

FINAL

ENVIRONMENTAL ASSESSMENT

OF THE PROPOSED

LAND ACQUISITION FOR A NEW VETERANS SUBSTANCE ABUSE RESIDENTIAL REHABILITATION TREATMENT PROGRAM FACILITY

70 RICEVILLE ROAD

ASHEVILLE, BUNCOMBE COUNTY, NORTH CAROLINA



DEPARTMENT OF VETERANS AFFAIRS

425 I STREET, NW

WASHINGTON, DC 20001

PREPARED BY:

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JANUARY 30, 2020

EXECUTIVE SUMMARY

This Environmental Assessment (EA) has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Department of Veterans Affairs' (VA's) proposed acquisition of approximately 8.3 acres of land located adjacent to the Charles George VA Medical Center in Asheville, North Carolina (Asheville VAMC) for the development of a new Veterans Substance Abuse Residential Rehabilitation Treatment Program (SARRTP) facility. This EA has been prepared as required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 *et seq.*), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26), and in accordance with *VA NEPA Interim Guidance for Projects* (2010).

PROPOSED ACTION

VA's Proposed Action is to reacquire an approximately 8.3-acre parcel of land (Site) located adjacent to the northwest of the Asheville VAMC campus and to rehabilitate the existing two to three-story, approximately 23,000-square foot, vacant Site building for a new, expanded SARRTP facility. Existing SARRTP operations at the Asheville VAMC campus would be transferred from their current undersized space in the main hospital building to the new facility. VA would use the existing SARRTP space to expand specialty care services at the Asheville VAMC.

PURPOSE AND NEED

The purpose of the Proposed Action is to enhance and expand SARRTP services to Veterans in the Asheville, North Carolina area by providing a new, larger, more appropriately configured space via relocation of the existing SARRTP services. Relocation of the SARRTP services would enable the VA to provide additional group therapy rooms, kitchen facilities for daily living instruction, and private and semi-private rooms for Veterans. Relocation of the SARRTP services outside of the main Asheville VAMC campus would enhance Veteran residential treatment by providing outside courtyards and recreational space vital to the SARRTP mission for Veteran rehabilitation.

The Proposed Action is needed to address current and future projected SARRTP capacity and space requirements and to address existing facility deficiencies. The existing SARRTP space is overcrowded, space-constrained, and inadequately configured (shared toilet space, congregate showers, etc.). Expansion of the SARRTP within the existing VAMC hospital is not possible due to increasing Veteran health care needs and lack of space at the Asheville VAMC hospital building. In addition, the current SARRTP location within the main hospital building does not provide an adequate residential setting or required square footage to promote treatment. It is estimated that approximately 22,746 square feet of space is needed for the SARRTP; however, the existing SARRTP space is only approximately 10,000 square feet.

The Proposed Action would result in improved substance abuse rehabilitation care for Asheville area Veterans by providing expanded and enhanced SARRTP services in a new, larger, modern facility and would allow for re-use of SARRTP occupied space at the main hospital building for needed specialty care services.

ALTERNATIVES

This EA examines in-depth two alternatives, the Proposed Action and the No Action Alternative, defined as follows:

Proposed Action

VA proposes to acquire the 8.3-acre Site (70 Riceville Road, Asheville, North Carolina), located adjacent to the northwest of the Asheville VAMC campus, and to rehabilitate the Site building for use as a new, expanded SARRTP facility. The Site to be acquired was originally part of the Asheville VAMC, but was divested in the 1980s along with other portions of the original campus that were underutilized at that time. The Site included up to seven structures associated with the Asheville VAMC in the 1910s and 1920s, which were demolished around 1930 and replaced with four newer structures that were present from the 1930s to approximately 1990, when all but the current site building (formerly known as Building 19) were demolished. The Site building was renovated for senior living apartments in the early 1980s, but has been vacant for several years.

The western portion of the Site is generally level and contains a vacant, approximately 23,000-square foot, two to three-story building with parking areas to the west and east of the building, and grassy areas with scattered trees and shrubs. The central and eastern portions of the Site are currently unimproved land that is generally level and grassy to moderately wooded with remnants (foundations, retaining wall, stairs) of former Site buildings.

VA plans to reacquire the Site and rehabilitate the interior of the current Site building (formerly Building 19) for use as a SARRTP facility for Asheville area Veterans. Design plans for the proposed SARRTP facility are currently not available; however, the new space would provide additional rooms for group therapy and kitchen facilities for daily living instruction, and private and semi-private rooms with private toilet/shower facilities for approximately 25 inpatient residents. No additions or substantial exterior alterations to the Site building are planned. VA intends to re-use the existing parking areas, access drive and utilities at the site. No development or modification is planned for the eastern and central portions of the Site.

VA would reacquire the Site and begin the new SARRTP design in 2020. It is anticipated that the Site building would be rehabilitated for the SARRTP in 2021. The new SARRTP facility would provide substance abuse rehabilitation health care services to the area's Veterans. SARRTP services currently provided in the Asheville VAMC main hospital building would be relocated to the new SARRTP facility. VA would expand specialty care services into the current SARRTP space.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. VA would continue to provide SARRTP services at the overcrowded and space-constrained Asheville

VAMC main hospital building. The Site likely would remain unused in the near future and ultimately be developed by others for other commercial or residential use, in accordance with local zoning. This alternative would limit VA's ability to provide necessary substance abuse health care services to Veterans in the region, and would not meet the purpose of or need for the Proposed Action. However, the No Action Alternative was retained to provide a comparative baseline analysis as required under the CEQ Regulations.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The affected environment of the Site and its immediate surroundings, or the Region of Influence (ROI) of the Proposed Action, is discussed in Section 3 of this EA.

The Proposed Action and the No Action Alternative are evaluated in this EA to determine their potential direct or indirect impact(s) on the physical, environmental, cultural, and socioeconomic aspects of the Proposed Action's ROI. Technical areas evaluated in this EA include:

- *Aesthetics*
- *Air Quality*
- *Cultural Resources*
- *Geology, Topography, and Soils*
- *Hydrology and Water Quality*
- *Wildlife and Habitat*
- *Noise*
- *Land Use*
- *Floodplains, Wetlands, and Coastal Zone Management*
- *Socioeconomics*
- *Community Services*
- *Solid Waste and Hazardous Materials*
- *Transportation and Parking*
- *Utilities*
- *Environmental Justice*
- *Cumulative Impacts*
- *Potential for Generating Substantial Controversy*

Proposed Action

The Proposed Action would result in impacts to the area as identified throughout Section 3 and summarized in the table below. These include short-term and/or long-term potential adverse impacts to air quality, cultural resources, noise, solid waste and hazardous materials, and transportation. All of these impacts are less than significant and would be further reduced through careful coordination and implementation of general BMPs and management measures, and compliance with regulatory requirements, as identified in Section 5.

The Proposed Action would result in beneficial short-term and long-term impacts to the local socioeconomic environment. Notably, a significant long-term beneficial effect to the health of Veterans in the region would occur should the new SARRTP facility be operated at the Site.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented and no improvements to the current level of VA's SARRTP services or capability would occur. No beneficial impacts attributable to the Proposed Action would occur and VA's ability to provide sufficient, requisite SARRTP services to the region's Veterans would be compromised.

Summary of Impact Analysis		
Resource Area	Proposed Action	No Action
Aesthetics	Existing historic Site building would be re-used with no substantial exterior alteration. No new construction. Negligible impact.	None
Air Quality	Minor dust and particulate matter emissions during construction/rehabilitation. Minor vehicle emissions during operation. No significant impact.	Similar vehicle emissions
Cultural Resources	The Site building was constructed in 1930 and is contributing resource to the NRHP-listed Oteen VA Hospital Historic District. Site building was substantially altered when converted to senior housing in the 1980s, but retains sufficient exterior integrity to convey its significance. Proposed Action does not include substantial exterior alterations. NC SHPO concurred Proposed Action would not adversely affect the Historic District, contingent upon VA providing NC SHPO design plans for review and comment. No significant impact.	None
Geology and Soils	No notable ground disturbance is proposed. Negligible impact.	None
Hydrology and Water Quality	Nearest surface water is 1,200 feet from the Site. No ground disturbance or discharges to surface water or groundwater are anticipated. Negligible impact.	None
Wildlife and Habitat	No federally or state protected species are likely to be present at the Site. No ground disturbance or vegetation clearing is proposed. Negligible impact.	None
Noise	Minor short-term adverse noise impacts during construction/rehabilitation, mostly occurring within the interior of the Site building. Minor operational impacts associated with vehicle traffic, HVAC system, and grounds maintenance. No significant impact.	None
Land Use	Site and all adjacent properties are zoned institutional. Site use would be consistent with local zoning and compatible with surrounding land use. Negligible impact.	None
Floodplains, Wetlands, and Coastal Zone Management	No wetlands, floodplains, or coastal zones are located on the Site or surrounding properties. No impact.	None

Summary of Impact Analysis		
Resource Area	Proposed Action	No Action
Socioeconomics	Minor short-term localized beneficial impact to employment during construction. Enhanced and expanded health care services would be a significant beneficial impact to Veterans in the Asheville area.	Inadequate VA SARRTP – adverse impact to local Veterans.
Community Services	Proposed SARRTP would not put a significant additional load on local community services. Negligible impact.	None
Solid and Hazardous Materials	Asbestos, lead-based paint, mold, and/or radon may be present within the Site building and would be further assessed and abated, as necessary, by licensed contractors. Minor petroleum and hazardous substance handling during construction. Typical household solid wastes generated during operation. No significant impact.	None
Transportation and Parking	Minor short-term impact from construction traffic and minor long-term impact from SARRTP operations (estimated 100 one-way vehicles trips per day). Adequate on-site parking already present. No significant impact.	None
Utilities	Utilities likely adequate for the SARRTP already service the Site. Negligible impact.	None
Environmental Justice	Site is located in an area with a slightly higher than average low- income population. Proposed Action would have negligible impact on Site area residents. Low-income and minority Veterans would benefit from the new SARRTP.	None

Cumulative Impacts

This EA also examines potential cumulative effects of implementing each of the considered alternatives. This analysis finds that the Proposed Action, with the implementation of general BMPs and management measures, and compliance with regulatory requirements specified in this EA, would not result in significant adverse cumulative impacts to onsite or regional natural or cultural resources, and would maintain or enhance the socioeconomic environment of the area through long-term provision of additional health care services to the region's Veterans. The No Action Alternative would not produce these potential positive socioeconomic gains. No significant cumulative effects are identified.

AGENCY AND PUBLIC INVOLVEMENT

Agencies consulted for this EA include:

- U.S. Fish and Wildlife Service (USFWS)
- U.S. Environmental Protection Agency (USEPA)
- U.S. Army Corps of Engineers (USACE)
- U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS)
- North Carolina State Historic Preservation Office (NC SHPO)
- North Carolina Department of Environmental Quality (NCDEQ)
- North Carolina Department of Transportation (NCDOT)
- North Carolina Wildlife Resources Commission (NCWRC)
- North Carolina Natural Heritage Program (NCNHP)
- Buncombe County Soil and Water Conservation District
- City of Asheville (various departments)

Responses were received from NC SHPO, NCDEQ (Division of Water Resources, Division of Waste Management Underground Storage Tank and Solid Waste Sections, Division of Energy, Minerals and Land Resources Land Quality Section, and Environmental Assistance Coordinator), NCWRC, USDA-NRCS, and Western North Carolina Regional Air Quality Agency. Input provided by these agencies is summarized in Section 4. Agency information and comments have been incorporated into this EA, as and where appropriate. Copies of relevant correspondence can be found in Appendix A.

Three federally recognized Native American Tribes [Catawba Indian Nation, Eastern Band of Cherokee Indians, and the Muscogee (Creek) Nation] were identified as having possible ancestral ties to the area of the Site. VA invited each of these Tribes to provide input regarding the Proposed Action. A response was received from the Catawba Indian Nation. No other Tribal responses have been received as of the date of this EA. Tribal information and comments have been incorporated in this EA. Tribal input is summarized in Section 4. Tribal correspondence is provided in Appendix B.

VA published and distributed the Draft EA for a 30-day public comment period, as announced by a Notice of Availability published in The Asheville Citizen-Times on December 21, 22 and 25, 2019. Copies of the Draft EA were made available for public review at Pack Memorial Library in Asheville and the Asheville VAMC. VA received no public comments regarding the Draft EA.

CONCLUSIONS

This EA concludes there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life associated with the Proposed Action, provided the BMPs, management measures, and regulatory compliance measures described in this EA are implemented. This EA's analysis determines, therefore, that an Environmental Impact Statement is unnecessary for implementation of the Proposed Action, and a Finding of No Significant Impact is appropriate.

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SECTION 1: INTRODUCTION

1.1 Introduction

This Section provides the reader with necessary introductory and background information concerning the Proposed Action for proper analytical context and identifies the purpose of and need for the Proposed Action and the federal decision to be made.

This Environmental Assessment (EA) has been prepared as required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 *et seq.*), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26), and in accordance with VA's *NEPA Interim Guidance for Projects* (2010). Federal agencies are required to consider the environmental and related social and economic effects of their proposed actions. This EA is required to determine if VA's Proposed Action would have significant environmental impacts.

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed acquisition of an approximately 8.3-acre parcel of land (Site) located adjacent to the northwest of the Asheville VAMC and the rehabilitation of the vacant Site building for a new, expanded SARRTP facility. Figure 1 depicts the general location of the Site and the Asheville VAMC.

In accordance with the above regulations, this EA: allows for public input into the federal decision-making process; provides federal decision-makers with an understanding of potential environmental effects of their decisions, before making these decisions; identifies measures the federal decision-maker could implement to reduce potential environmental effects; and documents the NEPA process.

1.2 Background

The Asheville VAMC is located in the eastern portion of the City of Asheville and includes approximately 45.9 acres of land owned by the Federal Government. In addition, three VA Clinics located in Franklin, Hickory, and Rutherford County, North Carolina are associated with Asheville VAMC. The Asheville VAMC and the region's VA Clinics service the primary care, specialty care, dental care, laboratory and pathology, mental health, geriatrics, nuclear medicine and radiology, substance abuse, work therapy, and pharmacy services needs of Veterans in the 23-county area of western North Carolina, parts of eastern Tennessee, and upstate South Carolina and Georgia. The original hospital (U.S. Army General Hospital No. 19) operated in the current Asheville VAMC area with numerous temporary wooden structures from the late 1910s to the early 1920s, when it was placed under the authority of the newly-formed Veterans Bureau (now VA). VA demolished the wooden buildings and constructed more permanent, masonry structures between 1924 and 1932, which became the Oteen Veterans Administration Medical Center. The current main Asheville VAMC hospital building (Building 47) was constructed in the mid-1960s. The hospital was renamed the Charles George VA Medical Center in 2007.

As part of the original U.S. Army General Hospital No. 19 from the late 1910s to the early 1920s, up to seven wooden structures were included on the Site and comprised four hospital wards, an administration and receiving building, and a kitchen and a mess hall. Between 1930 and 1932, the original Site buildings were removed and replaced with four masonry buildings, including hospital wards, a dining hall, and nurses' quarters, all linked by covered walkways. The Site became underutilized by VA and was transferred to private ownership in the 1980s. The westernmost structure (the current Site building) was renovated for senior living apartments in the early 1980s. The remaining Site buildings were demolished around 1990. The Site remains under private ownership with the existing Site building currently vacant.

The Asheville VAMC currently administers their SARRTP in an approximately 10,000-square foot space located in the main hospital building at the Asheville VAMC, which is undersized by approximately 12,746 square feet due to space constraints at the main hospital building.



<p align="center">FIGURE 1 REGIONAL LOCATION MAP</p> <p align="center">ENVIRONMENTAL ASSESSMENT PROPOSED LAND ACQUISITION FOR NEW SARRTP FACILITY ASHEVILLE VA MEDICAL CENTER ASHEVILLE, NORTH CAROLINA</p>	<p align="center">PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>	
	<p>TTL PROJECT NO. 1900801</p>	

1.3 Purpose and Need

The purpose of the Proposed Action is to enhance and expand SARRTP services to Veterans in the Asheville, North Carolina area by providing a new, larger, more appropriately configured space via relocation of the existing SARRTP services. Relocation of the SARRTP services would enable the VA to provide additional group therapy rooms, kitchen facilities for daily living instruction, and private and semi-private rooms for Veterans. Relocation of the SARRTP services outside the of the main Asheville VAMC campus would enhance Veteran residential treatment by providing outside courtyards and recreational space vital to the SARRTP mission for Veteran rehabilitation.

The Proposed Action is needed to address current and future projected SARRTP capacity and space requirements and to address existing facility deficiencies. The existing SARRTP space is overcrowded, space-constrained, and inadequately configured (shared toilet space, congregate showers, etc.). Expansion of the SARRTP within the existing VAMC hospital is not possible due to increasing Veteran health care needs and lack of space at the Asheville VAMC hospital building. In addition, the current SARRTP location within the main hospital building does not provide an adequate residential setting or required square footage to promote treatment. It is estimated that approximately 22,746 square feet of space is needed for the SARRTP; however, the existing SARRTP space is only approximately 10,000 square feet.

The Proposed Action would result in improved substance abuse rehabilitation care for Asheville area Veterans by providing expanded and enhanced SARRTP services in a new, larger, modern facility and would allow for re-use of SARRTP occupied space at the main hospital building for needed specialty care services.

1.4 Decision-Making

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed reacquisition of the approximately 8.3-acre Site and the rehabilitation of the Site building for a new, larger Veterans SARRTP facility.

VA, as a federal agency, is required to incorporate environmental considerations into their decision-making process for the actions they propose to undertake. This is done in accordance with the regulations identified in Section 1.1.

In accordance with the above regulations, VA has prepared this EA, which allows for public input into the federal decision-making process; provides federal decision-makers with an understanding of potential environmental effects of their decisions, before making these decisions; and documents the NEPA process.

Ultimately, VA will decide, in part based on the analysis presented in this EA and after having taken potential environmental, cultural, and socioeconomic effects into account, whether VA should implement the Proposed Action, and, as appropriate, carry out mitigation and management measures to reduce effects on the environment.

SECTION 2: DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

This Section provides the reader with necessary information regarding the Proposed Action and its alternatives, including those that VA initially considered, but eliminated, and the reasons for eliminating them. The screening criteria and process developed and applied by VA for selection of viable alternatives are described, providing the reader with an understanding of VA's rationale in ultimately analyzing the Proposed Action and No Action Alternatives in this EA.

2.2 Proposed Action

VA's Proposed Action is to reacquire an approximately 8.3-acre parcel of land (Site) located adjacent to the northwest of the Asheville VAMC campus and to rehabilitate the existing two to three-story, approximately 23,000-square foot, vacant Site building for a new, expanded SARRTP facility. Existing SARRTP operations at the Asheville VAMC campus would be transferred from their current undersized space in the main hospital building to the new facility. VA would use the existing SARRTP space to expand specialty care services at the Asheville VAMC.

The proposed SARRTP facility would operate 24 hours per day, 365 days per year and would be occupied by approximately 25 inpatient residents, 30 staff (over three daily shifts), and 15 volunteers and other guests on an average, daily basis. The SARRTP services would be available to Veterans and service members from all branches of the U.S. Armed Forces who meet the criteria for treatment.

2.3 Alternatives Analysis

NEPA, CEQ Regulations, and 38 CFR Part 26 require reasonable alternatives to be explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered "reasonable" only if it would enable VA to accomplish the primary mission of providing suitable Veteran substance abuse rehabilitation health care facilities that meet the purpose of and need for the Proposed Action. "Unreasonable" alternatives would not enable VA to meet the purpose of and need for the Proposed Action.

2.3.1 Alternatives Development

After identifying the inadequacies of the existing SARRTP facility in the main Asheville VAMC hospital building, VA evaluated other potential spaces within existing Asheville VAMC campus buildings for an expanded SARRTP facility. No suitable space was identified in the over-crowded and space-constrained VAMC buildings. In addition, VA determined the new SARRTP facility would be better suited outside of the main hospital building at a facility with outside space to promote residential treatment.

Based on this evaluation, VA initially planned to construct a new building at the Asheville VAMC campus to house the SARRTP. Subsequently, the approximately 8.3-acre Site located adjacent to the northwest of the Asheville VAMC was offered to VA for purchase. The existing Site building is of sufficient size (approximately 23,000 square feet) and configuration for adaptive reuse as the SARRTP. In addition, the Site provides outdoor space near, but outside of the Asheville VAMC campus, that is more suited to a residential substance abuse treatment facility. Consequently, VA determined that the reacquisition of the Site and the rehabilitation of the existing, historic Site building was the only viable and reasonable alternative to fully meet the purpose of and need for the Proposed Action.

2.3.2 Evaluated Alternatives

This EA examines in-depth two alternatives, the Proposed Action and the No Action Alternative, defined as follows:

Proposed Action

VA proposes to acquire the 8.3-acre Site (70 Riceville Road, Asheville, North Carolina), located adjacent to the northwest of the Asheville VAMC campus, and to rehabilitate the Site building for use as a new, expanded SARRTP facility. The Site was originally part of the Asheville VAMC, but was divested in the 1980s along with other portions of the original campus that were underutilized. The Site building was constructed in 1930 and was originally used as nurses' quarters. The building was renovated for senior living apartments in the early 1980s, but has been vacant for several years.

The western portion of the Site is generally level and contains a vacant, approximately 23,000-square foot, two to three-story building with parking areas to the west and east of the building, and grassy areas with scattered trees and shrubs. The central and eastern portions of the Site are currently unimproved land that is generally level and grassy to moderately wooded with remnants of previous Site buildings (foundations, retaining walls, and stairs). The general Site location is shown on Figures 1 and 2. Figure 3 is an aerial photograph of the Site, Asheville VAMC and surrounding area. Figure 4 depicts the current Site features.

VA plans to reacquire the Site and rehabilitate the interior of the current Site building (formerly Building 19) for use as a SARRTP facility for Asheville area Veterans. Design plans for the proposed SARRTP facility are currently not available; however, the new space would provide additional rooms for group therapy and kitchen facilities for daily living instruction, and private and semi-private rooms with private toilet/shower facilities for approximately 25 inpatient residents. No additions or substantial exterior alterations to the Site building are planned. VA intends to re-use the existing parking areas, access drive and utilities at the site. No development or modification is planned for the eastern and central portions of the Site.

VA would reacquire the Site and begin the new SARRTP design in 2020. It is anticipated that the Site building would be rehabilitated for the SARRTP in 2021. The new SARRTP facility would provide substance abuse rehabilitation health care services to the area's Veterans. SARRTP services currently provided in the Asheville VAMC main hospital building would be relocated to the new SARRTP facility. VA would expand specialty care services into the current SARRTP space.

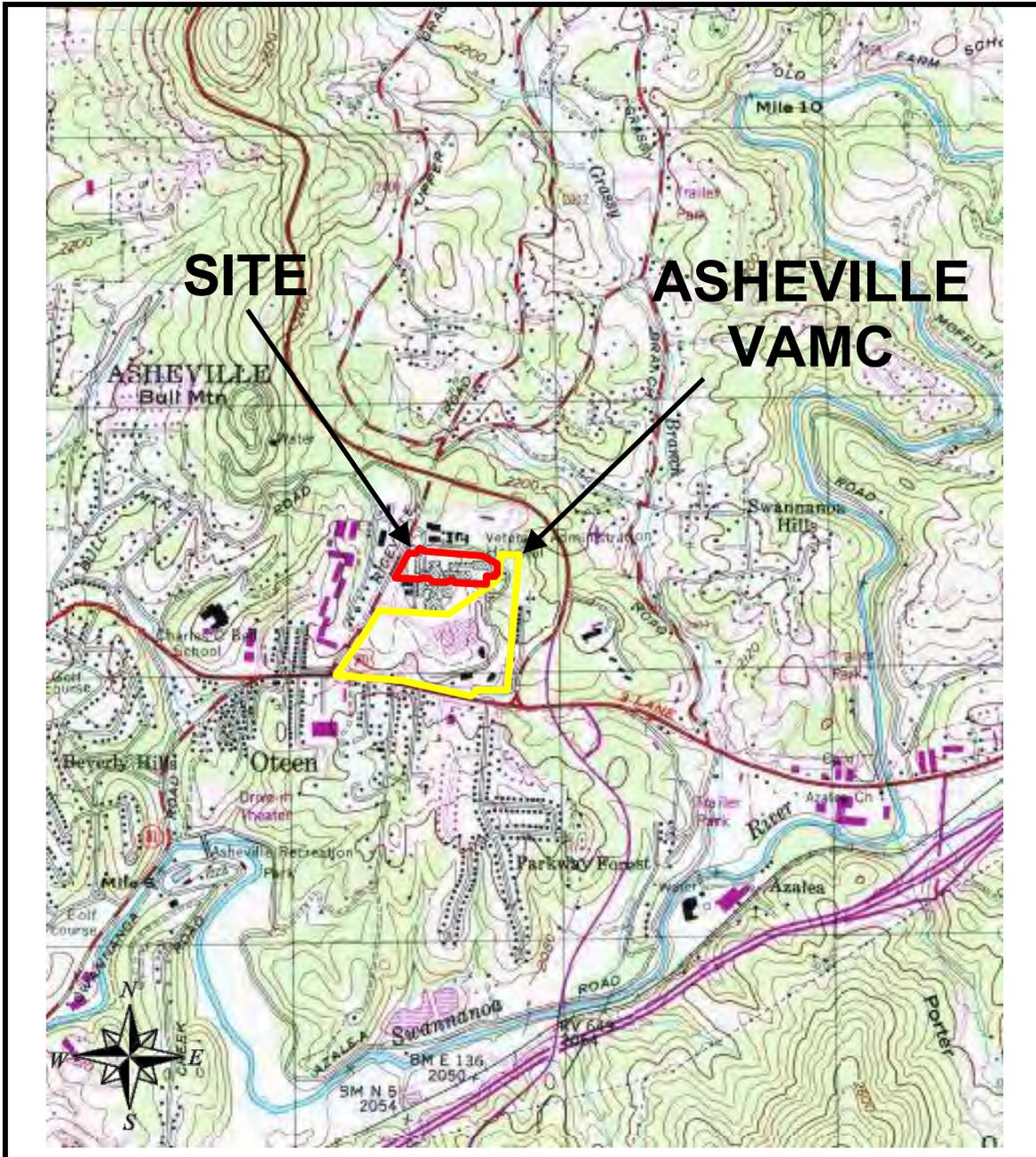
No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented. VA would continue to provide SARRTP services at the overcrowded and space-constrained Asheville VAMC main hospital building. The Site likely would remain unused in the near future and ultimately be developed by others for other commercial or residential use, in accordance with local zoning. This alternative would limit VA's ability to provide necessary substance abuse health care services to Veterans in the region, and would not meet the purpose of or need for the Proposed Action. However, the No Action Alternative was retained to provide a comparative baseline analysis against which to analyze the effects of the Proposed Action, as required under the CEQ Regulations.

2.3.3 Alternatives Eliminated From Further Consideration

As described in Section 2.3.1, VA eliminated other initially considered alternatives for expanding the SARRTP facility. Each of these other alternatives was not viable or failed to meet the purpose of and need for the Proposed Action.

VA considered modification and renovation of the current SARRTP facility within the main Asheville VAMC hospital building or relocation to another existing building space at the campus. However, currently the campus buildings are over-crowded and space-constrained. The SARRTP cannot not be reconfigured or expanded beyond its current size in existing Asheville VAMC buildings. VA initially planned to construct a new building to house the SARRTP at the Asheville VAMC campus. However, the Site, with an existing, suitably sized and configured building for the SARRTP, was then offered to VA. The Site provides an existing building at a preferred location (near but outside of the Asheville VAMC campus); consequently, the new construction at the Asheville VAMC campus alternative was eliminated.



**FIGURE 2
TOPOGRAPHIC MAP**

ENVIRONMENTAL ASSESSMENT
PROPOSED LAND ACQUISITION
FOR NEW SARRTP FACILITY
ASHEVILLE VA MEDICAL CENTER
ASHEVILLE, NORTH CAROLINA

PREPARED FOR
U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, DC

TTL PROJECT NO. 1900801





<p align="center">FIGURE 3 SITE AND ASHEVILLE VAMC AERIAL PHOTOGRAPH</p> <p>ENVIRONMENTAL ASSESSMENT PROPOSED LAND ACQUISITION FOR NEW SARRTP FACILITY ASHEVILLE VA MEDICAL CENTER ASHEVILLE, NORTH CAROLINA</p>	<p align="center">PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>
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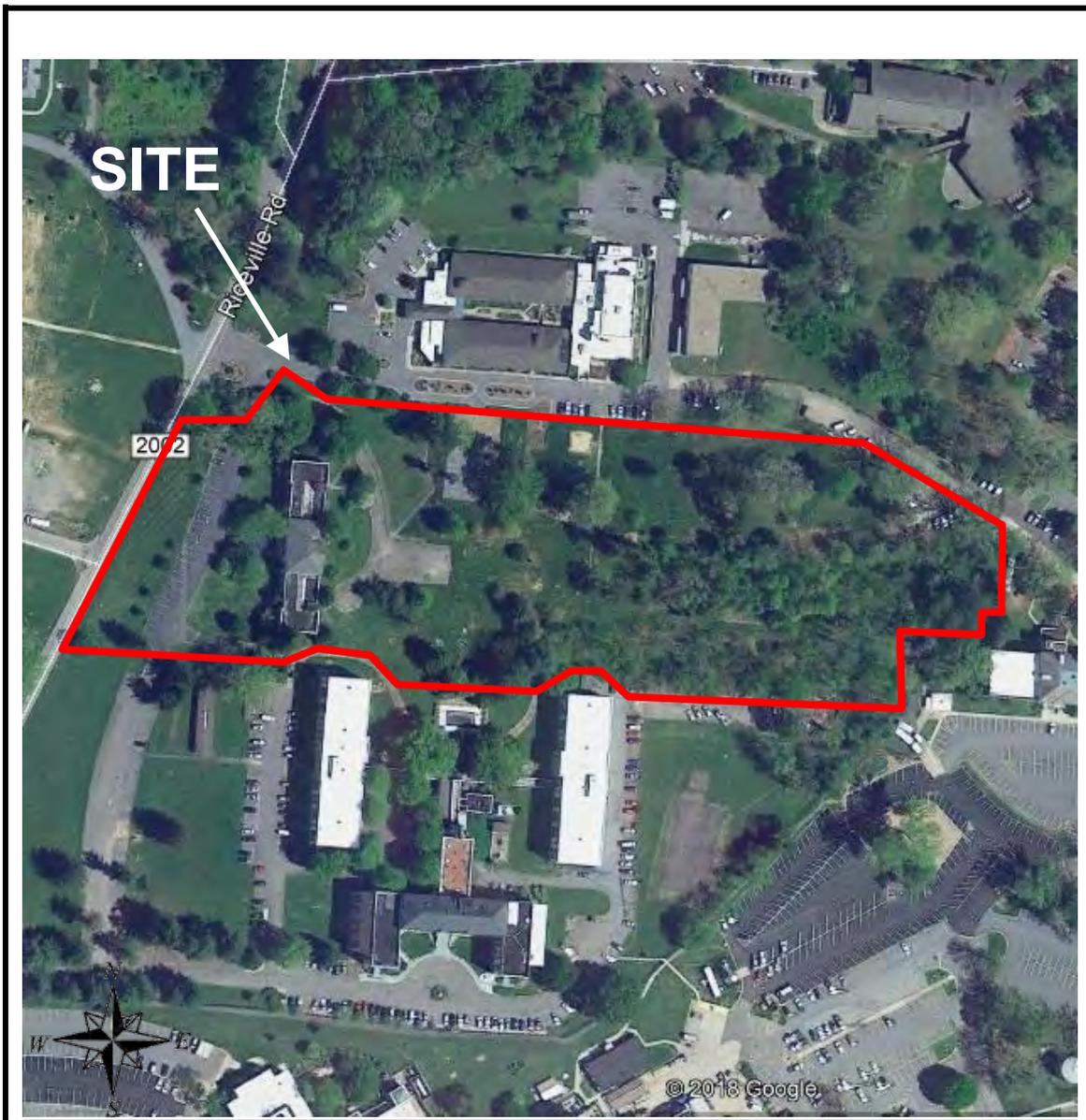


FIGURE 4
SITE AERIAL PHOTOGRAPH

ENVIRONMENTAL ASSESSMENT
PROPOSED LAND ACQUISITION
FOR NEW SARRTP FACILITY
ASHEVILLE VA MEDICAL CENTER
ASHEVILLE, NORTH CAROLINA

PREPARED FOR

U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, DC

TTL PROJECT NO. 1900801



SECTION 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.1 Introduction

This Section describes the baseline (existing) environmental, cultural, and socioeconomic conditions at the Site (see Figures 1 through 4) and its general vicinity (that is, the Proposed Action's Region of Influence (ROI), with emphasis on those resources potentially impacted by the Proposed Action. Appendix C provides photographs, with captions, of the Site and its vicinity. Under each resource area (Sections 3.2 through 3.16), the potential direct and indirect effects of the Proposed Action and the No Action Alternative are identified. Potential cumulative impacts are discussed in Section 3.17.

In this EA, impacts are identified as either significant, less than significant (that is, impacts that would not be of the context or intensity to be considered significant under the NEPA or CEQ Regulations), or no/negligible impact. As used in this EA, the terms "effects" and "impacts" are synonymous. Where appropriate and clearly discernible, each impact is identified as either adverse or beneficial.

The CEQ Regulations specify that in determining the significance of effects, consideration must be given to both "*context*" and "*intensity*" (40 CFR 1508.27):

Context refers to the significance of an effect to society as a whole (human and national), to an affected region, to affected interests, or to just the locality. Significance varies with the setting of the Proposed Action.

Intensity refers to the magnitude or severity of the effect and whether it is beneficial or adverse.

In this EA, the significance of potential direct, indirect, and cumulative effects has been determined through a systematic evaluation of each considered alternative in terms of its effects on each individual environmental resource component.

Resource areas considered in this EA are as follows:

- *Aesthetics*
- *Air Quality*
- *Cultural Resources*
- *Geology, Topography, and Soils*
- *Hydrology and Water Quality*
- *Wildlife and Habitat*
- *Noise*
- *Land Use*
- *Floodplains, Wetlands, and Coastal Zone Management*
- *Socioeconomics*
- *Community Services*
- *Solid Waste and Hazardous Materials*
- *Transportation and Parking*
- *Utilities*
- *Environmental Justice*
- *Cumulative Impacts*
- *Potential for Generating Substantial Controversy*

3.2 Aesthetics

The Asheville VAMC is located in the eastern portion of the City of Asheville in Buncombe County, North Carolina. Primary access to the Asheville VAMC campus is via Tunnel Road (south) with two secondary access points along the southern boundary (Tunnel Road) and western boundary (Riceville Road). The VAMC property slopes gently to the south and southeast towards the Swannanoa River. The regional area consists of steeply rolling hills and small mountains.

The approximately 8.3-acre Site is located adjacent to the northwestern portion of the Asheville VAMC campus. The central and eastern portions of the Site are generally level and vegetation cover ranges from grassy to moderately wooded. Remnants of former Site buildings (foundations, retaining walls, stairs, etc.) are also present in these areas. The western portion of the Site is generally level and contains a vacant, approximately 23,000-square foot, two to three-story masonry building with parking areas to the west and east of the building, and grassy areas with scattered trees and shrubs. The Site building (constructed in 1930) underwent substantial interior and exterior alterations when it was converted for senior housing in the 1980s; however, it retains basic aspects of its original exterior design. The Site and surrounding area are depicted on Figure 3. The current Site features are shown on Figure 4.

Abutting the north of the Site is Laurels of Summit Ridge Skilled Nursing and Rehabilitation Center (100 Riceville Road) and unimproved grassy land with scattered trees. Adjacent to the east of the Site are Asheville VAMC Buildings 15, 63, and 65, and surface-level parking areas. The main Asheville VAMC hospital building is located approximately 600 feet south-southeast of the Site. Adjacent to the south of the Site are the Evergreen Apartments (50 Riceville Road) with associated surface-level parking and grassy areas with scattered trees. Adjacent to the west of the Site (across Riceville Road) are Asheville VAMC Buildings 6, 7, and 9 with associated surface-level parking areas and grassy lots.

3.2.1 Effects of the Proposed Action

The Proposed Action would result in negligible aesthetic impacts as only the interior of the Site building would be substantially altered. No notable exterior building modifications are anticipated and no new construction or ground disturbing activities are planned.

3.2.2 Effects of the No Action Alternative

Under the No Action Alternative, no aesthetics impacts by VA would result. The Site would likely be ultimately developed by others for commercial or residential use consistent with local zoning. Aesthetics impacts could occur, depending on the use of the Site.

3.3 Air Quality

3.3.1 Ambient Air Quality

The ambient air quality in an area can be characterized in terms of whether or not it complies with the primary and secondary National Ambient Air Quality Standards (NAAQS). The Clean Air Act (CAA) requires the USEPA to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS are provided for the following principal pollutants, called “criteria pollutants” (as listed under Section 108 of the CAA):

- Carbon monoxide (CO)
- Lead (Pb)
- Nitrogen oxides (NO_x)
- Ozone (O₃)
- Particulate matter (PM), divided into two size classes:
 - Aerodynamic size less than or equal to 10 micrometers (PM₁₀)
 - Aerodynamic size less than or equal to 2.5 micrometers (PM_{2.5})
- Sulfur dioxide (SO₂)

Areas are designated by the USEPA as “attainment”, “non-attainment”, “maintenance”, or “unclassified” with respect to the NAAQS. Regions in compliance with the standards are designated as “attainment” areas. In areas where the applicable NAAQS are not being met, a “non-attainment” status is designated. Areas that have been classified as “non-attainment”, but are now in compliance can be re-designated “maintenance” status if the state completes an air quality planning process for the area. Areas for which no monitoring data is available are designated as “unclassified”, and are by default considered to be in attainment of the NAAQS. According to the USEPA Green Book, Buncombe County, including the City of Asheville, is currently designated as a full-attainment area.

3.3.2 Sensitive Receptors

Sensitive air quality receptors in the vicinity of the Site include Asheville VAMC buildings to the southeast and west, the skilled nursing and rehabilitation center to the north, and the residential apartments to the south of the Site. No other sensitive air quality receptors were identified.

3.3.3 Effects of the Proposed Action

Air emissions generated from the Proposed Action would have less-than-significant direct and indirect, short-term and long-term adverse impacts to the existing air quality environment around the Site. Impacts would include short-term and long-term increased air emission levels as a result of: 1) construction/rehabilitation activities, and 2) operation of the proposed SARRTP facility and onsite activities.

Construction/rehabilitation activities would be performed in accordance with federal and state air quality requirements. Construction/rehabilitation-related emissions are generally short-term, but may still have adverse impacts on air quality, primarily due to the production of dust. Dust can result from a variety of activities, including vehicle travel on paved and unpaved surfaces. Dust from construction/rehabilitation can lead to adverse health effects and nuisance concerns, such

as reduced visibility on nearby roadways. The amount of dust is dependent on the intensity of the activity, soil type and conditions, wind speed, and dust suppression activities used. Implementing dust control measures (BMPs) significantly reduces dust emissions from construction. Construction-related emissions also include the exhaust from the operation of construction equipment, including diesel particulate matter (DPM). The use of newer construction equipment with emissions controls and minimizing the time that the equipment is idling (BMPs) reduces construction equipment exhaust emissions.

Proposed Action construction/rehabilitation activities would primarily occur within the interior of the Site building. No new construction or notable earth moving/excavation activities are planned. Consequently, short-term construction-related, air quality impacts would be minor.

