checklist for this authority.

If No, continue.

Has the RE determined based on professional findings that the project “May Affect” federally protected (listed or proposed) threatened or endangered species (i.e., plants or animals, fish, or invertebrates), or adversely modify critical habitats?

Yes No

If Yes, formal consultation is required with the Services, in accordance with procedural regulations contained in 50 CFR Part 402, which mandates formal consultation in order to preserve the species. Mark box “B” on the Statutory Checklist for this authority.

If No, contact your FEO for assistance in determining impacts to federally protected species and critical habitat.

Comments:

The online review process with the U.S. Fish and Wildlife Service Virginia Field Office was used to create a project review package, which is included. Following the online review, the USFWS/Virginia Field Office provided an Online Consultation letter endorsing the determination in the Species Conclusion Table that the project activities will have **no effect** on the listed species, that there is **no critical habitat** located in or within approximately 25 miles of the project area, and that **no Eagle Act permit is required**.

A copy of the Online Consultation Letter, official species list from IPaC, VDGIF and VDCR-DNH database review results, Critical Habitat Map, Eagle Nest Buffer and Bald Eagle Concentration Area maps, and the Species Conclusion Table are attached.

For additional information see: (The Endangered Species Act of 1973 (16 U.S.C. 1531 *et seq.* as amended: particularly Section 7 (b) and (c). 50 CFR 402).

ESA HUD Guidance: <https://www.onecpd.info/environmental-review/endangered-species/>

USFWS ESA Species Search: <http://www.FWS.gov/endangered/species/index.html>

NMFS ESA Species Search: <http://www.nmfs.noaa.gov/pr/species/esa/>

USFWS Critical Habitat Maps: <http://crithab.FWS.gov/>

NMFS Critical Habitat Maps: <http://www.nmfs.noaa.gov/pr/species/criticalhabitat.htm>

Endangered Species Consultation Handbook:

http://www.nmfs.noaa.gov/pr/pdfs/laws/esa_section7_handbook.pdf

[USFWS Information, Planning, and Consultation](#)

<http://ecos.fws.gov/ipac/>

US FWS - VA Ecological Service – See Project Reviews in Virginia

http://www.fws.gov/northeast/virginiafield/EndSpec_FedAct.html

[Virginia Department of Game and Inland Fisheries](#)

<http://www.dgif.virginia.gov/environmental-programs/environmental-services-section.asp>

[Virginia Endangered Species by locality](#)

<http://vtpp.ext.vt.edu/pesticide-safety-education-program/endangered-species-and-pesticide-regulation/virginia-endangered-species-list>

7. §58.5(f) Wild and Scenic Rivers [36 CFR Part 297]

Does the project involve new construction, land use conversion, or substantial improvements?

Yes No

If Yes, continue.

If No, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Is the project located within one (1) mile of a designated Wild, Scenic, Recreational, or river being studied as a potential component of the Wild & Scenic River system or an inventory river?

Yes No

If Yes, determination from the National Park Service (NPS) must be obtained, with a finding that the project will not have a direct and adverse effect on the river nor invade or diminish values associated with such rivers. For NRI Rivers, consultation with NPS is recommended to identify and eliminate direct and adverse effects. Mark box "B" on the Statutory Checklist for this authority.

If No, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Comments:

Virginia has approximately 49,350 miles of river, but **no designated Wild and Scenic Rivers**, according to the database available at <http://www.rivers.gov/virginia.php>.

The closest designated Wild & Scenic Rivers to the project area are the Bluestone River in West Virginia, which empties into the New River downstream of Pulaski County, Virginia (approximately 42 miles by direct route), and a section of the New River (South Fork) in North Carolina, upstream of Pulaski, Virginia (approximately 57 miles by direct route. Maps created using NEPAssist are attached based on data from <http://www.rivers.gov/maps/conus.php>.

In 2009 a Study of the New River in West Virginia and Virginia was performed, with the finding that the study area, located between the US 460 Bridge in Glen Lyn, VA to Bluestone Lake in WV **is eligible for inclusion in the National Wild and Scenic Rivers System, most appropriately classified as a "scenic" river, but that Alternative #1, the "No Action" Alternative, is the only appropriate alternative at this time, given lack of suitability.** A copy of the Executive Summary from the study is included. The project area is located on Tract Fork, which flows into Peak Creek and eventually the New River upstream from the nearest extent of the study area at the US460 Bridge in Glen Lyn, VA based on data from <http://www.rivers.gov/maps/conus.php>.

Two rivers in Pulaski County, Virginia are listed on the National River Inventory (NRI) at <http://www.nps.gov/ncrc/programs/rtca/nri/states/va.html> : the Little River and Big Reed Island Creek, both of which flow from headwaters, join, and flow to the New River. Neither of these are located within the project area. Maps created using the National Rivers Inventory are attached which show relative distance from the project area.

For further information see:

Wild and Scenic Rivers HUD Guidance: <https://www.onecpd.info/environmental-review/wild-and-scenic-rivers/>

National Park Service: Designated Rivers <http://www.rivers.gov/map.php>

Study Rivers <http://www.rivers.gov/study.php>

National River Inventory (NRI) listed rivers: <http://www.nps.gov/ncrc/programs/rtca/nri/index.html>

Recreational River Segments – Virginia: <http://www.nps.gov/ncrc/programs/rtca/nri/states/va.html>

8. §58.5(g) Air Quality [40 CFR Parts 6, 51, 61 and 93]

Does the project involve demolition or renovation of buildings likely to contain asbestos containing materials?

Yes No

If Yes, ensure the project is in compliance with EPA’s Asbestos regulations found at 40 CFR Part 61 (NESHAP) and all State and local regulations. Continue below.

If No, continue.

Does the project require an environmental assessment or environmental impact statement?

Yes No

If Yes, continue.

If No, compliance with CAA State Implementation Plan factor is complete. Mark Box A on the Statutory checklist.

Does the project involve five or more dwelling units, acquisition of undeveloped land, a change of land use, demolition, major rehabilitation, or new construction?

Yes No

If Yes, continue.

If No, compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

Is the project located in a Non-Attainment area?

Yes No

If Yes, continue.

If No, compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

Has EPA or the State provided a written determination that the project will not exceed any of the de minimis emissions levels of all non-attainment and maintenance level pollutants or exceed the screening level established by the state or air quality management district?

Yes No

If Yes, continue.

If No, compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

Did EPA or the State provide a Letter of Consistency with the State Implementation Plan (SIP)?

