

# **U.S. Department of Veterans Affairs**



## **Proposed Raleigh Outpatient Clinic Final Environmental Assessment**

**August 2020**

**Prepared for:**

U.S. Department of Veterans Affairs  
Office of Construction and Facilities Management

**Prepared by:**

LRS Federal LLC

## Executive Summary

This environmental assessment (EA) has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code 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). This EA is required to determine if the Department of Veterans Affairs' (VA's) proposed action would have significant environmental impacts. Federal agencies are required to consider the environmental and related social and economic effects of their proposed actions. This EA has been prepared in accordance with relevant guidance from VA's NEPA Interim Guidance for Projects dated September 2010.

### Purpose and Need

The purpose of the proposed action is to enhance and expand services to Veterans in the Raleigh, North Carolina area by providing an integrated, right-sized, and energy-efficient outpatient clinic. The proposed Raleigh outpatient clinic would provide a centralized facility to consolidate and expand primary care, mental health, and specialty care services to Veterans in the rapidly growing region and relieve the existing overcrowded facilities.

The proposed action is needed to replace and consolidate three existing leased outpatient clinics in Raleigh; address current and future projected health care capacity, service gaps, and operational inefficiencies identified in the Strategic Capital Investment Planning process; and enhance VA outpatient services. The existing VA clinics are insufficient to meet the current and rapidly growing health care needs of Veterans in the Raleigh area. In addition, operating separate clinics in the area creates operational inefficiencies and poorly integrated services. The proposed outpatient clinic would allow VA to provide timely access to state-of-the-art health care and enhance primary care, mental health, dialysis, and limited specialty care services. It would also allow VA to provide new specialty care services, women's health care, ambulatory surgery, and imaging services to Veterans in the Raleigh area.

### Proposed Action

VA's proposed action is the construction and operation of an approximately 222,325-square-foot outpatient clinic near Raleigh, North Carolina. The outpatient clinic would include no more than two floors and would be in a modern-quality building with a façade of stone, marble, brick, stainless steel, aluminum or other permanent materials. The site would include other site improvements, amenities, and landscaped open space areas. The outpatient clinic would be designed and built to VA design criteria and in accordance with local building and zoning codes.

### Alternatives

The following two locations are being considered for the proposed outpatient clinic:

- Southwest of the intersection of Rand Road and Benson Road, Garner, North Carolina (Alternative A)
- Southeast of the intersection of Old Stage Road and Ten Ten Road, Garner, North Carolina (Alternative B)

Alternative A is approximately 16.76 acres along the west side of Benson Road (Highway 50) in the Town of Garner, in the southern Raleigh metro area. The site is currently undeveloped and wooded. Primary access would be from Benson Road with secondary access from the north at Rand Road and from the south at Arbor Green Drive. The L-shaped building would be situated toward the western boundary with parking towards the north and east with additional parking to the south. The closest public transportation stop is about 1.5 miles north of the site. Surrounding properties include farmland,

residential neighborhoods, a convenience store, an elementary school, an auto shop, and undeveloped land zoned for office and institutional use.

Alternative B is approximately 32.88 acres and is located at the intersection of Old Stage Road and Ten Ten Road in Garner; the site is partially in the Town of Garner (15.37 acres) with the remainder in unincorporated Wake County. If Alternative B is selected, the Town of Garner would annex the county property. The site includes cleared agricultural and wooded land with two residential structures, a shed, a septic drain field, and wells. A surface water feature is located in the wooded area near the center of the parcel with a ditch that extends in a westerly direction towards Old Stage Road. Primary access would be from Old Stage Road and Ten Ten Road. Two secondary access points from Ten Ten Road would facilitate entering parking areas on each side of the property. The L-shaped building would be situated in the southeastern portion of the site with primary parking northwest and east of the building, while secondary parking would be east and south of the building. Initial landscape designs incorporate the surface water feature and wooded areas with limited construction in these areas. The closest public transportation stop is about 3 miles east of the site. Surrounding properties include a residential neighborhood, storage units, a grocery store, an elementary school, and undeveloped land.

Under the no action alternative, the proposed action would not be implemented. VA would continue to provide services at the three separate leased clinic locations. The two proposed locations would not be used by VA and could possibly be developed by others consistent with local zoning. This alternative would limit VA's ability to provide needed health care services to Veterans in the region. The no action alternative does not meet the purpose and need. However, analysis of the no action alternative is required by CEQ regulations. It also provides a benchmark for comparing and analyzing the effects of the other alternatives.

### **Affected Environment and Environmental Consequences**

The EA describes the baseline physical, environmental, cultural, and socioeconomic conditions at the alternative project sites and the general vicinity, with emphasis on those resources potentially impacted by the alternatives. Potential impacts on physical, environmental, cultural, and socioeconomic conditions are analyzed for each alternative. Resource areas considered in this EA are aesthetics; air quality; cultural and historic resources; geology 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; traffic, transportation, and parking; utilities; and environmental justice. Table ES-1 summarizes the findings of the impact analysis.