Operational (long-term) air quality impacts from the SARRTP facility would include emissions from equipment, such as boilers and generators, and vehicle emissions from patients, staff and visitors driving to and from the facility. The proposed SARRTP facility would have daily site visits by approximately 45 staff, volunteers, and other guests (estimated total of 100 one-way daily vehicle trips). SARRTP facility patients generally would come and go from the facility through means other than personal vehicles. There would be a localized, minor increase in vehicle traffic and associated air emissions at the Site. However, regional vehicle emissions would be similar to current emissions as most patients, staff and visitors that would use the proposed SARRTP facility currently travel to the adjacent Asheville VAMC.

The Asheville VAMC currently generates air emissions (e.g., from boilers, generators, or other minor equipment) and has a USEPA Operating Synthetic Minor Air Permit (VA 2019); however, the VAMC is not considered to be a major source of criteria pollutants. The Asheville VAMC does not have and is not required to have a Title V operating permit.

A Title V operating permit would not be required for the proposed SARRTP facility's boiler equipment, generators, and other equipment as this equipment would not emit more than 100 tons per year of any individual or combination of hazardous air pollutants. VA would secure any required minor air emissions permits from the North Carolina Department of Environmental Quality (NCDEQ) Division of Air Quality (DAQ) and/or the Western North Carolina Regional Air Quality Agency (WNCRAQA), including modifications to the USEPA Operating Synthetic Minor Air Permit.

3.3.4 Effects of the No Action Alternative

Under the No Action Alternative, no air quality impacts related to construction or operation of the proposed SARRTP facility would result. Should the Site ultimately be used by others, potential air quality impacts could result, depending upon the future use.

3.4 Cultural Resources

The Site was originally part of the Asheville VAMC campus, but was divested in the 1980s along with other portions of the original campus that were underutilized by VA at that time. The Site included up to seven wooden structures associated with the original U.S. Army General Hospital 19 in the 1910s and 1920s (four hospital wards, an administration and receiving building, and a kitchen and a mess hall). These buildings were demolished around 1930 and replaced with four

masonry structures associated with the Oteen Veterans Administration Hospital (hospital wards, dining hall, and nurses quarters, all linked by covered walkways) that were present from the 1930s to approximately 1990, when all but the current Site building (former Building 19, also known as Ward C) were demolished. During the 1980s, the Site building was renovated for senior assisted living apartments. The Site building has been vacant since approximately 2015.

PRESERVE/scapes Consulting, LLC prepared an Initial Cultural Resources Impact Prediction (ICRIP) report for the Site in March 2019. The ICRIP report indicates the Site is located within the Oteen Veterans Administration Hospital Historic District, which was listed in the National Register of Historic Places (NRHP) in 1985. The current Site building (former Building 19) is listed as a contributing resource to this historic district. The ICRIP states that the building retains sufficient integrity to convey its significance as part of the historic district, but it underwent substantial interior and exterior alterations when it was converted to senior housing. There are no other structures from the historic hospital located within the boundaries of the Site, but remnants from the demolition of previous buildings remain on the eastern portion of the Site parcel. The ICRIP also included a desktop archaeological study and concluded that there is moderate potential for the discovery of artifacts from the first phase of construction of the Oteen Medical Center, which consisted of mostly temporary structures built circa 1918 and there is low potential for precontact artifacts within the Site parcel or for artifacts that predate the original hospital construction.

The ICRIP concluded that the proposed land reacquisition and rehabilitation of the Site building would not have an adverse effect on historic properties within the direct area of potential effect (APE), which is defined as the Site. Because the existing building previously underwent substantial alterations, its historic significance as a contributing resource to the NRHP historic district lies primarily in the retention of its form and location, as well as basic aspects of its exterior design. The Proposed Action does not include additions, relocation of the building, or substantial exterior alterations that would further diminish its historic integrity. The Proposed Action site work is minimal and limited to the reuse of impervious surfaces and utilities. With a limited scope of reuse and rehabilitation, the ICRIP concluded that the Proposed Action would also not have any adverse visual effects on historic resources within the Indirect APE, defined as the Oteen Veterans Administration Hospital Historic District. Because no ground disturbance is proposed, the ICRIP concluded there is no potential for adverse effects on archaeological resources. Because of the moderate potential for archaeological resources on sections of the Site, the ICRIP indicated further archaeological study and investigation would be required to determine the potential for effects on cultural resources in the case that ground disturbance or additional development (including paving) is proposed in the future.

3.4.1 Effects of the Proposed Action

Based on the findings of the March 2019 ICRIP for the Site and the nature of the Proposed Action (no additions or substantial exterior alterations to the Site building and no new exterior construction), the Proposed Action would have less-than-significant impacts on cultural resources. In November 2019, VA initiated National Historic Preservation Act (NHPA) Section 106 consultation with the North Carolina State Historic Preservation Office (SHPO) regarding the Proposed Action. VA submitted information detailing the cultural resources identification efforts (including the ICRIP report) and the Proposed Action and requested NC SHPO concurrence that the Proposed Action would have no effect on NRHP-listed or eligible historic properties. In a letter dated December 6, 2019, NC SHPO concurred that the Proposed Action would not adversely

affect the NRHP-listed Oteen Veterans Administration Hospital Historic District, conditioned upon VA's providing site plans to NC SHPO at the design development, schematic, and final design phases for review and comment.

3.4.2 Effects of the No Action Alternative

Under the No Action Alternative, no cultural resources impact by VA would occur. Should the Site be developed for use by others, cultural resources impacts could result.

3.5 Geology and Soils

According to *A Tapestry of Time and Terrain* (USGS 2000), the Site is located within the southern section of the Blue Ridge Physiographic Province of the Appalachian Highlands Physiographic Region of North Carolina. According to the Groundwater Atlas of the United States (USGS 1995), the Blue Ridge Physiographic Province includes many types of metamorphic and intrusive igneous rocks; however, sedimentary rocks (limestone, dolomite, conglomerate, sandstone, and shale) are also included.

The Oteen, North Carolina USGS Topographic Quadrangle (dated 1997) indicated that surficial topography at the Site (at elevation of approximately 2,240 feet above mean sea level [amsl]) is relatively level. The ground surface in the Site vicinity generally slopes down to the north and east. The nearest surface water body depicted on the USGS topographic map is an unnamed tributary of Grassy Branch, located approximately 1,200 feet north of the Site.

The United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey indicates the Site contains four soil types identified as Udorthents-Urban land complex, 2 to 50 percent slopes (majority of Site), Urban land (south-central portion), Clifton-Urban land complex, 8 to 15 percent slopes (northeast corner), and Tate-Urban land complex, 2 to 8 percent slopes (western portion). The Udorthents-Urban land complex and Urban land soils are characterized as moderately somewhat excessively drained loam and fill materials. Clifton-Urban land and Tate-Urban land complexes are characterized as well drained clay and loam soils. Site soils are shown on Figure 5.

According to the USGS, the Site is not located in a designated karst-sensitive area and no active significant faults are located in the Site area.

3.5.1 Prime and Unique Agricultural Land Soils

Prime and unique farmlands are regulated in accordance with the Farmland Protection Policy Act (FPPA) (7 USC 4201, *et seq.*) to ensure preservation of agricultural lands that are of statewide or local importance. Soils designated as prime agricultural land are capable of producing high yields of various crops when managed using modern farming methods. Prime agricultural land is land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, and without intolerable soil erosion. Unique agricultural lands are also capable of sustaining high crop yields and have special combinations of favorable soil and climate characteristics that support specific high-value foods or crops.

According to the USDA NRCS Web Soil Survey, none of the soils at the Site are classified as prime farmland.

3.5.2 Effects of the Proposed Action

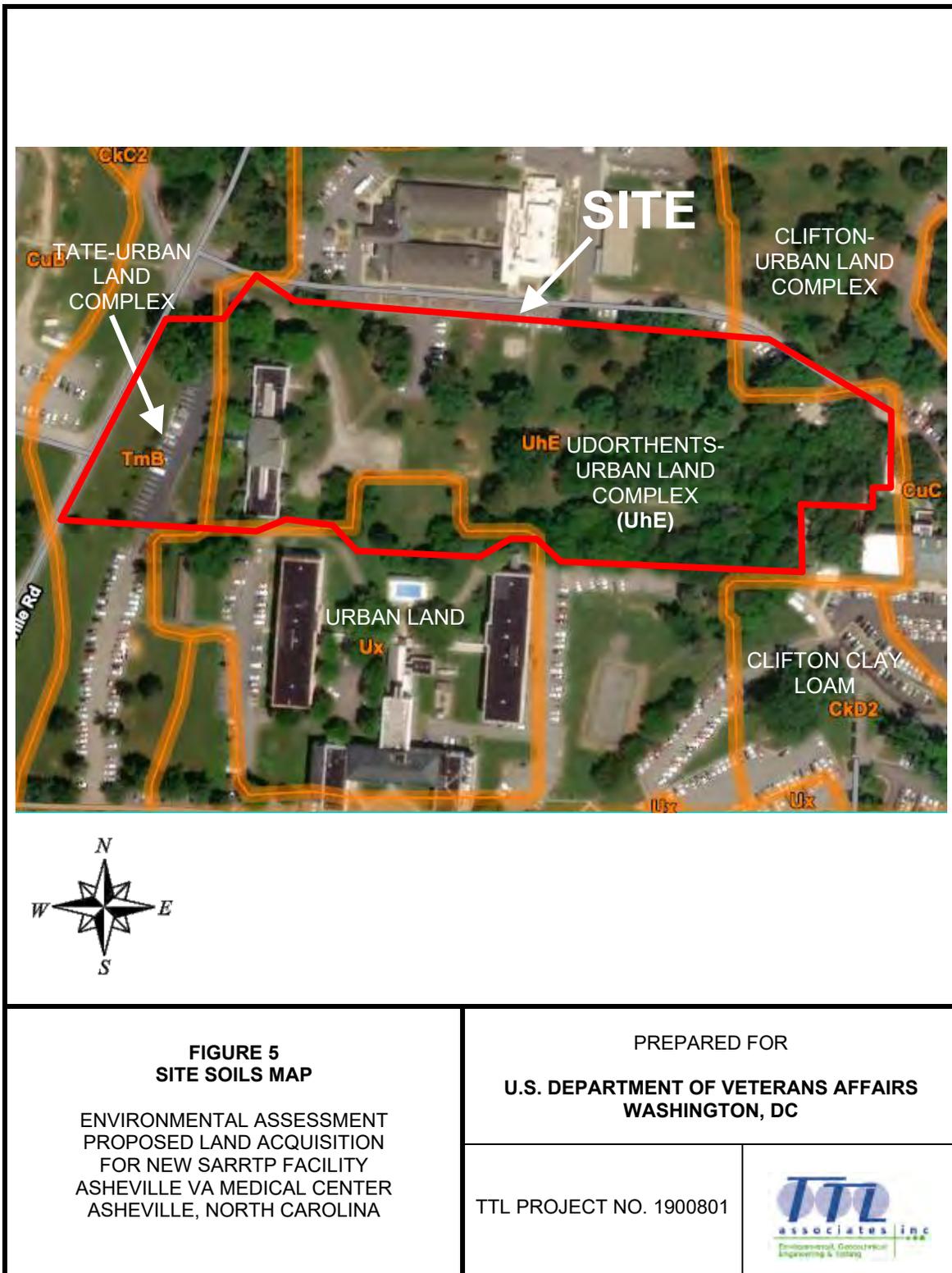
No changes to topography would occur at the Site due to the Proposed Action as no land-disturbing activities are planned.

No impacts to geology are anticipated. No active significant faults are known extend through the subsurface geology at the Site. As such, no impacts associated with seismic hazards are identified. No mineral resource impacts are anticipated, as the Proposed Action would not involve the commercial extraction of mineral resources, nor affect mineral resources considered important on a local, state, national, or global basis. In addition, the Proposed Action would not impact prime agricultural land.

No direct or indirect, short-term or long-term soil erosion and sedimentation impacts would be anticipated as no land-disturbing activities are planned.

3.5.3 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to soils, topography, or geology would occur at the Site as a result of VA's actions. Should the Site be used in the future by others, geology and soils impacts may occur, depending on the use.



3.6 Hydrology and Water Quality

3.6.1 Surface Waters

The Site is located in a gently to moderately sloping area of the Swannanoa River Watershed. No surface waters are present at the Site. The nearest surface water depicted on the USGS topographic map of the Site area is an unnamed tributary of Grassy Branch, located approximately 1,200 feet north of the Site. Grassy Branch is located approximately 1,800 feet east of the Site and the Swannanoa River is located approximately 4,500 feet east of the Site. Stormwater runoff at the Site area either infiltrates directly into soils or flows across paved areas and then infiltrates the soil.

3.6.2 Groundwater

According to the Groundwater Atlas of the United States, the Site is underlain by crystalline rock aquifers of the Blue Ridge Physiographic Province, which include crystalline metamorphic and igneous rocks of many types.

No site-specific information pertaining to the groundwater conditions was identified for the Site. However, based on available information from the USGS Groundwater Resources Program and topographic maps, groundwater is likely to be found within 30 feet below grade at the Site.

3.6.3 Effects of the Proposed Action

The Proposed Action would not impact water resources, as no surface waters are present at or near the Site, no land-disturbing activities are planned, and no discharges to surface water or groundwater are anticipated.

3.6.4 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to water resources would occur as a result of the VA's actions. However, should the Site be developed for future use by others, water resource impacts could occur.

3.7 Wildlife and Habitat

3.7.1 Vegetation and Wildlife

The central and eastern portions of the Site are generally level and grassy to moderately wooded with remnants of former Site buildings. The western portion of the Site is generally level and contains the two to three-story Site building with parking areas to the west and east of the building, surrounded by grassy areas with scattered trees and shrubs. The properties surrounding the Site are primarily developed with institutional buildings with maintained grassy lawns and scattered trees. Wooded areas associated with Blue Ridge Parkway are located approximately 300 feet east of the Site, and. The vegetative communities on the Site could support wildlife species associated with developed suburban Asheville areas.

3.7.2 Threatened and Endangered Species

As part of the preparation of this EA, the USFWS and various state natural resources' agencies were contacted to identify any potential for the presence of state or federally listed species on or in the vicinity of the Site.

The USFWS did not respond to the request for information. The USFWS Information for Planning and Conservation (IPaC) internet application, identified eight federally listed endangered species and four federally-listed threatened species for the vicinity of the Site. No critical habitats for protected species were identified on or adjacent to the Site. The IPaC report for the Site is provided in Appendix D. Table 1 provides a summary of the federally protected species listed in the IPaC report, their habitat requirements, and the potential presence of their required habitat at the Site. Based on their habitat requirements, none of these species are likely to be present at the Site.

Table 1. Federally Listed Species in the Vicinity of the Site			
Species	Status	Habitat	Potential Habitat Present at the Site
<i>Mammals</i>			
Carolina Northern Flying Squirrel	Endangered	Prefers coniferous and mixed forest with boreal characteristics, but will utilize deciduous woods and riparian woods that are cool, moist, mature forests with abundant standing and down snags.	No
Gray Bat	Endangered	Roost sites are nearly exclusively restricted to caves throughout the year within 1 kilometer of water resources for feeding.	No
North Long-Eared Bat	Threatened	Generally associated with old-growth forests composed of trees 100 years old or older. Relies on intact interior forest habitat, with low edge-to-interior ratios.	No
<i>Reptiles</i>			
Bog Turtle	Threatened	Slow, shallow, muck-bottomed rivulets of sphagnum bogs, calcareous fens, marshy/sedge-tussock meadows, spring seeps, wet cow pastures, and shrub swamps	No
<i>Clams</i>			
Appalachian Elktoe	Endangered	Relatively shallow, medium-sized creeks and rivers with cool, clean, well-oxygenated, moderate- to fast-flowing water.	No

Table 1. Federally Listed Species in the Vicinity of the Site			
Species	Status	Habitat	Potential Habitat Present at the Site
<i>Arachnids</i>			
Spruce-Fir Moss Spider	Endangered	High-elevation spruce-fir forest communities on moist but well-drained moss mats growing on rocks and boulders in well-shaded locations. Known from conifer forests dominated by red spruce.	No
<i>Flowering Plants</i>			
Blue Ridge Goldenrod	Threatened	Rocky places such as outcrops, ledges, cliffs, and balds at elevations above 1400 meters.	No
Bunched Arrowhead	Endangered	Very gently sloping areas with some standing water refreshed by slow continuous seepage of cool clear water.	No
Mountain Sweet Pitcher Plant	Endangered	Bogs and a few stream sides	No
Spreading Avens	Endangered	Exposed, high elevation situations in the southern Appalachians.	No
Virginia Spiraea	Threatened	Periodically flood-scoured banks of high-gradient mountain streams, meander scrolls, point bars, natural levees, and braided features of lower stream reaches, and occasionally near disturbed rights-of-way.	No
<i>Lichens</i>			
Rock Gnome Lichen	Endangered	Shady rock or shady moss-covered rock found in areas of high humidity, either on high-elevation cliffs, where it is frequently bathed in fog, or in deep river gorges at lower elevations.	No

The IPaC report also identified nine bird species protected under the Migratory Bird Treaty Act (MBTA) for the Site region. Based on habitat information obtained from the NatureServe Explorer internet application, only two of these species (Red-Headed Woodpecker and Yellow-Bellied Sapsucker) could potentially be present on the Site during breeding season. For the remaining migratory bird species, there is little to no suitable habitat at the Site.

The North Carolina Wildlife Resources Commission (NCWRC) stated that they do not anticipate any significant impacts to wildlife resources from the Proposed Action. The NCWRC indicated that they have no record of listed species in the vicinity of the Site.

3.7.3 Effects of the Proposed Action

Based on information from the USFWS IPaC report and NCWRC regarding protected species in the Site area and the nature of the Proposed Action (no new exterior construction or vegetation clearing), the Proposed Action would not affect federally or state listed protected species or their critical habitats. In addition, no impacts to species protected under the MBTA are anticipated.

3.7.4 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to biological resources by VA would occur. Should the Site ultimately be developed/used by others, impacts to federally listed protected species or their critical habitats are not likely to occur; however, impacts to species protected under the MBTA could occur.

3.8 Noise

The existing noise environment around the Site is relatively quiet with limited noise from vehicle traffic along Riceville Road, and more distant noise from vehicle traffic along Blue Ridge Parkway (approximately 1,000 feet east of the Site). No other notable noise-generating sources are present in the immediate vicinity of the Site. As such, the noise environment of the Site can be characterized as that typical of a suburban area.

3.8.1 Sensitive Receptors

Sensitive noise receptors in the vicinity of Site include Asheville VAMC buildings to the southeast and west, the skilled nursing and rehabilitation center to the north, and the residential apartments to the south of the Site.

3.8.2 Effects of the Proposed Action

The Proposed Action would have short-term impacts to the existing noise environment due to construction/rehabilitation activities; however, noise-generating activities would be generally limited to the interior portions of the Site building. Exterior noise-generating activities would be mostly limited to the vehicles delivering new materials and removing demolition/waste materials and minor exterior rehabilitation. No earth moving or heavy equipment operations are anticipated.

Areas that could be most affected by noise from construction/rehabilitation include those closest to the Site building, including the residential apartments located south of the Site and the skilled nursing and rehabilitation center north of the Site. Indoor noise levels would be expected to be 15-25 decibels lower than outdoor levels. In addition, BMPs (described in Section 5) would be implemented to reduce noise impacts, including limiting most construction noise to Monday through Saturday from 7 AM to 7 PM. Direct construction/rehabilitation noise impacts would be temporary and less than significant.

Indirect impacts include noise from workers commuting and material transport. Area traffic volumes and noise levels would increase slightly as construction employees commute to and from work at the project area, and delivery and service vehicles (including trucks of various sizes) transit to and from the site. Persons in the project area would experience temporary increases in

traffic noise during daytime hours. These effects would be temporary, intermittent, and similar to existing traffic noise levels in the area.

No significant long-term noise impacts are anticipated with the operation of the proposed SARRTP facility. The SARRTP facility would be a quiet, residential health care facility with operational noise from HVAC systems typical of other comparably sized commercial buildings and grounds maintenance noise (such as lawn mowing or leaf blowers). Operational activities at the new SARRTP facility would also include minor increased vehicle traffic to and from the Site. The vehicle traffic would not produce excessive noise, is consistent with the existing noise environment of the Site area, and would not produce a significant adverse noise impact on surrounding land uses.

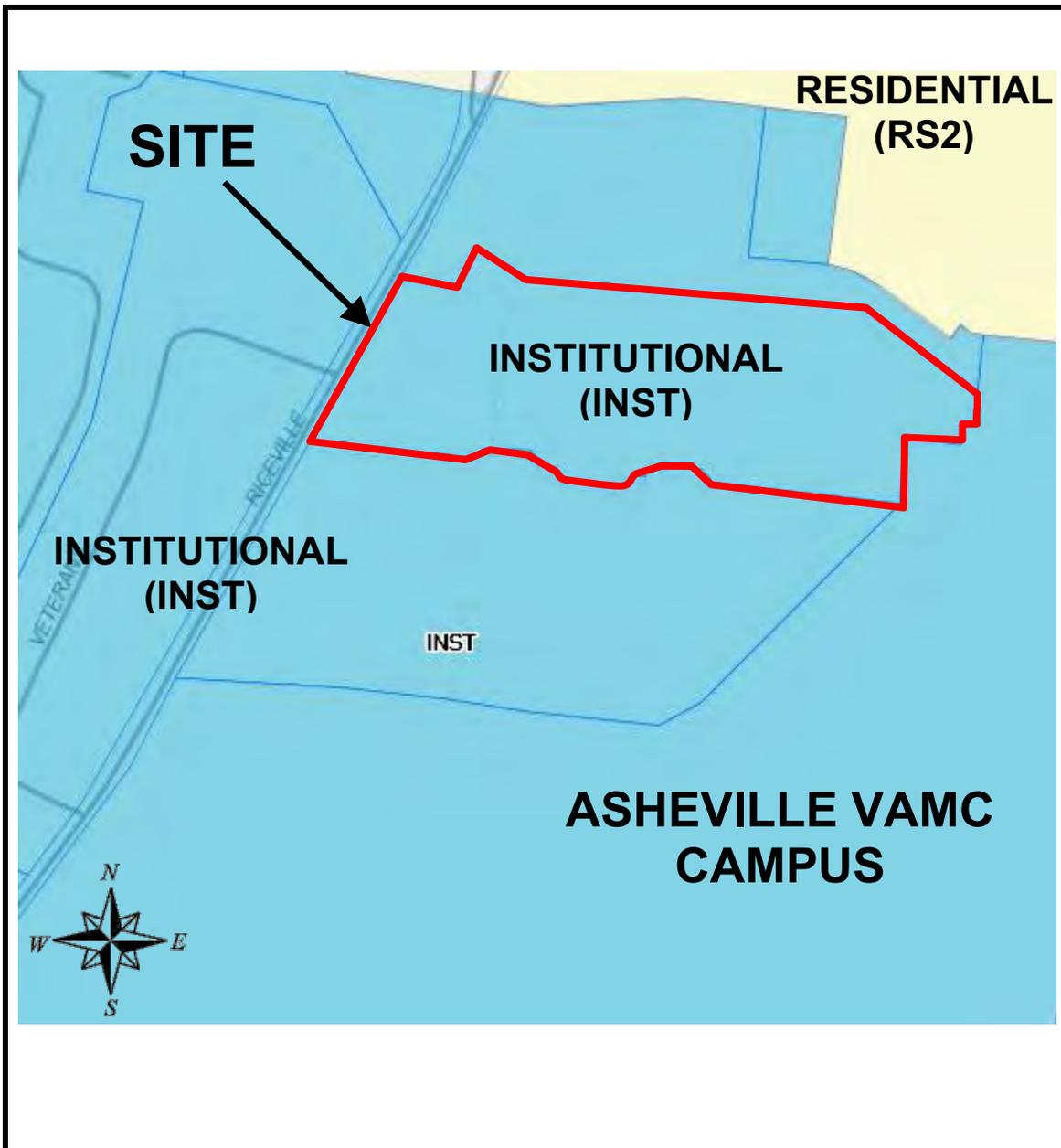
3.8.3 Effects of the No Action Alternative

Under the No Action Alternative, the noise environment of the Site would not be altered by activities of VA. However, should the Site be developed for future use by others, construction and operational noise impacts would occur.

3.9 Land Use

The western portion of the Site contains a vacant, approximately 23,000-square foot, two to three-story building and associated parking areas and grassy areas with scattered trees and shrubs. The eastern portion of the Site contains grassy and wooded areas and remnants of former buildings. The properties surrounding the Site are primarily developed with institutional buildings with maintained grassy lawns and scattered trees. Asheville Planning and Urban Design Department zoning maps indicate the Site is currently zoned Institutional (Inst). The proposed SARRTP facility would be a permitted use under the current Institutional zoning designation for the Site.

Properties surrounding the Site are also currently zoned Institutional. The area northeast of the Site associated with Blue Ridge Parkway is zoned Residential (RS2). Zoning designations for the Site and surrounding properties are shown on Figure 6.



<p>FIGURE 6 SITE ZONING MAP</p>	<p>PREPARED FOR U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, DC</p>	
<p>ENVIRONMENTAL ASSESSMENT PROPOSED LAND ACQUISITION FOR NEW SARRTP FACILITY ASHEVILLE VA MEDICAL CENTER ASHEVILLE, NORTH CAROLINA</p>	<p>TTL PROJECT NO. 1900801</p>	

3.9.1 Effects of the Proposed Action

The proposed SARRTP facility at the Site would be consistent with local zoning and compatible with surrounding land use. No adverse onsite building function or architecture impacts are anticipated as building rehabilitation activities would be mostly limited to the interior of the building and no ground-disturbing activities are planned. Land use effects would be negligible.

3.9.2 Effects of the No Action Alternative

Under the No Action Alternative, no land use impacts due to VA's Proposed Action would occur. The Site would likely be developed for residential or commercial use by others in the future in accordance with local zoning regulations. The land use impacts (and associated community benefits) of any future proposed developments would depend upon the use proposed.

3.10 Wetlands, Floodplains, and Coastal Zone Management

3.10.1 Wetlands

This section discusses wetlands at or near the Site and surface waters (streams) as they pertain to wetlands. Additional information regarding surface waters is provided in Section 3.6.

No wetlands were identified at the Site or surrounding properties on the USFWS National Wetland Inventory (NWI) online wetland mapper. No visual evidence of wetlands was observed at the Site or the surrounding properties during the site reconnaissance.

3.10.2 Floodplains

The Federal Emergency Management Agency (FEMA) National Flood Hazard Flood Layer FIRMette (FIRMette) internet mapping application was used to determine if the Site or surrounding properties are located in designated floodplains. The Site and surrounding properties are not located within the 100-year or 500-year floodplain.

3.10.3 Coastal Zone

The Coastal Zone Management Act (CZMA) was promulgated to control nonpoint pollution sources that affect coastal water quality. The CZMA of 1990, as amended (16 USC 1451 *et seq.*) encourages states to preserve, protect, develop, and where possible, restore or enhance valuable natural coastal resources such as wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as the fish and wildlife using those habitats.

According to the NCDEQ, Division of Coastal Management, the Site is not located within a designated coastal zone (NCDEQ 2019).

3.10.4 Effects of the Proposed Action

The Proposed Action would not result in impacts to regulated wetlands, floodplains, or coastal zones. No wetlands, floodplains, or coastal zones are located on the Site or surrounding properties.

3.10.5 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to wetlands, floodplains, or coastal zones would occur.

3.11 Socioeconomics

The following subsections identify and describe the socioeconomic environment of the City of Asheville, Buncombe County, and the State of North Carolina. The data provide an understanding of the socioeconomic factors that have developed the area. Socioeconomic areas of discussion include the local demographics of the area, regional and local economy, and local recreation activities. Data used in preparing this section were collected from the 2010 Census of Population and Housing (U.S. Census Bureau), subsequent U.S. Census Bureau data, and the U.S. Department of Commerce Bureau of Economic Analysis (BEA).

Demographics

The City of Asheville and Buncombe County have lower minority populations than that of the State of North Carolina as a whole. Minority populations specific to the Site area are discussed in Section 3.16 (Environmental Justice). Age distribution and high school graduation rates are generally similar throughout Asheville, Buncombe County, and North Carolina (Table 2).

Area	All Individuals (2018 Estimate)	Population Under 18 Age Years (2018)	Population Over 65 Age Years (2018)	Minority (2018)	High School Graduates (2013-17)	Veterans (2013-17)
North Carolina	10,383,620	22.2 %	16.3 %	36.7 %	86.9 %	670,326
Buncombe County	259,103	18.5 %	20.0 %	15.1 %	90.8 %	17,890
Asheville	92,452	12.5 %	17.3 %	20.2 %	92.9 %	5,453

Note: People of Hispanic or Latino origin may be of any race.
Source: U.S. Census Bureau, 2010 Census, Profile of General Demographic Characteristics, 2013-2017.
N/A – Not Available

Employment and Income

The City of Asheville and Buncombe County have similar median household incomes and populations below the poverty line to that of the State of North Carolina as a whole (Table 3). Household incomes specific to the Site area are discussed in Section 3.16.

Area	Number of Households	Median Household Income	Population Below Poverty Level	Unemployment Rate July 2019
North Carolina	3,874,346	\$50,320	14.0 %	4.2 %
Buncombe County	105,407	\$48,464	11.5 %	3.3 %
Asheville	39,697	\$46,464	15.1 %	3.3 %

Source: U.S. Census Bureau, 2010 Census, Profile of General Demographic Characteristics, 2013-2017.
N/A – Not Available

Commuting Patterns

Residents of the Asheville area are largely dependent on personal automobiles for transportation to and from work. Other methods of transit include public transportation (Asheville Regional Transit or ART), carpooling, and walking. The average commuting time in Asheville and Buncombe County was approximately 18 to 20 minutes in 2017.

Protection of Children

Because children may suffer disproportionately from environmental health risks and safety risks, EO 13045, *Protection of Children From Environmental Health Risks and Safety Risks*, was introduced in 1997 to prioritize the identification and assessment of environmental health risks and safety risks that may affect children and to ensure that federal agencies' policies, programs, activities, and standards address environmental risks and safety risks to children. This section identifies the distribution of children and locations where numbers of children may be proportionately high (such as schools, childcare centers, family housing) in areas potentially affected by the Proposed Action.

Children are not regularly present at the Site. Children may be present in the off-site residential apartments located adjacent to the south of the Site. No schools or playgrounds are located in the immediate area of the Site.

3.11.1 Effects of the Proposed Action

The Proposed Action is anticipated to result in short-term, direct, beneficial impacts to local employment and personal income. Construction/rehabilitation of the proposed SAR RTP facility would provide additional temporary construction jobs in the private sector, thus providing short-term socioeconomic benefit to the area.

The Proposed Action would result in significant long-term beneficial health impacts by providing a new, appropriately-sized, modern SAR RTP facility that would enhance the health care services provided to regional Veterans.

No adverse health or safety risks to children are anticipated to result from construction/rehabilitation or operation of the SARRTP facility. Children are not regularly present at the Site. In addition, once operational, children would only be present at the SARRTP facility as visitors; all Veterans are above the age of 18. Construction areas would be secured to prevent unauthorized access by children from the nearby residential areas. The construction contractor would limit and control construction dust and noise as discussed in Section 5, thereby minimizing adverse effects to children in the area.

3.11.2 Effects of the No Action Alternative

The No Action Alternative would result in no construction/rehabilitation of the Site building and no increased short-term or long-term economic benefit due to VA's action. The Site would likely be developed by others for future use in accordance with local zoning. The socioeconomic impacts of any future developments would depend on the proposed use.

Most importantly, the inability of VA to provide adequate health care services commensurate with the current and anticipated future needs would result in a significant adverse, long-term, direct impact to U.S. Veterans in the region.

3.12 Community Services

The Site is located within the Buncombe County School District (BCSD). C.C. Bell Elementary School (90 Maple Springs Road) is located approximately 2,000 feet west of the Site. No other schools are located within 0.5-mile of the Site (Google Earth 2019).

The City of Asheville provides police protection and fire protection services to the Site area.

The City of Asheville and/or North Carolina Department of Transportation (NCDOT) provide maintenance to primary roads and bridges in the vicinity of the Site.

With the exception of the Blue Ridge Parkway, located approximately 300 to 600 feet east of the Site, there are no recreational facilities in the immediate vicinity.

The City of Asheville and its surrounding suburbs are host to one major civilian hospital and trauma center (Mission Hospital), located at 509 Biltmore Avenue, approximately 3.5 miles southwest of the Site. This hospital provides medical care for the majority of the citizens of Asheville and the surrounding area. Other than the adjacent Asheville VAMC, there are no other hospitals or other major medical facilities located within five miles of the Site.

Public transportation is provided to the vicinity of the Asheville VAMC campus and the Site by ART (Bus Routes E1 and E2), via bus stops along Tunnel Road (at Riceville Road) and at the Asheville VAMC campus between Buildings 47 (main hospital) and 62 (Community Living Center). Additional information regarding public transportation in the Site vicinity is provided in Section 3.14.

3.12.1 Effects of the Proposed Action

No significant additional load is expected to be placed on the fire or police departments as the result of the Proposed Action. Increased use of other public or community services as a result of the Proposed Action is not expected. As such, the Proposed Action is expected to have a negligible impact on local public services.

3.12.2 Effects of the No Action Alternative

Under the No Action Alternative, no construction/rehabilitation of the Site building by VA would occur and no impacts to community services would be anticipated. Should the Site be used in the future by others, community service impacts may occur, depending on the use.

3.13 Solid Waste and Hazardous Materials

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (through either physical or chemical reactions) to human health or the environment.

A Phase I Environmental Site Assessment (Phase I ESA) of the Site was prepared by Mabbett and Associates, Inc. (Mabbett) in March 2019. The Phase I ESA indicated that the Site was largely farmland prior to the construction of U.S. Army General Hospital No. 19 in 1919, and subsequent replacement by the Oteen Veterans Administration Hospital around 1930. The Phase I ESA indicated the current and former Site buildings were used as hospital wards, an administrative building, a kitchen, and a mess hall. Hospital buildings of potential concern (boiler plant, coal storage, and laundry) were determined to have been located off-site and at crossgradient or downgradient locations. No recognized environmental conditions (RECs) were identified for the Site.

The Phase I ESA included a copy of an Asbestos Survey Report for the Site building completed by Bunnell-Lammons Engineering, Inc. in June 2018. The asbestos survey identified black mastic on the exposed concrete floor of some rooms and pipe insulation in the basement, crawl spaces, and hallways as asbestos containing materials (ACMs). In addition, due to the age of the Site building, Mabbett indicated lead-based paint (LBP) and polychlorinated biphenyls (PCBs) may be present. Mabbett also noted that the Site is located within USEPA Radon Zone 1, an area that may contain elevated levels of radon gas. Mabbett recommended that prior to or during the Site building rehabilitation, ACM, LBP, and PCBs should be characterized and managed in accordance with applicable regulations, mold remediation should be conducted prior to building occupancy, and radon testing should be completed. If radon gas is found to exceed the USEPA residential action level, Mabbett recommended the installation of a radon mitigation system at the building.

The Western North Carolina Regional Air Quality Agency (WNCRAQA) stated that VA would be required to notify the WNCRAQA of plans to demolish or remodel any building no matter the age, or of plans to remove any asbestos-containing material from a building. In addition, the WNCRAQA stated that a permit must be obtained from WNCRAQA to remove ACMs.

3.13.1 Effects of the Proposed Action

The Proposed Action could result in short-term, less-than-significant adverse impacts due to the increased presence and use of petroleum and hazardous substances during construction/rehabilitation. An increase in construction vehicle traffic would increase the likelihood for release of vehicle operating fluids (such as oil, diesel, gasoline, and antifreeze) and maintenance materials. As such, a less-than-significant, direct, short-term adverse impact is possible. Implementation of standard construction BMPs would serve to ensure this impact is further minimized.

The Site building is known to contain ACMs and mold, likely contains LBP, and is located in an area that may contain naturally occurring elevated radon gas levels. Surveys of the Site building for ACM, LBP, mold, and radon would be conducted by licensed inspectors prior to rehabilitation activities. Identified ACMs, LBP, and mold would be removed/managed by licensed contractors in accordance with the federal and state requirements. A radon gas mitigation system would be installed in the building, if necessary.

No significant adverse long-term impacts during operation of the SARRTP facility are anticipated. Long-term operational solid wastes, hazardous materials, and medical wastes would be managed in accordance with VA's solid waste and hazardous materials SOPs and applicable federal and state laws. Wastes would be collected and properly disposed of by licensed, contracted transportation and disposal companies.

The Proposed Action would not result in a substantial increase in the generation of solid or hazardous wastes, increase the exposure of persons to hazardous or toxic substances, increase the presence of hazardous or toxic materials in the environment, or place substantial restrictions on property use due to hazardous waste, materials, or site remediation. Based on the Phase I ESAs, no contamination is known or suspected to be present at the Site.

3.13.2 Effects of the No Action Alternative

Under the No Action Alternative, no construction/rehabilitation of the Site building by VA would occur and no petroleum and hazardous substances impacts associated with the Proposed Action would occur. Should the Site be developed in the future by others, short-term and long-term solid waste and hazardous materials impacts could occur, depending upon the use.

3.14 Transportation and Parking

Traffic in the vicinity of the Site is regulated by the Asheville Street and Transportation Departments, and/or NCDOT.

Public transportation is provided to the vicinity of the Site by Asheville Regional Transit or ART (Bus Routes E1 and E2), via bus stops along Tunnel Road (at Riceville Road) and at the Asheville VAMC campus between Buildings 47 (main hospital) and 62 (Community Living Center). There are no current bus stops on Riceville Road north of Tunnel Road.

Access to the Site is provided via Riceville Road (County Road 2002) from Tunnel Road (U.S. Route 70), which intersect approximately 1,400 feet southwest from the Site. Riceville Road is a generally north-south oriented, two-lane paved road (one traffic lane in each direction) with a current estimated Level of Service¹ (LOS) rating of B or better. Tunnel Road is a generally east-west oriented, four to five-lane paved road (two traffic lanes in each direction with associated turn lanes) with a current estimated LOS rating of C or better. The intersection of Riceville Road and Tunnel Road is fully signalized with dedicated turn lanes in all directions. According to NCDOT, the 2018 annual average daily traffic (AADT) for Riceville Road in the vicinity of the Site was 10,000 vehicles and the 2018 AADT for Tunnel Road in the vicinity of the Asheville VAMC campus was 17,000 vehicles.

Roads near the Site are illustrated on Figures 3 and 4. Refer to Table 4 for roadway information for the Site.

Type	Route	Direction Site	Road Width (feet)	Lanes	Average Daily Traffic (year)	Estimated Level of Service
Major Arterial	Tunnel Road (U.S. Route 70)	East-West Site	60	4 to 5	17,000 (2018)	C or better
Secondary Route	Riceville Road (County Road 2002)	North-South Site	25	2	10,000 (2018)	B or better
AADT Data Source: NCDOT Additional Data Source: TTL Site Reconnaissance, December 5, 2019. N/A – Not Available						

3.14.1 Effects of the Proposed Action

The Proposed Action could have minor short-term and long-term, direct and indirect, transportation impacts. Construction traffic, consisting of trucks, workers' personal vehicles, and construction equipment would increase traffic volumes in the local area, and could cause delays if this occurred during morning and evening peak periods. Modification of utilities (if necessary), located within or adjacent to the Site, could also impact local roadways. These activities could result in additional traffic congestion, as well as a potential need to detour traffic around the area during utility work.