Yes No

If **Yes**, obtain letter of consistency showing that the project is consistent with the SIP. Compliance is complete. Mark box “A” on the Statutory Checklist for this authority.

If No, continue.

Has EPA determined that the proposed activity is one that requires a permit under the SIP?

Yes No

If Yes, continue.

If No, compliance is complete. Mark box "B" on the Statutory Checklist for this authority.

Can project be brought into compliance through mitigation?

Yes No

If Yes, list mitigation measures required to achieve conformance with SIP in the mitigation section of the Statutory Checklist. Mark box "B" on the Statutory Checklist for this authority.

If No, Federal assistance may not be used at this location.

Comments:

The project area does not reside in a nonattainment area as determined by the Maryland/Washington DC/Virginia/Delaware 8-hour Ozone Nonattainment Areas (2015 Standard) located at http://www3.epa.gov/airquality/greenbk/map/mddcvade8_2015.pdf. The closest nonattainment area is the Washington DC-MD-VA; located approximately 206 miles northeast of the project area. Maps created with NEPAassist are included based on the database information available at <http://www3.epa.gov/airquality/greenbk/hnacs.html#VIRGINIA>.

Project activities will have no impact on ambient air quality. All asbestos and lead abatement activities involve repair of existing structures. Surfaces will be tested for the presence of lead- and asbestos-containing materials which, if found, will be abated according to all State and local regulations and will comply with EPA's Asbestos regulations found at 40 CFR Part 61 (NESHAP).

For further information see:

Air Quality HUD Guidance: <https://www.onecpd.info/environmental-review/air-quality/>

The Green Book Nonattainment Areas for Criteria Pollutants: <http://www.epa.gov/oar/oaqps/greenbk/>

Region 3 State Implementation Plans (SIPs): <http://yosemite.epa.gov/r3/r3sips.nsf/SIPIndex!OpenForm>

9. §58.5(h) Farmlands Protection [7 CFR Part 658]

Does the project involve acquisition of undeveloped land, conversion of undeveloped land, new construction or site clearance?

Yes No

If Yes, continue.

If No, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Is project located in an area zoned to urban and/or residential uses as mapped by the Census Bureau?

Yes No

If Yes, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

If No, continue.

Does the project site include prime or unique farmland, or other farmland of statewide or local importance as identified by the U.S. Department of Agriculture, Natural Resources Conservation Service (NRCS) (formerly the Soil Conservation Service)?

Yes No

If Yes, request evaluation of land type from the NRCS using Form AD-1006, and consider the resulting rating in deciding whether to approve the proposal, as well as mitigation measures (including measures to prevent adverse effects on adjacent farmlands). Mark box "B" on the Statutory Checklist for this authority. Include mitigation measures in the mitigation section of the Statutory Checklist.

If No, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Comments:

No parcels are slated for acquisition or clearance. New construction will be limited to a small addition at the rear of the existing school building on already-cleared land. The parcel is zoned R2 (Residential) per the attached map from the Pulaski County GIS. The local zoning ordinances permit these modifications with a Special Exception. None of the parcels adjoining the project area are zoned Agricultural; there is no farmland in the project area.

A project area map from the Pulaski County GIS, along with map key, are attached for reference.

For additional information see:

NRCS Soil Maps: <http://websoilsurvey.nrcs.usda.gov/app/>

Form AD-1006 and instructions: http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1045394.pdf

Farmland Protection HUD Guidance: <https://www.onecpd.info/environmental-review/farmlands-protection/>

Census Data Mapper: <http://tigerweb.geo.census.gov/datamapper/map.html>

10. §58.5(i) (1) Noise Abatement and Control [24 CFR Part 51B]

Does the project involve a noise sensitive use such as a residential structure, school, hospital, nursing home, library, etc.?

Yes No

If Yes, continue.

If No, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Is the project located within:

- 15 miles of a civilian or military airfield with more than 9,000 carrier operations annually;
 Yes No
- 1,000 feet of a major highway or busy road;
 Yes No
- 3,000 feet of a railroad.
 Yes No

If Yes to any the above, complete a noise calculation assessment. Use adopted DNL contours if the noise source is an airport. Continue.

If No, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Do noise calculations or airport noise contour maps indicate noise levels above 65dB (outside)?

Yes No

If No, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

If Yes, continue;

d. If the answer to "c" above is "yes," does the project involve rehabilitation?

Yes No

If Yes, noise attenuation measures are strongly encouraged for rehabilitation and new construction to reduce noise levels to below 65dB. Mark box "B" on the Statutory Checklist for this authority. List all attenuation measures in the mitigation section of the Statutory Checklist.

If No, continue.

If the answer to "c" is yes, does the project involve new construction?

Yes No

If Yes, Special Environmental Clearance is required (an Environmental Assessment). Noise attenuation measures are required for new construction to reduce noise levels to below 65dB. Mark box "B" on the Statutory Checklist for this authority. List all attenuation measures in the mitigation section of the Statutory Checklist.

If No, Continue.

Do noise calculations or airport noise contour maps indicate outdoor noise levels above 75dB?

Yes No

If Yes, continue.

If No, compliance is completed with respect to steps a-d above.

f. If noise levels are above 75 dB, does the project involve new construction?

Yes No

If Yes, HUD assistance for the construction of new noise sensitive uses is generally prohibited for projects with unacceptable noise exposure (>75dB). An Environmental Impact Statement (EIS) is required. Compliance cannot be achieved without either completion of an EIS or processing of an EIS waiver.

If No, compliance is complete with respect to steps a-e above.

g. If outdoor noise levels are > 75 dB and the project involves new construction, was an EIS waiver processed?

Yes No

If Yes, compliance is complete. Attach the EIS waiver, signed by the Certifying Officer. Mark box "B" of the Statutory Checklist and list all outdoor and indoor attenuation measures to reduce outdoor noise levels to 65 dB and indoor noise levels to 45 dB in the mitigation section of the Statutory Checklist.

If No, proceed with preparation of an EIS or deny the project.

Comments:

The project scope entails childcare facilities and business improvements and therefore is sensitive to noise.

The project area is located approximately 10.5 miles from the nearest commercial or military airport, the New River Valley Airport (KPSK). Airport operations average about 126/week, resulting in total annual carrier operations of approximately 6,550. Although the project area is located less than 15 miles from the airport, the total KPSK annual carrier operation does not exceed the 9,000 thresholds. Airport traffic is predominately single-engine aircraft and has no significant impact on the project area noise sensitivity. The A NEPAassist map indicating the distance between the closest points is attached; the NRVA data was found at <https://airnav.com/airport/KPSK>.