**Table ES-1. Summary of Impact Analysis**

<b>Resource Area</b>	<b>Alternative A</b>	<b>Alternative B</b>	<b>No Action Alternative</b>
Aesthetics	The outpatient clinic would be consistent with the aesthetics of the surrounding area and would be compatible with surrounding land uses, resulting in less than significant impacts.	The outpatient clinic would be consistent with the aesthetics of the surrounding area and would be compatible with surrounding land uses, resulting in less than significant impacts.	None

<b>Resource Area</b>	<b>Alternative A</b>	<b>Alternative B</b>	<b>No Action Alternative</b>
Air Quality	Construction activities would have short-term minor impacts related to emissions and fugitive dust. Long-term minor emissions from the operation of the outpatient clinic and vehicle emissions would result in less than significant impacts.	Construction activities would have short-term minor impacts related to emissions and fugitive dust. Long-term minor emissions from the operation of the outpatient clinic and vehicle emissions would result in less than significant impacts.	None
Cultural and Historic Resources	No historic properties were identified. Less than significant impacts to cultural resources.	Further investigation required to understand the National Register of Historic Places eligibility of the site. Establishing and implementing a memorandum of agreement would resolve adverse impacts to eligible historic resources and would result in less than significant adverse effects on cultural resources.	None
Geology and Soils	Construction activities would include ground disturbance. Disturbances would be stabilized during operation and permit requirements would be met, resulting in less than significant impacts.	Construction activities would include ground disturbance. Disturbances would be stabilized during operation and permit requirements would be met, resulting in less than significant impacts.	None
Hydrology and Water Quality	Implementation of best management practices and groundwater control measures, and following permit requirements, would result in less than significant impacts.	Implementation of best management practices and groundwater control measures, and following permit requirements, would result in less than significant impacts.	None
Wildlife and Habitat	No federally or state listed species are at the site. Less than significant impacts to vegetation and wildlife habitats.	No federally or state listed species are at the site. Less than significant impacts to vegetation and wildlife habitats.	None
Noise	Construction activities would have noticeably higher noise levels than current levels. Operation of the outpatient clinic would have a minor long-term increase in noise levels from traffic and ground maintenance. These impacts would be less than significant.	Construction activities would have noticeably higher noise levels than current levels. Operation of the outpatient clinic would have a minor long-term increase in noise levels from traffic and ground maintenance. These impacts would be less than significant.	None

<b>Resource Area</b>	<b>Alternative A</b>	<b>Alternative B</b>	<b>No Action Alternative</b>
Land Use	Rezone a portion of Alternative A. Compatible with surrounding land uses. Less than significant impacts.	Rezone a portion of Alternative B. Compatible with surrounding land uses. Less than significant impacts.	None
Floodplains, Wetlands, and Coastal Management	No floodplains or coastal management areas. Impacts to wetlands would be less than significant.	No floodplains or coastal management areas. Permitting and mitigation, as needed, of impacted wetland areas through United States Army Corps of Engineers permit process would result in impacts that are less than significant impacts.	None
Socioeconomics	Short-term beneficial impacts to local employment and personal income. Outpatient clinic would enhance health care for Veterans in the region. Less than significant adverse impacts.	Short-term beneficial impacts to local employment and personal income. Outpatient clinic would enhance health care for Veterans in the region. Less than significant adverse impacts.	None
Community Services	Minor increase in demand for fire protection, police services, and emergency services. Requires coordination with local agencies to expand public transportation. Less than significant impacts.	Minor increase in demand for fire protection, police services, and emergency services. Requires coordination with local agencies to expand public transportation. Less than significant impacts.	None
Solid Waste and Hazardous Materials	Increased risk for unintentional releases of petroleum and hazardous materials during construction activities. Waste generated during operation of the outpatient clinic would be collected and disposed of properly. Less than significant impacts.	Increased risk for unintentional releases of petroleum and hazardous materials during construction activities. Waste generated during operation of the outpatient clinic would be collected and disposed of properly. Less than significant impacts.	None
Traffic, Transportation, and Parking	Improvements to intersections would address increased traffic. Sufficient parking space. Less than significant impacts.	Improvements to intersections would address increased traffic. Sufficient parking space. Less than significant impacts.	None
Utilities	Increased demand for utilities. Requires the extension of utility connections. Less than significant impacts.	Increased demand for utilities. Requires the extension of utility connections. Less than significant impacts.	None

<b>Resource Area</b>	<b>Alternative A</b>	<b>Alternative B</b>	<b>No Action Alternative</b>
Environmental Justice	No disproportionate impacts to minority or low-income populations. Less than significant impacts.	No disproportionate impacts to minority or low-income populations. Less than significant impacts.	None

### **Agency Coordination and Public Participation**

VA published and distributed the Draft EA for a 30-day public comment period as announced by a Notice of Availability published in The News and Observer on July 8 and 12, 2020. Review copies of the Draft EA were made available online at [www.durham.va.gov/pressreleases/RaleighOPC\\_EA.asp](http://www.durham.va.gov/pressreleases/RaleighOPC_EA.asp) and at Garner Town Hall, 900 7th Avenue, Garner, North Carolina.

VA held a virtual public meeting on July 22, 2020. Three individuals attended the public meeting, including participants from the Town of Garner, Capital Area Preservation, and the public.

A total of three letters on the Draft EA were received during the 30-day public comment period and one question was asked during the virtual public meeting. These comments and VA's responses are in Section 5.4.