During operation, public roadways in the vicinity of the proposed SARRTP facility would experience traffic as a result of its usage. As described in Section 2.2, the proposed SARRTP facility would operate 24 hours per day, 365 days per year and would provide space for approximately 25 inpatient residents, 30 staff (over three daily shifts), and 15 daily volunteers and other guests on an average, daily basis. Given the proposed operational use, traffic generated by the Proposed Action (estimated 100 one-way vehicle trips per day) would occur throughout the day. Visitors of the SARRTP facility would travel at various times during the day during daylight hours. Staff at the SARRTP facility would largely commute to and from work at peak travel hours

¹ Level of Service – LOS represents a set of qualitative descriptions of a transportation system's performance. The Federal Highway Administration Highway Capacity Manual defines levels of service for intersections and highway segments, with ratings that range from A (best) to F (worst). Generally, a LOS of D or higher is considered acceptable by transportation planning agencies.

(7:00 am and 5:00 pm). Residents of the SARRTP facility would come and go from the facility through means other than personal vehicles.

Traffic associated with the proposed SARRTP facility at the Site would not be new to the local area, because the Veterans who would be served by the SARRTP facility (and the associated staff) currently use the existing Asheville VAMC SARRTP facilities located adjacent to the Site.

The Proposed Action would have no adverse impacts on parking. The SARRTP facility would utilize existing on-site parking, which is adequate to accommodate the projected needs of Veterans, VA staff and visitors using the proposed SARRTP facility.

Access to the SARRTP facility at the Site would be provided by Riceville Road. The estimated traffic associated with the proposed SARRTP facility (100 one-way vehicle trips/day) would be an increase of two percent on Riceville Road. There would be no increase in traffic on Tunnel Road, which provides primary access to the Asheville VAMC and the existing SARRTP facility. VA's NEPA regulations (38 CFR 26(26.6(a)2)(ii)) define a potential significant traffic impact as "an increase in average daily traffic volume of at least 20 percent on access roads to the site or the major roadway network." The anticipated increased traffic on Riceville Road is far below the 20 percent threshold that indicates a potential significant traffic impact and Riceville and Tunnel Roads currently operate at a good LOS (estimated C or better). As such, transportation impacts are anticipated to be less than significant.

3.14.2 Effects of the No Action Alternative

Under the No Action Alternative, no transportation or parking impacts associated with the Proposed Action would occur. However, should the Site ultimately be used by others, traffic and parking impacts would occur. The type and magnitude of transportation and parking effects would be dependent upon the future use of the Site.

3.15 Utilities

Basic utilities in the vicinity of the Site (water, sewer, natural gas, and electric) are provided by various utility providers. As part of the preparation of this EA, local utility providers were researched to determine the availability of required utilities for the Proposed Action. Utility providers to the Site were identified as follows:

- The **Asheville Water Resources Department (AWRD)** supplies potable water services to the Site.
- The **Buncombe County Metropolitan Sewer District (BCMSD)** supplies municipal sanitary sewer service to the Site.
- **Duke Energy** supplies the electrical service to the Site.
- **Scana/PSNC** provide natural gas service to the Site.
- **Charter Spectrum** provides telecommunication services to the Site.

3.15.1 Effects of the Proposed Action

The current Site building is serviced by all major utilities (although the service has been turned off). The proposed SAR RTP facility would result in an increase in the consumption of utilities, including electricity, natural gas, potable water, and sanitary sewer discharges over current levels. However, electrical, natural gas, water and sanitary sewer demands of the SAR RTP facility would likely be similar to recent previous senior independent living operations at the Site. Each utility provider would require a review of the design plans to determine connection requirements to service the proposed SAR RTP facility. Utility impacts would be negligible.

3.15.2 Effects of the No Action Alternative

Under the No Action Alternative, no construction/rehabilitation of the Site building by VA would occur and there would be no utility impacts by VA. However, should the Site ultimately be used by others in the future, impacts similar to those identified under the Proposed Action could occur. The type and magnitude of utility effects would be dependent upon the future use of the Site.

3.16 Environmental Justice

In 1994, EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was issued to focus attention of federal agencies on human health and environmental conditions in minority and low-income communities and to ensure that disproportionately high and adverse human health or environmental effects on these communities are identified and addressed.

According to the U.S. EPA-developed EJSCREEN (an environmental justice mapping and screening internet application), the Site is located in an area with a slightly higher low-income population (42 percent) than the State of North Carolina as a whole (37 percent). The Site is not located within an area with a disproportionately high minority population.

3.16.1 Effects of the Proposed Action

The Proposed Action would have negligible environmental justice effects. Although the Site is located in an area with a larger than average low-income population, the Proposed Action would have very little impact on the residents in the area. During construction/rehabilitation, effects on nearby residential land uses, such as through noise and dust, would be limited and controlled through BMPs, thereby minimizing adverse effects to populations within the ROI.

Proposed Action construction activities are anticipated to have a short-term beneficial socioeconomic (and environmental justice) effect on the local employment and personal income in the ROI, as described in Section 3.11.

3.16.2 Effects of the No Action Alternative

Under the No Action Alternative, no development by VA would occur at the Site and there would be no direct environmental justice effect by VA. However, Veterans in the Asheville area, including low-income and minority populations, would continue to be served by undersized and inadequate VA substance abuse rehabilitation health care facilities.

If the Site were to be developed and reused by others, there could be adverse environmental justice effects, depending on the use of the Site.

3.17 Cumulative Impacts

The CEQ Regulations define cumulative impacts as those which “result from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such other actions” (40 CFR 1508.7). Cumulative impact analysis captures the effects that result from the Proposed Action in combination with the effects of other actions before, during, or after the Proposed Action in the same geographic area. Because of extensive influences of multiple forces, cumulative effects are the most difficult to analyze.

The Site is located adjacent to the northwest of the Asheville VAMC in a suburban area approximately 3.75 miles east of the center of the City of Asheville. The ROI for the Site is a mix of unimproved land (northeast) and developed institutional and multi-family residential properties (north, west, southeast, and south). The area surrounding the Site has been mostly developed and utilized as part of the Asheville VAMC since the 1910s. Only since the 1980s have the Site and the areas to the north and south of the Site been divested for use as senior assisted residential living and apartments. With the exception of eastern portion of the Site, there is little remaining space in the immediate Site vicinity for additional development. Wooded areas along the Blue Ridge Parkway to the northeast of the Site are protected from development as part of the Blue Ridge Parkway scenic drive. Only small unimproved open areas remain at the Asheville VAMC campus and many of those areas are generally not available for development due to VA safety and setback requirements. Further development on the Asheville VAMC campus would likely require construction within surface-level parking areas.

VA may consider other Asheville VAMC-related uses of the eastern portion of the Site in the future; however, no other development plans/uses of the Site are known at this time. If other Asheville VAMC-related uses of the Site are planned in the future, they would be addressed in a future NEPA analysis, as applicable, prior to development. No specific other non-VA development plans were identified for the Site area.

3.17.1 Effects of the Proposed Action

The Proposed Action would result in impacts to the Site area as identified throughout Section 3. These include short-term and/or long-term potential adverse impacts to air quality, cultural resources, noise, solid waste and hazardous materials, and transportation. All of these impacts are less than significant and would be further reduced through careful coordination and implementation of general BMPs and management measures, and compliance with regulatory requirements, as identified in Section 5. Given the nature of the Proposed Action and the limited potential for other development in the Site area, no significant cumulative adverse effects to any of these resource areas are anticipated. Other potential non-federal development in the area of the Site would be subject to zoning requirements and site plan approval by the City of Asheville, which would serve to maintain and control regional, potentially cumulative impacts.

No significant adverse cumulative impacts to the environment, induced by the Proposed Action, are anticipated within the region. Close coordination between the federal and state agencies, the City of Asheville, and community representatives would serve to manage and control cumulative effects within the region, including managing regional transportation increases with adequate infrastructure. Implementation of local land use and resource management plans would serve to control the extent of environmental impacts, and continued planning would ensure future socioeconomic conditions maintain the quality of life the area's residents currently enjoy. Implementation of effective resource management plans and programs should minimize or eliminate any potential cumulative degradation of the natural ecosystem, cultural, or human environment within the ROI of the Proposed Action.

3.17.2 Effects of the No Action Alternative

Under the No Action Alternative, cumulative impacts would be similar to those identified for the Proposed Action, as the Site would likely be developed for other uses. The extent of cumulative effects under the No Action Alternative would depend upon that future use. However, cumulative impacts would not likely be significant, as any new development would likely be subject to zoning requirements and site plan approval.

3.18 Potential for Generating Substantial Public Controversy

As discussed in Section 4, VA has solicited input from various federal, state, and local government agencies regarding the Proposed Action. Several of these agencies have provided input; none of the input has identified opposition or controversy related to the Proposed Action.

VA published and distributed the Draft EA for a 30-day public comment period. VA received no public comments regarding the Draft EA. Based on the significant benefits of the Proposed Action and the findings of this EA (no significant adverse environmental impact), it is not anticipated that there would be substantial public controversy regarding the Proposed Action.

SECTION 4: PUBLIC INVOLVEMENT

VA invites public participation in decision-making on new proposals through the NEPA process. Public participation with respect to decision-making on the Proposed Action is guided by 38 CFR Part 26, VA's policy for implementing the NEPA. Additional guidance is provided in VA's NEPA Interim Guidance for Projects (VA 2010). Consideration of the views and information of all interested persons promotes open communication and enables better decision-making. Agencies, organizations, and members of the public with a potential interest in the Proposed Action including, minority, low-income, and disadvantaged persons, are urged to participate. A record of agency coordination and public involvement associated with this EA is provided in Appendix A and Appendix E.

4.1 Agency Coordination

Agencies consulted for this EA include:

- U.S. Fish and Wildlife Service
- U.S. Environmental Protection Agency
- U.S. Army Corps of Engineers
- U.S. Department of Agriculture Natural Resource Conservation Service
- North Carolina State Historic Preservation Office (SHPO)
- North Carolina Department of Environmental Quality
- North Carolina Department of Transportation
- North Carolina Wildlife Resources Commission
- North Carolina Natural Heritage Program
- Buncombe County Soil and Water Conservation District
- City of Asheville (various departments)

VA sent a Section 106 consultation letter to NC SHPO on November 12, 2019. VA mailed NEPA scoping letters regarding the Proposed Action to the remaining agencies on November 18, 2019. Responses were received from NC SHPO, NCDEQ (Division of Water Resources, Division of Waste Management Underground Storage Tank and Solid Waste Sections, Division of Energy, Mineral and Land Resources Land Quality Section, and Environmental Assistance Coordinator), NCWRC, USDA-NRCS, and Western North Carolina Regional Air Quality Agency (WNCRAQA). Input provided by these agencies is addressed in the appropriate resource sub-sections of Section 3. Written correspondence from the agencies is provided in Appendix A. The following summarizes that input, which VA used to focus this EA's analysis:

- VA submitted information regarding historic properties in the Site area and the Proposed Action to **NC SHPO** and requested NC SHPO review and concurrence that the Proposed Action would have no effect on NRHP-listed or eligible historic properties (Appendix A). In a letter dated December 6, 2019, NC SHPO concurred that the Proposed Action would not adversely affect the NRHP-listed Oteen Veterans Administration Hospital Historic District,

conditioned upon that VA provide site plans to NC SHPO at the design development, schematic, and final design phases for review and comment.

- The **NCDEQ UST Section** searched its databases and did not identify any petroleum incidents on or adjacent to the Site. The UST Section recommended removing any identified abandoned petroleum USTs or ASTs from the Site, and noted any future USTs or ASTs must be installed and maintained in accordance with applicable local, state, and federal regulations. The NCDEQ UST Section also stated that any petroleum spills must be contained and the area of impact must be properly restored, any soils excavated during demolition or construction that show evidence of petroleum contamination must be reported immediately to the local Fire Marshal and the NCDEQ UST Section, and any petroleum contaminated soils must be handled in accordance with all applicable regulations.
- The **NCDEQ Environmental Assistance Coordinator** provided a generic list of compliance and permitting considerations for conducting development-related projects in North Carolina. No comments or input specific to the Proposed Action were provided.
- The **NCDEQ Land Quality Section** provided information about sedimentation and erosion control requirements associated with land disturbing construction projects and stormwater discharge permits.
- The **NCDEQ Solid Waste Section** stated that due to the age of the Site building, lead paint, asbestos, or other contaminants may be present and must be managed appropriately prior to and during the project. They stated the Proposed Action would otherwise have no adverse impact on the surrounding community from a solid waste perspective. NCDEQ Solid Waste Section also stated that efforts should be made to minimize the generation of waste, to recycle materials for which viable markets exist, and to use recycled products and materials where suitable.
- The **NCDEQ DOWR** stated that the Site is likely serviced by the City of Asheville's water system and any construction, modification, or alteration of an existing water system shall first be approved through the Public Water Supply Section. NCDEQ DOWR also recommended contacting the City of Asheville Water Department to confirm that there is adequate capacity to serve the proposed project.
- The **NCWRC** stated that they do not anticipate any significant impacts to wildlife resources from the Proposed Action. NCWRC indicated that they have no records of listed species in the vicinity of the Site. The NCWRC recommended a series of measures that could be applied to any future development activities at the Site and provided recommendations to minimize impacts to aquatic and terrestrial wildlife resources should the Site be further developed.
- The **USDA-NRCS** indicated that they researched the Site and did not identify any potential concerns from an environmental standpoint, including hydric soils, prime farmland, and/or threatened and endangered species. NRCS noted that the Site is considered to be part of a historic district due to the 1924 Georgian Revival Medical Complex (Oteen VA Hospital Historic District).

- The **WNCRAQA** stated that VA would be required to notify the WNCRAQA of plans to demolish or remodel any building no matter the age, or plans to remove any asbestos-containing material from a building. WNCRAQA noted that buildings must be surveyed by accredited asbestos inspectors prior to demolition or remodeling. In addition, the WNCRAQA stated that a permit must be obtained from WNCRAQA to remove ACMs.

4.2 Native American Consultation

VA consulted with three federally recognized Native American Tribes [Catawba Indian Nation, Eastern Band of Cherokee Indians, and Muscogee (Creek) Nation] as part of this NEPA process, in accordance with 36 CFR 800.2 and EO 13175, *Consultation and Coordination with Indian Tribal Governments*, 6 November 2000. These Tribes, identified as having possible ancestral ties to the area of the Site, were invited by VA to participate in the EA process as Sovereign Nations per EO 13175. Coordination and consultation letters were sent to the Tribes in November 2019. Written correspondence with the Tribes is provided in Appendix B.

A response was received from the Catawba Indian Nation, who indicated that they have no immediate concerns with regard to traditional cultural properties, sacred sites, or Native American archaeological sites at the Site. The Catawba Indian Nation requested that they be notified if Native American artifacts and/or human remains are discovered during ground disturbances at the Site. As of the date of this EA, no other Tribal responses have been received.

4.3 Public Review

VA published and distributed the Draft EA for a 30-day public comment period, as announced by a Notice of Availability published in The Asheville Citizen-Times on December 21, 22 and 25, 2019. Copies of the Draft EA were made available for public review at Pack Memorial Library in Asheville and the Asheville VAMC. VA received no public comments regarding the Draft EA.

SECTION 5: MANAGEMENT AND MINIMIZATION MEASURES

This section summarizes the management and minimization measures that are proposed to minimize and maintain potential adverse effects of the Proposed Action at acceptable, less-than-significant levels.

Per established protocols, procedures, and requirements, VA and its construction contractors would implement BMPs and would satisfy all applicable regulatory requirements in association with the design, construction, and operation of the proposed SARRTP facility at the Site. These “management measures” are described in this EA, and are included as components of the Proposed Action. “Management measures” are defined as routine BMPs and/or regulatory compliance measures that are regularly implemented as part of proposed activities, as appropriate, across North Carolina. In general, implementation of such management measures would maintain impacts at acceptable levels for all resource areas analyzed. These are different from “mitigation measures,” which are defined as project-specific requirements, not routinely implemented as part of development projects, necessary to reduce identified potentially significant adverse environmental impacts to less-than-significant levels.

The routine BMPs, management measures, and minimization measures summarized in Table 5 would be included by VA in the Proposed Action to minimize and maintain adverse effects at less-than-significant levels.

Technical Resource Area	Best Management Practice/Minimization Measure
Aesthetics	Comply with the City of Asheville’s Unified Development Ordinances and development standards, to the extent practicable.
Air Quality	Use appropriate dust suppression methods (such as the use of water, dust palliative, and covers) during onsite construction/rehabilitation activities.
	Implement measures to reduce diesel particulate matter (DPM) emissions from construction equipment, such as reducing idling time and using newer equipment with emissions controls.
	Comply with the applicable North Carolina Department of Environmental Quality (NCDEQ) and Western North Carolina Regional Air Quality Agency (WNCRAQA) air quality regulations. Secure any required minor air emissions permits from NCDEQ and/or WNCRAQA prior to rehabilitation.

Table 5. Best Management Practices and Minimization Measures Incorporated into the Proposed Action	
Technical Resource Area	Best Management Practice/Minimization Measure
Cultural Resources	Complete Site building rehabilitation design and construction in accordance with the Secretary of Interior's Standards for Rehabilitation, as applicable, to maintain its historic integrity.
	Provide the North Carolina State Historic Preservation Office (NC SHPO) site plans for review and comment during the design development, schematic, and final design phases. Ensure NC SHPO is provided a minimum of 30 days to review and comment on the proposed plans.
	If Site design includes significant ground disturbance (not anticipated), complete additional assessment of potential impacts to archaeological resources and consult with NC SHPO and the Catawba Indian Nation, as required.
Geology, Topography, and Soils	None required.
Hydrology and Water Quality	None required.
Wildlife and Habitat	None required.
Noise	Comply with the City of Asheville noise regulations, to the extent practicable.
	Coordinate proposed construction activities in advance with nearby sensitive receptors. Let the local residents know what operations would be occurring at what times, including when they would start and when they would finish each day.
	Limit, to the extent possible, construction and rehabilitation activities and associated heavy truck traffic to occur between 7:00 a.m. and 7:00 p.m. on Monday through Saturday.
	Locate stationary operating equipment as far away from sensitive receptors as possible.
	Select material transportation routes as far away from sensitive receptors as possible.
	Shut down noise-generating heavy equipment when it is not needed.
	Maintain equipment per manufacturer's recommendations to minimize noise generation.
	Encourage construction personnel to operate equipment in the quietest manner practicable (such as speed restrictions, retarder brake restrictions, engine speed restrictions).

Table 5. Best Management Practices and Minimization Measures Incorporated into the Proposed Action	
Technical Resource Area	Best Management Practice/Minimization Measure
Land Use	Comply with the City of Asheville's Unified Development Ordinances and development standards, to the extent practicable.
Wetlands, Floodplains, and Coastal Zone Management	None required.
Socioeconomics	None required.
Community Services	None required.
Solid Waste and Hazardous Materials	Complete asbestos, lead-based paint, and mold surveys of the Site building prior to rehabilitation. Identified ACM, LBP and mold would be removed/managed in accordance with federal and state requirements.
	Complete a radon gas survey of the Site building. Install a radon gas mitigation system in the building, if necessary.
	Comply with VA Standard Operating Procedures and applicable federal and state laws governing the use, generation, storage, transportation, and disposal of solid waste, hazardous materials, and medical wastes.
Transportation and Parking	Work with NCDOT and the City of Asheville, as applicable, during the SARRTP facility design to identify and implement roadway improvements, if necessary.
	Coordinate with NCDOT and the City of Asheville, as applicable, to ensure that rehabilitation and operational traffic are considered in the planning of future transportation improvements in this vicinity.
	Ensure construction/rehabilitation activities do not adversely affect traffic flow on local roadways.
	Ensure debris and/or soil is not deposited on local roadways during construction activities.
Utilities	Submit detailed design plans to each utility provider to determine the specific connection/service requirements and implement the necessary requirements.
Environmental Justice	None required.

SECTION 6: SUMMARY AND CONCLUSIONS

This EA evaluates VA's Proposed Action to reacquire an approximately 8.3-acre parcel of land (Site) located adjacent to the northwest of the Asheville VAMC campus and to rehabilitate the existing two to three-story, approximately 23,000 square foot vacant Site building for a new, expanded SARRTP facility. This EA examines in depth two alternatives: the Proposed Action and the No Action Alternative. The EA evaluates possible effects to aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat, including threatened and endangered species; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomic; community services; solid waste and hazardous materials; transportation and parking; utilities; and environmental justice. Table 6 provides a summary of the Site characteristics and the potential environmental effects of the Proposed Action and the No Action Alternative.

This EA concludes there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life associated with the Proposed Action, provided the BMPs, management measures, and regulatory compliance measures described in this EA are implemented. This EA's analysis determines, therefore, that an Environmental Impact Statement is unnecessary for implementation of the Proposed Action, and a Finding of No Significant Impact is appropriate.

Table 6. Summary of Site Characteristics and Potential Impacts Associated with the Proposed Action

Technical Resource Area	Proposed Action	No Action Alternative
Aesthetics	<p>The Site is approximately 8.3 acres and located adjacent to the Asheville VAMC campus. The central and eastern portions of the Site are generally level and grassy to moderately wooded with remnants (foundations, retaining walls, and stairs) of former buildings. The western portion of the Site is generally level, and contains a vacant, approximately 23,000-square foot, two to three-story masonry building with parking areas to the west and east, and grassy areas with scattered trees and shrubs. The Site building (constructed in 1930) underwent substantial interior and exterior alterations when it was converted to senior housing in the 1980s, but retains basic aspects of its original exterior design.</p> <p>Institutional and multi-family residential area.</p> <p>No/Negligible Impact</p>	No Impact
Air Quality	<p>Located in a NAAQS full attainment area. Minor short-term impacts due to construction/rehabilitation equipment, dust and particulate matter (managed through BMPs) and minor long-term due to vehicle emissions.</p> <p>Less-than-significant Impacts</p>	Similar vehicle emissions with current SAR RTP
Cultural Resources	<p>Current Site building (former Building 19) was constructed in 1930 and is listed as a contributing resource to the Oteen Veterans Administration Hospital Historic District. The Site building underwent substantial interior and exterior alterations when it was converted to senior housing in the 1980s, but retains sufficient integrity to convey its significance as part of the historic district.</p> <p>The proposed rehabilitation of the Site building does not include substantial exterior alterations that would further diminish the historic integrity of the building. Because no notable ground disturbance is proposed, there is no potential for adverse effects on archaeological resources. There is moderate potential for archaeological resources associated with the original hospital (circa 1918) at the Site.</p> <p>NC SHPO concurred the Proposed Action would not adversely affect the historic district contingent upon VA providing NC SHPO Proposed Action design plans for review and comment.</p> <p>Less-than-significant Impacts</p>	No Impacts

Table 6. Summary of Site Characteristics and Potential Impacts Associated with the Proposed Action

Technical Resource Area	Proposed Action	No Action Alternative
Geology, Topography, and Soils	<p>Site is mostly level and does not contain prime farmland or soils of local importance. The Site is not located in a karst-sensitive area and no active significant faults are located in the Site area.</p> <p>No notable ground disturbance is proposed.</p> <p>No/Negligible Impact</p>	No Impact
Hydrology and Water Quality	<p>No surface water on or adjacent to the Site. The nearest surface water is an unnamed tributary to Grassy Branch, located 1,200 feet north of the Site. No ground disturbance is proposed and no discharges to surface water or groundwater are anticipated.</p> <p>No/Negligible Impact</p>	No Impact
Wildlife and Habitat	<p>The central and eastern portions of the Site are generally level and grassy to moderately wooded with remnants of former Site buildings. The western portion of the Site is developed with an approximately 23,000-square foot, two to three-story building, parking areas, and grassy areas with scattered trees and shrubs. Surrounding properties are primarily developed with institutional buildings with maintained grassy lawns and scattered trees. Wooded areas associated with Blue Ridge Parkway are located 300 to 600 feet east of the Site.</p> <p>Federally and state protected species listed for the general Site area are not likely to be present based on their habitat requirements and the mostly disturbed nature of the Site. No critical habitat for protected species was identified for the Site.</p> <p>No ground disturbance or vegetation clearing is proposed.</p> <p>No/Negligible Impact</p>	No Impact
Noise	<p>Sensitive noise receptors in the Site area include the adjacent Asheville VAMC, skilled nursing and rehabilitation center to the north, and residential apartments to the south. No notable noise-generating sources, other than vehicle traffic on area roads, are present.</p> <p>Noise generating activities associated with the Proposed Action would generally be limited to the interior of the Site building. No earth moving or heavy equipment operations are anticipated. Short-term noise impacts during construction/rehabilitation activities controlled through BMPs.</p> <p>Operational impacts minor associated with vehicle traffic, HVAC systems, and grounds maintenance.</p> <p>Less-than-significant Impacts</p>	No Impact

Table 6. Summary of Site Characteristics and Potential Impacts Associated with the Proposed Action

Technical Resource Area	Proposed Action	No Action Alternative
Land Use	<p>Site is located in a mostly institutional and multi-family residential area. Site is zoned Institutional, which allows for health care facilities. All adjacent properties are also zoned Institutional.</p> <p>Site use would be consistent with local zoning and compatible with surrounding land use.</p> <p>No/Negligible Impact</p>	No Impact
Wetlands, Floodplains, and Coastal Zone Management	<p>No wetlands, floodplains, or coastal zones located on the Site or surrounding properties.</p> <p>No/Negligible Impact</p>	No Impact
Socioeconomics	<p>Minor short-term beneficial impacts to local economy as a result of temporary construction jobs.</p> <p>Significant long-term beneficial impact by providing a new, appropriately-sized, modern SARRTP facility that would enhance health care services for regional Veterans.</p>	Inadequate VA SARRTP facilities – adverse impact to local Veterans
Community Services	<p>Community services are provided to the Site area. Proposed SARRTP facility would not put a significant additional load on these services.</p> <p>No/Negligible Impact</p>	No Impact
Solid Waste and Hazardous Materials	<p>Based on the March 2019 Phase I ESA, no contamination is known or likely to be present on the Site. The Site building contains ACMs and mold, likely contains LBP, and is located within an area that may contain naturally occurring elevated radon gas levels. Surveys of the Site building for ACM, LBP, mold, and radon would be conducted by licensed inspectors prior to rehabilitation activities. Identified ACMs, LBP, and mold would be removed/managed by licensed contractors in accordance with the federal and state requirements. A radon gas mitigation system would be installed in the building, if necessary.</p> <p>Potential impacts from petroleum/hazardous substance handling during construction and operation would be managed through standard BMPs and VA SOPs.</p> <p>Less-than-significant Impacts</p>	No Impact

Table 6. Summary of Site Characteristics and Potential Impacts Associated with the Proposed Action

Technical Resource Area	Proposed Action	No Action Alternative
<p>Transportation and Parking</p>	<p>Access to the SARRTP facility would be provided by Riceville Road. Additional traffic (estimated 100 one-way vehicle trips per day) would be an increase of approximately two percent on Riceville Road. Traffic associated with the SARRTP facility would not be new to the local area; Veterans, staff, and visitors to the proposed SARRTP currently use the existing SARRTP facility located adjacent to the Site at the Asheville VAMC.</p> <p>Proposed SARRTP facility would include adequate on-site parking.</p> <p>Less-than-significant Impacts</p>	<p>No Impact</p>
<p>Utilities</p>	<p>Utilities likely adequate for the proposed SARRTP facility already service the Site.</p> <p>No/Negligible Impact</p>	<p>No Impact</p>
<p>Environmental Justice</p>	<p>Site is located in an area with a slightly higher than average low-income population. Site is not located within an area with a disproportionately high minority population.</p> <p>Proposed Action would have negligible impact on the residents in the Site area. Low-income and minority Veterans would benefit from the proposed SARRTP facility.</p> <p>No/Negligible Impact</p>	<p>No Impact</p>

SECTION 7: LIST OF PREPARERS

DEPARTMENT OF VETERANS AFFAIRS STAFF

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TTL ASSOCIATES, INC. (CONSULTANTS)

Name	Role	Degree	Years of Experience
Paul Jackson	Research and Data Gathering, Document Preparation, Affected Environment, Environmental Impact Analysis, and Scoping Coordination	B.A., Biology/English 1992	20
Carrie Hess	Site Reconnaissance and Document Preparation	B.S., Geology, 2003	12
Rob Clark	Project Manager, Technical QA/QC Review, Program Management/Project Coordination	B.S., Aquatic Environments/ Environmental Science, 1985	33

SECTION 8: REFERENCES

- 38 CFR Part 26. Environmental Effects of the Department of Veterans Affairs Actions. 1 July 2008.
- Asbestos Survey Report, 70 Riceville Road Property, Asheville, North Carolina, Bunnell Lammons Engineering, Inc., June 4, 2018.
- Buncombe County Soil and Water Conservation District, 2019.
- City of Asheville, North Carolina, 2019.
- Clean Air Act of 1970 (42 U.S. Code [USC] 7401 et. seq.; 40 CFR Parts 50-87) Section 176(c).
- Council on Environmental Quality. 40 CFR Parts 1500-1508, Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (NEPA).
- Department of Veterans Affairs 1998. Environmental Compliance Manual. Last updated July 1998.
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- EO 13175, Consultation and Coordination with Indian Tribal Governments. 6 November, 2000.
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- Initial Cultural Resources Impact Prediction, Site, PRESERVE/scapes, LLC, March 2019.
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- North Carolina Wildlife Resources Commission. 2019.
- Groundwater Atlas of the United States, USGS, 1995.
- Phase I Environmental Site Assessment, 200 (70) Riceville Road, Asheville, North Carolina, Mabbett and Associates, Inc., March 6, 2019.
- U.S. Army Corps of Engineers, 2019.
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U.S. Department of Agriculture, Natural Resources Conservation Service Web Soil Survey, 2019.
U.S. Environmental Protection Agency National Ambient Air Quality Standards (NAAQS), 2019.
U.S. Fish and Wildlife Service, 2019.
USFWS National Wetlands Inventory Online Mapper, 2019.

Other internet searches and data (accessed November - December 2019):

City of Asheville, North Carolina: <https://www.ashevollenc.gov/>

Buncombe County, North Carolina: <https://www.buncombecounty.org/>

Buncombe County Soil and Water Conservation District:
<https://www.buncombecounty.org/Governing/depts/Soil/>

FEMA Flood Hazard Insurance Map: <http://msc.fema.gov/portal>

National Wetlands Inventory: <https://www.fws.gov/wetlands/Data/mapper.html>

North Carolina Department of Environmental Quality: <https://deq.nc.gov/>

North Carolina Natural Heritage Program: <https://www.ncnhp.org/>

North Carolina Wildlife Resources Commission: <https://www.nc.gov/wildlife-resources-commission>

North Carolina Department of Transportation: <https://www.ncdot.gov/Pages/default.aspx>

U.S. Army Corps of Engineers: <https://www.usace.army.mil>

U.S. Bureau of Census (2000 and 2010 U.S. Census Data): <https://www.census.gov/>

U.S. Department of Agriculture NRCS Web Soil Survey:
<https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

U.S. Environmental Protection Agency: <https://www.epa.gov>

U.S. Fish and Wildlife Service: <https://www.fws.gov>

U.S. Geological Survey: <https://store.usgs.gov/map-locator>

Various mapping tools: www.maps.google.com, www.google.earth.com, etc.

SECTION 9: LIST OF ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation	LOS	Level of Service
ADSD	Asheville Development Services Department	MBTA	Migratory Bird Treaty Act
APRD	Asheville Parks and Recreation Department	NAAQS	National Ambient Air Quality Standards
APUDD	Asheville Planning and Urban Design Department	NAGPRA	Native American Graves Protection and Repatriation Act
APWD	Asheville Public Works Department	NDEQ	North Carolina Department of Environmental Quality
AHPA	Archaeological and Historic Preservation Act	NCDOT	North Carolina Department of Transportation
AIRFA	American Indian Religious Freedom Act	NCWRC	North Carolina Wildlife Resources Commission
amsl	above mean sea level	NCNHP	North Carolina Natural Heritage Program
ASSD	Asheville Street Services Department	NEPA	National Environmental Policy Act of 1969
ASSUD	Asheville Stormwater Services and Utility Department	NESHAP	National Emission Standards for Hazardous Air Pollutants
ATD	Asheville Transportation Department	NHPA	National Historic Preservation Act
AWRD	Asheville Water Resources Department	NOA	Notice of Availability
BCSWCD	Buncombe County Soil and Water Conservation District	NO _x	Nitrogen Oxides
BEA	Bureau of Economic Analysis	NPDES	National Pollution Discharge Elimination System
bgs	Below Ground Surface	NPS	National Park Service
BMP	Best Management Practice	NRCS	Natural Resources Conservation Service
CAA	Clean Air Act	NRHP	National Register of Historic Places
CEQ	Council on Environmental Quality	NWI	National Wetlands Inventory
CFR	Code of Federal Regulations	O ₃	Ozone
CMP	Coastal Management Program	OPC	Outpatient Clinic
CWA	Clean Water Act	Pb	Lead
CZMA	Coastal Zone Management Act	PM	Particulate matter
EA	Environmental Assessment	PM ₁₀	Particulate matter less than or equal to 10 micrometers in aerodynamic size
EIS	Environmental Impact Statement	PM _{2.5}	Particulate matter less than or equal to 2.5 micrometers in aerodynamic size
EO	Executive Order	RCRA	Resource Conservation and Recovery Act
ESA	Endangered Species Act	ROI	Region of Influence
FEMA	Federal Emergency Management Agency	SCD	Soil Conservation District
FHA	Federal Highway Administration	SIP	State Implementation Plan
FONSI	Finding of No Significant Impact	SHPO	North Carolina State Historic Preservation Office
FPPA	Farmland Protection Policy Act	SO ₂	Sulfur dioxide
HAP	Hazardous Air Pollutant	TPY	Tons per year
IICEP	Interagency and Intergovernmental Coordination for Environmental Planning		

USACE	United States Army Corps of Engineers
USC	United States Code
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VA	Department of Veterans Affairs

SECTION 10: AGENCIES AND INDIVIDUALS CONSULTED

Agencies Consulted

US Fish and Wildlife Service
Asheville Ecological Services Field Office
160 Zillicoa Street
Asheville, North Carolina 28801-1082
Phone: (828) 258-3939

US Environmental Protection Agency, Region 4
Office of Public Affairs
Sam Nunn Atlanta Federal Center
61 Forsyth Street SW
Atlanta, Georgia 30303-8960
Phone: (404) 562-9900

US Army Corps of Engineers – Wilmington District
Asheville Regulatory Field Office
151 Patton Avenue, Room 208
Asheville, North Carolina 28801-5006
Phone: (828) 271-7980

North Carolina Department of Environmental Quality
Asheville Regional Office
2090 US 70 Highway
Swannanoa, North Carolina 28778-8211
Phone: (828) 296-4500

North Carolina Department of Transportation
Administration and Business Development
1501 Mail Service Center
Raleigh, North Carolina 27699-1501
Phone: (919) 707-2663

North Carolina Wildlife Resources Commission
Attn: Wildlife Management
1722 Mail Service Center
Raleigh, North Carolina 27699-1722
Phone: (919) 707-0050

North Carolina Natural Heritage Program
Nature Research Center – 121 West Jones Street
1651 Mail Service Center
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Natural Resources Conservation Service
Asheville Service Center
160 Zillicoa Street
Asheville, North Carolina 28801
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Buncombe County Soil and Water Conservation District
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Asheville, North Carolina 28806
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Asheville Development Services Department
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Asheville Planning and Urban Design Department
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P.O. Box 7148
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Asheville Street Services Department
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Phone: (828) 259-5943

Asheville Water Resources Department
P.O. Box 7148
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Native American Tribes Consulted**Eastern Band of Cherokee Indians**

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SECTION 11: LIST OF ENVIRONMENTAL PERMITS REQUIRED

11.1 Regulatory Framework

This EA has been prepared under the provisions of, and in accordance with the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, and VA's regulations for implementing NEPA (38 CFR Part 26). In addition, the EA has been prepared as prescribed in VA's *NEPA Interim Guidance for Projects* (VA 2010). Federal, state, and local laws and regulations specifically applicable to this Proposed Action are identified, where appropriate, within this EA, and include:

- Endangered Species Act (ESA) of 1973, as amended (7 USC 136; 16 USC 1531 et seq.).
- Energy Independence Security Act (EISA) Section 438.
- Executive Order 11988, *Floodplain Management* (24 May 1977).
- Executive Order 11990, *Protection of Wetlands* (24 May 1977).
- Executive Order 12898, *Environmental Justice* (11 February 1994).
- Executive Order 13834, *Efficient Federal Operations* (17 May 2018).
- Farmland Protection Policy Act (FPPA) (7 USC 4201, et seq.)
- Federal Clean Air Act (CAA) of 1990 (42 USC 7401 et seq., as amended).
- Federal Clean Water Act (Federal Water Pollution Control Act) of 1948, as amended (1972, 1977) (33 USC 1251 et seq.); Sections 401 and 404.
- Migratory Bird Treaty Act (MBTA; 16 USC 703-712, 3 July 1918; as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986, and 1989).
- Native American Graves Protection and Repatriation Act, as amended (NAGPRA) (25 USC 3001 et seq.).
- National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800).
- City of Asheville Unified Development Ordinances.
- North Carolina Department of Environmental Quality Air Quality Regulations.
- North Carolina Department of Environmental Quality NPDES Regulations.
- Western North Carolina Regional Air Quality Agency (WNCRAQA) Air Quality Regulations.

11.2 Environmental Permits Required

In addition to the regulatory framework of NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, VA's NEPA regulations (38 CFR Part 26), and VA's *NEPA Interim Guidance for Projects*, the following federal, state, and/or local environmental permits are required as part of this Proposed Action.

- WNCRAQA permit for asbestos abatement.

SECTION 12: GLOSSARY

100-Year Flood – A flood event of such magnitude that it occurs, on average, every 100 years; this equates to a one percent chance of it occurring in a given year.

Aesthetics – Pertaining to the quality of human perception of natural beauty.

Ambient - The environment as it exists around people, plants, and structures.

Ambient Air Quality Standards - Those standards established according to the CAA to protect health and welfare (AR 200-1).

Aquifer - An underground geological formation containing usable amounts of groundwater which can supply wells and springs.

Asbestos - Incombustible, chemical-resistant, fibrous mineral forms of impure magnesium silicate used for fireproofing, electrical insulation, building materials, brake linings, and chemical filters. Asbestos is a carcinogenic substance.

Attainment Area - Region that meets the National Ambient Air Quality Standard (NAAQS) for a criteria pollutant under the CAA.

Bedrock - The solid rock that underlies all soil, sand, clay, gravel and loose material on the earth's surface.

Best Management Practices (BMPs) - Methods, measures, or practices to prevent or reduce the contributions of pollutants to U.S. waters. Best management practices may be imposed in addition to, or in the absence of, effluent limitations, standards, or prohibitions (AR 200-1).

Commercial land use – Land use that includes private and public businesses (retail, wholesale, etc.), institutions (schools, churches, etc.), health services (hospitals,

clinics, etc.), and military buildings and installations.

Compaction - The packing of soil together into a firmer, denser mass, generally caused by the pressure of great weight.

Contaminants - Any physical, chemical, biological, or radiological substances that have an adverse effect on air, water, or soil.

Council on Environmental Quality (CEQ) - An Executive Office of the President composed of three members appointed by the President, subject to approval by the Senate. Each member shall be exceptionally qualified to analyze and interpret environmental trends, and to appraise programs and activities of the federal government. Members are to be conscious of and responsive to the scientific, economic, social, aesthetic, and cultural needs of the Nation; and to formulate and recommend national policies to promote the improvement of the quality of the environment.