The project area is located further than 1,000 ft. from the nearest Interstate (I-81 is 4.4 miles away) and the nearest primary road (US Route 11/Washington Ave. is 2,500 ft. from the project area), which has an Annual Average Daily Traffic Volume of 3,900 per the 2019 VDOT Annual Average Daily Traffic Volume By Section, found at the following link, http://www.virginiadot.org/info/2019_traffic_data.asp, an excerpt of which is included. This data was used to calculate the Day/Night Noise Level for the project area. The project area is sensitive to noise associated with the nearest major road or highway. NEPAassist maps indicating these distances are attached.

The project area is located approximately 971 feet from the Norfolk Southern Pocahontas Line which is a contributing factor to the noise in the project area. Crossing data for the intersection with Jefferson Avenue was used.

A per-unit Day/Night Noise Level calculation was performed for the project. The DNL was calculated to be less than 65 dB for this location. The DNL calculator used is found at the updated HUD website <https://www.hudexchange.info/environmental-review/dnl-calculator/>.

The Noise Assessment Calculations determined that the project is in compliance with the 65 dB threshold and no additional abatement or control measures are required.

For more information see:

HUD Noise Guidance:

<https://www.onecpd.info/environmental-review/noise-abatement-and-control/>

<http://www.hud.gov/offices/cpd/environment/dnlcalculator.cfm>

<http://www.hud.gov/offices/cpd/environment/mitigation.cfm>

<http://portal.hud.gov/hudstracat/noiseCalcEntry.jsp>

Virginia Department of Transportation Traffic Counts

<http://www.virginiadot.org/info/ct-trafficcounts.asp>

Federal Railroad Administration Crossing Data – Office of Safety Data – use 8.10

<http://safetydata.fra.dot.gov/officeofsafety/default.aspx>

Federal Aeronautics Administration:

http://www.faa.gov/airports/planning_capacity/npas/reports/

Airport Contacts: <http://www.airnav.com/airports/>

11. §58.5(i) (1) Explosive and Flammable Operations [24 CFR 51C]

Does the project involve development, construction, rehabilitation, modernization or land use conversion of a property intended for residential, institutional, recreational, commercial, or industrial use?

Yes No

If Yes, continue.

If No, compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

Was a field observation performed by a qualified professional who documents there are above ground storage tanks within line of site of the project?

Yes No

Is the project site within 1 mile of current or planned stationary aboveground storage tanks of more than 100 gallon capacity, containing common liquid industrial fuels OR of any capacity, containing hazardous liquids or gases, which are not liquid industrial fuels?

Yes No

Are industrial facilities handling explosive or fire-prone materials such as liquid propane, gasoline or other storage tanks adjacent to or visible from the project site?

Yes No

If Yes to any of b – d above, use HUD Hazards Guide to calculate an Acceptable Separation Distance to comply with 24 CFR Part 51, Subpart C. Continue.

If No to all of b – d above, compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

Is the project located at an Acceptable Separation Distance from any above-ground explosive or flammable fuels or chemicals containers as calculated above?

Yes No

If Yes, compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

If No, continue.

Can mitigation measures, such as construction of a barrier of adequate size and strength, reduce the blast overpressure or thermal radiation hazard to protect the project (per 24 CFR §51.205)?

Yes No

If Yes, Mark box “B” on the Statutory Checklist for this authority. List all mitigation measures in the mitigation section of the Statutory Checklist.

If No, HUD assistance cannot be used for this project.

Comments:

Nine (9) Above-Ground Storage Tanks (ASTs) are located at three (3) locations within one mile of the project area extents, based on registered tank data found at http://www.deq.virginia.gov/Portals/0/DEQ/Land/Tanks/i_register.txt from <http://www.deq.virginia.gov/Programs/LandProtectionRevitalization/PetroleumProgram/FilesForms.aspx#petdbf> . The three locations were mapped on the enclosed NEPAssist map. The table attached (Calfee Training School Adaptive Reuse Project – Above Ground Storage Tanks with ASDs) list the tanks, their capacity and contents, and Acceptable

Separation Distances (ASDs) from the project area extents. All tanks known by the locality to be active are outside their ASDs. The tank registered to the address at 4 Magnox Drive is inactive as the manufacturing facility is closed. The project is deemed compliant with no significant impact.

The ASD Calculator is found at: <https://www.hudexchange.info/environmental-review/asd-calculator/>

For additional information see:

HUD Guidance on Siting Projects near Explosive and Flammable Facilities: <https://www.onecpd.info/environmental-review/explosive-and-flammable-facilities/>

Acceptable Separation Distance Guidebook: <https://www.onecpd.info/resource/2762/acceptable-separation-distance-guidebook/>

Barrier Design Guidance for HUD Assisted Project Near Hazardous Facilities:
<https://www.onecpd.info/resource/2763/barrier-design-guidance-for-hud-assisted-projects-near-hazardous-facil/>

12. §58.5(i) (1) Airport Hazards [24 CFR 51D]

Will the project use HUD assistance, subsidy or insurance for construction; land development; community development or redevelopment; substantial modernization and rehabilitation which prolongs the physical or economic life of existing facilities; provide facilities and services which make land available for construction; change the use of a facility; increase the unit density or number of people at the site?

Yes No

If Yes, continue.

If No, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

Is the property within 5,000 feet of a civilian airport, the Runway Clear Zone (RCZ)?

Yes No

Is the project within the 15,000 foot military airfield Accident Potential Zone (APZ)?

Yes No

If Yes, continue.

If No to both of the above questions, compliance with this section is complete. Mark box "A" on the Statutory Checklist for this authority.

If the project is within 5,000 feet of the end of a civilian airport runway, did the Airport Operator provide a written determination that the project is not now and will not be 10 years from now, located 2,500 feet from the end of the civilian runway in a runway Clear Zone (CZ)?

Yes No

If Yes, compliance is complete. Mark Box "A" on the Statutory Checklist and attach the Airport Operator's written determination.

If No, continue.

If the project is within 15,000 feet of a military airfield did the airfield operator provide a written determination that the project is not currently located in a CZ/APZ and future expansion will not place the property in a CZ/APZ?

Yes No

If Yes, compliance is complete. Mark Box "A" on the Statutory Checklist and attach the Airport Operator's written determination.