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## Acronyms and Abbreviations

AST	aboveground storage tank
BCC	Bird of Conservation Concern
BMP	best management practice
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CWA	Clean Water Act
DoD	Department of Defense
EA	environmental assessment
ESA	environmental site assessment
FEMA	Federal Emergency Management Agency
IPaC	Information for Planning and Consultation
LOS	level of service
LUST	leaking underground storage tank
MOA	memorandum of agreement
NAAQS	National Ambient Air Quality Standards
NCNHP	North Carolina National Heritage Program
NCWRC	North Carolina Wildlife Resource Commission
NCDEQ	North Carolina Department of Environmental Quality
NCDOT	North Carolina Department of Transportation
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWP	Nationwide Permit
OPC	outpatient clinic
OSHA	Occupational Safety and Health Administration
PEM	palustrine emergent wetland
PFO	palustrine forested wetland
REC	recognized environmental condition
SHPO	State Historic Preservation Office
SWPPP	stormwater pollution prevention plan
USACE	United States Army Corps of Engineers
USEPA	United States Environmental Protection Agency

USFWS United States Fish and Wildlife Service  
USGS United States Geological Survey  
UST underground storage tank  
VA U.S. Department of Veterans Affairs  
VES vapor encroachment screening

## 1.0 Introduction

This environmental assessment (EA) has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code 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). This EA is required to determine if the Department of Veterans Affairs' (VA's) proposed action would have significant environmental impacts. Federal agencies are required to consider the environmental and related social and economic effects of their proposed actions. This EA has been prepared in accordance with relevant guidance from VA's NEPA Interim Guidance for Projects dated September 2010.

This EA identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed construction and operation of an approximately 222,325-square-foot outpatient clinic with approximately 1,300 parking spaces near Raleigh, North Carolina. The outpatient clinic would employ approximately 450 staff. The site would include other site improvements, amenities, and landscaped open space areas. The following two locations are being considered for the proposed outpatient clinic (Figure 1-1):

- Southwest of the intersection of Rand Road and Benson Road, Garner, North Carolina (Alternative A)
- Southeast of the intersection of Old Stage Road and Ten Ten Road, Garner, North Carolina (Alternative B)

In accordance with the cited 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 the measures the federal decision-maker could implement to reduce potential environmental effects, and documents the NEPA process.

VA published and distributed the Draft EA for a 30-day public comment period as announced by a Notice of Availability published in *The News and Observer* on July 8 and 12, 2020. Review copies of the Draft EA were made available online and at Garner Town Hall. VA held a virtual public meeting on July 22, 2020, which three individuals attended.

Three letters were received on the Draft EA during the 30-day public comment period and one question was asked during the virtual public meeting. These comments and VA's responses are in Section 5.4.

## 1.1 Background

Currently, VA provides health care services to Veterans in the Raleigh area at five existing clinics (Figure 1-1) and the Durham VA Medical Center. The current space in the outpatient facilities is insufficient to meet the projected needs of Veterans in Wake, Granville, Franklin, Nash, Wilson, and Johnston counties. VA estimates that by 2025 there will be 40,307 Veteran enrollees in the six-county area. Space limitations and an increase in workload limit Veteran's timely access to high-quality health care services.

In 2017, Congress authorized, under the VA Choice and Quality Employment Act, a replacement VA outpatient clinic in the Raleigh area. The outpatient clinic would consolidate three existing outpatient clinics and create a new facility to provide multiple health care services under one roof. The three clinics that would be consolidated (replaced and closed) are the Raleigh III VA Clinic (2600 Atlantic Avenue), the Wake County VA Clinic (3040 Hammond Business Place), and the Raleigh VA Clinic (3305 Sungate Boulevard). The new facility would enhance VA outpatient services for Veterans in the six-county area by providing an appropriately sized and state-of-the-art facility designed to meet current and projected health care needs.

## 1.2 Purpose and Need

The purpose of the proposed action is to enhance and expand services to Veterans in the Raleigh, North Carolina, area by providing an integrated, right-sized, and energy-efficient outpatient clinic. The proposed Raleigh outpatient clinic would provide a centralized facility to consolidate and expand primary care, mental health, and specialty care services to Veterans in the rapidly growing region and relieve the existing overcrowded facilities.

The proposed action is needed to replace and consolidate three existing leased outpatient clinics in Raleigh; address current and future projected health care capacity, service gaps, and operational inefficiencies identified in the Strategic Capital Investment Planning process; and enhance VA outpatient services. The existing VA clinics are insufficient to meet the current and rapidly growing health care needs of Veterans in the Raleigh area. In addition, operating separate clinics in the area creates operational inefficiencies and poorly integrated services. The proposed outpatient clinic would allow VA to provide timely access to state-of-the-art health care and enhance primary care, mental health, dialysis, and limited specialty care services. It would also allow VA to provide new specialty care services, women's health care, ambulatory surgery, and imaging services to Veterans in the Raleigh area.