Criteria Pollutants - The CAA of 1970 required the USEPA to set air quality standards for common and widespread pollutants in order to protect human health and welfare. There are six "criteria pollutants": ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂), lead (Pb), nitrogen dioxide (NO₂), and particulate matter.

Cultural Resources - The physical evidence of our Nation's heritage. Included are: archaeological sites; historic buildings, structures, and districts; and localities with social significance to the human community.

Cumulative Impact - The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what

agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).

Decibel (dB) - A unit of measurement of sound pressure level.

Direct Impact - A direct impact is caused by a Proposed Action and occurs at the same time and place.

Emission - A release of a pollutant.

Endangered Species - Any species which is in danger of extinction throughout all or a significant portion of its range.

Environmental Assessment (EA) - An EA is a publication that provides sufficient evidence and analyses to show whether a proposed system will adversely affect the environment or be environmentally controversial.

Erosion - The wearing away of the land surface by detachment and movement of soil and rock fragments through the action of moving water and other geological agents.

Agricultural land - Cropland, pastures, meadows, and planted woodland.

Fauna - Animal life, especially the animal characteristics of a region, period, or special environment.

Flora - Vegetation; plant life characteristic of a region, period, or special environment.

Floodplain - The relatively flat area or lowlands adjoining a river, stream, ocean, lake, or other body of water that is susceptible to being inundated by floodwaters.

FONSI - Finding of No Significant Impact, a NEPA document.

Fugitive Dust - Particles light enough to be suspended in air, but not captured by a filtering system. For this document, this refers to particles put in the air by moving vehicles and air movement over disturbed

soils at construction sites.

Geology - Science which deals with the physical history of the earth, the rocks of which it is composed, and physical changes in the earth.

Groundwater - Water found below the ground surface. Groundwater may be geologic in origin and as pristine as it was when it was entrapped by the surrounding rock or it may be subject to daily or seasonal effects depending on the local hydrologic cycle. Groundwater may be pumped from wells and used for drinking water, irrigation, and other purposes. It is recharged by precipitation or irrigation water soaking into the ground. Thus, any contaminant in precipitation or irrigation water may be carried into groundwater.

Hazardous Substance - Hazardous materials are defined within several laws and regulations to have certain meanings. For this document, a hazardous material is any one of the following:

Any substance designated pursuant to section 311 (b)(2)(A) of the Clean Water Act.

Any element, compound, mixture, solution, or substance designated pursuant to Section 102 of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Any hazardous substance as defined under the Resource Conservation and Recovery Act (RCRA).

Any toxic pollutant listed under TSCA.

Any hazardous air pollutant listed under Section 112 of CAA.

Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to Subsection 7 of TSCA.

The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance in a

above. 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). A list of hazardous substances is found in 40 CFR 302.4.

Hazardous Waste - A solid waste which, when improperly treated, stored, transported, or disposed of, poses a substantial hazard to human health or the environment. Hazardous wastes are identified in 40 CFR 261.3 or applicable foreign law, rule, or regulation.

Hazardous Waste Storage - As defined in 40 CFR 260.10, ". . . the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere".

Hydric Soil - A soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic (oxygen-lacking) conditions that favor the growth and regeneration of hydrophytic vegetation. A wetland indicator.

Indirect Impact - An indirect impact is caused by a Proposed Action that occurs later in time or farther removed in distance, but is still reasonably foreseeable. Indirect impacts may include induced changes in the pattern of land use, population density or growth rate, and related effects on air, water, and other natural and social systems. For example, referring to the possible direct impacts described above, the clearing of trees for new development may have an indirect impact on area wildlife by decreasing available habitat.

Industrial Land Use – Land uses of a relatively higher intensity that are generally not compatible with residential development. Examples include light and heavy manufacturing, mining, and chemical refining.

Isolated Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, but do not have a direct connection to the Waters of the U.S.

Jurisdictional Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, and have a direct connection to the Waters of the U.S. These wetlands are regulated by the USACE.

Listed Species - Any plant or animal designated by a state or the federal government as threatened, endangered, special concern, or candidate species.

Mitigation - Measures taken to reduce adverse impacts on the environment.

Asheville Sources - Vehicles, aircraft, watercraft, construction equipment, and other equipment that use internal combustion engines for energy sources.

Monitoring - A process of inspecting and recording the progress of mitigation measures implemented.

National Ambient Air Quality Standards (NAAQS) - Nationwide standards set up by the USEPA for widespread air pollutants, as required by Section 109 of the Clean Air Act (CAA). Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), particulate matter, and sulfur dioxide (SO₂).

National Environmental Policy Act (NEPA) - U.S. statute that requires all federal agencies to consider the potential effects of major federal actions on the human and natural environment.

Non-attainment Area - An area that has been designated by the EPA or the appropriate State air quality agency as exceeding one or more national or state ambient air quality standards.

Parcel - A plot of land, usually a division of a larger area.

Particulates or Particulate Matter - Fine liquid or solid particles such as dust, smoke, mist, fumes, or smog found in air.

Physiographic Region - A portion of the Earth's surface with a basically common

topography and common morphology.

Pollutant - A substance introduced into the environment that adversely affects the usefulness of a resource.

Potable Water - Water which is suitable for drinking.

Prime Agricultural land - A special category of highly productive cropland that is recognized and described by the U.S. Department of Agriculture's Natural Resource Conservation Service and receives special protection under the Surface Mining Law.

Remediation - A long-term action that reduces or eliminates a threat to the environment.

Riparian Areas - Areas adjacent to rivers and streams that have a high density, diversity, and productivity of plant and animal species relative to nearby uplands.

River Basin - The land area drained by a river and its tributaries.

Sensitive Receptors - Include, but are not limited to, asthmatics, children, and the elderly, as well as specific facilities, such as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, and childcare centers.

Significant Impact - According to 40 CFR 1508.27, "significance" as used in NEPA requires consideration of both context and intensity.

Context. The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the Proposed Action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.

Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

Small quantity generator - A generator who generates greater than 220 pounds but less than 2,200 pounds of hazardous waste in a calendar month and who does not accumulate more than 13,200 pounds of hazardous waste at any one time (if either threshold is exceeded, the generator becomes a large quantity generator). A small quantity generator may accumulate hazardous waste up to 180 days from the accumulation start date.

Soil - The mixture of altered mineral and organic material at the earth's surface that supports plant life.

Solid Waste - Any discarded material that is not excluded by section 261.4(a) or that is not excluded by variance granted under sections 260.30 and 260.31.

Threatened species - Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Topography - The relief features or surface configuration of an area.

Toxic Substance - A harmful substance which includes elements, compounds, mixtures, and materials of complex composition.

Waters of the United States - Include the following: (1) All waters which are currently being used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide. (2) All interstate waters including interstate wetlands. (3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds; the use, degradation or destruction of which

could affect interstate or foreign commerce.

Watershed - The region draining into a particular stream, river, or entire river system.

Wetlands - Areas that are regularly saturated by surface or groundwater and, thus, are characterized by a prevalence of vegetation that is adapted for life in saturated soil conditions. Examples include swamps, bogs, fens, marshes, and estuaries.

Wildlife Habitat - Set of living communities in which a wildlife population lives.

APPENDIX A
Agency Correspondence



44265 Plymouth Oaks Blvd.
Plymouth, MI 48170
T 734-455-8600
F 734-455-8608
www.tlassoc.com

November 18, 2019

Asheville Development Services Department
161 South Charlotte Street
Asheville, North Carolina 28801

**SUBJECT: NEPA Scoping Letter
US Department of Veterans Affairs
Proposed Land Acquisition for Development of a
Substance Abuse Rehabilitation Facility
70 Riceville Road
Asheville, Buncombe County, North Carolina**

To Whom It May Concern:

The US Department of Veterans Affairs (VA) is preparing environmental documentation to assist in the Federal decision-making process concerning the proposed acquisition of approximately 8.3 acres of land located adjacent to the Charles George VA Medical Center (Asheville VAMC) campus for the development of a Substance Abuse Residential Rehabilitation Treatment Program (SARRTP) facility (Proposed Action).

The approximately 8.3-acre Site, located adjacent to the northwest of the Asheville VAMC campus, was originally part of the Asheville VAMC, but was divested in the 1980s along with other portions of the original campus that were underutilized. The Site included up to seven structures associated with the Asheville VAMC in the 1910s and 1920s, which were demolished around 1930 and replaced with four newer structures that were present from the 1930s to approximately 1990, when all but the current building (Building 19) were demolished. Building 19 (also known as Ward C) was renovated for senior living apartments in the early 1980s, but has been vacant for several years.

The western portion of the Site is generally level and currently contains a vacant, approximately 23,000-square foot, two to three-story structure (Building 19) with parking areas to the west and east of the building, and grassy areas with scattered trees and shrubs. The central and eastern portions of the Site are currently unimproved land that is generally level and moderately wooded with grassy and ivy-covered areas. The locations of the Asheville VAMC campus and the Site are shown on Attachments 1A through 1C. Site details are shown on Attachment 1D.

VA plans reacquire the 8.3-acre Site and rehabilitate the interior of vacant Building 19 for use as a SARRTP facility for Asheville area Veterans. No additions or substantial exterior alterations to Building 19 are planned. It is anticipated the proposed SARRTP would re-use the existing parking areas.

VA is conducting an Environmental Assessment (EA) to evaluate the environmental, cultural, and socioeconomic issues associated with the Proposed Action pursuant to the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code (USC) §4321 *et seq.*);

the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500-1508); and VA's NEPA Regulations (38 CFR Part 26).

Information Request: *Information your agency can provide on any of the following environmental issue areas (at or in the vicinity of the project) would be appreciated. Examples of such information include, but are not limited to:*

- Potential environmental concerns or issues;
- Surface and groundwater resources, including streams, wetlands, floodplains, open water features, wells, and local aquifers;
- Federally or state listed threatened or endangered species, or any species proposed for such listing, or critical habitat for such species that may occur within a one-mile radius around the proposed Site;
- Parks, nature preserves, conservation areas, designated wild or scenic rivers, migratory bird habitats, or special wildlife issues;
- Natural resource issues;
- Soils and geologic data, including lists of hydric soils;
- Traffic, noise, or socioeconomic concerns;
- Air quality concerns; and
- Additional environmental, cultural, land use, or socioeconomic information or concerns your agency may have with regard to the referenced properties.

Data that you make available will be used to scope the NEPA analysis and will provide valuable and necessary input into the Environmental Assessment process. As part of the NEPA process, local citizens, groups, and agencies, among others, will have opportunity to review and comment on the information and alternatives addressed in the Draft EA.

Other Agencies and Organizations: A listing of agencies and organizations to which this request was sent is provided in Attachment 2. VA is conducting separate consultation with the North Carolina State Historic Preservation Office (SHPO) and Native American Tribes. *Should you know of any additional agencies or organizations that may have data or concerns relevant to this project, please forward them a copy of this letter, include their information in your response, or contact us directly with this information.*

We look forward to and welcome your participation in this process. **Please respond on or before December 6, 2019** to enable us to complete this phase of the project within the scheduled timeframe. TTL Associates, Inc. is assisting VA in conducting this NEPA process.

Please send your written responses via regular or e-mail (preferred) to:

TTL Associates, Inc.
44265 Plymouth Oaks Boulevard
Plymouth, Michigan 48170
ATTN: Paul J. Jackson, Environmental Scientist
pjackson@tlassoc.com

If you have any questions concerning this request, please direct them to Mr. Jackson at (734) 582-4960.

Sincerely,

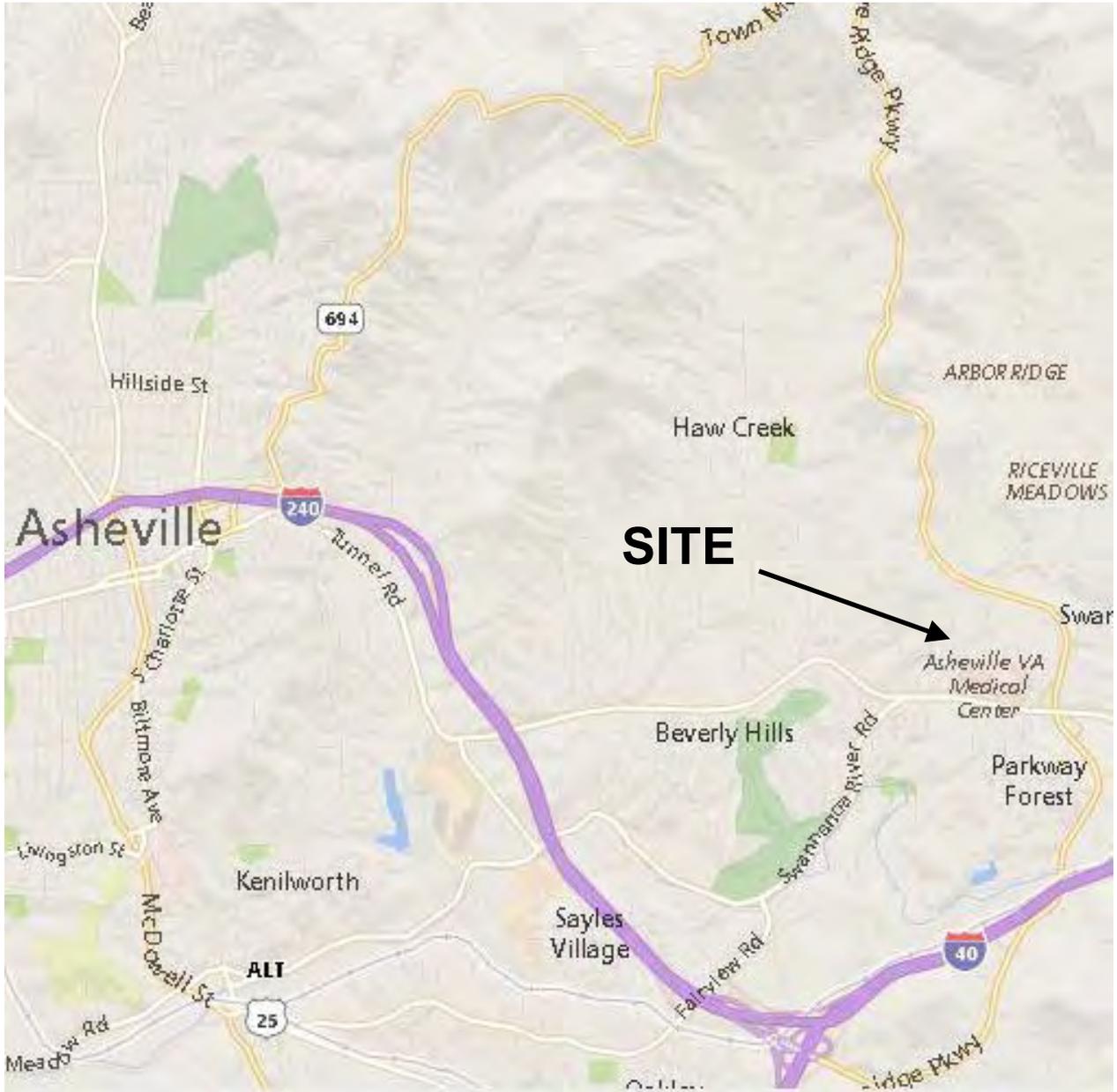


Paul J. Jackson
Environmental Scientist

Attachment 1A through 1D: Asheville VAMC Campus and Site Location Maps
Attachment 2: List of Agencies and Organizations Contacted

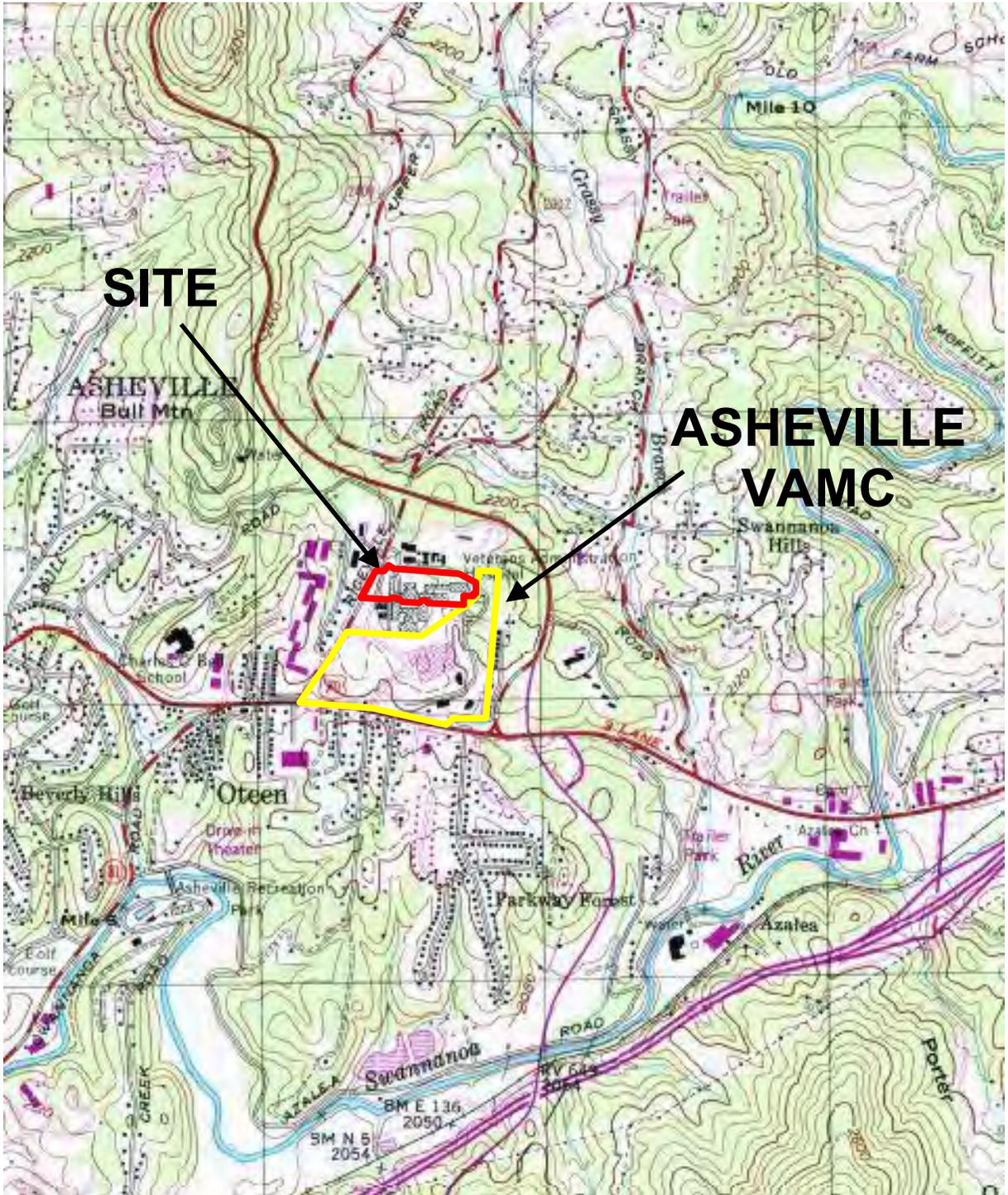
ATTACHMENT 1A

**STREET LOCATION MAP
70 Riceville Road
Asheville, North Carolina**



ATTACHMENT 1B

**TOPOGRAPHIC LOCATION MAP
70 Riceville Road
Asheville, North Carolina**



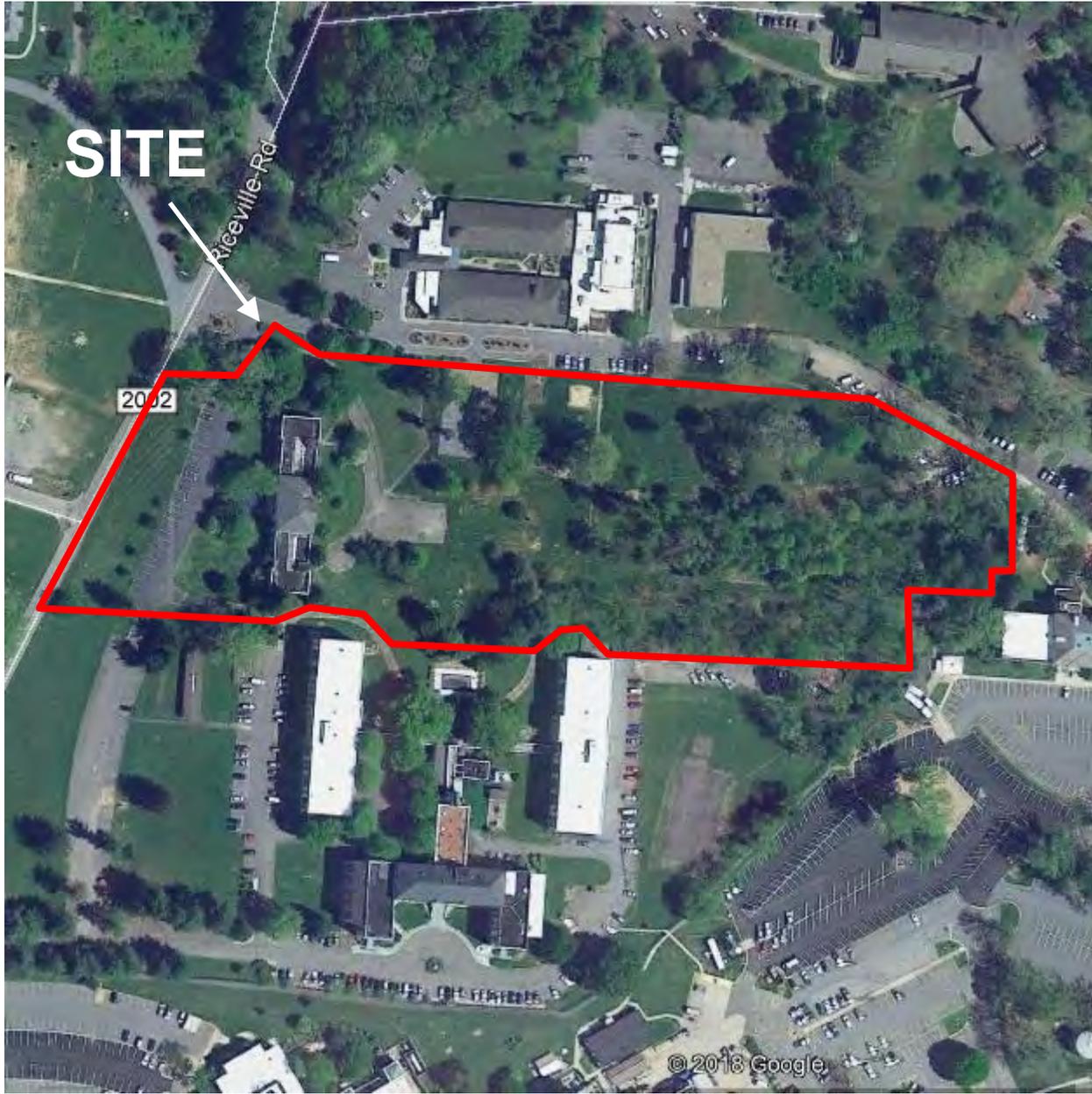
ATTACHMENT 1C

**SITE AND VAMC LOCATION MAP (2018 AERIAL PHOTOGRAPH)
70 Riceville Road
Asheville, North Carolina**



ATTACHMENT 1D

**SITE LOCATION MAP (2018 AERIAL PHOTOGRAPH)
70 Riceville Road
Asheville, North Carolina**



Attachment 2
List of Agencies and Organizations Contacted
Department of Veterans Affairs
NEPA Environmental Assessment
Proposed Land Acquisition for Substance Abuse Rehabilitation Facility
70 Riceville Road
Asheville, Buncombe County, North Carolina

US Fish and Wildlife Service
Asheville Ecological Services Field Office
160 Zillicoa Street
Asheville, North Carolina 28801-1082
Phone: (828) 258-3939

US Environmental Protection Agency, Region 4
Office of Public Affairs
Sam Nunn Atlanta Federal Center
61 Forsyth Street SW
Atlanta, Georgia 30303-8960
Phone: (404) 562-9900

US Army Corps of Engineers – Wilmington District
Asheville Regulatory Field Office
151 Patton Avenue, Room 208
Asheville, North Carolina 28801-5006
Phone: (828) 271-7980

North Carolina Department of Environmental Quality
Asheville Regional Office
2090 US 70 Highway
Swannanoa, North Carolina 28778-8211
Phone: (828) 296-4500

North Carolina Department of Transportation
Administration and Business Development
1501 Mail Service Center
Raleigh, North Carolina 27699-1501
Phone: (919) 707-2663

North Carolina Wildlife Resources Commission
Attn: Wildlife Management
1722 Mail Service Center
Raleigh, North Carolina 27699-1722
Phone: (919) 707-0050

North Carolina Natural Heritage Program
Nature Research Center – 121 West Jones Street
1651 Mail Service Center
Raleigh, North Carolina 27699-1651
Phone: (919) 707-8107

Natural Resources Conservation Service
Asheville Service Center
160 Zillicoa Street
Asheville, North Carolina 28801
Phone: (828) 254-0916

Buncombe County Soil and Water Conservation District
49 Mount Carmel Road, Suite 101
Asheville, North Carolina 28806
Phone: (828) 250-4785

Asheville Development Services Department
161 South Charlotte Street
Asheville, North Carolina 28801
Phone: (828) 259-5846

Asheville Planning and Urban Design Department
P.O. Box 7148
Asheville, North Carolina 28802
Phone: (828) 259-5830

Asheville Parks and Recreation Department
P.O. Box 7148
Asheville, North Carolina 28802
Phone: (828) 259-5800

Asheville Public Works Department
P.O. Box 7148
Asheville, North Carolina 28802
Phone: (828) 259-5935

Asheville Stormwater Services and Utility Department
P.O. Box 7148
Asheville, North Carolina 28802
Phone: (828) 232-4567

Asheville Street Services Department
P.O. Box 7148
Asheville, North Carolina 28802
Phone: (828) 259-5431

Asheville Transportation Department
P.O. Box 7148
Asheville, North Carolina 28802
Phone: (828) 259-5943

Asheville Water Resources Department
P.O. Box 7148
Asheville, North Carolina 28802
Phone: (828) 251-1122



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington, DC 20420

November 12, 2019

Ramona Bartos
Administrator and Deputy State Historic Preservation Officer
North Carolina State Historic Preservation Office
4617 Mail Service Center
Raleigh, NC 27699-4617

RE: Initiation of Section 106 Consultation for
Charles George VA Medical Center – Asheville, North Carolina

Dear Ms. Bartos:

The U.S. Department of Veterans Affairs (VA), in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800, provides information for your review and concurrence regarding the above-referenced project VA is considering a potential site for a new outpatient clinic and seeks input by the North Carolina State Historic Preservation Office (SHPO) as part of its evaluation of alternatives.

Undertaking

VA seeks to acquire 8.3 acres of land adjacent to the Charles George VA Medical Center in Asheville, North Carolina. VA plans to rehabilitate an existing structure on the site for use as a Substance Abuse Residential Rehabilitation Treatment Program (SARRTP) facility. VA does not propose any additions to the existing building and will reuse the existing parking lot, access road, and utilities on the site.

Area of Potential Effect

The APE for this undertaking includes a direct and an indirect APE. The direct APE addresses direct effects associated with the proposed undertaking, including acquisition of the parcel, rehabilitation of an existing building, and site work. The indirect APE addresses potential indirect effects (in this case, visual effects) on historic resources outside the parcel boundaries. The Direct APE for this undertaking is defined by the general boundaries of the 8.3-acre acquisition parcel. The Indirect APE for this undertaking is limited to a 0.25-mile radius from an approximate center point in the parcel.

Identification of Historic Properties

VA has made an effort to identify any sites of historic, architectural, or archaeological significance that may be affected by this undertaking. The parcel is located within the Oteen Veterans Administration Hospital Historic District, which was listed in the National Register of Historic Places (NRHP) in 1985. The building planned for reuse as part of this undertaking is the only extant building on the parcel and is listed as a Contributing resource to this historic district. Now vacant, the building was constructed in 1930 as part of the second phase of construction of the Oteen Veterans Administration Hospital. The building and surrounding parcel were subsequently transferred to private ownership and renovated for use as senior housing. The indirect APE consists of both the Historic District and several of its Contributing resources. A desktop archaeological study concludes that there is moderate potential for the discovery of artifacts from the first phase of construction of the Oteen Medical Center, which consisted of mostly temporary structures built circa 1918. There is low potential for precontact artifacts within the parcel or for artifacts that predate the original hospital construction.

Determination of Effects

Pursuant to 36 CFR 800.4(d), the proposed acquisition and rehabilitation of an existing building will not have an adverse effect on historic properties within the Direct APE. The building has undergone substantial previous

alterations, and the rehabilitation scope proposed by VA does not include additions, relocation of the building, or substantial exterior alterations that would further diminish its historic integrity. The proposed site work is minimal and limited to the reuse of impervious surfaces and utilities. With a limited scope of reuse and rehabilitation, VA finds that the rehabilitation also not have any adverse visual effects on historic resources within the Indirect APE. Because no ground disturbance is currently proposed as part of the undertaking, VA finds that there is no potential for adverse effects on archaeological resources.

VA requests SHPO review of the enclosed documentation and concurrence with the determination of No Adverse Effect. In accordance with 36 CFR 800.4(d)(1)(i), if SHPO does not object within thirty (30) days of the receipt of this finding, the Office of Real Property will consider the VA's responsibility under Section 106 of the NHPA fulfilled as it pertains to the acquisition and development of this land based on the aforementioned scope of the undertaking.

In addition to the submission of this documentation package to SHPO, VA has contacted the Tribal Historic Preservation Officers (THPO) who have an interest in the preservation of Native American cultural resources of significance in this region of the country. VA has also contacted other relevant stakeholders identified as Consulting Parties for this undertaking. A list of all contacted parties is included in the supplementary materials of this submission. VA distributed letters to these entities in April 2019.

If you have any questions concerning this project or the documentation provided within this package, please do not hesitate to contact me by telephone at (202)-461-6849, or by email at maina.gakure@va.gov.

Sincerely,

Maina Gakure, DBA
Realty Specialist/Project Manager
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management (CFM)
Office of Real Property (003C4E) 6W.210E
425 I St, NW
Washington, DC 20001



North Carolina Department of Natural and Cultural Resources
State Historic Preservation Office

Ramona M. Bartos, Administrator

Governor Roy Cooper
Secretary Susi H. Hamilton

Office of Archives and History
Deputy Secretary Kevin Cherry

December 6, 2019

Maina Gakure
Realty Specialist
Department of Veterans Affairs
Office of Real Property (003C4E) 6W.210E
425 I Street, NW
Washington, DC 20001

maina.gakure@va.gov

Re: Acquisition of 8.3 Acres of Land with Structure and Amenities, Charles George VA Medical Center, Asheville, Buncombe County, ER 19-5003

Dear Mr. Gakure:

Thank you for your November 12, 2019, letter concerning the above-referenced undertaking and the Department of Veterans Affairs' (VA) proposed finding of no adverse effect for the purchase of the subject property. We have reviewed the proposal and concur that it will not adversely affect the National Register-listed Oteen Veterans Administration Hospital Historic District (BN0041) conditioned upon the following conditions being implemented.

- If rehabilitation of the building is proposed, the VA will provide plans at the design development, schematic, and final phases for review and comment by the State Historic Preservation Office. The plans shall include site improvements, parking and landscaping.
- The SHPO shall have 30 days to review and comment upon the proposed plans to determine their affect upon the historic property.

We look forward to consulting with the staff of the Charles George VA Medical Center concerning the rehabilitation of the property following its acquisition.

The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-814-6579 or environmental.review@ncdcr.gov. In all future communication concerning this project, please cite the above referenced tracking number.

Sincerely,

 Ramona M. Bartos
Deputy State Historic Preservation Officer

Paul Jackson

From: LaFond, Caroline <caroline.lafond@ncdenr.gov>
Sent: Tuesday, December 3, 2019 9:54 AM
To: Paul Jackson
Subject: NEPA Scoping Letter for US Department of Veterans Affairs

Paul,

I searched the Petroleum Underground Storage Tank (UST) and Non-UST Databases and did not identify any petroleum incidents on or adjacent to the proposed project area.

The following comments are pertinent to my review:

The Asheville Regional Office (ARO) UST Section recommends removal of any abandoned or out-of-use petroleum USTs or petroleum ASTs within the project area. The UST Section should be contacted regarding use of any proposed or on-site petroleum USTs or ASTs. We may be reached at (828) 296-4500.

Any petroleum USTs or ASTs must be installed and maintained in accordance with applicable local, state, and federal regulations. For additional information on petroleum ASTs it is advisable that the North Carolina Department of Insurance at (919) 661-5880 ext. 239, USEPA (404) 562-8761, local fire department, and Local Building Inspectors be contacted.

Any petroleum spills must be contained and the area of impact must be properly restored. Petroleum spills of significant quantity must be reported to the North Carolina Department of Environmental Quality (NCDEQ) – Division of Waste Management (DWM) UST Section in the ARO.

Any soils excavated during demolition or construction that show evidence of petroleum contamination, such as stained soil, odors, or free product must be reported immediately to the local Fire Marshall to determine whether explosive or inhalation hazards exist. Also, notify the UST Section of the ARO. Petroleum contaminated soils must be handled in accordance with all applicable regulations.

Any questions or concerns regarding spills from petroleum USTs, ASTs, or vehicles should be directed to the UST Section at (828) 296-4500. If you have any questions or need additional information, please contact me via email at caroline.lafond@ncdenr.gov or by phone at (828) 296-4644.

Thanks!
Caroline



Caroline LaFond
Regional Supervisor, DWM, UST Section, Asheville Regional Office
North Carolina Department of Environmental Quality
828.296.4500 (Main Office)
caroline.lafond@ncdenr.gov

Equal Opportunity/Affirmative Action Employer. Minorities and women are encouraged to apply. If you are a person with a disability and need a reasonable accommodation to use our website, please contact us at (828) 296-4500.

Rob Clark

From: Paul Jackson
Sent: Friday, December 6, 2019 8:27 PM
To: Rob Clark
Subject: FW: US Department of Veteran Affairs Substance Abuse Rehabilitation Facility
Attachments: Permitting-Considerations.pdf

Thanks,

Paul Jackson

Environmental Scientist

TTL Associates, Inc.

44265 Plymouth Oaks Boulevard | Plymouth, MI 48170 | ttlassoc.com

Direct: (734) 582-4960 | Fax: (734) 582-4961



From: Davidson, Alison [mailto:alison.davidson@ncdenr.gov] -
Sent: Friday, December 6, 2019 3:33 PM -
To: Paul Jackson <pjackson@ttlassoc.com> -
Subject: US Department of Veteran Affairs Substance Abuse Rehabilitation Facility -

Mr. Jackson, -

Please see the attached document addressing important compliance and permitting items for conducting development-related activities in North Carolina. Please note the document isn't comprehensive, but it's helpful for front-end project due-diligence. -

I may be reached directly at 828.296.4698 if you have any questions. -

Best Regards, -
-Alison -

Alison Davidson -
Environmental Assistance Coordinator, DEACS -
N.C. Department of Environmental Quality
Asheville Regional Office
2090 U.S. 70 Hwy
Swannanoa, NC 28778

828.296.4698 (Direct)
828.296.4500 (Switchboard)
alison.davidson@ncdenr.gov



Email correspondence to and from this address is subject to the North Carolina Public Records Law and may be disclosed to third parties. -

Permitting Considerations

1. There are streams and wetlands all over the state. To be assured that the proposed project does not impact jurisdictional water features, [contact the US Army Corps of Engineers](#) to have the project site evaluated for the presence of wetlands and streams. Additionally, there may be isolated wetlands that are regulated by the State. To learn more about these requirements, visit the 401 & Isolated Wetlands/Waters Program: <https://deq.nc.gov/401-sw>.
2. Contact the State Historic Preservation Office prior to land disturbance to determine if there are any cultural or archaeologically significant features on or near your site. http://www.hpo.ncdcr.gov/er/er_email_submission.html and <http://hpo.ncdcr.gov/> - *Click on HPOWEB Map Service*
3. Submit a site-specific request to the Natural Heritage Program (NHP): <http://www.ncnhp.org/data/request-information> to initiate a search of the NHP database for lists of rare species, natural communities, natural areas, etc. Additionally, you should consult the U.S. Fish and Wildlife's endangered species database at <http://www.fws.gov/endangered/>. Please note that the absence of records does not necessarily mean that there are not rare, threatened or endangered species present. It may simply mean that the area has not been surveyed and the use of these resources should not take the place of on-site surveys prior to any land-disturbing activities. Please note that the listing of the Northern long-eared bat may affect your land-clearing activities, visit the [USFWS website for guidance](#).
4. For proposed projects on currently developed sites, contact the [Division of Waste Management, UST Section](#) to determine if underground storage tanks are present.
5. For land disturbance of one acre or more, you will need an approved Erosion and Sediment Control Plan (E/S) and a NPDES Construction Stormwater permit from the Division of Energy, Mineral and Land Resources - Land Quality Section: <http://deq.nc.gov/about/divisions/energy-mineral-land-resources/energy-mineral-land-permits/erosion-sediment-control>. **Please note:** Authority may be delegated to cities and counties that adopt a qualifying local erosion and sediment control ordinance in compliance with State requirements. These requirements may be more stringent and thus require permits for land disturbances less than 1 acre. [Click here for list of local programs in N.C.](#)
6. Land-disturbing activities adjacent to waters that have been classified as [trout waters](#) should have an undisturbed buffer zone 25-feet wide. There is an allowable amount of encroachment within the buffer zone, but it must have special approval. [Learn more about trout buffer requirements](#). Also, trout moratoriums on construction activities, established by the NC Wildlife Resources Commission, may apply to your project if working within designated trout waters or the 25' trout buffer zone. Exemptions to this condition *may require written approval* by the resource agency: <http://www.ncwildlife.org/contacts.aspx>.
7. If your project or facility will have emission sources that emit five or more tons of pollutants each year, then you'll likely need an air permit. The tons generated by the operation will determine the type of permit required. If you're unsure about air permitting, then [contact an Air Quality staff member](#) to conduct an Air Permit Applicability Determination. [Learn more](#) about Air Quality Permitting.
8. If development is to occur on a barrier island, adjacent to a water body, coastal marsh, in or over the water, or along the ocean front, a Coastal Area Management Act (CAMA) permit may be required within the coastal counties: <http://deq.nc.gov/about/divisions/coastal-management/coastal-management-permits>.
9. Any development that is located in a coastal county and requires a soil erosion and sedimentation control plan or a Coastal Area Management Act (CAMA) permit <http://deq.nc.gov/about/divisions/coastal-management/coastal-management-permits> may need to obtain a state coastal stormwater permit: <http://deq.nc.gov/about/divisions/energy-mineral-land-resources/energy-mineral-land-rules/stormwater-program/coastal-stormwater-rules>. (Coastal Counties: *Beaufort, Bertie, Brunswick, Camden, Carteret, Chowan, Craven, Currituck, Dare, Gates, Hertford, Hyde, New Hanover, Onslow, Pamlico, Pasquotank, Pender, Perquimans, Tyrrell, Washington*)
10. A State Coastal Stormwater permit will be required for **Non-residential projects** proposing 10,000 sf of build upon area within the 20 coastal counties. <http://deq.nc.gov/about/divisions/energy-mineral-land-resources/energy-mineral-land-rules/stormwater-program/coastal-stormwater-rules>
11. To determine whether development activities are subject to post-construction stormwater requirements or other stormwater permitting requirements, please consult the [Stormwater Permitting Interactive Map](#).
12. [NPDES Industrial Stormwater Permitting](#) applicability for industrial activities is based upon the standard industrial Classification (SIC) code of the manufacturing process or a narrative description if there is a point-source discharge of stormwater. Permitting applicability can be assessed by reviewing the [list of the activities](#) as noted in 40 CFR 122.26(b)(14)(i)-(xi) that fall under the program. Coverage may be through an individual permit or one of 20 general permits.
13. Any construction activity along the [Goose Creek Watershed, Jordan Lake Water Supply Watershed, Randlemen Lake Water Supply Watershed, Catawba River, Neuse River and Tar-Pamlico River basins](#) will need to comply with the 50' buffer and may need wetlands delineation from the U.S. Army Corp of Engineers and/or stream determinations, buffer variances, and stormwater management approvals from the Division of Water Resources, Wetlands Branch, 401 and Buffer Permitting Unit. <http://deq.nc.gov/about/divisions/water-resources/water-resources-permits/wastewater-branch/401-wetlands-buffer-permits/401-riparian-buffer-protection-program>

Permitting Considerations

14. If demolition will occur, please note the following: The Health Hazards Control Unit (HHCU) of the N.C. Department of Health and Human Services, must be **notified** of plans to demolish a building, including residences for commercial or industrial expansion, ***even if no asbestos is present in the building***. In addition, county or local building inspections departments may have requirements for demolition or asbestos removal. **Note:** Obtaining a demolition permit from the local city or county Building Inspections Department does NOT satisfy or meet the notification requirements of the HHCU.