If No, continue.

If the project is or will be in a CZ, will the project be frequently used or occupied by people?

Yes No

If Yes, HUD funds may not be used for this project.

If No, continue.

If the project will not frequently be used by people, has the airport operator provided a written statement that there are no plans to purchase the land involved with such facilities as part of a Runway CZ acquisition program?

Yes No

If Yes, attach copy of written assurance from airport operator. Mark box "B" on the Statutory Checklist for this authority.

If No, HUD funds may not be used for this project.

If the project is located in a military airfield APZ, is the project consistent with the Land Use Compatibility Guidelines for Accident Potential Zones (32 CFR Part 256, DOD Instruction 4165.57).

Yes No

If Yes, attach copy of written assurance from airport operator. Mark box "B" on the Statutory Checklist for this authority.

If No, HUD funds may not be used for this project.

Comments:

The project area is located approximately 10 miles from the nearest commercial airport, the New River Valley Airport (KPSK) which is outside the 5,000-ft Runway Clear Zone (RCZ) for commercial airports.

The project area is located approximately 156 miles from the nearest military airfield at Fort Pickett in Blackstone, VA (BKT). This is located outside the 15,000-ft Accident Potential Zone (APZ).

The attached maps, created with NEPAssist, indicates the two airport locations with the RCZ and APZ marked, as well as a distance to the project area.

For further information see:

Airport Information: <http://www.airnav.com/airports/>

Airport Hazards HUD Guidance:

[https://www.onecpd.info/environmental-review/airport-hazards/DOD Instruction 4165.57](https://www.onecpd.info/environmental-review/airport-hazards/DOD%20Instruction%204165.57)

<http://www.dtic.mil/whs/directives/corres/pdf/416557p.pdf>

13. §58.5(i) (2) Contamination and Toxic Substances

Government Records Search

Is the property located within the search distances of any of the types of environmental contamination sources?

Standard Environmental Record Sources	ASTM 1527-13 Recommended Minimum Search Distance (mi)	Yes	No
Federal Delisted NPL Site List	0.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) List	0.5	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Federal CERCLIS No Further Remedial Action Planned (NFRAP) Site List	0.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Federal RCRA Non-CORRACTS Treatment, Storage and Disposal (TSD) Facilities List	0.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
State- and Tribal-Equivalent CERCLIS	0.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
State and Tribal Landfill and/or Solid Waste Disposal Site Lists	0.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
State and Tribal Leaking Storage Tank Lists	0.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
State and Tribal Voluntary Cleanup Sites	0.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
State and Tribal Brownfield Sites	0.5	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Federal National Priorities List (NPL)	1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Federal RCRA Correction Action (CORRACTS) Facilities List	1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
State- and Tribal-Equivalent NPL	1	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Federal Institutional Control/Engineering Control Registries	Property Only	<input type="checkbox"/>	<input checked="" type="checkbox"/>
State and Tribal Institutional Control/Engineering Control Registries	Property Only	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Federal Emergency Response and Notification System (ERNS) List	Property Only	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Federal RCRA Generators List	Property/Adjoining Properties	<input checked="" type="checkbox"/>	<input type="checkbox"/>
State and Tribal Registered Storage Tank Lists	Property/Adjoining Properties	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the project is located within any of the minimum search distances above, then the RE must further evaluate to determine if there has been a release or there is a threat of release to the subject property. Attach supporting documentation to the environmental review to support any conclusion that the site of concern is not a threat.

If a release or threat of release cannot be ruled out, then services of a qualified environmental professional is necessary to further evaluate potential for site contamination. Recommend an ASTM 1527-13 Phase I Environmental Site Assessment (Phase I).

Prior Uses of the Property

Has the subject property, adjacent property, or adjoining property ever been used for any of the following types of uses?

	Yes	No		Yes	No
Gas Station	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Vehicle Repair Shop	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Car Dealership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Auto Garage	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Depot	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Commercial Printing Facility	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Industrial or commercial warehouses	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Dry Cleaners	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Photo Developing Laboratory	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Hospital	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Junkyard or landfill	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Agricultural/Farming Operations	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tannery	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Livestock Operations	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If the evaluation of previous uses results in a yes answer to any of the above, the service of a qualified environmental professional is necessary to rule out site contamination. An ASTM E1527-13 Phase I report is recommended.

If the evaluation of previous uses does not identify previous uses of concern, attach supporting documentation for the conclusion to the environmental review.

Field Site Visit

Did a visual inspection of the site show the following?

	Yes	No
Distressed vegetation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Vent or Fill Pipes	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Storage Oil Tanks or Questionable Containers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pits, Ponds or Lagoons	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Stained Soil or Pavement (other than water stains)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Pungent, Foul or Noxious Odors	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Dumped Material or Soil, Mounds of Dirt, Rubble, Fill, etc.	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Does the project have an underground storage tank other than a residential fuel tank, or known or suspected to be contaminated by toxic chemicals or radioactive materials?

Yes No

Is the project site near an industry or commercial facility disposing of chemicals or hazardous wastes?

Yes No

Could a nearby source of toxic, hazardous or radioactive substances affect the health and safety of project occupants or conflict with the intended use of the property?

Yes or No

If the site visit identifies a “Yes” answer to any of the above, a qualified environmental professional must undertake investigations necessary to ensure that the project is free of hazardous materials, contamination, toxic chemicals and gases, and radioactive substances such that there is no hazard which could affect the health and safety of occupants or conflict with the intended utilization of the property. Continue.

Results of ASTM Site Contamination Reviews

Was an ASTM E1527-13 Phase I Environmental Site Assessment (ESA) report completed for this project? (Strongly recommend a Phase I ESA for land acquisition, new construction, reconstruction or substantial rehabilitation).

Yes No

Did a Phase I, or equivalent evaluation, identify the potential for site contamination? [The RE must independently evaluate the Phase I and not rely entirely on the conclusions of whether or not there is a Recognized Environmental Condition (REC) since Phase I's do not always appropriately identify RECs]

Yes No

If there is the potential for site contamination, was an ASTM E1903-11 Phase II Environmental Site Assessment Completed that documented contamination?

Yes or No

Did results of the Phase I or Phase II identify the need to mitigate the environmental condition by removing, stabilizing or encapsulating the toxic substances in accordance with the requirements of the appropriate Federal, state or local oversight agency?

Yes No

If the project site requires remediation, does the RE have the following documentation?