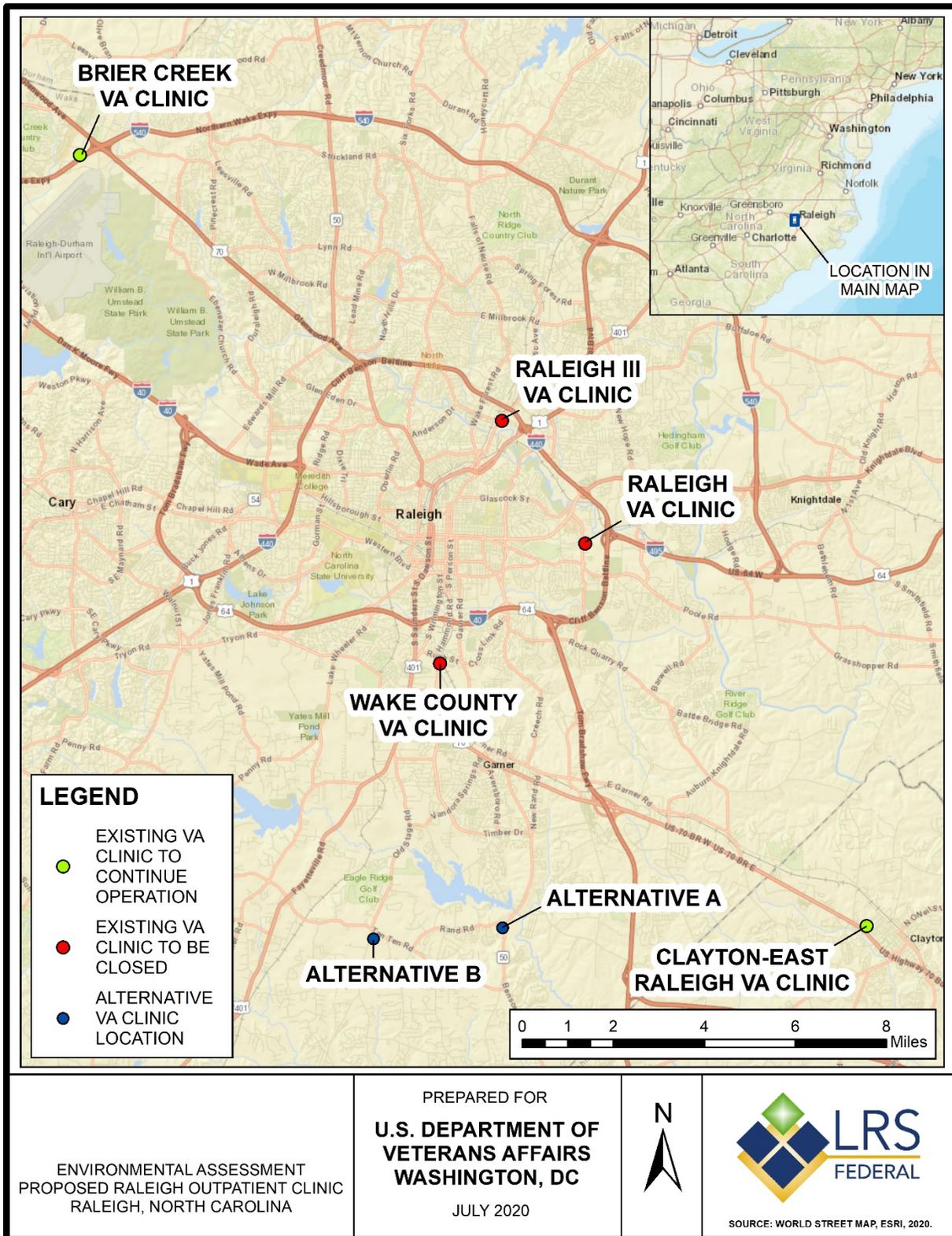


Figure 1-1. Existing and Alternative Proposed VA Outpatient Clinics

## 2.0 Alternatives

This section describes the proposed action and alternatives considered by VA, including those alternatives eliminated from further analysis. NEPA and VA regulations for implementing NEPA require all reasonable alternatives to be rigorously explored and objectively evaluated. The criteria and process applied by VA to narrow the number of viable sites is described.

### 2.1 Proposed Action

VA's proposed action is the construction and operation of an approximately 222,325-square-foot outpatient clinic near Raleigh, North Carolina. The outpatient clinic would include no more than two floors and would be in a modern-quality building with a façade of stone, marble, brick, stainless steel, aluminum or other permanent materials. The site would include other site improvements, amenities, and landscaped open space areas. The outpatient clinic would be designed and built to VA design criteria and in accordance with local building and zoning codes.

VA established the size of the facility and land required for the outpatient clinic based on the number of Veterans currently receiving health care services in the Raleigh area and the forecasted number of Veterans requiring these services. VA estimates that by 2025 there will be 40,307 Veteran enrollees in Wake, Granville, Franklin, Nash, Wilson, and Johnston counties. VA plans to select a developer who would construct the proposed outpatient clinic and then lease the facility to VA for up to 20 years.

The outpatient clinic would be used Monday through Saturday except on federal holidays. Operating hours would be Monday through Friday from 7 AM to 6 PM and on Saturdays from 7 AM to 1 PM. There would be 1,300 parking spaces with 130 spaces for use by the physically disabled to accommodate approximately 450 staff and up to 500 patient visits per day. The outpatient clinic would be available to Veterans and service members from all branches of the U.S. Armed Forces who meet the criteria for treatment.