Local Air Pollution Control Programs in Mecklenburg, Buncombe and Forsyth counties have their own asbestos-related requirements in North Carolina — refer to the County-Specific Ordinances section of the [AHMP Rules, Regulations & Ordinances](#) page for contact information for those counties. When regulated asbestos is to be removed in these counties, an asbestos removal permit is required and must be obtained from the HHCU. [Learn more](#)
15. Development in a water supply watershed can include certain land-use restrictions. Municipal and county governments with jurisdictions within a water supply watershed must prepare water supply ordinances (or include water supply sections within existing local ordinances) for land under their jurisdiction in the water supply watershed. The [Water Supply Watershed Map](#) is an interactive web-based map to help determine if your project is in a water supply watershed. For guidance and applicability contact the local governing authority first. If you have further questions, please contact the [DEQ Stormwater Program Unit](#). *Always contact your local government to verify current boundaries and classifications of water supply watershed areas.*
16. For wastewater collection and disposal you may need a permit from the Division of Water Resources (Water Quality Permitting Section), [Wastewater Branch](#) for direct discharge to surface waters or the [Non-Discharge Permitting Unit](#) for the permitting of residual and/or wastewater effluent land application or for the beneficial use of reclaimed water.
17. Generating or transporting hazardous wastes may require an EPA Identification Number or a permit. If you're unsure of what's considered "listed" and "characteristic" hazardous wastes as well as the regulated quantities, then visit the [Hazardous Wastes Section's website](#) or [contact a Hazardous Waste staff member](#) for help with interpreting the RCRA rules and regulations and how they apply.
18. For On-site wastewater treatment (septic systems) and private drinking water wells – [contact the County Environmental Health Department](#).
19. If county water and sewer is available, contact the County or City Public Works Department for permitting requirements. If sewer on the project site will be privately owned you may need to obtain a permit from the [Division of Water Resources PERCs Unit](#).
20. Contact the city/county planner and local governing authorities where the project is proposed to verify local rules and requirements (e.g. zoning, local ordinances, floodplain development, stormwater, Fire Marshal, etc.).
21. [Per 44 CFR 60.3.d.3 and the North Carolina Executive Order 123](#) – Any new proposed development located within the Special Flood Hazard Area (SFHA), 100-yr Floodplain, may need a Floodplain Development Permit prior to construction.
 - If the proposed development causes an increase in flood levels, a Conditional Letter of Map Revision will be required prior to permitting and construction.
 - If the proposed development does not cause an increase in flood levels, a No-Rise Certification will be required. This Certification, including the Hydraulic analysis, should be reviewed by a qualified professional Engineer prior to approval. Please contact your local NFIP Community Official (e.g., your local Building Inspections Permit Office, Engineering or Planning Department) for more direction or a NC NFIP Planner with the National Flood Insurance Program (NFIP).
 - Terry Foxx – Western Area - Terry.Foxx@ncdps.gov or 828-228-8526
 - Milton Carpenter – Central Area - Milton.Carpenter@ncdps.gov or 919-825-2302
 - Heather Keefer – Eastern Area - Heather.Keefer@ncdps.gov or 919-825-2289Program Website (and Digital Flood Maps) - <http://www.ncfloodmaps.com/>
22. Contact the Department of Transportation, or any owners of easements for approval/permission to cross their property. Also, to obtain a driveway permit from NCDOT please contact the appropriate DOT district office and ask to speak with the District Engineer. <http://www.ncdot.gov/doh/divisions/>
23. Check if your project is subject to SEPA (State Environmental Policy Act): <http://deq.nc.gov/permits-regulations/sepa>.
24. [Surface Water Classifications Map](#) – verify the stream classification as certain stream classifications can dictate more stringent permitting requirements. For example, if the project site drains to waters classified as a Water Supply-I, Outstanding Resource Waters, High Quality Waters or Nutrient Sensitive Waters there may be site-specific requirements.
25. [Guide to Surface Water Freshwater Classifications and definitions](#) and [alphabetical/hydrological lists by river basin](#).
26. If the registered agent is being asked for on your permit application, visit the NC Secretary of State's website to verify who is officially listed: <http://www.secretary.state.nc.us/corporations/>
27. NC DEQ Permit Directory: <http://deq.nc.gov/permits-regulations/permit-directory>

Have questions?

[Contact your regional Environmental Assistance Coordinator for permit assistance](#)

Rob Clark

From: Paul Jackson
Sent: Tuesday, December 10, 2019 2:35 PM
To: Rob Clark
Subject: FW: NCDEQ Land Quality comments regarding the proposed land acquisition for development of a Substance Abuse Rehabilitation Facility located at 70 Riceville Road, Asheville, Buncombe County, North Carolina

Thanks,

Paul Jackson

Environmental Scientist

TTL Associates, Inc.

44265 Plymouth Oaks Boulevard | Plymouth, MI 48170 | tlassoc.com

Direct: (734) 582-4960 | Fax: (734) 582-4961



From: Smith, Mike M [mailto:michael.smith@ncdenr.gov] -
Sent: Tuesday, December 10, 2019 1:44 PM -
To: Paul Jackson <pjackson@tlassoc.com> -
Cc: Aiken, Stan E <stan.aiken@ncdenr.gov> -
Subject: NCDEQ Land Quality comments regarding the proposed land acquisition for development of a Substance Abuse - Rehabilitation Facility located at 70 Riceville Road, Asheville, Buncombe County, North Carolina -

Mr. Jackson, -

Please see my comments below regarding the proposed land acquisition for development of a Substance Abuse - Rehabilitation Facility located at 70 Riceville Road, Asheville, Buncombe County, North Carolina. -

The Sedimentation Pollution Control Act of 1973 must be properly addressed for any land disturbing activity. An erosion - and sedimentation control plan will be required if one or more acres are to be disturbed. Plan must be filed with and - approved by applicable Regional Office (Land Quality Section) at least 30 days before beginning activity. A NPDES - Construction Stormwater permit (NCG010000) is also usually issued should design features meet minimum - requirements. A fee of \$65 for the first acre or any part of an acre. An express review option is available with additional - fees. -

Sedimentation and erosion control must be addressed in accordance with Buncombe County's approved program. - Particular attention should be given to design and installation of appropriate perimeter sediment trapping devices as - well as stable Stormwater conveyances and outlets. -

Additionally, at this site compliance with 15A NCAC 2H .0126 may be required. This involves the NPDES Stormwater Program which regulates three types of activities: Industrial, Municipal Separate Storm Sewer System & Construction activities that disturb ≥ 1 acre.

Also, compliance with 15A NCAC 2H 1000 may be required at this site. This involves the State Stormwater Permitting Programs which regulate site development and post- construction stormwater runoff control. Areas subject to these permit programs include all 20 coastal counties, and various other counties and watersheds throughout the state.

No records for this address were located in the Land Quality Section of the NC Department of Environmental Quality databases.

Please contact me with any questions you may have regarding this site.

Thank you,

Michael Smith

Assistant Regional Engineer
Land Quality Section
North Carolina Department of Environmental Quality

828 296-4500 main
828 296-4621 office
michael.smith@ncdenr.gov

2090 US70 Highway
Swannanoa, NC 28778-8211



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Rob Clark

From: pjacksonttl@gmail.com
Sent: Friday, December 6, 2019 12:21 PM
To: Rob Clark
Subject: Fwd: US Department of Veteran Affairs Substance Abuse Rehabilitation Facility
Attachments: image001.jpg; ATT00001.htm; DOC112519-11252019140258.pdf; ATT00002.htm

Sent from Paul Jackson's iPhone

Begin forwarded message:

From: "Aja, Deborah" <deborah.aja@ncdenr.gov> -
Date: December 6, 2019 at 11:28:36 AM EST -
To: "pjackson@ttlassoc.com" <pjackson@ttlassoc.com> -
Cc: "Davidson, Alison" <alison.davidson@ncdenr.gov>, "Riddle, Kris" <kris.riddle@ncdenr.gov> -
Subject: **US Department of Veteran Affairs Substance Abuse Rehabilitation Facility**

Mr. Jackson, -

The Solid Waste Section has reviewed the attached NEPA Scoping Letter for the US Department of Veteran Affairs Substance Abuse Rehabilitation Facility, located at 70 Riceville Road in Asheville, - Buncombe County, North Carolina. The review has found that due to the age of the structure(s) - proposed to be renovated, lead paint and asbestos or other contaminants may be present and must be - managed appropriately prior to and during project activities. Otherwise, the review has been completed - and has found no adverse impact on the surrounding community and likewise knows of no situations in - the community, which would affect this project from a solid waste perspective. -

During the project, every feasible effort should be made to minimize the generation of waste, to recycle - materials for which viable markets exist, and to use recycled products and materials in the development - of this project where suitable. Any waste generated by this project that cannot be beneficially reused or recycled must be disposed of at a solid waste management facility approved to manage the respective - waste type. The Section strongly recommends that any contractors are required to provide proof of proper disposal for all waste generated as part of the project. -

A list of permitted solid waste management facilities is available on the Solid Waste Section portal site - at: <http://deq.nc.gov/about/divisions/waste-management/waste-management-rules-data/solid-waste-management-annual-reports/solid-waste-permitted-facility-list>. -

Please let me know if you need additional information.

Thanks,
Deb

Paul Jackson

From: Walker, Fred <fred.walker@ncdenr.gov>
Sent: Tuesday, December 3, 2019 2:03 PM
To: Paul Jackson
Cc: Barnett, Kimberly; Davidson, Alison
Subject: 70 Riceville Rd., Asheville, NC - Environmental Review

Mr. Jackson,

The proposed project site is likely within the City of Asheville's water system (NC0111010). Any construction, modification, or alteration of an existing water system shall first be approved through the Public Water Supply Section. The City of Asheville Water Department should be contacted to confirm that there is adequate capacity to serve this proposed project. Please contact myself or Kimberly Barnett at the contact information below if you have any questions. Thanks for your time.

Best,

Fred Walker, P.E.
Engineer, Public Water Supply Section
Division of Water Resources
Department of Environmental Quality

828 296 4500 office
828 296 4582 direct
fred.walker@ncdenr.gov

2090 US Highway 70
Swannanoa, North Carolina 28778



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◊ North Carolina Wildlife Resources Commission ◊

Gordon Myers, Executive Director

December 2, 2019

Paul Jackson
TTL Associates, Inc
44265 Plymouth Oaks Boulevard
Plymouth, MI, 48170

SUBJECT: NEPA Scoping Letter – VA Substance Abuse Rehabilitation Facility
Buncombe County

Dear Mr. Jackson:

Biologists with the North Carolina Wildlife Resources Commission (NCWRC) received your November 18, 2019 letter about the US Department of Veterans Affairs (VA) intention to acquire 8.3 acres of land adjacent to the VA Medical Center in Asheville for the development of a Substance Abuse Rehabilitation facility. You requested our input on environmental issue areas, including any environmental concerns or issues, listed species, and more. Our comments are provided in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661-667e) and North Carolina General Statutes (G.S. 113-131 et seq.).

The project involves the rehabilitation of an existing building, and no new buildings are planned. Existing parking areas will be re-used. We do not anticipate any significant impacts to wildlife resources from this project.

The Blue Ridge Parkway is adjacent to the property. We have no records of listed species in the vicinity of the site; however, this does not preclude the presence of such a species on or adjacent to the site. It simply may mean the site has not been surveyed. An on-site survey is the only definitive means to determine whether a listed or proposed species is on the site and would be impacted by the proposed project.

If plans for the property change and further development of the site is involved, we offer the following recommendations to minimize impacts to aquatic and terrestrial wildlife resources:

1. Although USGS topographic maps and National Wetlands Inventory (NWI) maps provide a general overview of stream and wetland resources, these should not be used to determine whether the project will impact streams or wetlands. Wetlands and streams

- within the site boundaries should be identified through on-site surveys prior to any land disturbing activities. If wetlands and/or streams will be impacted by construction activities, then the project should be coordinated with the U.S. Army Corps of Engineers and the N.C. Division of Water Resources.
2. Maintain a minimum 100-foot undisturbed, native, forested buffer along perennial streams, and a 50-foot buffer along intermittent streams and wetlands. Plant native shrubs and trees along any stream that does not have a woody buffer, such as the stream on the north side of the property. Maintaining undisturbed, forested buffers along these areas will minimize impacts to aquatic and terrestrial wildlife resources, water quality, and aquatic habitat both within and downstream of the project area.
 3. Measures to avoid or minimize impacts to wetlands should be implemented during construction. In addition to providing wildlife habitat, wetland areas perform important functions of flood control and water quality protection.
 4. Limit impervious surface to less than 10% or use stormwater control measures to mimic the hydrograph consistent with an impervious coverage of less than 10%.
 5. Minimize cutting trees on the site as much as possible in order to conserve wildlife habitat on site.
 6. Use non-invasive native species and Low Impact Development (LID) technology in landscaping. Using native species instead of ornamentals should reduce the need for water, fertilizers and pesticides. Using LID technology in landscaping will not only help maintain the predevelopment hydrologic regime, but also enhance the aesthetic and habitat value of the site.
 7. Sediment and erosion control measures should be installed prior to any land clearing or construction. The use of biodegradable and wildlife-friendly sediment and erosion control devices is strongly recommended. Silt fencing, fiber rolls and/or other products should have loose-weave netting that is made of natural fiber materials with movable joints between the vertical and horizontal twines. Silt fencing that has been reinforced with plastic or metal mesh should be avoided as it impedes the movement of terrestrial wildlife species. These measures should be routinely inspected and properly maintained. Excessive silt and sediment loads can have numerous detrimental effects on aquatic resources including destruction of spawning habitat, suffocation of eggs, and clogging of gills of aquatic species.

Thank you for the opportunity to review and comment on this project. Please contact me at (828) 803-6054 if you have any questions about these comments or need further assistance.

Sincerely,



Andrea Leslie

Mountain Region Coordinator, Habitat Conservation Program

Paul Jackson

From: Street, Austin - NRCS, Asheville, NC <austin.street@usda.gov>
Sent: Monday, December 2, 2019 9:10 AM
To: Paul Jackson
Subject: NEPA Scoping Letter, US Department of Veterans Affairs, Proposed Land Acquisition-70 Riceville Road, Asheville, NC

Mr. Jackson,

I have done some research on the property located at 70 Riceville Road using the NRCS Area of Potential Effect Web Mapping Tool and have found nothing of potential concern from an environmental standpoint. There are no hydric soils or farmland soils located on the property and no sign of threatened and/or endangered species. It doesn't seem that there is any sign of surface or groundwater concerns and the air quality and noise concerns are similar to any expected near the city of Asheville. I did not see anything I believe to be of potential concern. The only thing that showed up for me was the fact that the property is considered historic due to the 1924 Georgian Revival Medical Complex. I hope this has helped with your research and if there is anything else I can provide or give more information on, I would be glad to. I apologize for taking awhile to get back to you.

Best,
Austin Street
Soil Conservationist
USDA-NRCS
Asheville Field Office (Team 2)
(828)254-0916x3
(828)552-8692

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Paul Jackson

From: Mike Matthews <Mike.Matthews@buncombecounty.org>
Sent: Wednesday, December 4, 2019 11:25 AM
To: Paul Jackson
Cc: Ashley Featherstone; Betsy Brown
Subject: Veterans Affairs (VA) Building 19

Mr. Jackson,

I have no permits that any work have been done at 70 Riceville Road for the VAMC. I do have Permits on file for other Building for them. (Building 3,5,and 47) If and work is planned for this Address.

WNCRAQA must be notified of plans to demolish or remodel any building no matter the age, including residential, commercial, industrial or public buildings; or plans to remove any asbestos-containing material. These buildings must be surveyed by accredited asbestos inspectors prior to beginning any demolition or removal activities, to determine the amount of asbestos present and the applicable rules.

If present, a permit must be obtained from WNCRAQA before any asbestos-containing materials are to be removed from a building. (All asbestos-containing materials must be removed before a building may be demolished by burning.)

Demolition or removal must be handled so that asbestos fibers are not released into the air. Asbestos-containing materials must be kept wet during removal. Materials that easily crumble in your hand (friable) must be removed by asbestos-accredited professionals prior to demolition. Asbestos cement board, also known as transite siding or shingles, must also be removed prior to demolition.

Please call (828) 250-6776 if you have any further questions or need additional information on removal of asbestos-containing materials.

Thank You
Mike

Michael B. Matthews
Senior Air Quality Specialist
WNC Regional Air Quality Agency
30 Valley Street
Asheville, NC. 28801
Phone: 828-250-6776
Fax: 828-250-6082
www.wncairquality.org



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APPENDIX B

Native American Tribe Correspondence



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington, DC 20420

November 12, 2019

Russell Townsend
Eastern Band of Cherokee Indians
Tribal Historic Preservation Specialist
PO Box 455
Cherokee, NC 28719

RE: Initiation of Section 106 Consultation for
Charles George VA Medical Center – Asheville, North Carolina

Dear Mr. Townsend:

The U.S. Department of Veterans Affairs (VA), in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800, provides information for your review and concurrence regarding the above-referenced project (Undertaking). VA is considering acquisition of a site for a rehabilitation facility and seeks input by the Eastern Band of Cherokee Indians as part of its evaluation of alternatives.

Undertaking

VA seeks to acquire 8.3 acres of land adjacent to the Charles George VA Medical Center in Asheville, North Carolina. VA plans to rehabilitate an existing structure on the site for use as a Substance Abuse Residential Rehabilitation Treatment Program (SARRTP) facility. VA does not propose any additions to the existing building and will reuse the existing parking lot, access road, and utilities on the site.

Area of Potential Effect

The APE for this undertaking includes a direct and an indirect APE. The direct APE addresses direct effects associated with the proposed undertaking, including acquisition of the parcel, rehabilitation of an existing building, and site work. The indirect APE addresses potential indirect effects (in this case, visual effects) on historic resources outside the parcel boundaries. The Direct APE for this undertaking is defined by the general boundaries of the 8.3-acre acquisition parcel. The Indirect APE for this undertaking is limited to a 0.25-mile radius from an approximate center point in the parcel.

Identification of Historic Properties

VA has made an effort to identify any sites of historic, architectural, or archaeological significance that may be affected by this undertaking. The parcel is located within the Oteen Veterans Administration Hospital Historic District, which was listed in the National Register of Historic Places (NRHP) in 1985. The building planned for reuse as part of this undertaking is the only extant building on the parcel and is listed as a Contributing resource to this historic district. Now vacant, the building was constructed in 1930 as part of the second phase of construction of the Oteen Veterans Administration Hospital. The building and surrounding parcel were subsequently transferred to private ownership and renovated for use as senior housing. The indirect APE consists of both the Historic District and several of its Contributing resources. A desktop archaeological study concludes that there is moderate potential for the discovery of artifacts from the first phase of construction of the Oteen Medical Center, which consisted of mostly temporary structures built circa 1918. There is low potential for precontact artifacts within the parcel or for artifacts that predate the original hospital construction.

Determination of Effects

Pursuant to 36 CFR 800.4(d), the proposed acquisition and rehabilitation of an existing building will not have an adverse effect on historic properties within the Direct APE. The building has undergone substantial previous

alterations, and the rehabilitation scope proposed by VA does not include additions, relocation of the building, or substantial exterior alterations that would further diminish its historic integrity. The proposed site work is minimal and limited to the reuse of impervious surfaces and utilities. With a limited scope of reuse and rehabilitation, VA finds that the rehabilitation also not have any adverse visual effects on historic resources within the Indirect APE. Because no ground disturbance is currently proposed as part of the undertaking, VA finds that there is no potential for adverse effects on archaeological resources.

VA requests the Tribe's review of this documentation and concurrence with the determination of No Adverse Effect. In accordance with 36 CFR 800.4(d)(1)(i), if the Tribe does not object within thirty (30) days of the receipt of this finding, the Office of Real Property will consider the VA's responsibility under Section 106 of the NHPA fulfilled as it pertains to the acquisition and development of this land based on the aforementioned scope of the undertaking.

VA has contacted the North Carolina State Historic Preservation Office (SHPO) and other Tribes who may have an interest in the preservation of Native American cultural resources of significance in this region of the country. VA has also contacted other relevant stakeholders identified as Consulting Parties for this undertaking. VA distributed letters to these entities in April 2019.

If you have any questions concerning this project or the documentation provided within this package, please do not hesitate to contact me by telephone at (202)-461-6849, or by email at maina.gakure@va.gov.

Sincerely,

Maina Gakure, DBA
Realty Specialist/Project Manager
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management (CFM)
Office of Real Property (003C4E) 6W.210E
425 I St, NW
Washington, DC 20001

Enclosures

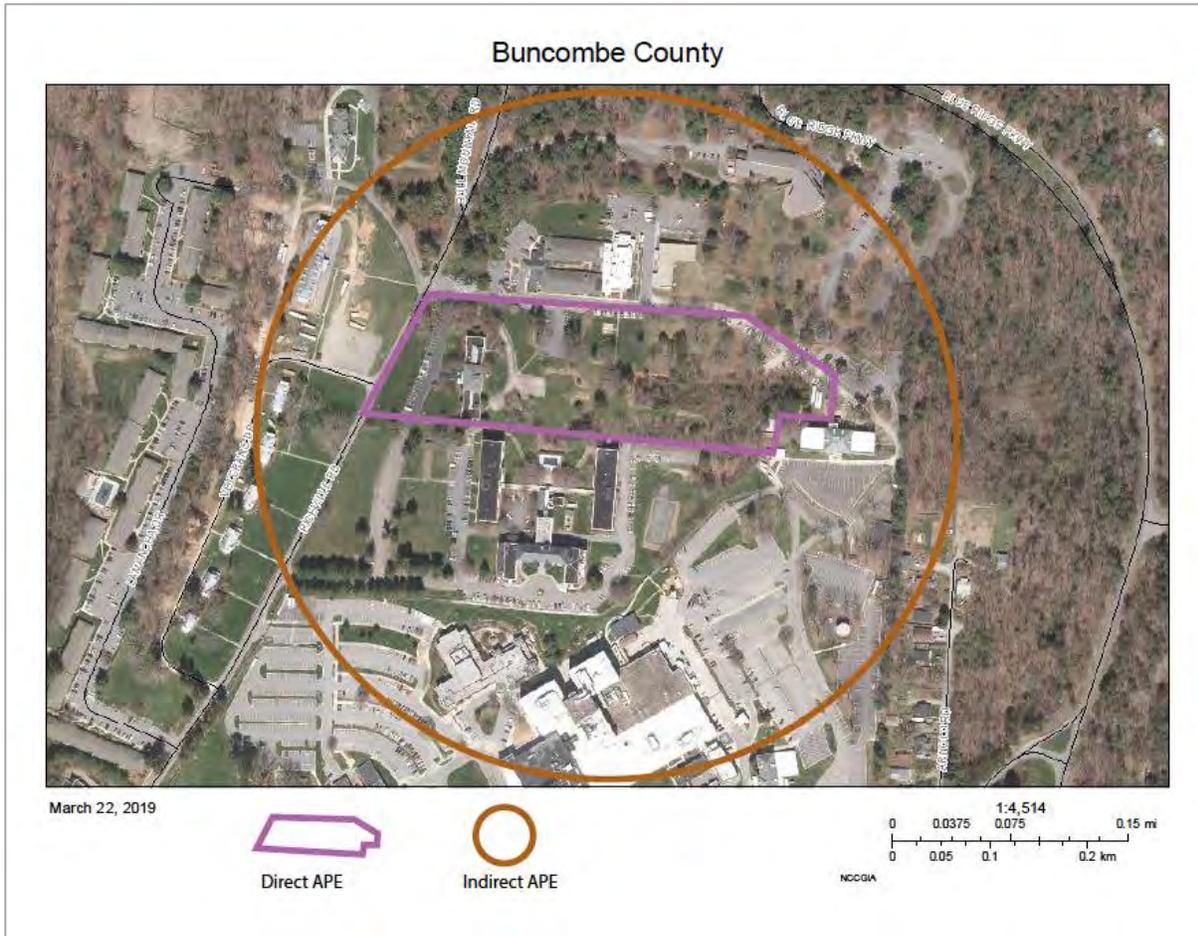


Figure 1 APE Map. Direct APE reflects the general boundaries of the acquisition parcel. The Indirect APE is defined by a .25-mile radius from the center point of the acquisition parcel. Base map provided by www.gis.buncombecounty.org.



Figure 2 Front elevation of Ward C (Building 19), view looking east from Riceville Road (PRESERVE/scapes, February 2019)



Figure 3 Circa 1930 photograph of the Ward C building (Building 19) that is proposed for adaptive reuse as part of this undertaking, looking east. (image courtesy of the Charles George VA Medical Center).



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington, DC 20420

November 12, 2019

Dr. Wenonah G. Haire
Tribal Historic Preservation Officer
Catawba Indian Nation
1536 Tom Steven Road
Rock Hill, SC 29730

RE: Initiation of Section 106 Consultation for
Charles George VA Medical Center – Asheville, North Carolina

Dear Ms. Haire:

The U.S. Department of Veterans Affairs (VA), in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800, provides information for your review and concurrence regarding the above-referenced project (Undertaking). VA is considering acquisition of a site for a rehabilitation facility and seeks input by the Catawba Indian Nation as part of its evaluation of alternatives.

Undertaking

VA seeks to acquire 8.3 acres of land adjacent to the Charles George VA Medical Center in Asheville, North Carolina. VA plans to rehabilitate an existing structure on the site for use as a Substance Abuse Residential Rehabilitation Treatment Program (SARRTP) facility. VA does not propose any additions to the existing building and will reuse the existing parking lot, access road, and utilities on the site.

Area of Potential Effect

The APE for this undertaking includes a direct and an indirect APE. The direct APE addresses direct effects associated with the proposed undertaking, including acquisition of the parcel, rehabilitation of an existing building, and site work. The indirect APE addresses potential indirect effects (in this case, visual effects) on historic resources outside the parcel boundaries. The Direct APE for this undertaking is defined by the general boundaries of the 8.3-acre acquisition parcel. The Indirect APE for this undertaking is limited to a 0.25-mile radius from an approximate center point in the parcel.

Identification of Historic Properties

VA has made an effort to identify any sites of historic, architectural, or archaeological significance that may be affected by this undertaking. The parcel is located within the Oteen Veterans Administration Hospital Historic District, which was listed in the National Register of Historic Places (NRHP) in 1985. The building planned for reuse as part of this undertaking is the only extant building on the parcel and is listed as a Contributing resource to this historic district. Now vacant, the building was constructed in 1930 as part of the second phase of construction of the Oteen Veterans Administration Hospital. The building and surrounding parcel were subsequently transferred to private ownership and renovated for use as senior housing. The indirect APE consists of both the Historic District and several of its Contributing resources. A desktop archaeological study concludes that there is moderate potential for the discovery of artifacts from the first phase of construction of the Oteen Medical Center, which consisted of mostly temporary structures built circa 1918. There is low potential for precontact artifacts within the parcel or for artifacts that predate the original hospital construction.

Determination of Effects

Pursuant to 36 CFR 800.4(d), the proposed acquisition and rehabilitation of an existing building will not have an adverse effect on historic properties within the Direct APE. The building has undergone substantial previous

alterations, and the rehabilitation scope proposed by VA does not include additions, relocation of the building, or substantial exterior alterations that would further diminish its historic integrity. The proposed site work is minimal and limited to the reuse of impervious surfaces and utilities. With a limited scope of reuse and rehabilitation, VA finds that the rehabilitation also not have any adverse visual effects on historic resources within the Indirect APE. Because no ground disturbance is currently proposed as part of the undertaking, VA finds that there is no potential for adverse effects on archaeological resources.

VA requests the Tribe's review of this documentation and concurrence with the determination of No Adverse Effect. In accordance with 36 CFR 800.4(d)(1)(i), if the Tribe does not object within thirty (30) days of the receipt of this finding, the Office of Real Property will consider the VA's responsibility under Section 106 of the NHPA fulfilled as it pertains to the acquisition and development of this land based on the aforementioned scope of the undertaking.

VA has contacted the North Carolina State Historic Preservation Office (SHPO) and other Tribes who may have an interest in the preservation of Native American cultural resources of significance in this region of the country. VA has also contacted other relevant stakeholders identified as Consulting Parties for this undertaking. VA distributed letters to these entities in April 2019.

If you have any questions concerning this project or the documentation provided within this package, please do not hesitate to contact me by telephone at (202)-461-6849, or by email at maina.gakure@va.gov.

Sincerely,

Maina Gakure, DBA
Realty Specialist/Project Manager
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management (CFM)
Office of Real Property (003C4E) 6W.210E
425 I St, NW
Washington, DC 20001

Enclosures



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington, DC 20420

November 12, 2019

RaeLynn Butler
THPO
Muscogee (Creek) Nation
PO Box 580
Okmulgee, OK 74447
(918) 732-7678

RE: Initiation of Section 106 Consultation for
Charles George VA Medical Center – Asheville, North Carolina

Dear Ms. Butler:

The U.S. Department of Veterans Affairs (VA), in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, 36 CFR Part 800, provides information for your review and concurrence regarding the above-referenced project (Undertaking). VA is considering acquisition of a site for a rehabilitation facility and seeks input by the Muscogee (Creek) Nation as part of its evaluation of alternatives.

Undertaking

VA seeks to acquire 8.3 acres of land adjacent to the Charles George VA Medical Center in Asheville, North Carolina. VA plans to rehabilitate an existing structure on the site for use as a Substance Abuse Residential Rehabilitation Treatment Program (SARRTP) facility. VA does not propose any additions to the existing building and will reuse the existing parking lot, access road, and utilities on the site.

Area of Potential Effect

The APE for this undertaking includes a direct and an indirect APE. The direct APE addresses direct effects associated with the proposed undertaking, including acquisition of the parcel, rehabilitation of an existing building, and site work. The indirect APE addresses potential indirect effects (in this case, visual effects) on historic resources outside the parcel boundaries. The Direct APE for this undertaking is defined by the general boundaries of the 8.3-acre acquisition parcel. The Indirect APE for this undertaking is limited to a 0.25-mile radius from an approximate center point in the parcel.

Identification of Historic Properties

VA has made an effort to identify any sites of historic, architectural, or archaeological significance that may be affected by this undertaking. The parcel is located within the Oteen Veterans Administration Hospital Historic District, which was listed in the National Register of Historic Places (NRHP) in 1985. The building planned for reuse as part of this undertaking is the only extant building on the parcel and is listed as a Contributing resource to this historic district. Now vacant, the building was constructed in 1930 as part of the second phase of construction of the Oteen Veterans Administration Hospital. The building and surrounding parcel were subsequently transferred to private ownership and renovated for use as senior housing. The indirect APE consists of both the Historic District and several of its Contributing resources. A desktop archaeological study concludes that there is moderate potential for the discovery of artifacts from the first phase of construction of the Oteen Medical Center, which consisted of mostly temporary structures built circa 1918. There is low potential for precontact artifacts within the parcel or for artifacts that predate the original hospital construction.

Determination of Effects

Pursuant to 36 CFR 800.4(d), the proposed acquisition and rehabilitation of an existing building will not have an adverse effect on historic properties within the Direct APE. The building has undergone substantial previous alterations, and the rehabilitation scope proposed by VA does not include additions, relocation of the building, or substantial exterior alterations that would further diminish its historic integrity. The proposed site work is minimal and limited to the reuse of impervious surfaces and utilities. With a limited scope of reuse and rehabilitation, VA finds that the rehabilitation also not have any adverse visual effects on historic resources within the Indirect APE. Because no ground disturbance is currently proposed as part of the undertaking, VA finds that there is no potential for adverse effects on archaeological resources.

VA requests the Tribe's review of this documentation and concurrence with the determination of No Adverse Effect. In accordance with 36 CFR 800.4(d)(1)(i), if the Tribe does not object within thirty (30) days of the receipt of this finding, the Office of Real Property will consider the VA's responsibility under Section 106 of the NHPA fulfilled as it pertains to the acquisition and development of this land based on the aforementioned scope of the undertaking.

VA has contacted the North Carolina State Historic Preservation Office (SHPO) and other Tribes who may have an interest in the preservation of Native American cultural resources of significance in this region of the country. VA has also contacted other relevant stakeholders identified as Consulting Parties for this undertaking. VA distributed letters to these entities in April 2019.

If you have any questions concerning this project or the documentation provided within this package, please do not hesitate to contact me by telephone at (202)-461-6849, or by email at maina.gakure@va.gov.

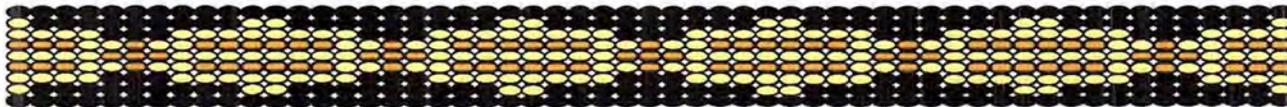
Sincerely,

Maina Gakure, DBA
Realty Specialist/Project Manager
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management (CFM)
Office of Real Property (003C4E) 6W.210E
425 I St, NW
Washington, DC 20001

Enclosures

Catawba Indian Nation
Tribal Historic Preservation Office
1536 Tom Steven Road
Rock Hill, South Carolina 29730

Office 803-328-2427
Fax 803-328-5791



December 12, 2019

Attention: Maina Gakure
U.S. Department of Veterans Affairs
425 1 St., NW
Washington, DC 20001

Re. THPO #	TCNS #	Project Description
2020-197-2		Charles George VA Medical Center – Asheville, NC

Dear Ms. Gakure,

The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. **However, the Catawba are to be notified if Native American artifacts and / or human remains are located during the ground disturbance phase of this project.**

If you have questions please contact Caitlin Rogers at 803-328-2427 ext. 226, or e-mail caitlinh@ccppcrafts.com.

Sincerely,

A handwritten signature in cursive script that reads "Caitlin Rogers for".

Wenonah G. Haire
Tribal Historic Preservation Officer

APPENDIX C

Photograph Logs

SITE PHOTOGRAPHS



Photo Looking northeasterly at the west side of the #1: Site building.



Photo Looking northwesterly across the south side of the #2: Site building.



Photo Looking westerly at the east side of the Site #3: building.



Photo Looking westerly across the north side of the #4: Site building.



Photo Front entrance of the Site building. #5:



Photo Interior entrance of the Site building. #6:

SITE PHOTOGRAPHS



Photo First floor hallway.
#7:



Photo Second floor exterior hallway.
#8:



Photo Typical unit/apartment.
#9:



Photo Guttied unit/apartment.
#10:



Photo Third floor terrace from stairwell.
#11:



Photo Third floor open space.
#12:

SITE PHOTOGRAPHS



Photo Basement entry.
#13:



Photo Utility room.
#14:



Photo Interior of paint room.
#15:



Photo General storage in basement.
#16:



Photo Boiler room.
#17:



Photo Maintenance supply room.
#18:

SITE PHOTOGRAPHS



Photo Looking east across the northern portion of #19: the Site.



Photo Looking east across the southern portion of #20: the Site.



Photo Looking east in the eastern portion of the #21: Site.



Photo Looking south at the vegetated former #22: building area located in the southeastern portion of the Site.



Photo Looking northeast at the vegetated former #23: building area located in the southeastern portion of the Site.



Photo Looking southwest in the southeastern #24: portion of the Site.