	Yes	No
Remediation Plan	<input type="checkbox"/>	<input type="checkbox"/>
Regulatory Oversight Agency Approval of the Remediation Plan	<input type="checkbox"/>	<input type="checkbox"/>
Firm Cost Estimate to Implement the Remediation Plan	<input type="checkbox"/>	<input type="checkbox"/>
A Secured Source of Funding for Site Remediation	<input type="checkbox"/>	<input type="checkbox"/>
A project condition that the project construction or rehabilitation cannot proceed until the RE received a No Further Action (NFA) Required or Site Closure Letter from the Regulatory Oversight Agency	<input type="checkbox"/>	<input type="checkbox"/>
A project condition for Deed Restrictions related to any continuing obligations associated with the remediation plan or NFA or Site Closure Letters	<input type="checkbox"/>	<input type="checkbox"/>

If Yes, then, compliance is complete. Attach supporting documentation to the environmental review. Ensure that all mitigation measures are identified in the environmental review and that there is a mechanism for conveying requirements in agreements and awards. Mark Box B on the Statutory Checklist for this Authority. Attach all supporting documentation.

If No, HUD cannot provide assistance for the project at this site.

- j. If the site requires remediation, and the property owner intends to complete the remediation prior to transferring the property to the HUD recipient, can the RE provide documentation of the following?

	Yes	No
Remediation Plan	<input type="checkbox"/>	<input type="checkbox"/>
Regulatory Oversight Agency Approval of the Remediation Plan	<input type="checkbox"/>	<input type="checkbox"/>
Purchase contract and closing document requirements for receipt of a No Further Action Required or Site Closure Letter from the Regulatory Oversight Agency prior to closing.	<input type="checkbox"/>	<input type="checkbox"/>
Deed restrictions for any continuing obligations associated with the remediation plan or NFA or Site Closure Letters	<input type="checkbox"/>	<input type="checkbox"/>

If Yes, then, compliance is complete. Attach supporting documentation to the environmental review. Ensure that all mitigation measures are identified in the environmental review and that there is a mechanism for conveying requirements in agreements and awards. Mark Box B on the Statutory Checklist for this Authority. Attach all supporting documentation.

If No, HUD cannot provide assistance for the project at this site.

Comments:

The proposed project site is not an identified EPA facility.

An Environmental Radius Report (ERR) was prepared for the site which indicates one (1) US RCRA Generator within 0.25 miles of project area, the now-shuttered Nanochemonics (Magnox) facility located at Four Magnox Drive. Efforts are underway to clean up the site. Note the Calfee Training School Project site (One Magnox Drive) served as office space for the manufacturing facility accessed at Four Magnox Drive; the majority of the manufacturing equipment and materials were located on the opposite side of Peak Creek, approximately 0.5 miles from the Calfee Training School.

Two (2) toxic substance releases were recorded at two (2) locations within 0.5 miles of the project area from the Toxic Release Inventory (TRI) as reported in the Environmental Radius Report:

1. Nanochemonics Holdings – 4 Magnox Dr. (2010)
2. Jefferson Yarns – 27 Valley St. (2000)

Each of the facilities listed in the above reports was reviewed and determined to be in compliance with all regulations and mitigation plans. Review of ECHO Reports for both facilities indicate compliance with all EPA regulations for the last 12 quarters. Nanochemonics (Magnox) is permanently closed. A current (2019) TRI Factsheet lists two different emitters, Bondcote and James Hardie, both of which are more than a mile from the project area.

Seven (7) RCRA generators were identified at or within 0.5 miles of the project area. Of the seven generators, all but one (Jefferson Yarns) is permanently closed. None of these locations will impact the project.

An ASTM Phase I Environmental Site Assessment (ESA) report will be pursued by the Town of Pulaski through its EPA Brownfields grant. Necessary Mitigation Steps will be assessed pending report completion and further evaluation will take place at that time.

For additional information see:

HUD Guidance on Site Contamination: <https://www.onecpd.info/environmental-review/site-contamination/>

NEPAssist: <http://nepassisttool.epa.gov/nepassist/entry.aspx>

EPA Envirofacts Data: <http://www.epa.gov/enviro/>

EPA Maps: <http://www.epa.gov/emefdata/em4ef.home>

ATSDR Hazardous substances: <http://www.atsdr.cdc.gov/toxfaqs/index.asp>

Right-To-Know Network: <http://www.rtknet.org/>

14. §58.5(j) Environmental Justice (E.O. 12898)

Is the project located in or designed to serve a predominantly minority and low-income neighborhood?

Yes No

If Yes, continue.

If No, compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

Would there be an adverse environmental impact caused by the proposed action, or would the proposed action be subject to an existing adverse environmental impact?

Yes No

If No, compliance with this section is complete. Mark box “A” on the Statutory Checklist for this authority.

If Yes, perform an Environmental Justice (EJ) analysis using census, geographic and other data to determine if a low-income/minority population is disproportionately impacted. Continue.

Will the adverse environmental impact of the proposed action disproportionately impact minority and low-income populations relative to the community-at-large?

Yes No

If Yes, Mitigation or avoidance of adverse impacts must be considered to the extent practicable; and, public participation processes must involve the affected population(s) in the decision-making process. Continue.

If No, compliance with this section is complete. Document the determination of no disproportionate impacts. Mark box “A” on the Statutory Checklist for this authority.

Has the mitigation plan been approved by the RE and the impacted community?

Yes No

If Yes, compliance with this section is complete. Include mitigation plan in the mitigation section of the Statutory Checklist. Mark box “B” on the Statutory Checklist for this authority.

If No, Project cannot move forward until EJ issue is mitigated to the satisfaction of the RE and impacted community.

Comments:

The project area does not currently have nor will this project create adverse health or environmental impacts.

Data for a 10-mile radius surrounding the Calfee Training School was consulted to determine Environmental Justice (EJ) Indices and impact on the project area relative to the entire Census Area. The EJ mapper databases indicate that the project area is at equal or lower risk than neighboring census areas. Data for the project area also indicates that the Distribution of Burdens does not disproportionately impact a minority or low-income population relative to the community at large.

For additional information see:

EJ HUD Guidance: <https://www.onecpd.info/environmental-review/environmental-justice/>

EPA’s “EJ View” Tool provides information relevant to EJ assessments: <http://epamap14.epa.gov/ejmap/entry.html>

Census Bureau – American Fact Finder - data and maps: <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>

Tract-level data on race & income: <http://www.ffiec.gov/geocode>

Summary of Mitigation Measures:

(Required for Incorporation into Project Design, included in Public Notices, and included as requirements of contracts, grants, loans, etcetera? Ensure final measures are included in Project Description Section of 7015.15)

Intensive-level survey for VLR/NRHP eligibility as requested by the Virginia Department of Historic Resources (DHR).