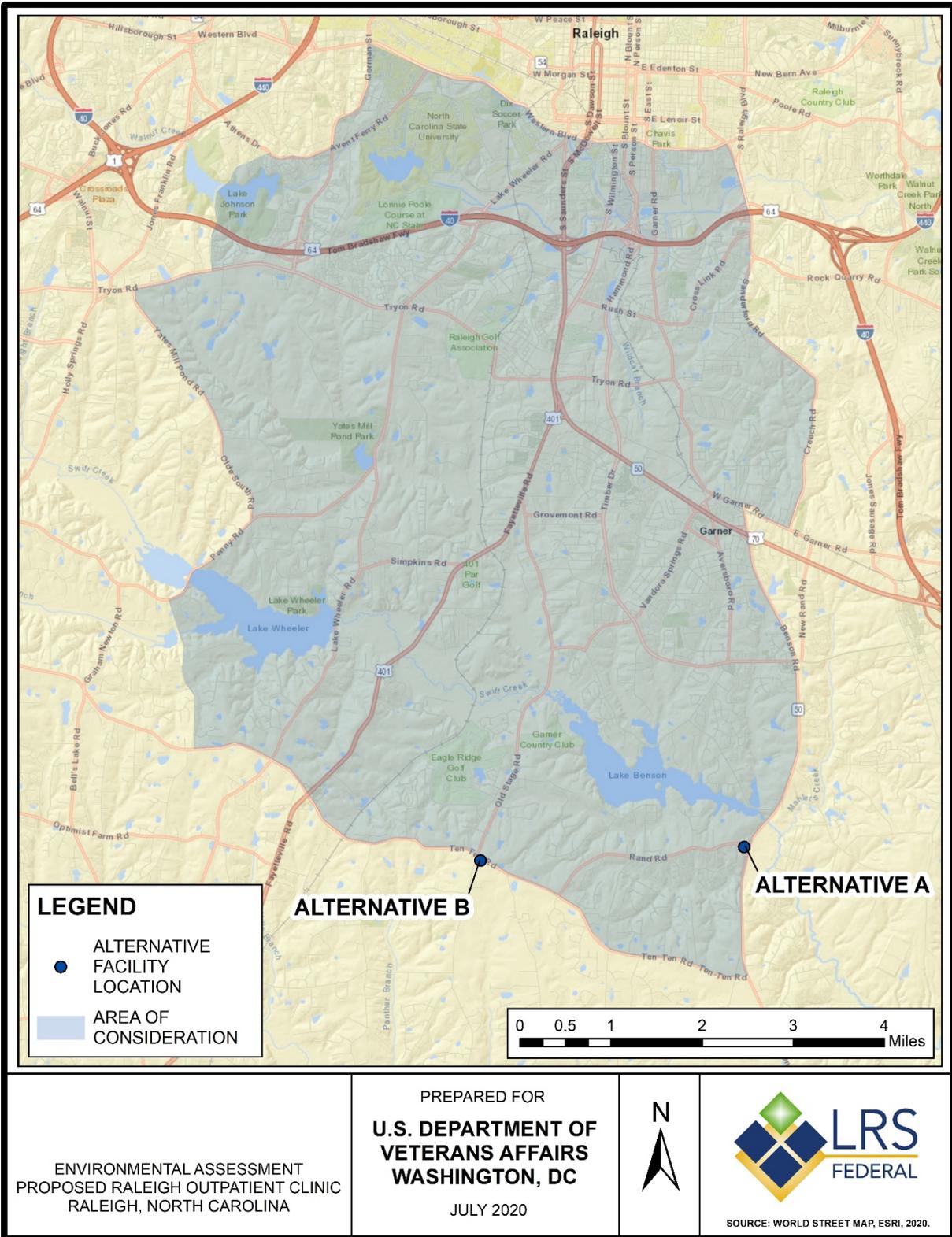
VA is considering two locations for the proposed outpatient clinic: southwest of the intersection of Rand Road and Benson Road, Garner, North Carolina and southeast of the intersection of Old Stage Road and Ten Ten Road, Garner, North Carolina.

### 2.2 Alternatives Development

After considering several approaches for meeting the purpose and need (Section 2.6), VA elected to acquire a new lease for an outpatient clinic with capacity to expand services and consolidate three existing VA facilities.

In early 2020, VA requested lease proposals from offerors. The request was for the development and lease of new construction with a maximum of 222,325 square feet of contiguous space within the area of consideration (Figure 2-1). VA also required specific minimum characteristics including, but not limited to zoning; outside of floodplains; compatibility with surrounding land uses; proximity to emergency response services and a hospital; accessibility to public transportation; near major intersection and transportation routes; and near amenities such as groceries, retail, services, or community facilities.

VA received offers for the proposed outpatient clinic. VA identified two reasonable offers for the outpatient clinic. These two sites are described in Section 2.3 and Section 2.4 and shown in Figure 2-1.



**Figure 2-1. Area of Consideration**

## 2.3 Alternative A

Alternative A is approximately 16.76 acres along the west side of Benson Road (Highway 50) in the Town of Garner, in the southern Raleigh metro area. The site is currently undeveloped and wooded (Figure 2-2). Primary access would be from Benson Road with secondary access from the north at Rand Road and from the south at Arbor Green Drive. The L-shaped building would be situated toward the western boundary with parking towards the north and east with additional parking to the south. The closest public transportation stop is about 1.5 miles north of the site. The offeror is coordinating with the City of Raleigh to extend the existing bus route to the outpatient clinic. Surrounding properties include farmland, residential neighborhoods, a convenience store, an elementary school, an auto shop, and undeveloped land zoned for office and institutional use.