APPENDIX D

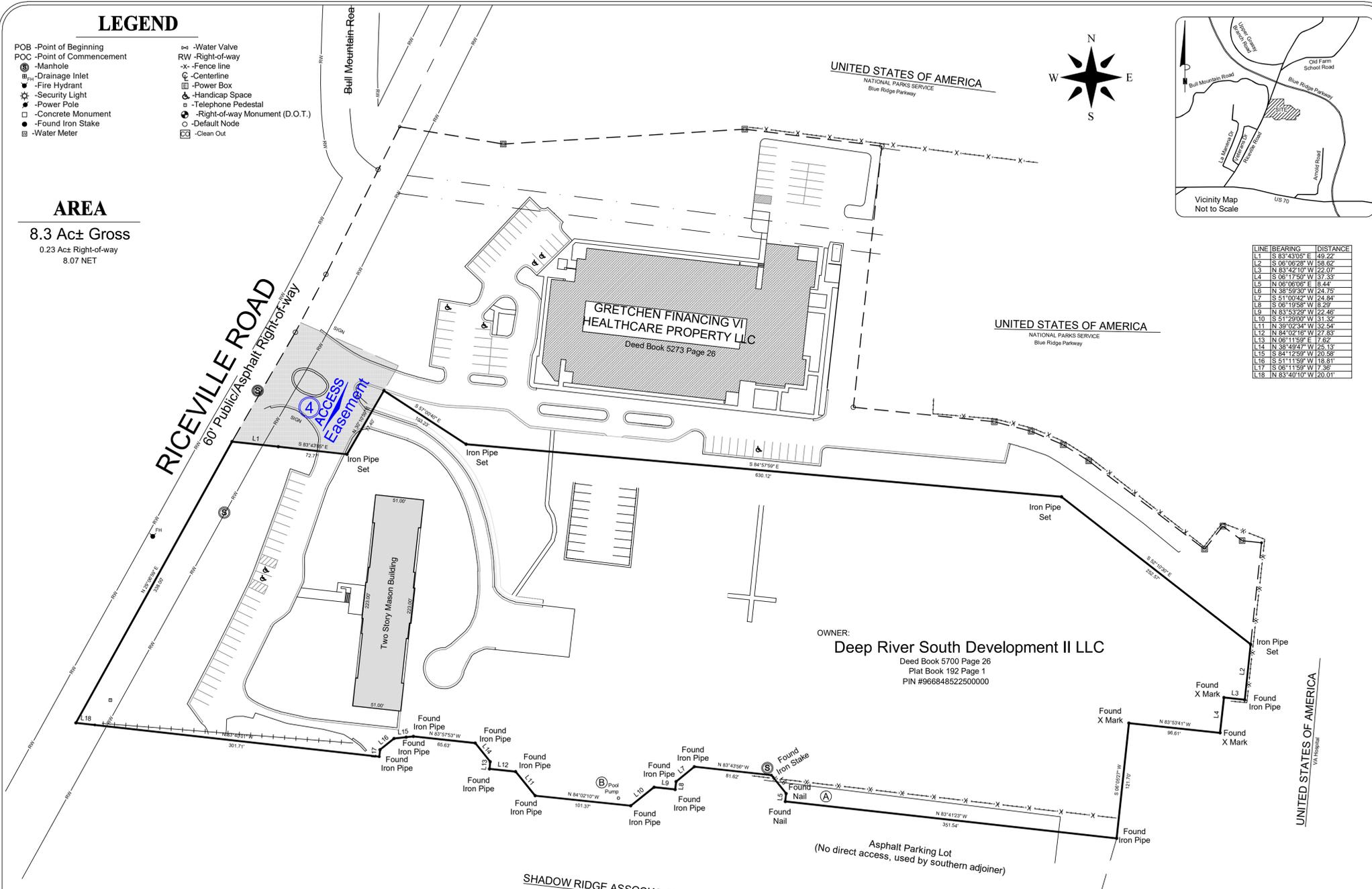
Other Relevant Environmental Data

LEGEND

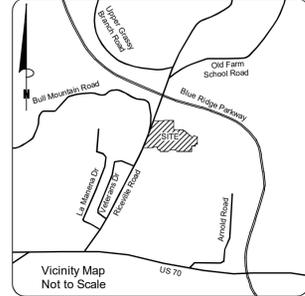
- POB -Point of Beginning
- POC -Point of Commencement
- ⊙ -Manhole
- ⊕ -Drainage Inlet
- ⊕ -Fire Hydrant
- ⊕ -Security Light
- ⊕ -Power Pole
- ⊕ -Concrete Monument
- ⊕ -Found Iron Stake
- ⊕ -Water Meter
- ⊕ -Water Valve
- ⊕ -Fence line
- ⊕ -Centerline
- ⊕ -Power Box
- ⊕ -Handicap Space
- ⊕ -Telephone Pedestal
- ⊕ -Right-of-way Monument (D.O.T.)
- ⊕ -Default Node
- ⊕ -Clean Out

AREA

8.3 Ac± Gross
0.23 Ac± Right-of-way
8.07 NET



LINE	BEARING	DISTANCE
L1	S 83°43'00" E	49.22'
L2	S 06°06'28" W	58.62'
L3	N 83°42'10" W	22.07'
L4	S 06°17'50" W	51.53'
L5	N 06°06'06" E	8.44'
L6	N 38°59'30" W	24.75'
L7	S 51°00'42" W	24.84'
L8	S 06°19'58" W	8.29'
L9	N 83°53'29" W	22.46'
L10	S 51°29'00" W	51.32'
L11	N 39°02'34" W	101.37'
L12	N 84°02'16" W	27.83'
L13	N 06°11'59" E	7.36'
L14	N 38°49'47" W	25.13'
L15	S 84°12'59" W	20.58'
L16	S 51°11'59" W	18.81'
L17	S 06°11'59" W	7.36'
L18	N 83°40'02" W	321.72'



Zoning

Source of Information: City of Asheville
Name of Contact: Zoning Administrator
Address: P.O. Box 7148, Asheville
Phone: 828-259-5830
Zoning District(s): INST
Zoning Definition: Institutional

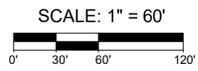
Building Setback Requirements			
	Observed	Required	Notes
Front Yard Setback	158.99 Feet	15 Feet	N/A
Side Yard Setback	27.78 Feet	10 Feet	
Rear Yard Setback	54.94 Feet	10 Feet	

Parking Tabulation			
	Observed	Required	Notes
Regular Spaces	25	NA	N/A
Handicapped Spaces	2	NA	
Total Parking Spaces	27	NA	

Height Restrictions			
	Observed	Max. Allowed	Notes
Maximum Height	47.5 Feet	NA	N/A

Bulk Restrictions			
	Observed	Required	Notes
Lot Area	583.8825sqft	20,000 Sqft	
Coverage Ratio	+2%	80%	
Other:	N/A	N/A	

CREzoning Project #14-0182-18 dated 11/23/14



Encroachment Statement

- (A) Concrete/Asphalt paving extends off subject property. However, these conditions were in existence at the creation of this parcel. (from research performed)
- (B) Pool pump is located if inside property line servicing pool on southern adjoiner.

Flood Note

By graphic plotting only, this property is in Zone(s) X (Minimal Flood Risk) of the Flood Insurance Rate Map, Community Panel No. 3700968800J, which bears an effective date of 01-06-10 and is not in a Special Flood Hazard Area.

Miscellaneous Notes

- (MN1) All field measurements matched recorded dimensions within the precision requirements of ALTA/NSPS specifications unless otherwise shown.
- (MN2) All underground utilities shown were plotted from maps provided and actual above ground location. No underground investigation has been performed.
- (MN3) No evidence of any recent earth moving work, building construction or building additions within the recent months.
- (MN4) No apparent changes in the street right-of-way lines, either completed or proposed. No observed evidence of recent street of sidewalk construction.
- (MNS) No evidence that any portion of the property is being used as a cemetery.
- (MN6) From above ground appurtenances only as shown hereon, electric, gas, sanitary sewer and water lines and/or service is available to the subject property within a dedicated street or easement.
- (MN7) Property has direct access to Riceville Road, a dedicated public right-of-way.

Items Corresponding to Schedule B-2

4. Any right, easement, setback, interest, claim, encroachment, encumbrance, violation, variations or other adverse circumstance affecting the Title disclosed by plat(s) recorded in Plat Book 38, page 107; Plat Book 45, page 170; Plat Book 56, page 98; and Plat Book 192, page 1. **Applies and affects as shown.**
5. Covenants, conditions, restrictions, easements, and liens provided for in Quitclaim Deed filed for record in Book 1041, page 51, and any related maps, plans, bylaws and other document(s) and amendment(s) **Applies and affects. Blanket easements for utilities and maintenance of those lines.**
6. Easements and other matters set forth in Deeds recorded in Book 1082, page 63; Book 1230, page 709; Book 1230, page 714; Book 1547, page 478; Book 1663, page 658; Book 1643, page 153 and as amended in Book 5700, page 44; Book 1756, page 131; and Book 5700, page 26.
DB 1082-63: Offsite.
DB 1230-709: Blanket easements not plotted.
DB 1230-714: Blanket easements not plotted.
DB 1547-478: Parking easement not shown. Parking area destroyed for division requirements
DB 1663-658: Access easement shown. Parking area destroyed for division requirements
DB 1643-153: Access easement shown. Blanket easements not shown.
DB 5700-44: No items plotted.
DB 1756-131: Blanket easements not shown.
DB 5700-26: Blanket easements not shown.
7. Easement(s) to Carolina Power & Light Company recorded in Book 1056, page 103; Book 1117, page 223; Book 1192, page 687; and Book 1192, page 688. **Blanket easements not shown.**
8. Deed of Access and Cross-Utility Easements recorded in Book 1637, page 2; and as amended by Amendment of Deed of Access and Cross-Utility Easements recorded in Book 5700, page 38. **Blanket easements not shown.**
9. Right of Way Easement to Southern Bell Telephone and Telegraph Company recorded in Book 1162, page 692. **Offsite.**



Cain Surveying, P.C.
License No. C-4491
6333 NC 242 South
Bladenboro, NC 28320
Ph: (910) 648-4359
Fax: (910) 648-4389

ALTA/NSPS Land Title Survey

Summit Ridge, Lot #2
70 Riceville Road
Asheville, NC
County of Buncombe

To U.S. Department of Veterans Affairs, (name of insurer, if known), (names of others as negotiated with the client):

This is to certify that this map or plat and the survey on which it is based were made in accordance with the 2016 Minimum Standard Detail Requirements for ALTA/NSPS Land Title Surveys, jointly established and adopted by ALTA and NSPS, and includes Items 1, 2, 3, 4, 5, 7a, 7b1, 8, 11a, 13, 14, 15, & 20 of Table A thereof. The fieldwork was completed on 03/13/19.

Date of Plat or Map: _____

Jimmy F. Cain, PLS
Registered Land Surveyor #L-2498
In the State of North Carolina

Date of Survey	03/13/19
Revision	03/18/19
Revision	
Revision	

LEGAL DESCRIPTION

Lying and being situate in Buncombe County, North Carolina, and being more particularly described as follows:

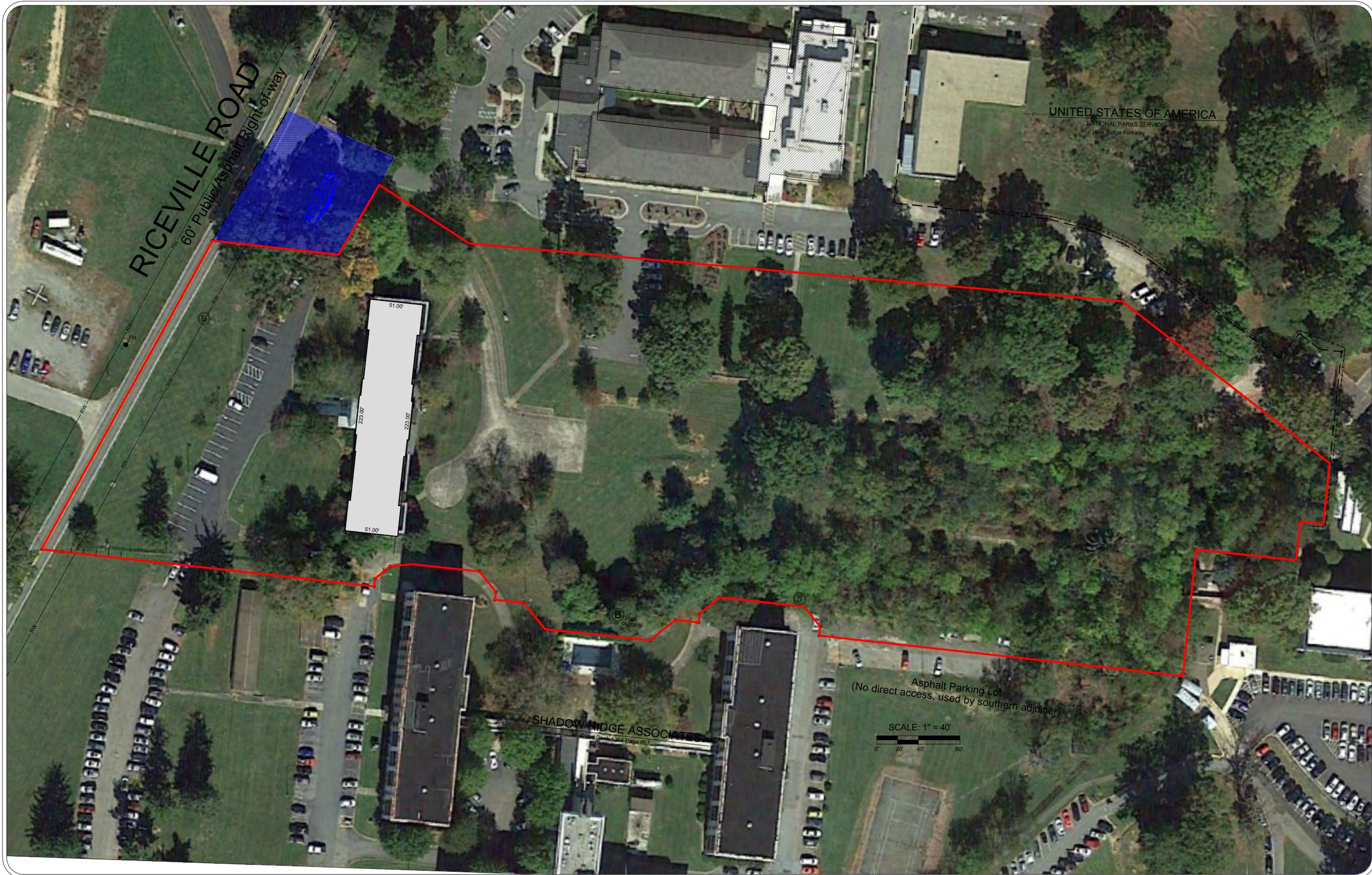
BEGINNING at a point in the centerline of Riceville Road, a projected corner of the Shadow Ridge Associates property as found in Deed Book 1364 Page 667 of the Buncombe County Registry and running thence with the centerline North 29°06'59" East a distance of 338.00 feet to a point; thence leaving the centerline and running South 83°43'05" East a distance of 121.99 feet to a new point; thence with four (4) new property lines: 1) North 30°10'59" East a distance of 77.40 feet to a point; 2) South 57°00'40" East a distance of 103.23 feet to a point; 3) South 84°57'59" East a distance of 630.12 feet to a point; 4) South 52°10'30" East a distance of 252.57 feet to a point on the boundary of the United States of America; thence running with the said USA property the following five (5) courses and distances: 1) South 06°06'28" West a distance of 58.62 feet to a found iron pipe, 2) North 83°42'10" West a distance of 22.07 feet to a found "X" mark, 3) South 06°17'50" West a distance of 37.33 feet to a point, 4) North 83°53'41" West a distance of 96.61 feet to a found iron pipe, a corner of the Shadow Ridge Associates property; thence running with the said Shadow Ridge property the following eighteen (18) courses and distances:

1. North 83°41'23" West a distance of 351.54 feet to a found nail;
2. North 06°06'06" East a distance of 8.44 feet to a found nail;
3. North 38°59'30" West a distance of 24.75 feet to a found rebar;
4. North 83°43'56" West a distance of 81.62 feet to a found iron pipe;
5. South 51°00'42" West a distance of 24.84 feet to a found iron pipe;
6. South 06°19'58" West a distance of 8.29 feet to a found iron pipe;
7. North 83°53'29" West a distance of 22.46 feet to a found iron pipe;
8. South 51°29'00" West a distance of 31.32 feet to a found iron pipe;
9. North 84°02'10" West a distance of 101.37 feet to a found iron pipe;
10. North 39°02'34" West a distance of 32.54 feet to a found iron pipe;
11. North 84°02'16" West a distance of 27.83 feet to a point;
12. North 06°11'59" East a distance of 7.62 feet to a point;
13. North 38°49'47" West a distance of 25.13 feet to a found iron pipe;
14. North 83°57'53" West a distance of 65.63 feet to a point;
15. South 84°12'59" West a distance of 20.58 feet to a point;
16. South 51°11'59" West a distance of 18.81 feet to a point;
17. South 06°11'59" West a distance of 7.36 feet to a found rebar;
18. North 83°40'02" West a distance of 321.72 feet to the POINT AND PLACE OF BEGINNING.

TOGETHER WITH the Access Easement set forth in the Deed recorded in Deed Book 5700, Page 26, Buncombe County Registry, more particularly decry by deeds and bounds as follows:

BEGINNING at a point in the centerline of Riceville Road and running thence with the said centerline North 30°10'59" East 133.00 feet to a point; thence continuing with the said centerline North 27°59'59" East 112.68 feet to a point; thence leaving the centerline and running South 66°15'35" East 112.68 feet to a point; thence running South 30°10'59" West 107.71 feet to a point; thence North 83°43'05" West 121.88 feet to the point and place of BEGINNING. BEING the common Access Easement between Lot 1 & 2 as shown on the plat recorded in Plat Book 192, Page 1, Buncombe County Registry.

THE LANDS SURVEYED, SHOWN AND DESCRIBED HEREON ARE THE SAME LANDS AS DESCRIBED IN THE TITLE COMMITMENT PROVIDED BY CHICAGO TITLE INSURANCE COMPANY, COMMITMENT NO. 19-03727CH, 03/06/19.



RICEVILLE ROAD
60' Public/Asphalt Right-of-Way

UNITED STATES OF AMERICA
NATIONAL PARKS SERVICE
Blue Ridge Parkway

51.00'
223.00'
223.00'
51.00'

SHADOW RIDGE ASSOCIATES
Deed Book 1264 Page 667

Asphalt Parking Lot
(No direct access, used by southern adjiner)

SCALE: 1" = 40'
0' 20' 40' 80'

INITIAL CULTURAL RESOURCE IMPACT PREDICTION

**for the acquisition by the U.S. Department of Veterans Affairs of one parcel
of land located in Asheville, North Carolina**

Submitted by: PRESERVE/scapes Consulting, LLC

Submitted to: the U.S. Department of Veterans Affairs

Date: March 2019

Authors:

Carrie Barton

Historic Preservation Specialist

PRESERVE/scapes Consulting, LLC

Dr. Paul Kreisa, RPA

Senior Archaeologist

Stantec

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I. PUBLIC SUMMARY

The U.S. Department of Veterans Affairs (VA) retained PRESERVE/scapes Consulting LLC to conduct an initial cultural resources impact prediction for a proposed undertaking in Asheville, Buncombe County, North Carolina. Stantec provided a desktop archaeological assessment as part of this study.

The undertaking is defined as the acquisition by VA of an 8.3-acre parcel of land located adjacent to the Charles George VA Medical Center in Asheville. VA proposes the rehabilitation of an existing building on the parcel for use as a Substance Abuse Residential Rehabilitation Treatment Program (SARRTP) facility. The study area is defined by a 0.25-mile radius around the site. These findings are accompanied by the figures in Appendix A of this report.

PRESERVE/scapes finds that there are no potential adverse effects to historic resources based on a scope of acquisition and rehabilitation. Additional study is recommended to determine the potential for archaeological resources within the parcel if future development of the parcel is proposed.

I.A PROPERTY DESCRIPTION

I.A.1 Acquisition Parcel

The acquisition parcel encompasses 8.3 acres located adjacent to the Charles George VA Medical Center (Figure 1). The 8.3-acre parcel consists of one building constructed in 1930 and a mix of maintained lawn, paved access roads and parking lots, and a sparsely forested area to the east. The parcel is bounded by the Evergreen Ridge Apartments to the south, Riceville Road to the west, the Laurels of Summit Ridge healthcare center to the north, and the Medical Center to the east. This 8.3-acre tract is situated between the Blue Ridge Parkway to the north and east, Tunnel Road (U.S. Route 70) to the south, and Riceville Road to the west. The surrounding area includes residential housing, healthcare facilities, and community and governmental facilities, Downtown Asheville is located approximately 5 miles to the east.

The land was historically used as farmland prior to development as the Oteen Medical Center in 1918-1919. The original hospital construction consisted primarily of temporary barracks-style frame structures that served as one of the nation's largest tuberculosis treatment hospitals in the country. Permanent construction replaced the temporary structures starting in 1924, resulting in a more formal complex of masonry structures, many of which were connected by enclosed corridors. The complex spanned both sides of what is now Riceville Road. The west side of the road also includes a row of officers quarters of frame construction that are visible from the parcel.

I.B SUMMARY OF FINDINGS

The findings of this assessment are consistent with the guidance provided in 36 CFR Part 800 implementing Section 106 of NHPA (54 U.S.C. 306108).

1. Definition of Undertaking: VA will acquire an 8.3-acre parcel of land and rehabilitate an existing building on the parcel for use as a SARRTP facility as part of the adjacent Charles George VA Medical Center. Site work will include reuse of the existing access roads and parking lot. No additional development on the parcel is proposed at this time.

2. Definition of Area of Potential Effects: The Area of Potential Effect (APE) is defined as the geographic area within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The APE for this undertaking includes a direct and an indirect APE. The direct APE addresses direct effects associated with the proposed undertaking, including acquisition of the parcel, rehabilitation of an existing building, and site work. The indirect APE addresses potential indirect effects (in this case, visual effects) on historic resources outside the parcel boundaries. The Direct APE for this undertaking is defined by the general boundaries of the acquisition parcel. The Indirect APE for this undertaking is limited to a 0.25-mile radius from a general center point in the parcel. See Figure 40 for the APE boundaries.

3. Identification of historic properties within the APE: The parcel is located within the Oteen Veterans Administration Hospital Historic District, which was listed in the National Register of Historic Places (NRHP) in 1985. There is one extant building on the parcel, which is listed as a Contributing resource to this historic district. The building, now vacant, was constructed in 1930 as part of the second phase of construction of the Oteen Veterans Administration Hospital. The building and surrounding parcel was subsequently transferred to private ownership and renovated for use as senior housing. The building is Contributing and retains sufficient integrity to convey its significance as part of the historic district, but it underwent substantial interior and exterior alterations when it was converted to senior housing. There are no other extant structures from the original hospital located within the boundaries of the parcel, but several remnants from the demolition of previous buildings are extant on the west side of the parcel. The indirect APE consists of both the Historic District and several of its Contributing resources.

A desktop archaeological study concludes that there is moderate potential for the discovery of artifacts from the first phase of construction of the Oteen Medical Center, which consisted of mostly temporary structures built circa 1918. There is low potential for precontact artifacts within the parcel or for artifacts that predate the original hospital construction.

4. Determination of Effects: The proposed acquisition and rehabilitation of an existing building will not have an adverse effect on historic properties within the Direct APE. Because the existing building previously underwent substantial alterations, its historic significance as a Contributing resource lies primarily in the retention of its form and location, as well as basic aspects of its exterior design. The proposed rehabilitation does not include additions, relocation of the building, or substantial exterior alterations that would further diminish its historic integrity. The proposed site work is minimal and limited to the reuse of impervious surfaces and utilities. With a limited scope of reuse and rehabilitation, VA finds that the rehabilitation also not have any adverse visual effects on historic resources within the Indirect APE.

Because no ground disturbance is currently proposed as part of the undertaking, PRESERVE/scapes finds that there is no potential for adverse effects on archaeological resources. Because of the moderate potential for archaeological resources on sections of the acquisition parcel, further archaeological study and investigation would be required to determine the potential for effects on cultural resources in the case that ground disturbance or additional development (including paving) is proposed in the future.

5. Identification of Stakeholders: This action requires a Section 106 consultation process to ensure compliance with the National Historic Preservation Act (NHPA). PRESERVE/scapes anticipates that the North Carolina State Historic Preservation Office (SHPO), housed within the state's Department of Natural and Cultural Resources, will be the primary interested stakeholder in the consultation process based on the scope of the undertaking as defined in this report. Other potential Consulting Parties include:

- North Carolina State Historic Preservation Office
- Catawba Indian Nation
- Eastern Band of Cherokee Indians
- Muscogee (Creek) Nation
- North Carolina Archaeological Society
- Historic Resources Commission for Asheville and Buncombe County
- Preservation Society of Asheville and Buncombe County
- North Carolina Archaeological Council
- Preservation Society of Asheville and Buncombe County
- The Historic Preservation Foundation of North Carolina, Inc.
- Advisory Council on Historic Preservation (in the case of a Finding of Adverse Effect only)

6. Recommendations for Consultation: Based on the existing scope of the proposed undertakings, our recommendations for compliance and consultation include:

- Prepare a submission to SHPO including a cover letter and supporting documentation based on the state's guidelines for environmental review, which are provided online at <https://www.ncdcr.gov> (see Appendix D).

- Conduct additional archaeological study and investigation only in the case that future development is anticipated or proposed for the western portion of the parcel.
- Notify other consulting parties (in addition to SHPO) of the undertaking and findings of the assessment.

If the scope of the action is expanded beyond acquisition and rehabilitation to include any other development of the parcel (including new paving), additional assessment of potential direct and indirect effects on the adjacent historic district and its Contributing resources will be required.

In the case of development, VA must also comply with NAGPRA if any Native American human remains or items of cultural patrimony are encountered. VA must also comply with 36 CFR 800.13(b) (post-review discoveries) if unanticipated archaeological resources are discovered.

I.C PROFESSIONAL QUALIFICATIONS

PRESERVE/scapes consultants contributing to this report meet the professional qualifications for preservation prescribed by the Secretary of the Interior (36 CFR 61, Appendix A). Carrie Barton has a Masters Degree in historic preservation planning and over 14 years of professional experience. Archaeologists contributing to this report meet the professional qualifications for archaeology prescribed by the Secretary of the Interior (36 CFR 61, Appendix A). Dr. Paul Kreisa is in the Register of Professional Archaeologists, received his doctorate in archaeology, and has over 35 years of experience.

II. INTRODUCTION

II.A PURPOSE

PRESERVE/scapes provides the following initial cultural resources impact prediction for the acquisition by the U.S. Department of Veterans Affairs (VA) of an 8.3-acre parcel of land in Asheville, Buncombe County, North Carolina. PRESERVE/scapes provides this report to assess the potential impacts of this action based on information provided by VA, a reconnaissance survey of the site, and research conducted by the PRESERVE/scapes team. The purpose of this report is to assist VA in its compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA) and inform consultation with the North Carolina State Historic Preservation Office (SHPO), which is housed within the North Carolina Department of Natural and Cultural Resources. Stantec assisted in this effort by providing a desktop archaeological assessment for the undertaking.

II.B METHODOLOGY

The following assessment is consistent with 36 CFR Part 800 implementing Section 106 of NHPA (54 U.S.C. 306108).

PRESERVE/scapes completed archival research and on-site investigation to inform this assessment. Research included a review of historic maps and aerial photographs dating between 1900 and 2018, as well as archival materials provided by the Charles George VA Medical Center staff. PRESERVE/scapes also conducted on-site research of project files at the Western Office of the North Carolina Division of Cultural Resources. Stantec reviewed the archaeological resources site file at the Western Office of the North Carolina Office of State Archaeology to identify all reported archaeological sites and prior archaeological investigations conducted within or adjacent to the acquisition parcel. Archaeological site forms and technical reports identified during the site file search were reviewed. Stantec also conducted reviews of the characteristics of the identified soil types and historic maps and aerial photographs dating between 1900 and circa 2017 for the 8.3-acre acquisition parcel.

PRESERVE/scapes conducted a site visit on February 18, 2019 to perform a reconnaissance survey of the parcel and its surroundings and to meet with engineering and archives staff at the adjacent Charles George VA Medical Center.

III. ASSESSMENT

III.A PROPERTY DESCRIPTION

III.A.1 Definition

The acquisition parcel encompasses 8.3 acres located adjacent to the Charles George VA Medical Center (Figure 1). The parcel is bounded by the Evergreen Ridge Apartments to the south, Riceville Road to the west, the Laurels of Summit Ridge healthcare center to the north, and the Medical Center to the east. This 8.3-acre tract is situated between the Blue Ridge Parkway to the north and east, Tunnel Road (U.S. Route 70) to the south, and Riceville Road to the west.

III.A.2 History

The history of the site is based on a review of a series of historic plat maps, topographic maps, and aerial photographs dating from 1900 to 2018.

The initial depiction of the acquisition parcel, on a 1900 USGS topographic map, suggests the area to have been rural and likely in agricultural use (Figure 2). Several structures (likely farm residences) are present to the east and southeast. Few historic maps, plan, or plats encompassing the vicinity of the acquisition parcel could be located, and any historic period occupation of the area before that time is poorly understood.

The land use pattern of the parcel's vicinity changed with the United States' entry into World War I. By early 1918, the Army realized that virtually no available space for tuberculosis patients remained at existing facilities (United States Army Medical Department, Office of Medical History 2019). Plans were made for a facility in the North Carolina mountains on which to construct 60 buildings and house up to 1,000 patients. The Secretary of the Army authorized purchase of 400 acres near Asheville, and the facility, named General Hospital No. 19, was completed by the fall of 1918. A 1918 plan map illustrates six different structures and associated covered walkways, entirely or partially, present within the 8.3-acre acquisition parcel (Figure 4). An undated (but likely late 1910s to 1920s) dated plan of the hospital depicts the same six structures in the acquisition parcel but without the walkways (Figure 5). These are identified as four hospital wards, an administration and receiving building, and a kitchen and mess. The World War I-era construction consisted of frame, barracks-style buildings.

Between 1924 and 1932 many of the original buildings were removed and replaced with more permanent construction. A total of eighteen new buildings were constructed during that period. A 1946 plan (Figure 6) denotes changes to the acquisition parcel that likely occurred during that period. At that point the northernmost three structures depicted on the 1918 plan had been removed and were replaced by parking lots and lawn. Four structures were present in the south

half of the acquisition parcel, including hospital wards, dining hall, and nurses quarters, all linked by covered walkways. Swain and Sumner (1984) indicate that all four structures were constructed between 1930 and 1932. The 1946 arrangement of structures does not change through 1990 (see Figures 6 through 9). The buildings, with the exception of the westernmost structure, were demolished after 1990 when the parcel was transferred to private ownership. The remaining structure is former Ward C, which was constructed in 1930. The structure remains extant within the acquisition parcel today.

III.A.3 Current Conditions

The 8.3-acre parcel consists of one building (former Ward C) constructed in 1930 and a mix of maintained lawn, paved access roads and parking lots, and a sparsely forested area to the east (see Figures 20 through 32). The surrounding area includes residential housing, healthcare facilities, and community and governmental facilities, Downtown Asheville is located approximately 5 miles to the east.

The former Ward C building (also formerly called Building 19 on historic campus maps) was built and used as a women's ward (see Figures 10 through 13 and 20 through 26). The building is typical of the general form and architectural style that characterizes the permanent hospital buildings of the second phase of construction of the Oteen Veterans Administration Medical Center, which took place between 1924 and 1932. The building faces west and fronts on Riceville Road. According to the NRHP nomination for the Oteen Veterans Administration Historic District, the building was designed to accommodate eighty beds. Like many of the other hospital wards within district, Ward C is a bilaterally symmetrical structure, the focal point of which is a central three-story hip-roofed mass flanked by two-story flat-roofed wings. The central section is five bays across, with a three-bay projecting entrance pavilion. Bas-relief swags ornament the spandrels on the pavilion, and a segmental pediment caps the main entrance. A full entablature cornice crowns the two-story wings and continues through the first bay of the central section on either side. The hip-roofed, three-story central section displays its own full entablature cornice. All corners, as well as the pillars between window bays, display rusticated quoining. Ward C was rehabilitated as apartments for senior living circa 1980. State files indicate that the rehabilitation work was not done in accordance with the Secretary of the Interior's Standards. A letter from VA to the North Carolina Department of Cultural Resources in January 1984 state: "Ward C (Building 19), we agree, has not been renovated according to the Secretary's Standards. Not only have some windows been filled in, the dimensions of the remaining window openings have been altered from a vertical to horizontal appearance (in most cases). The porches were originally screen within decorative wooden framing. The present porches retain only the ornamental railings. The present entrance and porch shelter appear to be totally new with a ribbed metal roof. The stairs and railings do not appear to be either original or to match the original design. While some of what appear to be original window sills remain (in the bays to either side of the entrance)

most of the sills and all of the lintels appear to have been lost. Single panes have replaced the multiple light windows. From the photograph, it is not possible to tell whether relief swags remain over the entrance, The color scheme has been changed from a single color to a contrast of colors. While this does emphasize the quoins it also changes the entire character of the building. The same can be said for the light color ornamental doors onto the porches.” Based on an interior survey, the entirety of the building’s interior was gutted, and little or no historic fabric remains (see Figures 25-26). Despite these alterations, the basic form of the building and its exterior features were preserved.

Areas of the parcel located east of former Ward C contain remnants of previously demolished hospital construction, including remnants of Wards D and F (Buildings 20 and 16, respectively), the dining and mess hall (Building 10), and several enclosed corridors that connected the buildings. Extant remnants are primarily comprised of rubble from demolition, sections of foundation walls, and sections of entrance stairs (see Figures 28, 29, and 32). Several paved walkways also remain. Directly east of the parcel is land owned by the Charles George VA Medical Center, which is separated from the parcel by a metal fence. The former Ward E building (Building 15) and a partially demolished section of an enclosed corridor that connected Wards F and E are extant directly east of the parcel. The former Ward E building is currently occupied by VA Medical Center operations.

III.B DEFINITION OF UNDERTAKING

VA will acquire the 8.3-acre parcel of land and rehabilitate the existing building (former Ward C) on the parcel for use as a Substance Abuse Residential Rehabilitation Treatment Program (SARRTP) facility as part of the adjacent Charles George VA Medical Center. Site work will include reuse of the existing access roads and parking lot. No additional development on the parcel is proposed at this time.

III.C DEFINITION OF AREA OF POTENTIAL EFFECT

The Area of Potential Effect (APE) is defined as the geographic area within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The APE for this undertaking includes a direct and an indirect APE. The direct APE addresses direct effects associated with the proposed undertaking, including acquisition of the parcel, rehabilitation of an existing building, and site work. The indirect APE addresses potential indirect effects (in this case, visual effects) on historic resources outside the parcel boundaries. The Direct APE for this undertaking is defined by the general boundaries of the acquisition parcel. The Indirect APE for this undertaking is limited to a 0.25-mile radius from a general center point in the parcel. See Figure 40 for the APE boundaries.

III.D IDENTIFICATION OF HISTORIC AND CULTURAL RESOURCES

III.D.1 Identification and Evaluation of Historic Resources

The entirety of the acquisition parcel is located within the Oteen Veterans Administration Hospital Historic District (Historic District), which was listed in the National Register of Historic Places in 1985. The Historic District spans the east and west sides of Riceville Road and comprises much of the original area of the historic hospital (see Figure 39). The building extant on the parcel, the former Ward C hospital building, is a Contributing resource to the Historic District. There are no other extant resources within the parcel boundaries that are listed as Contributing, but there are several remnants of Contributing buildings that were previously demolished: Ward D (Building 20), Ward F (Building 16), the Dining/Mess Hall (Building 10), and several enclosed corridors that connected the hospital buildings. These buildings were extant at the time the Historic District was designated but were removed circa 1990. See Figure 38 for a 1946 campus map showing the locations of these buildings. See Figures 14 through 19 for photographs of these buildings prior to their demolition.

The Historic District and several of its Contributing resources are located within the Indirect APE. Directly south of the acquisition parcel is a cluster of former hospital buildings (Buildings 17, 18, and 1), all of which are Contributing to the Historic District (see Figures 33 and 35). These buildings are used as the Evergreen Ridge Apartments, a privately owned senior housing development. The Evergreen complex obscures views from the acquisition parcel to much of the development located further south and associated with the Charles George VA Medical Center.

Directly east of the acquisition parcel is the former Ward D building (Building 15), which is owned and occupied by VA and Contributing to the Historic District. Connected to Ward D is a partially demolished section of an enclosed corridor that connected Ward D to the now demolished Ward F building.

To the west of the acquisition parcel, across Riceville Road, is a row of frame residences that were historically built and used as staff quarters for the hospital, as well as two former nurse's quarters (Buildings 9 and 13), which are large masonry structures resembling the form and design of the hospital wards (see Figures 36 and 37). All of these resources are Contributing to the Historic District. None of the development located west of these resources and within the Indirect APE is visible from the acquisition parcel.

Directly north of the acquisition parcel is the Laurels of Summit Ridge, a senior living facility. The primary Laurels facility is of modern construction but incorporated Building 25 from the Oteen development, which is identified on a 1946 campus map as the hospital fire department garage and quarters. Building 35, one of the hospital's warehouses, is also still extant and used by the Laurels development (see

Figure 34). Both Buildings 25 and 35 are identified as Contributing to the Historic District. None of the resources located north of the Laurels property and within the Indirect APE are visible from the acquisition parcel because of the Laurels development and a vegetative buffer.

III.D.2 Identification and Evaluation of Cultural Resources

III.D.2.A Site File Review

A review of the North Carolina archaeological resources site file was conducted at the Western (Asheville) office of the North Carolina Office of State Archaeology, Department of Natural and Cultural Resources, during February 2019. The site file was reviewed for the presence of known archaeological sites and archaeological investigations conducted within approximately 1-mile of the 8.3-acre VA acquisition parcel. The site file review indicated that the acquisition parcel had not been previously surveyed for the presence of archaeological resources. As such, no known archaeological sites are present within the 8.3-acre parcel. However, several nearby areas have been surveyed for archaeological resources and seven archaeological sites have been identified within 1 mile or less of the 8.3-acre acquisition parcel.

The archaeological resources site file review indicated that the acquisition parcel had not been surveyed for the presence of archaeological resources, although five archaeological surveys have been conducted within 1-mile of the 8.3-acre parcel.

The earliest survey consists of a short letter report on the results of surveys at four alternatives for a proposed folk arts center along the Blue Ridge Parkway (Dorwin 1975). Closest to and within 1-mile of the 8.3-acre acquisition parcel were Alternatives 1 and 2. The parcels were surveyed by excavating what is described as a shovel scrape, conducted at 50- to 100-foot intervals, to determine if Native American artifacts were present. No archaeological artifacts or resources were identified within Alternative 1, the selected alternative. Alternative 2 yielded both a projectile point (undated) and pottery dating to the Late Woodland period. This location was registered as archaeological site 31BN337. The other two alternatives are located greater than 1-mile from the 8.3-acre parcel.

Next, the National Park Service (Walker 1988) reported on a survey of the Mountain-to-Sea Trail Corridor within the Blue Ridge Parkway. Eight trail sections were surveyed as part of that effort. The section closest to the 8.3-acre parcel is the Folk Art Center to Swannanoa River Bridge section. A walkover survey of the recently completed trail section was conducted, excepting agricultural land on the river floodplain. No archaeological sites were located although it was noted that locations in agricultural fields within the river floodplain had topographic similarities to known Pre-Contact Native American site locations.

Kimball (1991) reports on the survey of a 250-x-300 ft tract located just northwest of the 8.3-acre acquisition parcel that was investigated prior to construction of a

booster pump station. The survey was conducted on an upland slope and adjacent floodplain of an unnamed tributary of the Swannanoa River. Survey consisted of a pedestrian walkover of the entire parcel and the excavation of 24 small-bore core holes at 50-foot intervals. No archaeological sites were located as a result of the survey.

Kimball (1995) also undertook a buried archaeological site survey of selected locations along the Swannanoa River. Kimball (1995) used the known archaeological site 31BN29, situated on the floodplain of the Swannanoa River, to create a model of subsurface site burial. The one location tested within 1-mile of the 8.3-acre parcel was known archaeological site 31BN8. Backhoe trenches were excavated within the site limits and a complex stratigraphic profile, with several strata containing Pisgah Phase ceramics, was recorded. Uncarbonized wood fragments found at 4.5 m below surface yielded a radiocarbon date of AD 260 ±50.

Finally, in 2012 TRC Environmental Corporation conducted an archaeological survey and geomorphic assessment for the Lake Craig flood management project, and a portion of the project area extended to within 1-mile of the 8.3-acre acquisition parcel. The survey tract consisted of the former Lake Craig, a dammed lake that was drained in 1952. Geomorphic assessment of the area indicated that there was little to no potential for the presence of Pre-Contact Native American archaeological sites.

Seven archaeological sites have been identified within a 1-mile radius of the VA Acquisition parcel (Table 1). Of this number, three were identified by members of the public, two were reported as part of Section 106 compliance projects, and one was located during a youth training exercise. The final site, 31BN733, appears to have been located during a Section 106 project but a site form was not submitted to the Office of State Archaeology. None of the seven sites have been evaluated for listing in the NRHP.

Of the seven sites, three (31BN8, 31BN121, and 31BN983) are located to the south of the acquisition parcel along the Swannanoa River. Two of these sites are prehistoric Native American while the third is the remains of an historic mill. The remaining four are all located in the uplands north of the river but appear to be situated quite close to intermittent drainages. All four are prehistoric Native American sites at least two of which are described as being short-term, limited activity, habitation sites. One (31BN154) also contains remains associated with a YCC camp. Based on this pattern, it appears that larger, more intensively occupied Native American archaeological sites are to be expected on terrace and floodplain formations along the Swannanoa River or larger tributaries, while smaller and less intensively occupied sites are situated in the nearby uplands, such as the location of the VA Acquisition Parcel.