Post-Design Review of land disturbance as requested by DHR

Erosion and Sediment control for all construction. All construction within the 100-year floodplain will comply with the local Floodplain ordinance.

ASTM Phase I Environmental Site Assessment will be performed through the Town of Pulaski's Brownfields grant from the Environmental Protection Agency. Further Mitigation Plans will be developed as informed by the study.

References:

(List the Federal, State, or local agencies contacted to obtain their existing environmental reports and other data used for the environmental review of the proposed project)

No references beyond those listed above were required.

List of Major Reports Obtained:

(Attach report(s), such as wetlands delineation studies, biological evaluations or habitat assessments, Phase I and II environmental site assessments)

No major reports were obtained for this review.

List of Preparers and Summary of Qualifications:

No major reports were obtained for this review.

This Environmental Review Record was prepared by Jill Williams, Principal, Wide Angle Strategies, in conjunction with the staff from the Town of Pulaski, VA.



ENVIRONMENTAL REVIEW RECORD PART 2

ENVIRONMENTAL ASSESSMENT

PROJECT NAME: CALFEE TRAINING SCHOOL ADAPTIVE REUSE PROJECT

TOWN OF PULASKI, VIRGINIA

APPLICATION / GRANT NUMBER: VIRGINIA ARC #19-PG-19

1. Is project in compliance with applicable laws and regulations? YES
2. Is an Environmental Impact Study required? NO
3. Finding of No Significant Impact (FONSI) can be made. Project will not significantly affect the quality of the human environment. YES

PREPARED BY: JANET JONAS FOR WIDE ANGLE STRATEGIES

DATE: FEBRUARY 1, 2021

ENVIRONMENTAL ASSESSMENT CHECKLIST

IMPACT CATEGORIES	IMPACT ANTICIPATED			REQUIRES MITIGATION OR MODIFICATION	NOTE CONDITIONS AND/OR SOURCE DOCUMENTATION THAT SUPPORTS FINDING
	NONE	MINOR	MAJOR		
LAND DEVELOPMENT					
Conformance with Comprehensive Plans and Zoning			B	N	The 2016 Town of Pulaski Comprehensive Plan goals include creating a “developer-friendly” plan for economic development, providing broad based, citizen-led efforts, support life and health of the community, and respect the historic character of the area. This project addresses each of these goals.
Compatibility and Urban Impact			B	N	Proposed project activities will greatly benefit the built environment by addressing disused resource in need of repair.
Slope	X			N	Project activities will have no impact on project area slope. Limited new construction will occur on a currently-cleared area adjacent to the current school structure. Impact, whether adverse or beneficial, will be insignificant.
Erosion		A		N	Project activities (new construction excavation and asphalt removal) will have no impact on project area erosion. The Pulaski Erosion and Sediment Control ordinance will be strictly adhered to.
Soil Suitability	X			N	Construction will take place on the existing lot. Impact, whether adverse or beneficial, will be insignificant. The Pulaski Erosion and Sediment Control ordinance will be strictly adhered to.
Hazards and Nuisances Including Site Safety	X			N	All CDBG-funded constructed activities will comply with OSHA guidelines.
Energy Consumption		B		N	Building improvements will provide a net increase to energy efficient operation of the Community Facility.

A = Adverse

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NOISE						
Effects of Ambient Noise on Project and Contribution to Community Noise Levels			A		N	Project activities will produce no prolonged increased levels of ambient noise in the project area or greater community. Construction activities involve repair and construction of the Community Facility which will have temporary impact on community noise levels.
AIR QUALITY						
Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels	X				N	Project activities will have no impact on ambient air quality. All activities involve repair or replacement. Applicable regulations regarding abatement of toxic substances will be strictly adhered to.
ENVIRONMENTAL DESIGN AND HISTORIC VALUES URBAN IMPACT						
Visual Quality – Coherence, Diversity, Compatible Use and Scale				B	N	Project activities will enhance the visual quality of the project area by addressing blight resulting from a disused facility.
Historic, Cultural, and Archaeological Resources				B	N	Project activities will preserve, repair, repurpose, and celebrate an historic cultural resource in the former Calfee Training School.
SOCIOECONOMIC						
Demographic Character Changes				B	N	Project activities will provide support for low- and moderate-income families.
Displacement	X				N	No displacement will occur as a result of this project.
Employment and Income Patterns				B	N	Project activities involving childcare and small business recovery will support the community which utilizes the facility Positive impact on employment and income patterns is expected.

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COMMUNITY FACILITIES AND SERVICES					
Educational Facilities			B	N	Project activities include provision of childcare and directly impact young children's school readiness.
Commercial Facilities			B	N	Project activities involve providing small business office and support spaces as well as a community kitchen. Substantial positive impact on commercial facilities is anticipated.
Health Care			B	N	Project activities include addressing the locality's fresh food desert and includes programming through the community kitchen to promote healthy lifestyles.
Social Services			B	N	The project is expected to have a positive effect on social services through the provision of quality childcare and small business assistance.
Solid Waste			A	N	Project activities are expected to have a slightly increased impact on the Town's solid waste system but not outside the current capacity.
Waste Water			A	N	Project activities are expected to have a slightly increased impact on the Town's wastewater system but not outside the current capacity.
Storm Water			A	N	Project activities include construction of a small addition to the existing school and redesign of the paved parking areas. These are expected to result in slightly more stormwater runoff. To mitigate future issues, the Town entered into an open-space easement with Virginia Outdoors Foundation to ensure the property remains stormwater neutral going forward.
Water Supply			A	N	Project activities are expected to have a slightly increased impact on the Town's water supply system but not outside the current capacity.
Public Safety	Police		B	N	Project activities include adaptive reuse of a vacant building, childcare, and economic development opportunities. Removal of blighting influences and addition economic security will have a slightly positive impact.