Figure 2-2. Aerial View of Alternative A

## 2.4 Alternative B

Alternative B is approximately 32.88 acres and is located at the intersection of Old Stage Road and Ten Ten Road; the site is partially in the Town of Garner (15.37 acres) with the remainder in unincorporated Wake County. If Alternative B is selected, the Town of Garner would annex the county property. The site includes cleared agricultural and wooded land with two residential structures, a shed, a septic drain field, and wells (Figure 2-3). A surface water feature is located in the wooded area near the center of the parcel with a ditch that extends in a westerly direction towards Old Stage Road. Primary access would be from Old Stage Road and Ten Ten Road. Two secondary access points from Ten Ten Road would facilitate entering parking areas on each side of the property. The L-shaped building would be situated in the southeastern portion of the site with primary parking northwest and east of the building, while secondary parking would be east and south of the building. Initial landscape designs incorporate the surface water feature and wooded areas with limited construction in these areas. The closest public transportation stop is about 3 miles east of the site. The offeror is coordinating with the City of Raleigh to extend the existing bus route to the outpatient clinic. Surrounding properties include a residential neighborhood, storage units, a grocery store, an elementary school, and undeveloped land.

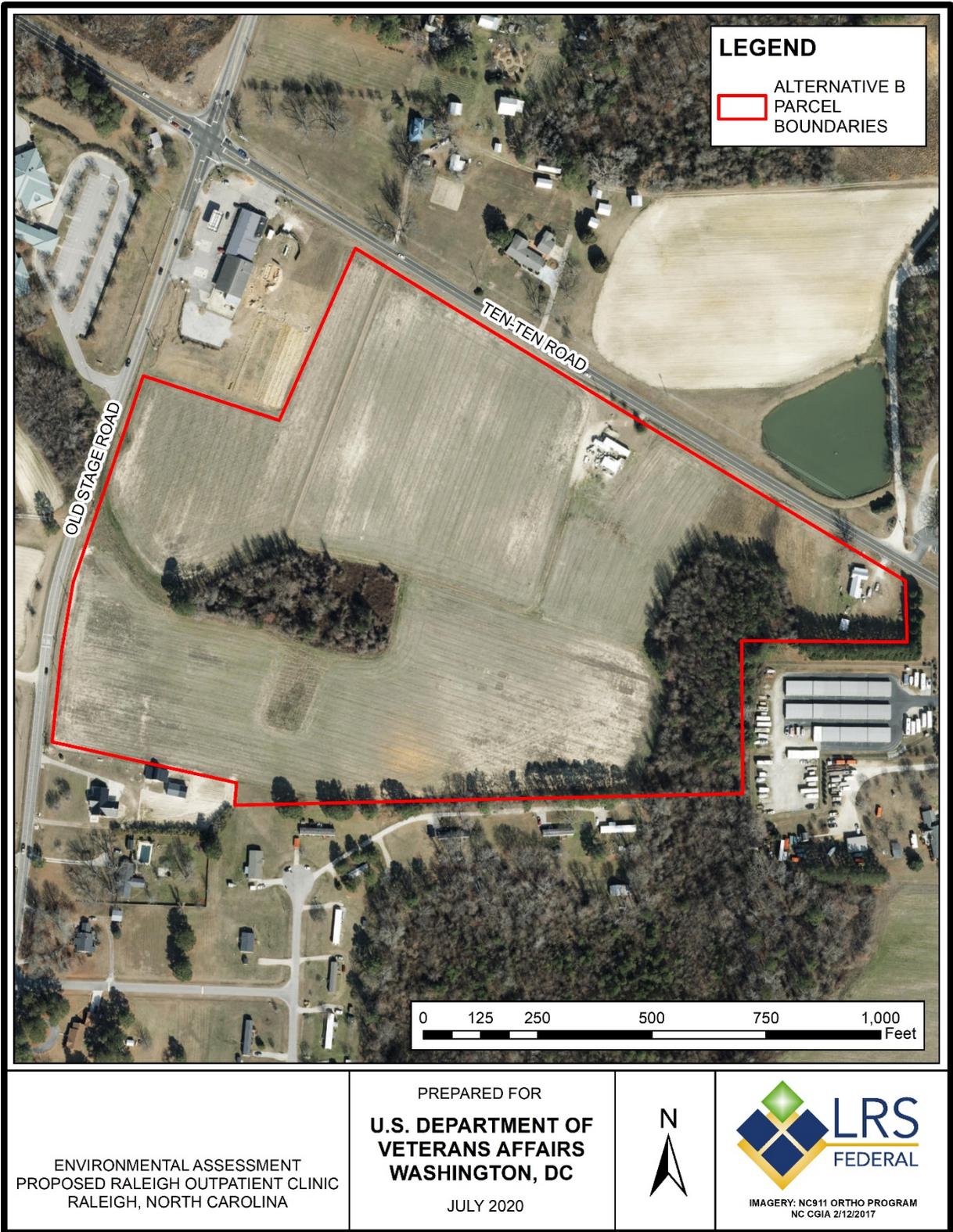


Figure 2-3. Aerial View of Alternative B

## 2.5 No Action Alternative

Under the no action alternative, the proposed action would not be implemented. VA would continue to provide services at the three separate leased clinic locations. The two proposed locations would not be used by VA and could possibly be developed by others consistent with local zoning. This alternative would limit VA's ability to provide needed health care services to Veterans in the region. The no action alternative does not meet the purpose and need. However, analysis of the no action alternative is required by CEQ regulations. It also provides a benchmark for comparing and analyzing the effects of the other alternatives.