Table 1. Archaeological sites located within 1 mile of the VA Acquisition Parcel.

Site	Resource Type	Time Period	NRHP Assessment
31BN8	Unidentified	Middle Archaic and unidentified components	Assessment not conducted
31BN121	Unidentified	Prehistoric Native American	Assessment not conducted
31BN154	Short-term Habitation; Limited Activity; YCC Camp	Early Archaic, Late Archaic, Early Woodland; Historic	Assessment not conducted
31BN200	Limited Activity	Middle Archaic, Late Archaic, unidentified Woodland	Assessment not conducted
31BN337	Unidentified	Late Woodland and unidentified components	Assessment not conducted
31BN733	Unidentified	Prehistoric Native American	Assessment not conducted
31BN983	Mill	Ca. 1858–1920s	Assessment not conducted

III.D.2.B Review of Soil Data

The online Web Soil Survey maps three soil types for the 8.3-acre VA acquisition parcel (Web Soil Survey 2019). The main soil type is Udorthents-Urban land, 2 to 50 percent slopes. The Udorthents classification indicates some level of disturbance within the mapped soil type, while the 2 to 50 percent slope designation indicates that the area has a significant side slope of an upland landform. The Udorthents soil type has a characteristic profile of cobbly sand loam C horizon soils on the surface to 80 inches below surface. A smaller area of Tate-Urban land complex, 2 to 8 percent slopes, is present along Riceville Road. This soil type occurs as a slope base, in keeping with the sloped designation of the adjacent Udorthents-Urban land, 2 to 50 percent slopes, soil type. The Tate-Urban land complex 2 to 8 percent slopes, is found along stream terraces, benches, or fans and consist of a 7-inch thick loam A horizon followed by clay loam Bt horizon soils to 46 inches, and finally fine sandy loam C horizon soils. Lastly, hard surfaced areas are classified as Urban land. No data is available for the soils below these hard-surfaced areas.

These soil type descriptions suggest that any archaeological resources that may have been present within the areas mapped as Udrthents-Urban land, 2 to 50 percent slopes have likely been disturbed or destroyed. Potential archaeological resources could be present in the area mapped as Tate-Urban land complex, 2 to 8 percent slopes, within approximately 7 inches of the ground surface. Below, the Bt and C horizon soils pre-date the entrance into the New World of Native Americans. Disturbance by Riceville Road and utilities construction, as well as parking lots, within the area mapped as Tate-Urban land complex, 2 to 8 percent slopes, soils, would have diminished the integrity of any archaeological resources present.

III.E ASSESSMENT OF EFFECTS

PRESERVE/scapes recommends a finding of No Adverse Effect based on the scope of acquisition and adaptive reuse of the existing building.

III.E.1 Potential Effects on Historic Resources

The proposed acquisition and rehabilitation of an existing building will not have an adverse effect on historic properties within the Direct APE. Because the existing building previously underwent substantial alterations, its historic significance as a Contributing resource lies primarily in the retention of its form and location, as well as basic aspects of its exterior design. The proposed rehabilitation does not include additions, relocation of the building, or substantial exterior alterations that would further diminish its historic integrity. The proposed site work is minimal and limited to the reuse of impervious surfaces and utilities. No new paving is proposed.

With a limited scope of reuse and rehabilitation, VA finds that the undertaking will not have any adverse visual effects on historic resources within the Indirect APE. The undertaking does not include changes to the existing building's footprint or massing or any new development that would affect views to or from surrounding historic resources.

III.E.2 Potential Effects on Cultural Resources

The archaeological assessment for 8.3-acre Asheville VA acquisition parcel was based on a review of historic maps, soils, proximity to sources of water, soils characteristics, degree of prior disturbance, the results of previous archaeological investigations, and the presence, location, and nature of previously identified archaeological sites within or near the acquisition parcel.

Historic maps suggest that no structures or significant pre-World War I occupation of the parcel occurred. World War I-era structures were constructed across almost the entire parcel, with all demolished during the early 1930s. The northern half of the 8.3-acre acquisition parcel was then reconfigured as lawns and parking lots while the southern half was used to construct a dining hall and hospital wards. These structures remained until the 1990s.

Known Pre-Contact Native American sites in the vicinity of the 8.3-acre parcel are either located in floodplain or terrace settings along the Swannanoa River and larger tributaries or in uplands adjacent to tributary streams of the same river. Similar tributary stream ravines to the east and southeast of the 8.3-acre parcel. Larger sites with dense artifact concentrations are more typical of the floodplain and terrace settings while smaller sites with few artifacts are more characteristic of the upland settings. This would suggest that the 8.3-acre parcel should have a moderate potential for the presence of small, low artifact density, Pre-Contact Native American sites. However, the sequential episodes of construction and demolition within the parcel, starting in 1918, would indicate that any such resources, if present, likely have either been destroyed or lack context and integrity. The soil type descriptions for the parcel also suggest a generally significant degree of prior disturbance with the possible exception of areas along Riceville Road and in the north half of the parcel.

A review of historic maps suggests that there is little potential for pre-World War I-era structures within the 8.3-acre parcel. Demolition and rebuilding sequences also suggest that there is little potential for structure remains or artifact deposits in the south half of

the parcel. Those present in the south half were demolished and in ca. 1930 structures larger in scale and degree of associated subsurface disturbance were constructed in the same location. The ca. 1930 structures were documented and found to be contributing resources of the Oteen Hospital National Register of Historic Places District. These structures were in turn demolished at some point after 1984.

This second construction (1930) and demolition (post-1990) event did not occur within the north half of the parcel. There, upon demolition of the World War I-era structures, the area was repurposed as lawn and parking lots.

This sequence of demolition and construction suggests that any archaeological deposits or structure remains associated with the World War I structures in the south half of the parcel have likely been destroyed by the 1930 construction episode. The lack of subsequent construction in the north half of the parcel suggests that there remains a potential for World War I-era archaeological deposits and structure remains in that portion of the 8.3-acre parcel.

III.F IDENTIFICATION OF STAKEHOLDERS

VA must conduct Section 106 consultation with the SHPO and other Consulting Parties for compliance with NHPA. The North Carolina SHPO is housed in the North Carolina Department of Natural and Cultural Resources. The SHPO provides guidance to government agencies planning projects within the state. The North Carolina SHPO provides specific guidance for the documentation required to initiate Section 106 review (see Appendix D).

For a list of potential stakeholders that will require notification and potential consultation regarding this undertaking, VA can refer to the list provided in Appendix B.

III.G RECOMMENDATIONS FOR ADDITIONAL STUDY

Because of the thorough documentation provided in the NRHP nomination for the Historic District, PSC does not recommend additional architectural survey for this undertaking.

Based on the low probability for the presence of intact archaeological resources within the south half of the 8.3-acre acquisition parcel, Stantec recommends that no further archaeological investigations are warranted. However, there is a moderate potential for archaeological deposits and features associated with the World War I-era hospital structures in the north half of the parcel. In the case that ground disturbance or additional development (including paving) is proposed in the future, Stantec recommends a Phase I archaeological survey to determine whether intact archaeological resources are present.

PSC recommends that VA proceed with initiating Section 106 consultation with the SHPO and other stakeholders listed in Appendix B. The letter should notify them of the

proposed undertaking and follow the documentation guidance found in Appendix D of this report.

In the case of development, VA must comply with NAGPRA if any Native American human remains or items of cultural patrimony are encountered. VA must also comply with 36 CFR 800.13(b) (post-review discoveries) if unanticipated archaeological resources are discovered.

Any future changes or additional development will require further Section 106 review and consultation and a continuation of the assessment of effects on historic and cultural resources based on the scope of the proposed undertaking.

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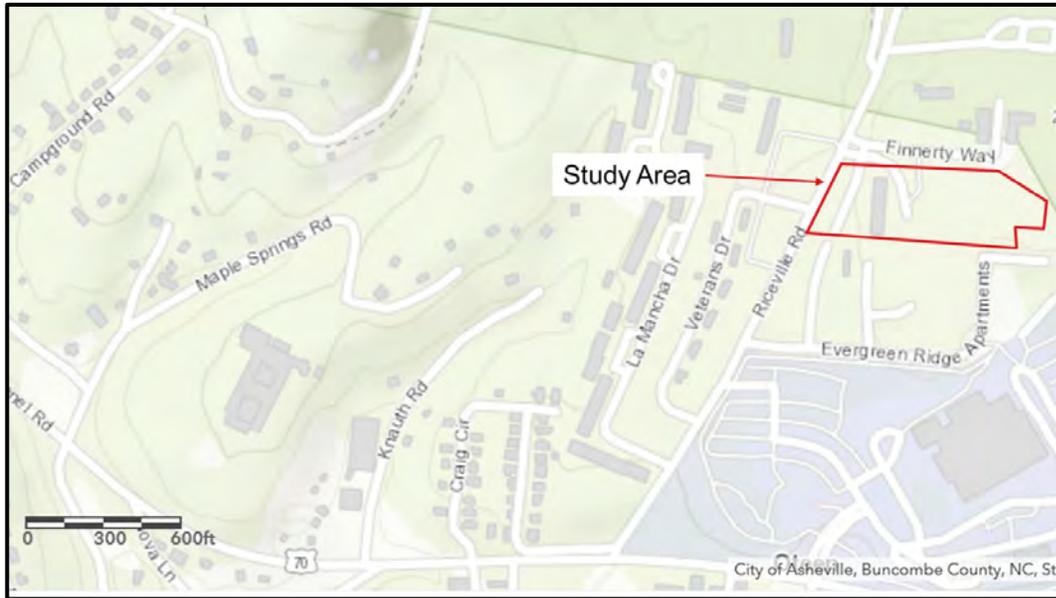


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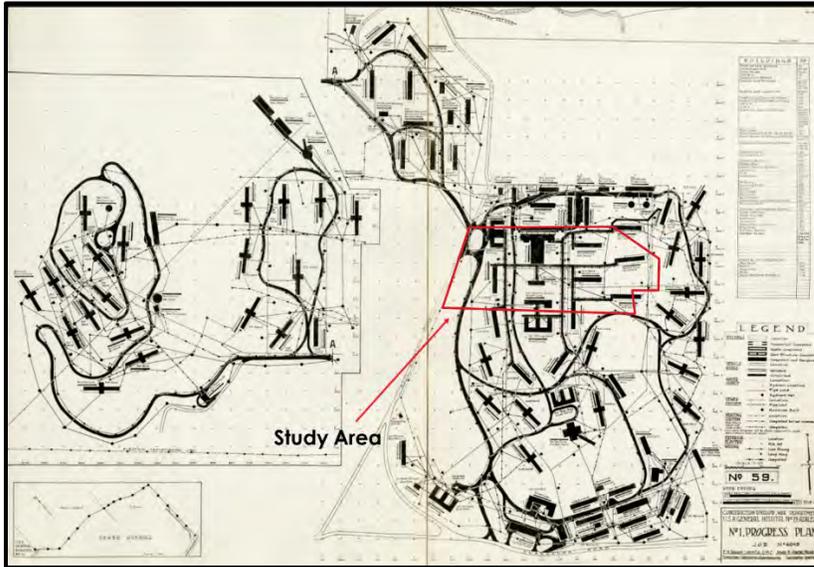


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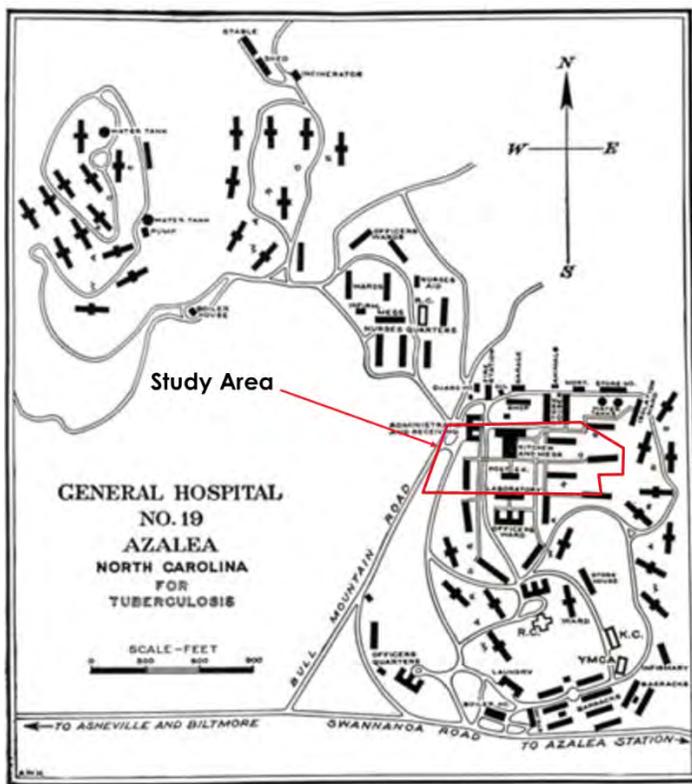


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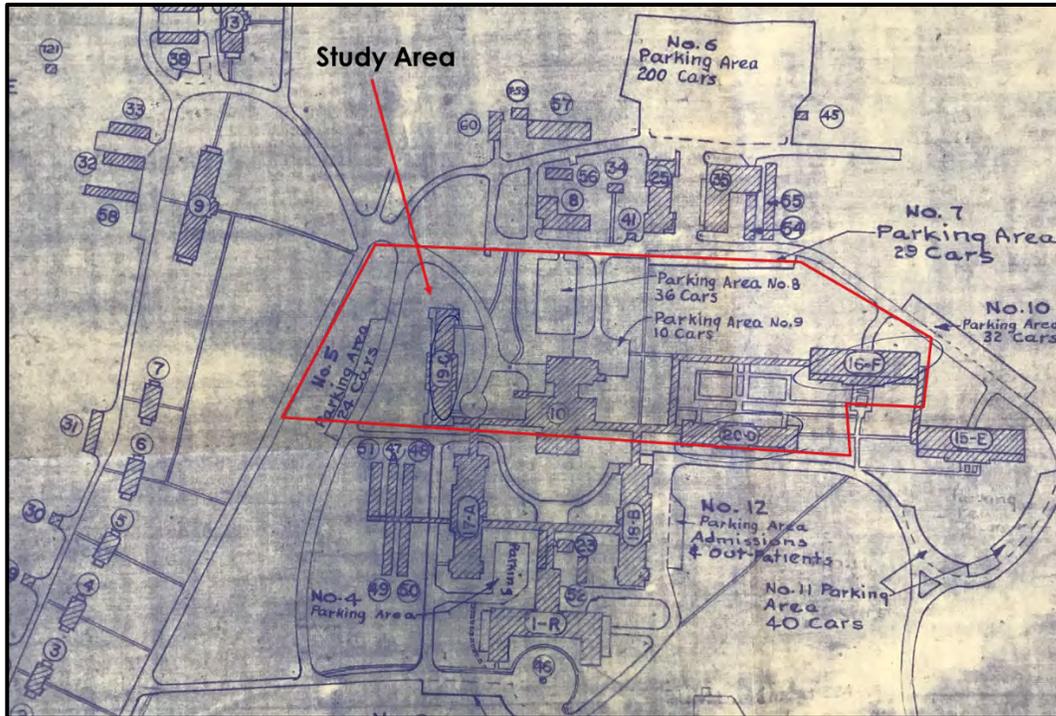


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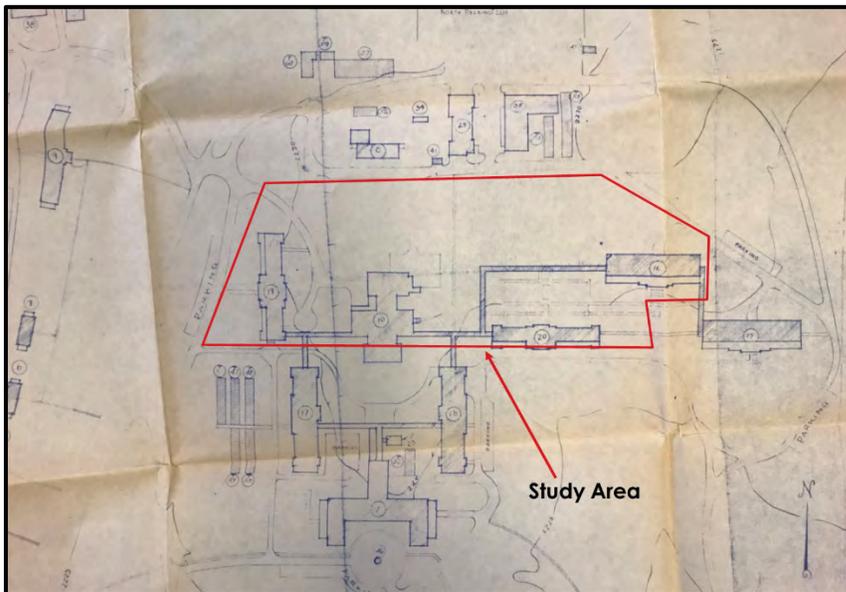


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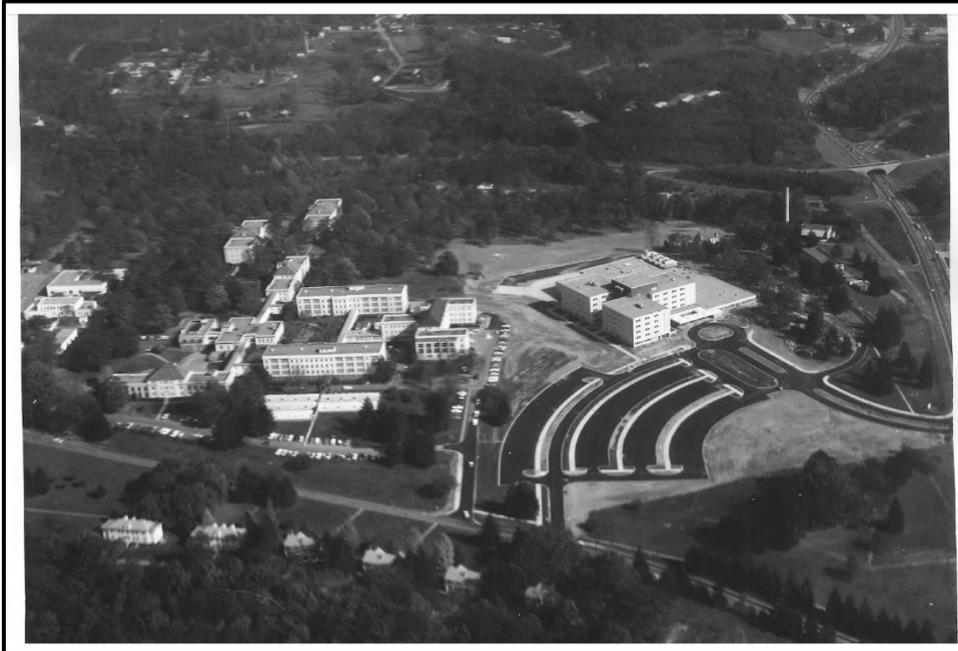


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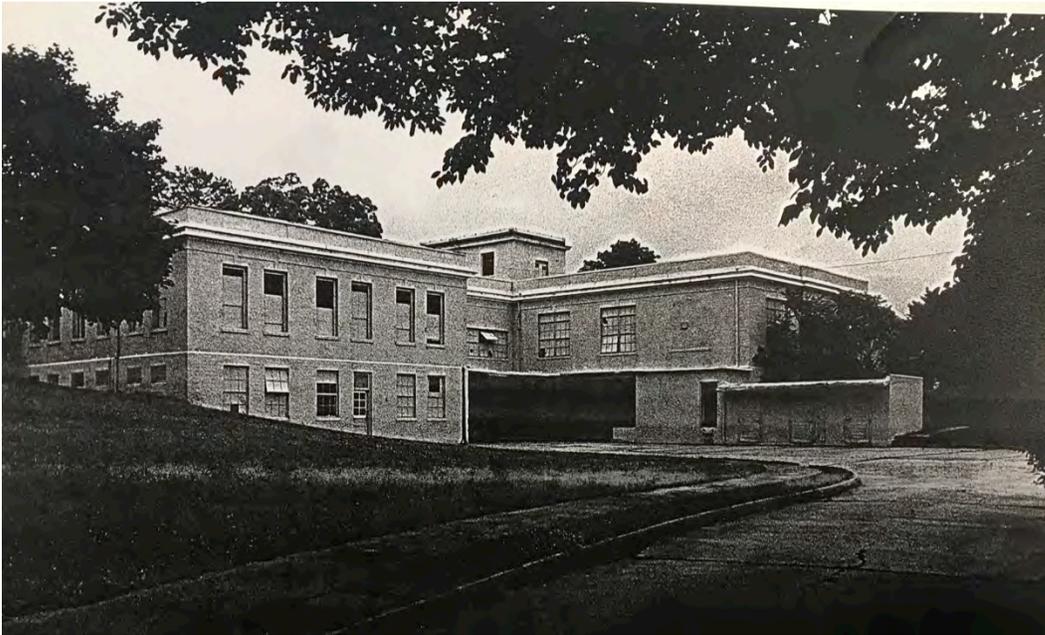


Figure 14 May 1984 photograph of the Kitchen and Dining Hall (Building 10) that was previously located on the acquisition parcel and demolished circa 1990. Looking southeast. (NRHP nomination file for Oteen Veterans Administration Hospital Historic District, North Carolina Division of Cultural Resources Western Regional Office).



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Figure 16 May 1984 photograph of the former Ward F building (Building 16) that was previously located on the acquisition parcel and demolished circa 1990. Looking northeast. (NRHP nomination file for Oteen Veterans Administration Hospital Historic District, North Carolina Division of Cultural Resources Western Regional Office).



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Figure 18 May 1984 photograph of one of the connecting corridors previously located on the acquisition parcel and demolished circa 1990. Identified as a corridor located to the west of the former Ward F building. Looking north. (NRHP nomination file for Oteen Veterans Administration Hospital Historic District, North Carolina Division of Cultural Resources Western Regional Office).



Figure 19 May 1984 photograph of a walkway located to the west of the former Ward F building on the acquisition parcel. Looking east from Ward F. (NRHP nomination file for Oteen Veterans Administration Hospital Historic District, North Carolina Division of Cultural Resources Western Regional Office).



Figure 20 Front elevation of Ward C (Building 19), view looking east from Riceville Road (PRESERVE/scapes, February 2019)



Figure 21 Front elevation of Ward C (Building 19), view looking northeast from Riceville Road (PRESERVE/scapes, February 2019)



Figure 22 Existing parking lot west of Ward C (Building 19), looking north (PRESERVE/scapes, February 2019)



Figure 23 Rear elevation of Ward C (Building 19), view looking northwest from southern edge of acquisition parcel (PRESERVE/scapes, February 2019)



Figure 24 Rear elevation of Ward C (Building 19), view looking south west from northern edge of acquisition parcel. Existing paving in foreground. (PRESERVE/scapes, February 2019)



Figure 25 View of interior alterations of porch area of Ward C (Building 19), (PRESERVE/scapes, February 2019)



Figure 26 View of interior alterations of Ward C (Building 19), (PRESERVE/scapes, February 2019)



Figure 27 View of eastern section of acquisition parcel, west of Ward C (Building 19), looking east (PRESERVE/scapes, February 2019)



Figure 28 View of building remnants on the eastern section of acquisition parcel, west of Ward C (Building 19), looking northeast (PRESERVE/scapes, February 2019)



Figure 29 View of building remnants on the eastern section of acquisition parcel, west of Ward C (Building 19), looking northeast (PRESERVE/scapes, February 2019)



Figure 30 View of walkways on eastern section of acquisition parcel, west of Ward C (Building 19), looking west (PRESERVE/scapes, February 2019)



Figure 31 View looking west from eastern edge of acquisition parcel, Ward C(Building 19) seen in background, private development to the right (north) (PRESERVE/scapes, February 2019)



Figure 32 View of rubble pile located west of Ward C (Building 19) (PRESERVE/scapes, February 2019)



Figure 33 View of Evergreen Ridge development looking south from acquisition parcel
(PRESERVE/scapes August 2018)



Figure 34 View of Laurels at Summit Ridge development looking north from acquisition parcel
(PRESERVE/scapes August 2018)



Figure 35 View of former Ward A (Building 17), which is now part of the Evergreen Ridge development, looking southeast from acquisition parcel (PRESERVE/scapes August 2018)



Figure 36 View of quarters buildings located west of Riceville Road, view looking southwest from western edge of acquisition parcel (PRESERVE/scapes February 2019)



Figure 37 View of nurse's quarters 9 (left) and 13 (right) located west of Riceville Road, view looking northwest from western edge of acquisition parcel (PRESERVE/scapes February 2019)



Figure 38 1946 Campus map of Oteen Veterans Administration Hospital (courtesy of the North Carolina Division of Cultural Resources Western Regional Office)

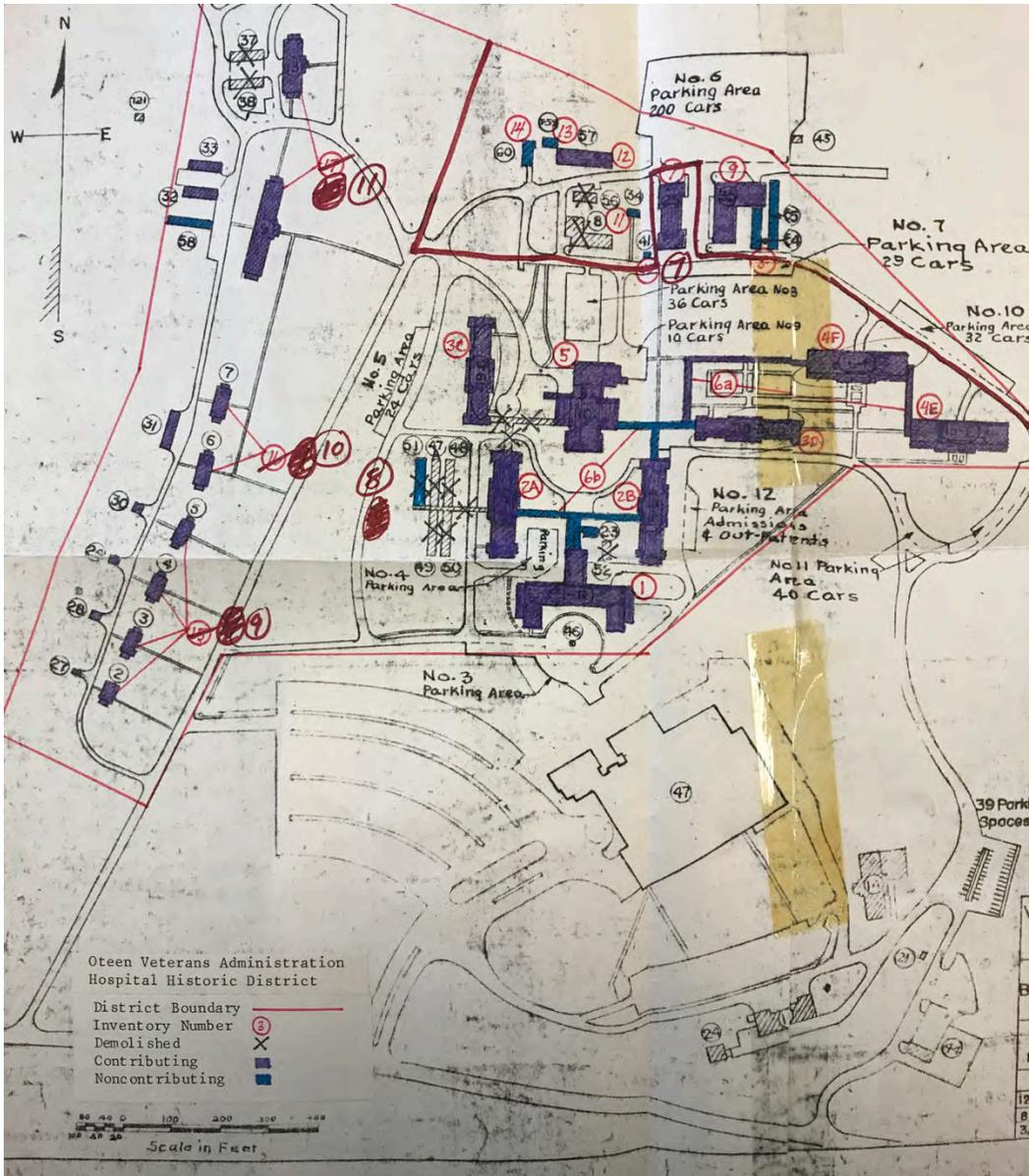


Figure 39 Map of Oteen Veterans Administration Hospital Historic District (courtesy of the North Carolina Division of Cultural Resources Western Regional Office)

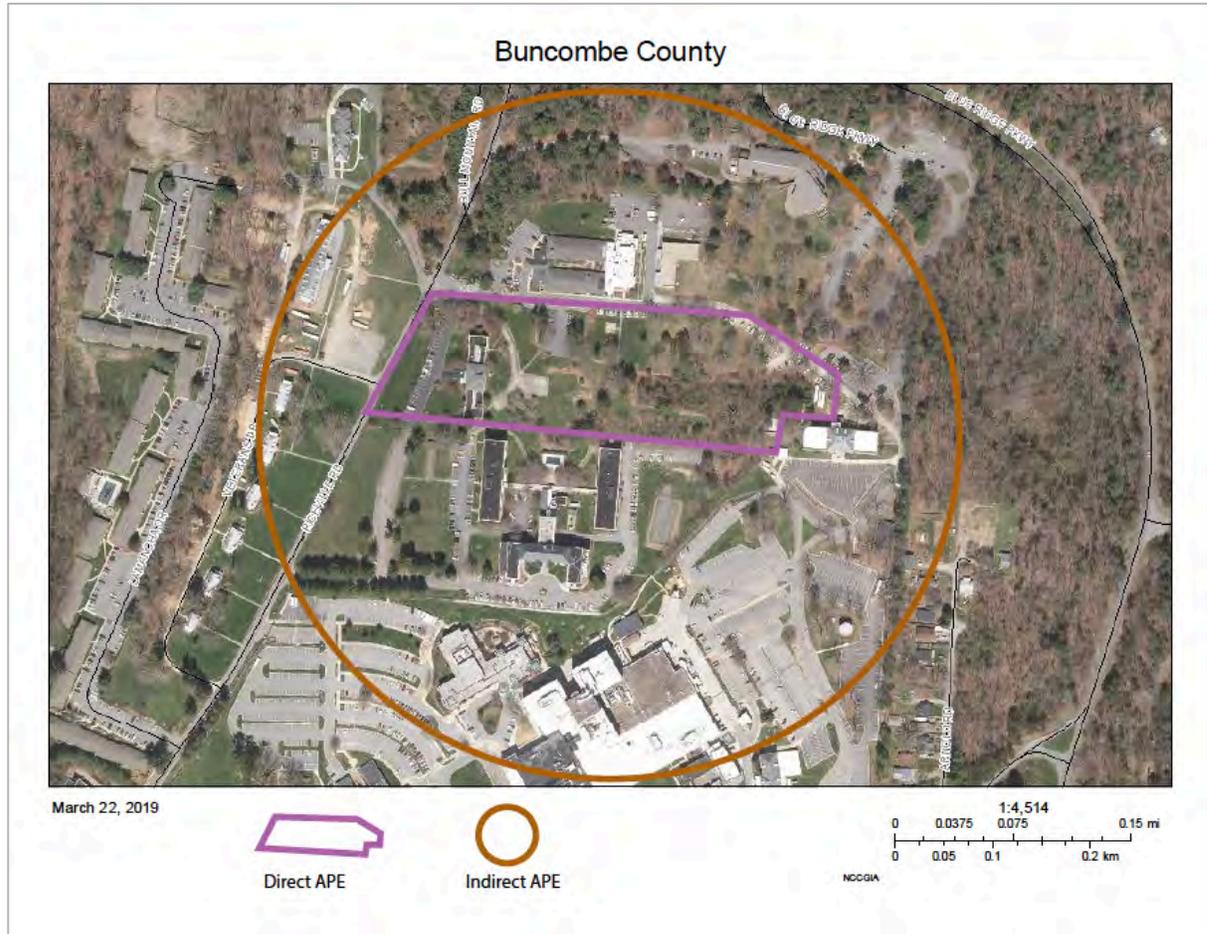


Figure 40 APE Map. Direct APE reflects the general boundaries of the acquisition parcel. The Indirect APE is defined by a .25-mile radius from the center point of the acquisition parcel. Base map provided by www.gis.buncombecounty.org.

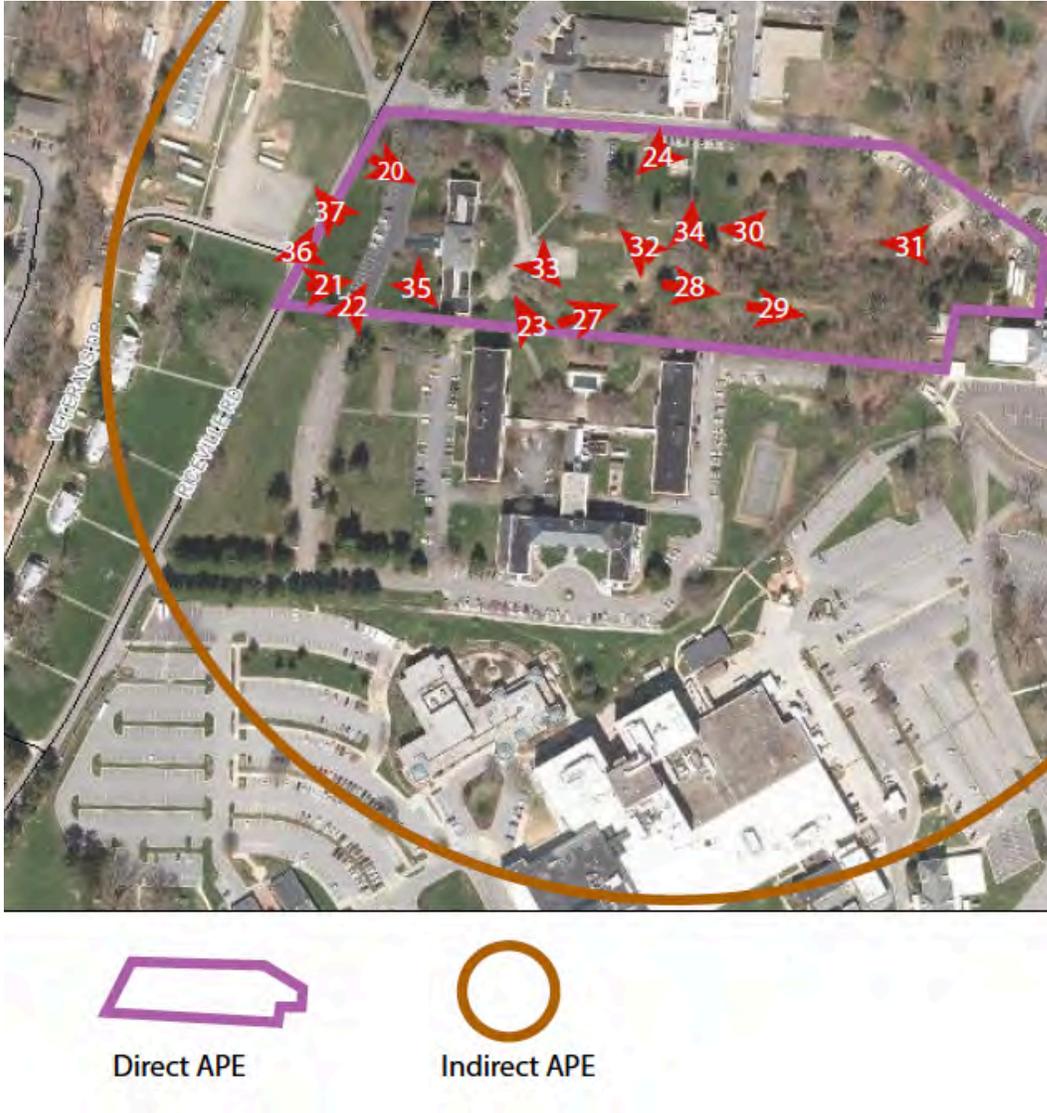


Figure 41 Photo key

APPENDIX B: Stakeholders

All consultation letters and correspondence should be sent by senior VA staff.

STATE HISTORIC PRESERVATION OFFICE

Address cover letter to:

Ramona Bartos

Administrator and Deputy State Historic Preservation Officer
North Carolina State Historic Preservation Office
4617 Mail Service Center
Raleigh, NC 27699-4617

Mail submission to:

Renee Gledhill-Earley

State Historic Preservation Office
4617 Mail Service Center
Raleigh, NC 27699-4617
Environmental.Review@ncdcr.gov

TRIBAL HISTORIC PRESERVATION OFFICERS

(Based on the online U.S. Department of Housing and Urban Development's Tribal Directory and Assessment Tool, search completed March 2019 for Buncombe County, North Carolina).

Catawba Indian Nation

Dr. Wenonah G. Haire
Tribal Historic Preservation Officer
1536 Tom Steven Road
Rock Hill, SC 29730
(803) 328-2427 ext. 224
wenonah@ccppcrafts.com
<http://www.catawbaindian.net/>

Eastern Band of Cherokee Indians

Russell Townsend
Tribal Historic Preservation Specialist
PO Box 455
Cherokee, NC 28719
(828) 554-6851
rustown@nc-chokeee.com

<http://nc-cherokee.com/>

Muscogee (Creek) Nation

RaeLynn Butler
THPO
PO Box 580
Okmulgee, OK 74447
(918) 732-7678
section106@mcn-nsn.gov
www.muscogeenation-nsn.gov

OTHER

North Carolina Archaeological Society

c/o Research laboratories of Archaeology
Campus Box 3120
University of North Carolina
Chapel Hill, North Carolina 27599

Historic Resources Commission for Asheville and Buncombe County

Alexandra Cole, Historic Resources Specialist
PO Box 7148
Asheville, North Carolina 28802

Preservation Society of Asheville and Buncombe County

324 Charlotte Street
Asheville, North Carolina 28801

North Carolina Archaeological Council

No address or contact listed
See www.rla.unuc.edu/ncac/

Preservation Society of Asheville and Buncombe County

Jack Thomson
Executive Director
324 Charlotte Street
Asheville, NC 28801
(828) 254-2343
director@psabc.org

The Historic Preservation Foundation of North Carolina, Inc.

Ted Alexander
Regional Director, Western Office
2 1/2 E. Warren Street, Suite 8

PO Box 2
Shelby, NC 28151-0002
Office: 704-482-3531
talexander@presnc.org

APPENDIX D: GUIDELINES FOR ENVIRONMENTAL REVIEW

The North Carolina State Historic Preservation Office (SHPO) provides the following guidelines for submitting projects to SHPO for environmental (Section 106) review. These guidelines are provided on the SHPO's website: (<https://www.ncdcr.gov/state-historic-preservation-office/environmental-review/environmental-review-submission-process-0>)

Project Review Checklist

To initiate the [North Carolina State Historic Preservation Office's](#) (SHPO) review of projects subject to applicable federal and/or state cultural resources protection laws, including Section 106 of the [National Historic Preservation Act](#) and North Carolina [General Statute 121-12\(a\)](#), submit the following project information. Please allow 30 days from receipt of a completed submission for the SHPO's review; incomplete submissions will be returned. Additional information may be required. Unless directed otherwise, submit all projects separately and include all information and attachments on 8½" × 11" paper or by e-mail.

The SHPO's comments will address projects with potential effects to archaeological properties (land and underwater) and include comments from the Office of State Archaeology. Separate submittals for archaeological impacts are not necessary.