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	Fire		B		N	Project activities include adaptive reuse of a vacant building, childcare, and economic development opportunities. Removal of blighting influences and addition economic security will have a slightly positive impact.
	Emergency Medical		B		N	Project activities include adaptive reuse of a vacant building, childcare, food security, and economic development opportunities. Removal of blighting influences and addition economic security will have a slightly positive impact.
Open Space and Recreation	Open Space			B	N	Project activities include rehabilitation of existing outdoor spaces and addition of a half basketball court for recreational use. A small amount of open space will be eliminated by construction of a small addition to the building.
	Recreation			B	N	Project activities include rehabilitation of existing outdoor spaces and addition of a half basketball court for recreational use. All are expected to have a positive impact.
	Cultural Facilities			B	N	Project activities include rehabilitation of a culturally significant African American school, construction of a museum, and provide flexible meeting spaces for community gathering. All are expected to have a positive impact.
Transportation		X			N	Project activities are not expected to impact the area transportation systems.
NATURAL FEATURES						
Water Resources		X			N	Project activities are primarily internal improvements. No impact on water resources is anticipated.
Surface Water			A		N	Project activities include construction of a small addition to the existing school and redesign of the paved parking areas. These are expected to result in slightly more stormwater runoff. To mitigate future issues, the Town entered into an open-space easement with Virginia Outdoors Foundation to ensure the property remains stormwater neutral going forward.
Floodplains			A		Y	A 100-yr floodplain has been located within the proposed project boundaries. All appropriate agencies have been contacted

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					and the public has been informed. Project alternatives have been considered.
Wetlands		A		N	The project area is located adjacent to a riparian stream per the National Wetlands Inventory Map (attached). No adverse impacts are anticipated as care will be taken to follow Pulaski's Erosion and Sediment Control practices for all excavation and paving work.
Coastal Zone	X			N	The project area is not within an area covered by a Federally-approved CZM program.
Unique Natural Features and Agricultural Lands	X			N	Project activities include adaptive reuse of a former school building with limited exterior work. There will be no impact to unique natural features or agricultural lands.
Vegetation and Wildlife		B		N	Project activities include adaptive reuse of a former school building with limited exterior work. A slight positive impact is expected as the currently vacant building will again be commissioned and the grounds will be landscaped and maintained.

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US Department of Housing and Community Development

FLOODPLAIN MANAGEMENT 8-STEP DECISION-MAKING PROCESS

Calfee Community and Cultural Center Adaptive Reuse Project

Pulaski, Virginia

Decision Process for E.O. 11988 as Provided by 24 CFR §55.20

Step 1: *Determine whether the action is located in a 100-year floodplain (or a 500-year floodplain for critical actions) or wetland.*

The Calfee Community and Cultural Center Project is an Adaptive Reuse of the historic African American Calfee Training School through the Virginia Department of Housing and Community Development's Community Development Block Grant Program and the Appalachian Regional Commission's Area Development - Construction Program.

The project area is in a 100-year floodplain (Zone AE). The 100-year floodplain is associated with Trace Fork which comprises the western boundary of the project area. The project area consists of 2.66 acres with three buildings: a former school, a storage shed, and a water pump station. The school and storage shed lie completely within Zone AE, as indicated on Flood Insurance Rate Map (FIRM) 51155C0141D, revised September 26, 2008. The water pump station is in Zone X with a 0.2 % Annual Chance Flood Hazard.

Project activities within Zone AE include interior modifications to the former Calfee Training School to meet the identified purposes of the future Calfee Community and Cultural Center including a childcare program, a museum commemorating local African American history, a community kitchen, multiple event and office spaces, a computer lab; construction of a two-story addition at the rear of the existing school building for bathrooms, storage, and an elevator; and exterior improvements to two natural outdoor play spaces and creation of a half basketball court.

Most original classroom walls will remain intact. Three children's bathrooms will be added. The original bathrooms in the middle of the building will be converted into an infant classroom and an administrative office for the learning center. One classroom at the front of the building will be divided into an office, kitchenette, bathrooms, and storage closets. The four classrooms adjacent to the entry will be restored. The only new construction to the building will be a small two-story addition on the back which will add space for storage and bathrooms on both the first and second floors. A passenger elevator will be added at the rear of the building to make the second floor accessible.

On the building's exterior, the major changes will be (1) the addition of a wheelchair accessible ramp on the front of the building wrapping around to an entrance on the side of the building, (2) on the creek side of the building, the entryway to the childcare center and event space will change in appearance somewhat to accommodate a ramp and an outdoor space, and (3) external doors will be added to each of the six childcare classrooms for ease of access to the outdoor play spaces.

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This project includes (a) adaptive reuse of an existing structure, (b) external construction of additional bathrooms and storage space, and (c) limited exterior improvements including accessibility ramps, outdoor gathering space, and outdoor recreation areas; for these reasons, E.O. 11988- Floodplain Management applies. While this project technically meets the exceptions at 24 CFR 55.12, in an abundance of caution and as there is a floodplain located in the project area, an 8-step analysis of the direct and indirect impacts associated with the construction, occupancy, and modification of the floodplain has been completed.

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 describing the project will be published in the *Pulaski Patriot*, a local and regional paper, in the February 5, 2021 edition and posted on the Town’s website www.pulaskitown.org. The ad will target residents and stakeholders, including those living adjacent to the property located in the floodplain. A copy of the published notification will be kept in the project's environmental review records and will be attached to this document. The required 15 calendar days will be allowed for public comment. As required by regulation, the notice also includes the name, proposed location and description of the activity, total number of floodplain acres involved, and the HUD official or responsible entity contact for information as well as the location and hours of the office at which a full description of the proposed action can be viewed.

Comments from the public were received:

Step 3: Identify and evaluate practicable alternatives.

The Town of Pulaski’s selection criteria for choosing this location to pursue CDBG and ARC funding were:

- a) Identification of Pulaski as a childcare desert with need for additional facilities.
- b) Identification of the neighborhood as a food desert lacking access to fresh produce within walking distance.
- c) Identification of a blighted area in need of repair close to the downtown and residential historic districts.
- d) Identification of an historic African American school in danger of deterioration from disuse.
- e) Identification of immediate need to address food insecurity and small business recovery needs.
- f) Identification of need to preserve cultural heritage and foster community engagement.
- g) Location of property adjacent to identified population needs.
- h) Availability of property already owned by the Town of Pulaski Redevelopment and Housing Authority.

Alternatives Considered:

- 1. Locate the Project Within the Floodplain
 - 1. Locate the project in proposed project boundaries

This site meets all the above-stated Town requirements.

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2. Obtain a Letter of Map Amendment (LOMA) or Letter of Map Revision (LOMR)

The Town considered applying for a LOMA, but the elevation information certified by a Licensed Land Surveyor/Registered Professional Engineer indicated that the lowest adjacent grade (the lowest ground touching the structures) was not at or above the Base Flood Elevation (BFE), so the site was not eligible.