## 2.6 Alternatives Eliminated from Further Consideration

VA eliminated other approaches for meeting the purpose and need. These alternatives were not viable or failed to meet the purpose and need for the proposed action. After identifying the inadequacies of the existing VA facilities in the Raleigh area, VA examined alternatives. These alternatives included the following:

- VA considered acquiring land and constructing a new outpatient clinic. This alternative would address space and utilization gaps. However, a permanent VA-owned facility would limit the ability to relocate services in the future based on changes in Veteran demographics. In addition, new construction by VA would require a longer implementation timeline.
- VA considered renovating a vacant or underutilized VA-owned facility. However, local VA planners determined no existing VA-owned facilities are suitable for renovation and fit the project requirements.
- VA considered contracting out primary care, mental health, and specialty care services to private health care providers in the Raleigh area. However, this alternative is not cost-effective and could result in the loss of quality and control over Veteran health care. Additionally, there may not be sufficient, qualified private health care providers in the Raleigh area to accommodate current and projected Veteran populations.
- VA considered purchasing an existing facility in the local community that is suitable for renovation and able to accommodate project requirements. However, a permanent VA-owned facility would limit flexibility to relocate services in the future based on changes in Veteran demographics. Market research and interviews with local VA planners indicated that a suitable facility for purchase and subsequent renovation does not exist in the delineated market area of the proposed outpatient clinic.
- VA considered leasing a new shared facility with the Department of Defense (DoD) as a sub-lease. This alternative would address space and utilization gaps and departmental initiatives. However, local VA planners and Veterans Health Administration's Office of VA-DoD Coordination professionals determined there are no existing facility-sharing opportunities in the vicinity of the proposed outpatient clinic. The nearest DoD location, Womack Army Medical Center at Fort Bragg, is approximately 53 miles away.
- In response to VA's Request for Lease Proposals, other sites were offered but were eliminated from the competitive range for further consideration.

For the reasons stated above, these alternatives were eliminated from further consideration.

## 3.0 Affected Environment and Environmental Consequences

This section describes the baseline physical, environmental, cultural, and socioeconomic conditions at the alternative project sites and the general vicinity, with emphasis on those resources potentially impacted by the alternatives.

CEQ guidelines and regulations encourage agencies to streamline environmental analyses in their EAs (CEQ, 2012) by focusing on significant issues and discussing insignificant issues only briefly, discussing impacts in proportion to their significance, and incorporating by reference other environmental analyses (40 CFR 1500.4(c), 1502.2(b), and 1502.21).

Impacts are identified as either significant or less than significant. The terms “effects” and “impacts” are synonymous in this EA. Where possible, impacts are identified as short-term, temporary, or long-term in relation to the length of the effect of the impact.

Resource areas considered in this EA are aesthetics; air quality; cultural and historic resources; geology 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; traffic, transportation, and parking; utilities; and environmental justice. This section also addresses cumulative impacts and the potential for generating substantial controversy.

As described in Section 1.0, the outpatient clinic would consolidate three existing outpatient clinics. The leases of the three clinics would expire and the buildings could be leased by others for medical or other uses. The expiration of these leases would result in closure of the outpatient clinics. The closure of the three clinics and replacement of their services with those from the new outpatient clinic would have negligible impacts to the resource areas considered in this EA and are not further evaluated in this EA.

### 3.1 Aesthetics

#### 3.1.1 Affected Environment

##### 3.1.1.1 Alternative A

Alternative A is approximately 16.76 acres of undeveloped and wooded land along the west side of Benson Road (Highway 50) between Rand Road and Arbor Greene in Garner (Figure 2-2). The site is in a developing suburban area 10 miles south of the Raleigh metro area. Surrounding land uses are residential, agricultural, and commercial. Adjacent properties include farmland, wooded land, a gas station and convenience store, an auto repair shop, undeveloped land zoned for office and institutional use, residential neighborhoods, and an elementary school. The closest controlled-access highway is Interstate 40 with an entrance about 4.5 miles northeast of Alternative A.

##### 3.1.1.2 Alternative B

Alternative B is approximately 32.88 acres of cleared agricultural and wooded land with two residential structures (Figure 2-3). The site is located at the intersection of Old Stage Road and Ten Ten Road in Garner and is approximately 10 miles south of the Raleigh metro area in a developing suburban area. In the wooded area near the center of the site is a surface water feature and a ditch that extends west towards Old Stage Road. Surrounding land uses are residential, agricultural, and commercial. Adjacent properties include a gas station and convenience store, retail, farmland, wooded land, storage units, a pond, places of worship, residential neighborhoods, and an elementary school. The closest highway is U.S. Route 401 which is approximately 2.5 miles west of the site.