For all [cell tower reviews](#) or [borrow pit/waste area reviews](#) please use the

Project Name

- If this project has been previously reviewed by the North Carolina ##### or CH ##-#####).

Project Location

- Address
- City
- County

Project Contact Information

- Name
- Company
- Address
- Phone/Fax/E-Mail

Project Description

- Provide a detailed description of the proposed project, including the acreage of the project area.
- List all licenses, permits, approvals, grants, or funding sought from federal and/or state agencies.
- Describe all historic properties (buildings, structures, districts, archaeological sites, or designed landscape features that are listed in, or eligible for listing in, the National Register of Historic Places, or that are 50 or more years old) and located within or immediately adjacent to the project area. Include photographs of all historic properties. For more information on the location of historic properties, see the SHPO's new online GIS Mapping Application at gis.ncdcr.gov/hpoweb/. Be sure to check each of the HPOGIS Layers (National Register, Study List, etc.) within your project area.
- If the project proposes to rehabilitate, alter, remove, or demolish any historic property within the project area, provide a description of the historic property's current condition and the proposed renovations.
- Describe any proposed sale, transfer, or lease of historic properties within the project area.
- If known, describe past usage of the project area, including any ground disturbance that has taken place.
- Describe all proposed ground-disturbing activity within the project area, including the nature, dimensions (length, width, and depth), and exact location.

Project Area Map

- Submit a map showing the proposed project area. Road names must be legible. Where available, provide state road numbers (SR 1234, NC 24, etc.) For projects in urban areas, please use a city map or tax parcel map.
- All projects that propose ground-disturbing activity must also include a U.S. Geological Survey (USGS) topographic map (or map excerpt) showing the project area. The map should be sized to an

area is located within. The USGS's National Map Viewer provides free online access to and downloads of USGS 1:24K Index maps at <http://viewer.nationalmap.gov/viewer/>.

Site Photographs

- Photographs of the site are mandatory. Include photographs of all structures within the project area that appear to be 50 or more years old.
- All printed digital photographs should be a minimum size of 4" x 4" (a maximum of 2 images per 8½" x 11" page).
- For legibility purposes, images taken from the internet (Google Street View, county tax appraiser websites, etc.) cannot be substituted for digital photographs.
- If submitting photographs of multiple structures clearly label the subject of each photograph and ensure that the location of any detail photographs or interior photographs can be identified.

Submitting Project Review Requests

When submitting hardcopy review requests, please use the following addresses:

<u>By US Postal Service:</u>	<u>By FedEx, UPS, or courier:</u>
Renee Gledhill-Earley State Historic Preservation Office 4617 Mail Service Center Raleigh, NC 27699-4617	Renee Gledhill-Earley State Historic Preservation Office 109 East Jones Street, Room 258 Raleigh, NC 27601

Applications may also be e-mailed to: Environmental.Review@ncdcr.gov. All attachments should be in .pdf, .doc (or .docx), or .jpeg formats; do not send .zip, .tif files, or links to websites. The message size, including all attachments, must be no larger than 10 megabytes. You will receive an automated message confirming receipt of your submission. **Only one**

Faxed submittals will **not** be accepted.

Please submit all projects under the Energy Efficiency and Conservation Block Grant Program (EECBG), the State Energy Plan (SEP), or the

to: Energy.Projects@ncdcr.gov.



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Asheville Ecological Services Field Office
160 Zillicoa Street
Asheville, NC 28801-1082
Phone: (828) 258-3939 Fax: (828) 258-5330
<http://www.fws.gov/nc-es/es/countyfr.html>

In Reply Refer To:
Consultation Code: 04EN1000-2020-SLI-0114
Event Code: 04EN1000-2020-E-00289
Project Name: Proposed SARRTP facility, Asheville, NC

November 18, 2019

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The attached species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. Although not required by section 7, many agencies request species lists to start the informal consultation process and begin their fulfillment of the requirements under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

This list, along with other helpful resources, is also available on the U.S. Fish and Wildlife Service (Service) Asheville Field Office's (AFO) website: https://www.fws.gov/raleigh/species/cntylist/nc_counties.html. The AFO website list includes “species of concern” species that could potentially be placed on the federal list of threatened and endangered species in the future. Also available are:

Design and Construction Recommendations
https://www.fws.gov/asheville/htmls/project_review/Recommendations.html

Optimal Survey Times for Federally Listed Plants
https://www.fws.gov/nc-es/plant/plant_survey.html

Northern long-eared bat Guidance
https://www.fws.gov/asheville/htmls/project_review/NLEB_in_WNC.html

Predictive Habitat Model for Aquatic Species
<https://www.fws.gov/asheville/htmls/Maxent/Maxent.html>

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could require modifications of these lists. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of the species lists should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website or the AFO website (the AFO website dates each county list with the day of the most recent update/change) at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list or by going to the AFO website.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a Biological Evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12 and on our office's website at https://www.fws.gov/asheville/htmls/project_review/assessment_guidance.html.

If a Federal agency (or their non-federal representative) determines, based on the Biological Assessment or Biological Evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species, and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at: <http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>.

Though the bald eagle is no longer protected under the Endangered Species Act, please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require additional consultation (see <https://www.fws.gov/southeast/our-services/permits/eagles/>). Wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds (including bald and golden eagles) and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>;

<http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List
 - Migratory Birds
 - Wetlands
-

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Asheville Ecological Services Field Office

160 Zillicoa Street

Asheville, NC 28801-1082

(828) 258-3939

Project Summary

Consultation Code: 04EN1000-2020-SLI-0114

Event Code: 04EN1000-2020-E-00289

Project Name: Proposed SARRTP facility, Asheville, NC

Project Type: DEVELOPMENT

Project Description: Proposed SARRTP facility, Asheville, NC

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/35.591231434942415N82.48362757221199W>



Counties: Buncombe, NC

Endangered Species Act Species

There is a total of 12 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Carolina Northern Flying Squirrel <i>Glaucomys sabrinus coloratus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2657	Endangered
Gray Bat <i>Myotis grisescens</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6329	Endangered
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Reptiles

NAME	STATUS
Bog Turtle <i>Clemmys muhlenbergii</i> Population: U.S.A. (GA, NC, SC, TN, VA) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6962	Similarity of Appearance (Threatened)

Clams

NAME	STATUS
Appalachian Elktoe <i>Alasmidonta raveneliana</i> There is final critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/5039	Endangered

Arachnids

NAME	STATUS
Spruce-fir Moss Spider <i>Microhexura montivaga</i> There is final critical habitat for this species. Your location is outside the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/4801	Endangered

Flowering Plants

NAME	STATUS
Blue Ridge Goldenrod <i>Solidago spithamaea</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5821	Threatened
Bunched Arrowhead <i>Sagittaria fasciculata</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1720	Endangered
Mountain Sweet Pitcher-plant <i>Sarracenia rubra ssp. jonesii</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/4283	Endangered
Spreading Avens <i>Geum radiatum</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/6854	Endangered
Virginia Spiraea <i>Spiraea virginiana</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/1728	Threatened

Lichens

NAME	STATUS
Rock Gnome Lichen <i>Gymnoderma lineare</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/3933	Endangered

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
<p>Bald Eagle <i>Haliaeetus leucocephalus</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626</p>	Breeds Sep 1 to Aug 31
<p>Cerulean Warbler <i>Dendroica cerulea</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2974</p>	Breeds Apr 27 to Jul 20

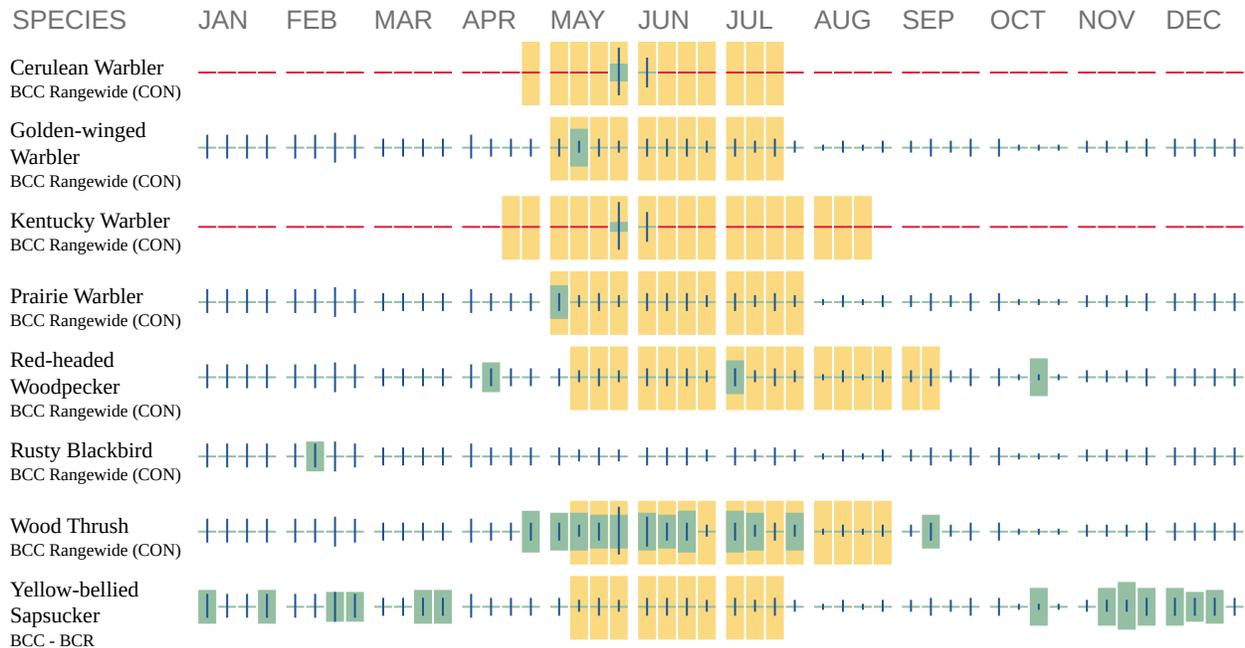
NAME	BREEDING SEASON
Golden-winged Warbler <i>Vermivora chrysoptera</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8745	Breeds May 1 to Jul 20
Kentucky Warbler <i>Oporornis formosus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 20 to Aug 20
Prairie Warbler <i>Dendroica discolor</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Jul 31
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10
Rusty Blackbird <i>Euphagus carolinus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Wood Thrush <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 31
Yellow-bellied Sapsucker <i>sphyrapicus varius</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8792	Breeds May 10 to Jul 15

Probability Of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ “Proper Interpretation and Use of Your Migratory Bird Report” before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.



Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

Migratory Birds FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) and/or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
 2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
-

3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell

me about conservation measures I can implement to avoid or minimize impacts to migratory birds” at the bottom of your migratory bird trust resources page.

Wetlands

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

THERE ARE NO WETLANDS WITHIN YOUR PROJECT AREA.



November 15, 2019

Wetlands

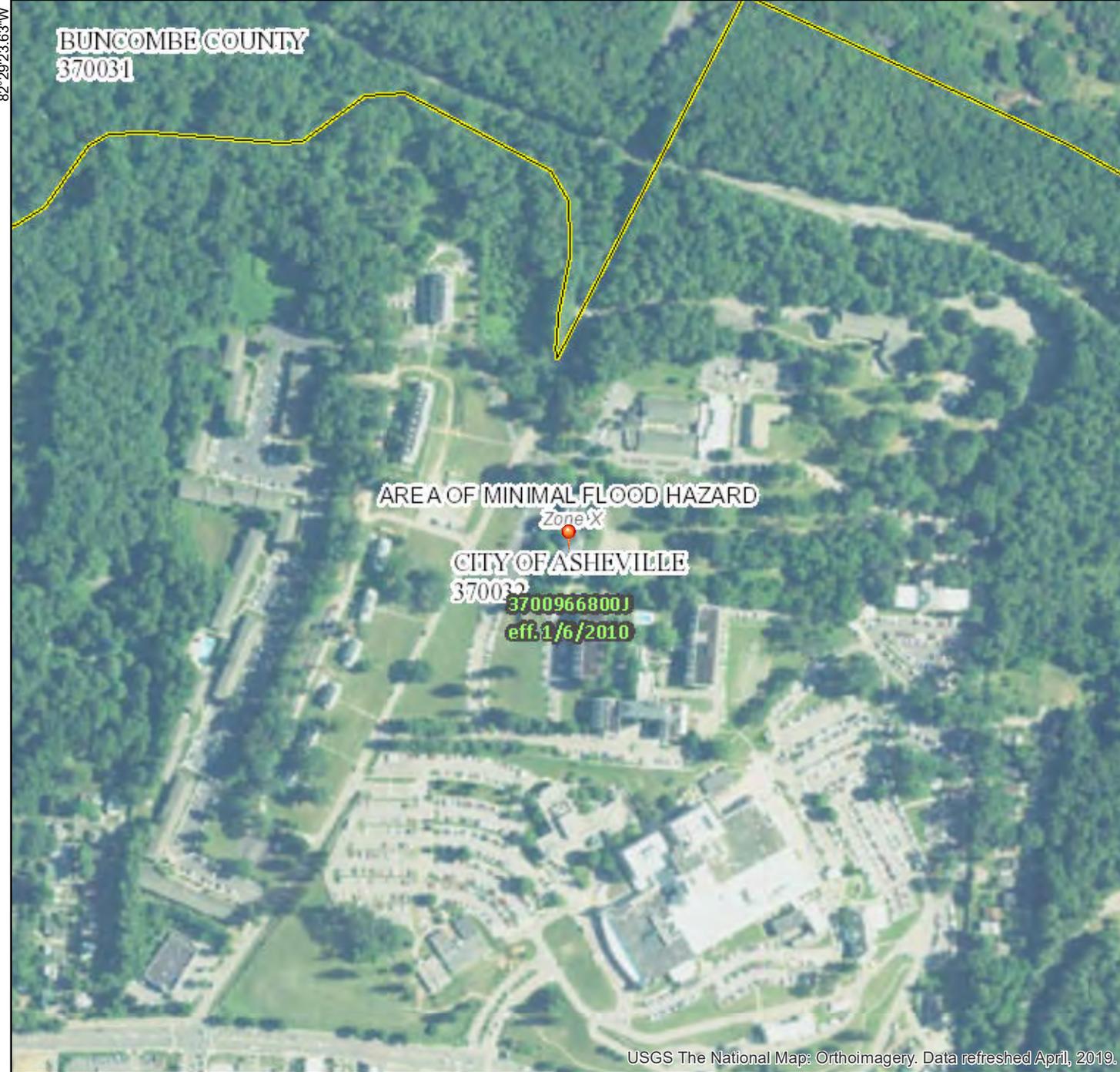
- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
| | |  | Freshwater Pond |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Flood Hazard Layer FIRMette



35°35'43.02"N



82°29'23.63"W

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D

OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D

GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall

OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature

MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **11/15/2019 at 10:43:04 AM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



USGS The National Map: Orthoimagery. Data refreshed April, 2019.

35°35'13.77"N

82°28'46.17"W

QuickFacts

North Carolina; Buncombe County, North Carolina; Asheville city, North Carolina

QuickFacts provides statistics for all states and counties, and for cities and towns with a *population of 5,000 or more*.

Table

ALL TOPICS	North Carolina	Buncombe County, North Carolina	Asheville city, North Carolina
Population estimates, July 1, 2018, (V2018)	10,383,620	259,103	92,452
 PEOPLE			
Population			
Population estimates, July 1, 2018, (V2018)	10,383,620	259,103	92,452
Population estimates base, April 1, 2010, (V2018)	9,535,736	238,331	83,433
Population, percent change - April 1, 2010 (estimates base) to July 1, 2018, (V2018)	8.9%	8.7%	10.8%
Population, Census, April 1, 2010	9,535,483	238,318	83,393
Age and Sex			
Persons under 5 years, percent	▲ 5.9%	▲ 5.0%	▲ 5.1%
Persons under 18 years, percent	▲ 22.2%	▲ 18.5%	▲ 17.8%
Persons 65 years and over, percent	▲ 16.3%	▲ 20.0%	▲ 17.3%
Female persons, percent	▲ 51.4%	▲ 52.1%	▲ 52.7%
Race and Hispanic Origin			
White alone, percent	▲ 70.6%	▲ 89.4%	▲ 82.9%
Black or African American alone, percent (a)	▲ 22.2%	▲ 6.3%	▲ 12.0%
American Indian and Alaska Native alone, percent (a)	▲ 1.6%	▲ 0.5%	▲ 0.3%
Asian alone, percent (a)	▲ 3.2%	▲ 1.4%	▲ 2.0%
Native Hawaiian and Other Pacific Islander alone, percent (a)	▲ 0.1%	▲ 0.2%	▲ 0.0%
Two or More Races, percent	▲ 2.3%	▲ 2.2%	▲ 2.4%
Hispanic or Latino, percent (b)	▲ 9.6%	▲ 6.7%	▲ 5.9%
White alone, not Hispanic or Latino, percent	▲ 62.8%	▲ 83.5%	▲ 77.9%
Population Characteristics			
Veterans, 2013-2017	670,326	17,890	5,453
Foreign born persons, percent, 2013-2017	7.8%	5.9%	7.1%
Housing			
Housing units, July 1, 2018, (V2018)	4,684,876	126,567	X
Owner-occupied housing unit rate, 2013-2017	65.0%	63.7%	49.4%
Median value of owner-occupied housing units, 2013-2017	\$161,000	\$209,800	\$227,500
Median selected monthly owner costs -with a mortgage, 2013-2017	\$1,261	\$1,291	\$1,379
Median selected monthly owner costs -without a mortgage, 2013-2017	\$383	\$385	\$460
Median gross rent, 2013-2017	\$844	\$897	\$954
Building permits, 2018	71,691	1,667	X
Families & Living Arrangements			
Households, 2013-2017	3,874,346	105,407	39,697
Persons per household, 2013-2017	2.53	2.33	2.16
Living in same house 1 year ago, percent of persons age 1 year+, 2013-2017	84.8%	86.2%	82.5%
Language other than English spoken at home, percent of persons age 5 years+, 2013-2017	11.4%	8.1%	9.2%
Computer and Internet Use			
Households with a computer, percent, 2013-2017	85.5%	86.4%	88.0%
Households with a broadband Internet subscription, percent, 2013-2017	75.8%	79.3%	81.5%
Education			
High school graduate or higher, percent of persons age 25 years+, 2013-2017	86.9%	90.8%	92.9%
Bachelor's degree or higher, percent of persons age 25 years+, 2013-2017	29.9%	38.5%	48.2%
Health			
With a disability, under age 65 years, percent, 2013-2017	9.6%	9.2%	7.9%
Persons without health insurance, under age 65 years, percent	▲ 12.7%	▲ 13.5%	▲ 13.7%

Economy

In civilian labor force, total, percent of population age 16 years+, 2013-2017	61.4%	61.8%	64.9%
In civilian labor force, female, percent of population age 16 years+, 2013-2017	57.4%	57.6%	60.5%
Total accommodation and food services sales, 2012 (\$1,000) (c)	18,622,258	880,092	698,603
Total health care and social assistance receipts/revenue, 2012 (\$1,000) (c)	55,227,505	2,518,169	2,300,057
Total manufacturers shipments, 2012 (\$1,000) (c)	202,344,646	2,839,482	983,771
Total merchant wholesaler sales, 2012 (\$1,000) (c)	105,275,586	1,286,734	883,557
Total retail sales, 2012 (\$1,000) (c)	120,691,007	3,884,191	2,822,002
Total retail sales per capita, 2012 (c)	\$12,376	\$15,887	\$32,924

Transportation

Mean travel time to work (minutes), workers age 16 years+, 2013-2017	24.3	20.1	17.8
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Income & Poverty

Median household income (in 2017 dollars), 2013-2017	\$50,320	\$48,464	\$46,464
Per capita income in past 12 months (in 2017 dollars), 2013-2017	\$28,123	\$29,590	\$31,075
Persons in poverty, percent	▲ 14.0%	▲ 11.5%	▲ 15.1%

 BUSINESSES**Businesses**

Total employer establishments, 2016	227,347 ¹	8,252	X
Total employment, 2016	3,794,926 ¹	116,660	X
Total annual payroll, 2016 (\$1,000)	170,980,033 ¹	4,563,747	X
Total employment, percent change, 2015-2016	3.4% ¹	5.9%	X
Total nonemployer establishments, 2017	760,638	28,020	X
All firms, 2012	805,985	28,498	12,785
Men-owned firms, 2012	435,677	14,685	6,053
Women-owned firms, 2012	287,058	10,468	4,955
Minority-owned firms, 2012	183,380	2,113	1,247
Nonminority-owned firms, 2012	603,182	25,428	10,914
Veteran-owned firms, 2012	86,571	2,564	954
Nonveteran-owned firms, 2012	684,743	24,586	10,982

 GEOGRAPHY**Geography**

Population per square mile, 2010	196.1	362.9	1,855.9
Land area in square miles, 2010	48,617.91	656.67	44.93
FIPS Code	37	37021	3702140

About datasets used in this table

Value Notes

- 1. Includes data not distributed by county.

▲ Estimates are not comparable to other geographic levels due to methodology differences that may exist between different data sources.

Some estimates presented here come from sample data, and thus have sampling errors that may render some apparent differences between geographies statistically indistinguishable. Click the Quick Info ⓘ in row in TABLE view to learn about sampling error.

The vintage year (e.g., V2018) refers to the final year of the series (2010 thru 2018). *Different vintage years of estimates are not comparable.*

Fact Notes

- (a) Includes persons reporting only one race
- (b) Hispanics may be of any race, so also are included in applicable race categories
- (c) Economic Census - Puerto Rico data are not comparable to U.S. Economic Census data

Value Flags

- Either no or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest or open ended distribution.
- D Suppressed to avoid disclosure of confidential information
- F Fewer than 25 firms
- FN Footnote on this item in place of data
- NA Not available
- S Suppressed; does not meet publication standards
- X Not applicable
- Z Value greater than zero but less than half unit of measure shown

QuickFacts data are derived from: Population Estimates, American Community Survey, Census of Population and Housing, Current Population Survey, Small Area Health Insurance Estimates, Small Area Income Estimates, State and County Housing Unit Estimates, County Business Patterns, Nonemployer Statistics, Economic Census, Survey of Business Owners, Building Permits.

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Longitudinal Employer-Household Dynamics (LEHD)
Survey of Business Owners

PEOPLE & HOUSEHOLDS

2020 Census
2010 Census
American Community Survey
Income
Poverty
Population Estimates
Population Projections
Health Insurance
Housing
International
Genealogy

SPECIAL TOPICS

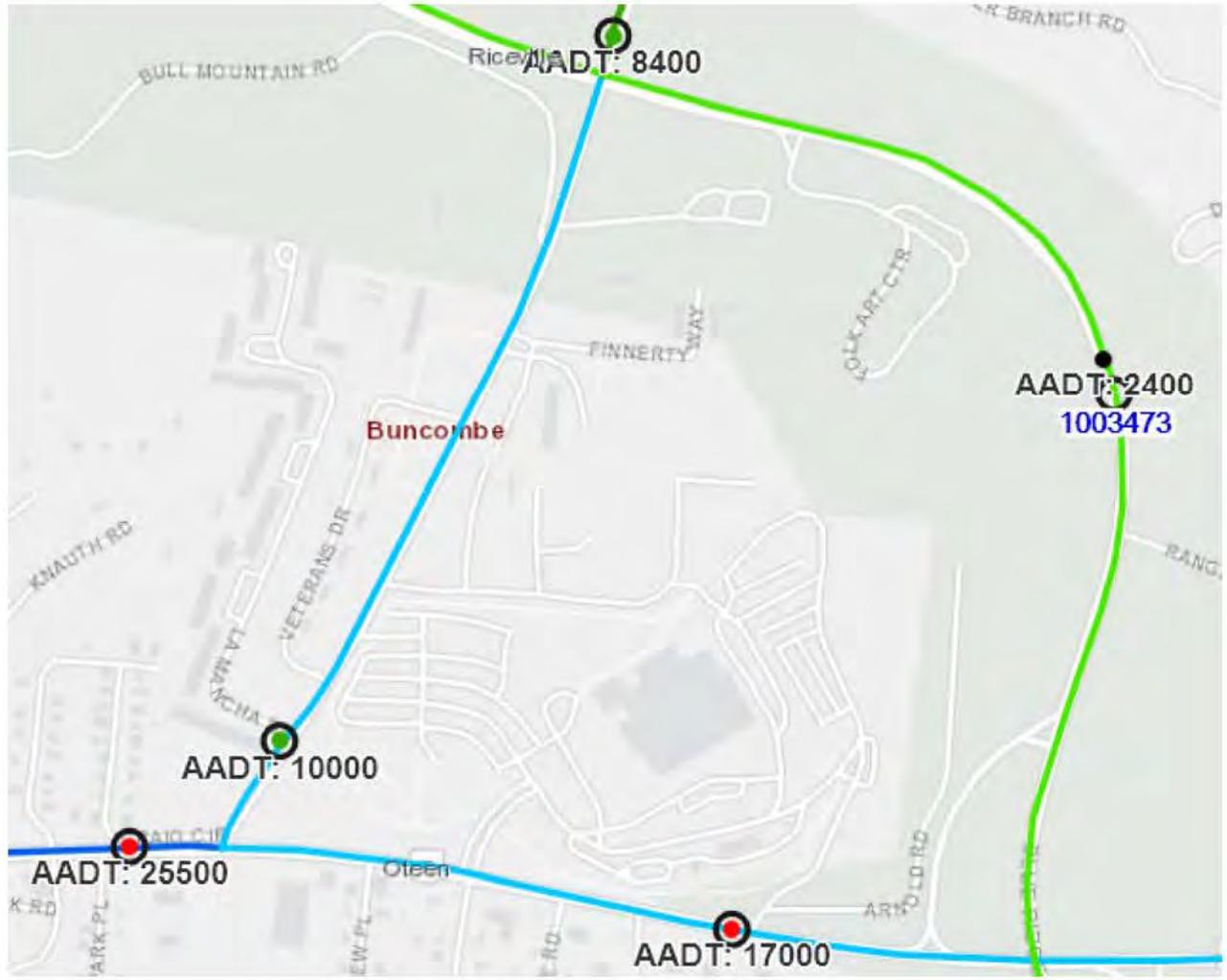
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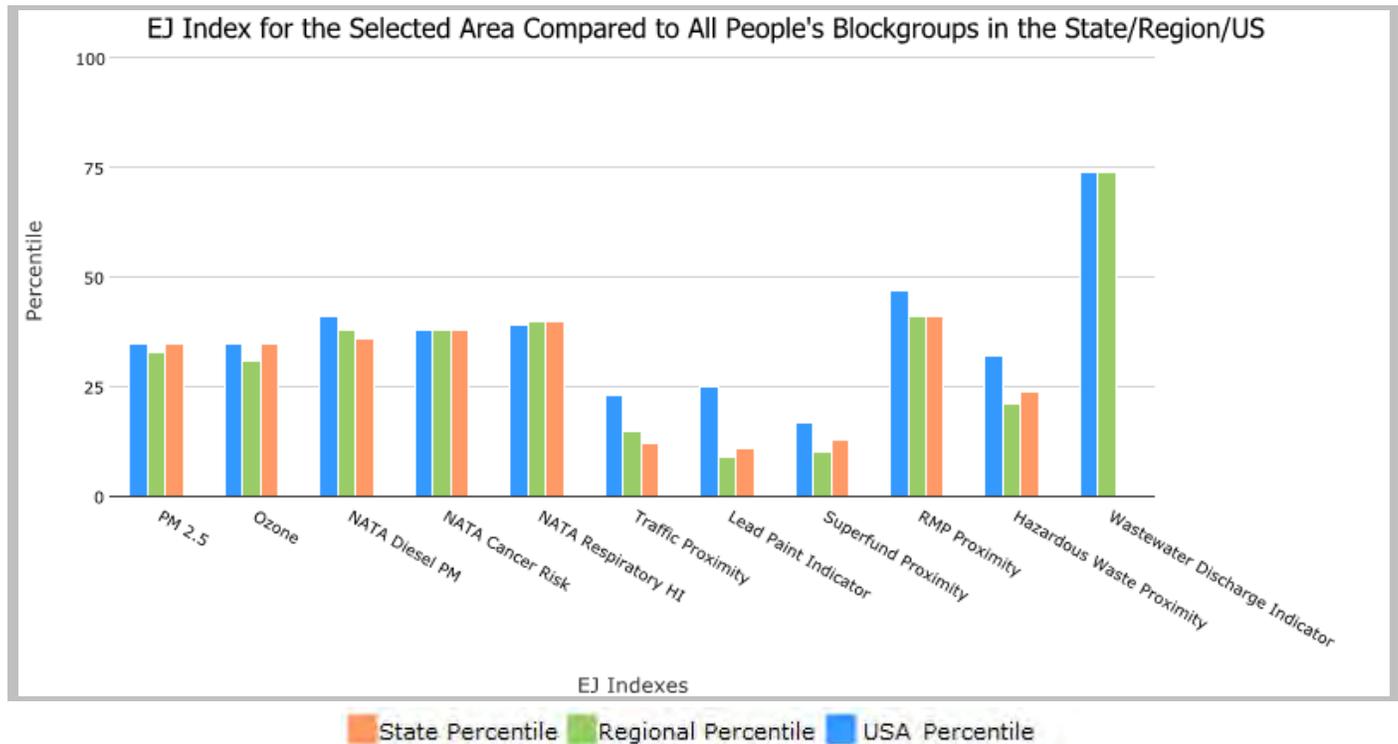


the User Specified Area, NORTH CAROLINA, EPA Region 4

Approximate Population: 1,752

Input Area (sq. miles): 0.94

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	35	33	35
EJ Index for Ozone	35	31	35
EJ Index for NATA* Diesel PM	36	38	41
EJ Index for NATA* Air Toxics Cancer Risk	38	38	38
EJ Index for NATA* Respiratory Hazard Index	40	40	39
EJ Index for Traffic Proximity and Volume	12	15	23
EJ Index for Lead Paint Indicator	11	9	25
EJ Index for Superfund Proximity	13	10	17
EJ Index for RMP Proximity	41	41	47
EJ Index for Hazardous Waste Proximity	24	21	32
EJ Index for Wastewater Discharge Indicator	N/A	74	74

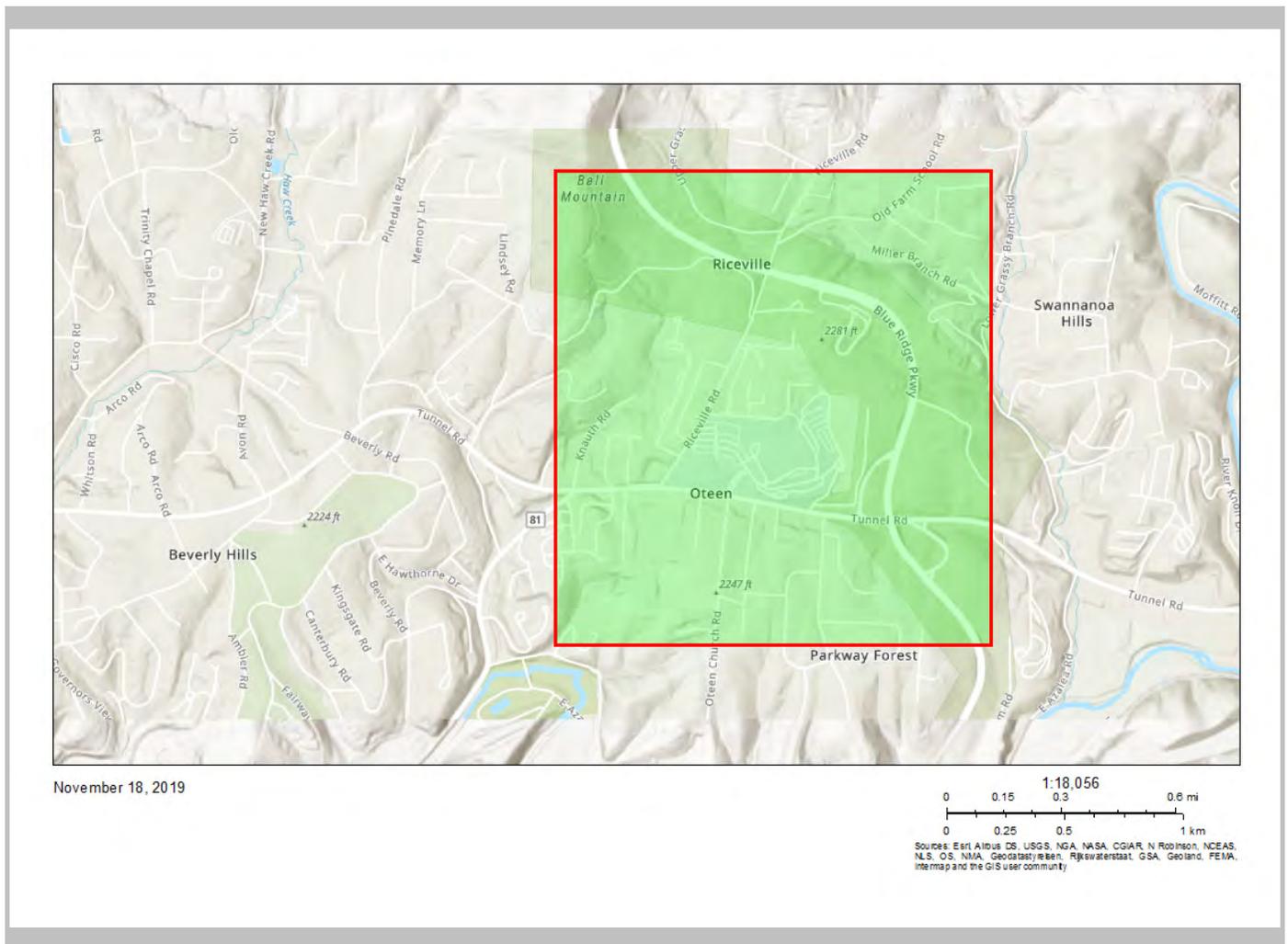


This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

the User Specified Area, NORTH CAROLINA, EPA Region 4

Approximate Population: 1,752

Input Area (sq. miles): 0.94



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJSCREEN Report (Version 2019)



the User Specified Area, NORTH CAROLINA, EPA Region 4

Approximate Population: 1,752

Input Area (sq. miles): 0.94

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	8.39	8.54	33	8.59	43	8.3	52
Ozone (ppb)	44.7	43.9	62	40	76	43	60
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.222	0.308	35	0.417	<50th	0.479	<50th
NATA* Cancer Risk (lifetime risk per million)	27	34	9	36	<50th	32	<50th
NATA* Respiratory Hazard Index	0.33	0.46	7	0.52	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	240	230	72	350	66	750	52
Lead Paint Indicator (% Pre-1960 Housing)	0.23	0.16	77	0.15	78	0.28	55
Superfund Proximity (site count/km distance)	0.16	0.082	90	0.083	88	0.13	81
RMP Proximity (facility count/km distance)	0.092	0.39	20	0.6	17	0.74	13
Hazardous Waste Proximity (facility count/km distance)	0.3	0.63	60	0.52	64	4	43
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0	0.14	N/A	0.45	42	14	37
Demographic Indicators							
Demographic Index	29%	36%	43	38%	41	36%	48
Minority Population	16%	36%	27	38%	29	39%	32
Low Income Population	42%	37%	61	37%	60	33%	68
Linguistically Isolated Population	5%	2%	83	3%	78	4%	71
Population With Less Than High School Education	10%	13%	46	13%	45	13%	53
Population Under 5 years of age	5%	6%	38	6%	39	6%	37
Population over 64 years of age	23%	15%	85	16%	83	15%	85

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

APPENDIX E

Public Notices and Comments

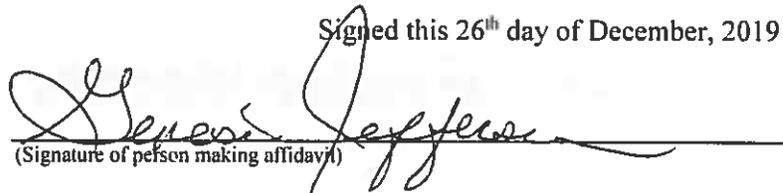
AFFIDAVIT OF PUBLICATION

BUNCOMBE COUNTY

SS.
NORTH CAROLINA

Before the undersigned, a Notary Public of said County and State, duly commissioned, qualified and authorized by law to administer oaths, personally appeared **Genesis Jefferson**, who, being first duly sworn, deposes and says: that she is the **Legal Clerk of The Asheville Citizen-Times**, engaged in publication of a newspaper known as **The Asheville Citizen-Times**, published, issued, and entered as first class mail in the City of Asheville, in said County and State; that she is authorized to make this affidavit and sworn statement; that the notice or other legal advertisement, a true copy of which is attached hereto, was published in **The Asheville Citizen-Times** on the following date: December 21, 22, 25, 2019. And that the said newspaper in which said notice, paper, document or legal advertisement was published was, at the time of each and every publication, a newspaper meeting all of the requirements and qualifications of Section 1-597 of the General Statutes of North Carolina and was a qualified newspaper within the meaning of Section 1-597 of the General Statutes of North Carolina.

Signed this 26th day of December, 2019

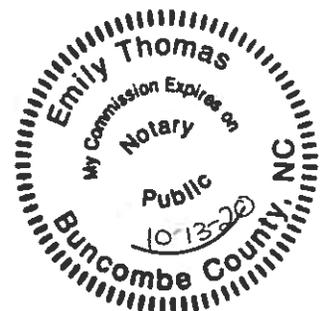

(Signature of person making affidavit)

Sworn to and subscribed before me the 26th day of
December, 2019.


(Notary Public)

My Commission expires the 13th day of October, 2020

(828) 232-5830 | (828) 253-5092 FAX
14 O. HENRY AVE. | P.O. BOX 2090 | ASHEVILLE, NC 28802 | (800) 800-4204



NOTICE OF AVAILABILITY
DRAFT ENVIRONMENTAL ASSESSMENT
U.S. DEPARTMENT OF VETERANS AFFAIRS
Proposed Land Acquisition for a New Veterans Substance Abuse Residential Rehabilitation Treatment Program Facility
70 Riceville Road
Asheville, Buncombe County, North Carolina

The Department of Veterans Affairs (VA) announces the preparation and availability of a Draft Environmental Assessment (DEA) for the proposed acquisition of approximately 1.3 acres of land (Site) located adjacent to the northwest of the Asheville VA Medical Center (VAMC) and the rehabilitation of the existing, approximately 23,000-square foot vacant Site building for a new, expanded Substance Abuse Residential Rehabilitation Treatment Program Facility. The DEA has been prepared in accordance with the Council on Environmental Quality and VA regulations for implementing the National Environmental Policy Act (40 CFR Part 1500, 38 CFR Part 26). VA intends to issue a Finding of No Significant Impact (FONSI) following a 30-day comment period in accordance with the Council on Environmental Quality regulations (40 CFR 1508.13) provided there are no substantive comments that warrant further evaluation. The public comment period will end on January 22, 2020.

Copies of the DEA are available for review at the Asheville VAMC located at 1100 Tunnel Road, Asheville, NC and Pack Memorial Library located at 67 Haywood Street, Asheville, NC. Please submit comments to the following:

U.S. Department of Veterans Affairs
PM Office of Real Property
Attn: Mr. Malna Gakure, DBA
125 I Street NW
Washington, DC 20001
Email: malna.gakure@va.gov (please put "Asheville SARRTP NEPA EA" in subject line)

December 21, 22, 25, 2019
003963182