2. Locate the Project Outside of the Floodplain

1. Modify current project area to exclude 100-year floodplain

The current project area cannot be modified cost-effectively to exclude the 100-year floodplain, as it would require demolition of all existing structures and reconstruction at least 1' above the BFE.

2. Choose a Completely Different Project Area

Other neighborhoods in the Town of Pulaski meet some, but not all, of the above requirements. The Town of Pulaski and the Pulaski Redevelopment and Housing Authority own the following properties which were considered:

- Land: Unimproved lots on Highland Terrace, Chestnut Street, Bertha Street, Mifflin Avenue, and South Washington Street were evaluated and rejected due to steeply sloped elevations, cost to clear forested lots and excavation, lack of water and sewer service, and/or inadequate lot size for construction. The unimproved lots on Altoona Road, located adjacent to the Calfee Training School, were considered, and rejected due to inadequate size lot size for construction and location in the Tract Fork floodway.
- Property lots: Cleared residential lots on Second Avenue SW and Jackson Avenue were considered but rejected due to inadequate lot size for construction. Properties located in the Downtown Business District were rejected due to location in the floodplain and desire to reserve these addresses for small businesses. 91 First Street NE was considered as having the most comparable lot size and functionality but was rejected due to location in the floodplain and the cost of site work and building reconstruction required to meet the project needs.

3. No Action or Alternative Action which Serve the Same Purpose

A no action alternative was considered and rejected because the Town of Pulaski has an immediate need to expand childcare facilities, address food insecurity, and preserve this historic and cultural resource for community engagement and enjoyment.

An alternative action to expand the local facilities for childcare (YMCA, Building Bridge, and New River Community Head Start) was considered but rejected due to cost and inability to provide sufficient facility space to address the community's additional needs for food security, small business support, and community engagement efforts. The YMCA building is currently in need of extensive improvements, but general interest in construction of a new County recreation facility has resulted in YMCA Board reticence in additional

investments in the current building. The Building Bridges and New River Community Action Head Start programs are located in leased spaces which are impossible to expand.

Step 4: Identify Potential Direct and Indirect Impacts of Associated with Floodplain Development.

Locating the project in the Calfee Training School building will have minimum impacts to the floodplain due to the limited scope of project activities requiring exterior construction. Project activities within the floodplain include primarily interior improvements to the existing structure. Exterior improvements include construction of a 400 square foot addition in the rear of the building, construction of two accessibility ramps, addition of six additional exterior doors for classroom access to the outside, update of two existing natural play spaces, and addition of approximately 9000 square feet of paved parking and a half-size basketball court.

Design will minimize potential damage to the property by possible flooding. The area has experienced some flooding in the past but never inside the existing school building.

The Fish and Wildlife Service anticipates this project will not adversely impact natural heritage resources due to the scope of activity and the distance from resources. Additionally, there are no State Natural Area Preserves under the Virginia Department of Conservation and Recreation's (DCR) jurisdiction in the project vicinity.

In addition to concerns for life and property, the Town considered the natural and beneficial values of the floodplain. The natural resources of the floodplain include water, biological, and societal resources.

Step 5: Where practicable, design or modify the proposed action to minimize the potential adverse impacts to lives, property, and natural values within the floodplain and to restore, and preserve the values of the floodplain.

Efforts to minimize the potential adverse impacts to lives, property, and natural values within the floodplain were incorporated into the original design of the proposed action; therefore, no further modifications are deemed practicable due to the limited scope of activities and project budget.

Step 6: Reevaluate the Alternatives.

Although the Calfee Community and Cultural Center is located within a floodplain, the project has been adapted to minimize effects on floodplains values. New construction will be elevated at least one foot above the BFE and adaptive reuse design standards for properties in the floodplain will be observed.

There is strong public support for the current location and boundaries of this project. The primary parties with interest in this project include Calfee Training School students and their families as well as families who will benefit from programs at the future Calfee Community and Cultural Center (CCCC). The entire initiative has been guided by principles of community engagement and ownership.

The CCCC Board continues to engage the broader public as it designs the programs and spaces in ways which meet the needs of the community members and organizations it intends to serve. An initial public hearing was held on July 7, 2020 to solicit community feedback on the Town's community development needs. The CCCC's Board is regularly advised on its decisions by subcommittees related to fundraising, museum, kitchen, childcare, and building plans and members of the public are encouraged to join those subcommittees.

Modifying the current proposed project areas to exclude the floodplain is not feasible. No additional suitable properties exist at this time. Needs for affordable and available childcare and means to address food insecurity

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have been exacerbated by the COVID-19 pandemic. Stakeholders believe the building will deteriorate if left unoccupied and unrenovated and may eventually become a blighting influence.

The no action alternative is also impracticable because the Calfee Training School would continue to deteriorate.

Step 7: Determination of No Practicable Alternative

It is our determination that there is no practicable alternative for locating the project in the flood zone. This is due to: (1) the defined need for additional affordable childcare, food security, and small business resources in the Town; (2) the desire to preserve and protect this cultural heritage resource through adaptive reuse; (3) the availability of structurally-sound resource already owned by the Pulaski Redevelopment and Housing Authority.

A final notice will be published on March 5, 2021 detailing the reasons why the project must be located in the floodplain, a list of alternatives considered, and all mitigation measures taken to minimize adverse impacts.

Comments received during the Comment Period:

Step 8: Implement the Proposed Action

The Town will assure that this plan, as modified and described above, is executed and necessary language will be included in all agreements with participating parties. The Town will also take an active role in monitoring the construction process to ensure no unnecessary impacts occur nor unnecessary risks are taken.

ADDITIONAL STUDIES PERFORMED

No additional studies were performed.

MITIGATION MEASURES NEEDED

Erosion and Sediment control for all construction and demolition activities as required. All construction within the 100-year floodplain will comply with the local Floodplain ordinance.

SUMMARY OF FINDINGS AND CONCLUSIONS

Environmental Assessment found that floodplains are present. Alternatives were considered to mitigate the impact on floodplains and the public was given an opportunity to comment on the proposals. Any rehabilitation or construction will be done in accordance with Pulaski’s Floodplain and Erosion and Sediment Control Ordinances.

Under the mitigating measures, no adverse impact is anticipated by the Calfee Training School Adaptive Reuse Project.

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