### **3.1.2 Environmental Consequences**

VA has established criteria for the developer to design a modern quality, two-story building with a design that complies with locally adopted codes. The aesthetic concept for the exterior of the building includes a façade of stone, marble, brick, stainless steel, aluminum or other permanent materials. Landscaping for the outpatient clinic is required to be integrated with the site design and building aesthetics to provide a welcoming and pleasant environment.

#### **3.1.2.1 Alternative A**

Construction activities such as site preparation, grading, excavation, vehicle traffic, movement of heavy equipment, and paving roadways and parking areas would have short-term and minor impacts on aesthetics. These activities would not be aesthetically consistent with the surrounding area, but they would end once construction is complete.

The site would transition from undeveloped and wooded land to a developed site with a two-story outpatient clinic. The appearance of the constructed outpatient clinic would be consistent with the aesthetics and visual character of the Town of Garner Unified Development Ordinance. Visual impacts would be minimized by the attractive design of the outpatient clinic and landscaping. Under Alternative A, the exterior design concept of the outpatient clinic includes an open entry canopy; metal, local stone, curtain wall, and brick exterior materials; and a focus on bold features to convey strength and security. The outpatient clinic for Alternative A is designed as an unimposing facility compatible with the surrounding properties and land uses.

Implementation of VA design and landscaping criteria outlined in the VA Raleigh, NC Outpatient Clinic Request for Lease Proposals and compliance with the Town of Garner Unified Development Ordinance would ensure the outpatient clinic and the developed site would be aesthetically attractive and compatible with the surrounding land uses. These actions would result in less than significant impacts.

#### **3.1.2.2 Alternative B**

Construction activities such as site preparation, grading, excavation, vehicle traffic, movement of heavy equipment, and paving roadways and parking areas would have short-term and minor impacts on aesthetics. These activities would not be aesthetically consistent with the surrounding area, but they would end once construction is complete.

The site would transition from agricultural and wooded land to a developed site with a two-story outpatient clinic. The appearance of the constructed outpatient clinic would be consistent with the aesthetics and visual character of the Wake County Unified Development Code and Town of Garner Unified Development Ordinance. Visual impacts would be minimized by the attractive design of the outpatient clinic and landscaping. Under Alternative B, the goal of the exterior design concept was to create a modern building with a comfortable and inviting appearance. The exterior of the building incorporates stucco, stone, and masonry with earth tone colors that create a warm and friendly environment. An existing surface water feature is incorporated into the landscaping design. Under Alternative B, the outpatient clinic is designed to be compatible with the surrounding properties and land uses.

Implementation of VA design and landscaping criteria outlined in the VA Raleigh, NC Outpatient Clinic Request for Lease Proposals and compliance with the Wake County Unified Development Code and Town of Garner Unified Development Ordinance would ensure the outpatient clinic and the developed site would be aesthetically attractive and compatible with the surrounding land uses. These actions would result in less than significant impacts.

### **3.1.2.3 No Action Alternative**

Under the no action alternative, no construction by VA's selected developer would occur. No impacts to aesthetics would occur as a result of VA's actions. However, the proposed sites could be developed by others with the potential for impacts to aesthetics dependent on that potential development.

## **3.2 Air Quality**

### **3.2.1 Affected Environment**

Ambient air quality in an area is characterized by compliance with the primary and secondary National Ambient Air Quality Standards (NAAQS). The United States Environmental Protection Agency (USEPA) sets standards for pollutants considered harmful to public health and the environment. Areas are then classified as attainment, non-attainment, or maintenance with respect to compliance with NAAQS. The USEPA Green Book provides information about the area NAAQS designations and nonattainment status. According to the USEPA Green Book, Wake County, North Carolina is designated as an attainment area. This means that the area is in compliance with air quality standards (USEPA, 2020).

#### **3.2.1.1 Alternative A**

Sensitive air quality receptors in the area include an elementary school, two churches, a senior citizen center, a nursing home, and residential areas. The Rand Road Elementary School is adjacent to the west boundary of Alternative A. One church is approximately 0.5 miles south of Alternative A on Benson Road and the second church is approximately 1 mile north on Benson Road. The senior citizen center is 1 mile south of Alternative A on Benson Road and the nursing home is about 1 mile north of Alternative A on Benson Road. The residential areas are within 0.1 mile of Alternative A.

#### **3.2.1.2 Alternative B**

Sensitive receptors in the area include an elementary school, four churches, and residential areas. The Vance Elementary School is 0.2 miles northwest of Alternative B on Ten Ten Road. Three churches are 0.2 miles, 0.8 miles, and 1.4 miles southeast of Alternative A. The fourth church is about 1 mile south on Old Stage Road. The residential areas are on adjacent properties.

### **3.2.2 Environmental Consequences**

#### **3.2.2.1 Action Alternatives**

Construction activities and emissions from construction vehicles would have the potential for short-term and minor impacts to air quality at Alternative A and Alternative B. Construction activities such as site preparation, grading, and movement of heavy equipment could generate fugitive dust. There could be short-term health effects and nuisances such as reduced visibility. The amount of fugitive dust would be dependent on the soil type, wind speed, size and intensity of the activity, and the type of dust suppression measure implemented. These measures could include applying suppressants or palliatives, such as water, clay additives, or polymers, stabilizing disturbed areas with vegetation or mulch, or limiting earth moving construction activities during high wind conditions.

Exhaust from the operation of construction equipment would generate emissions that would have short-term and minor impacts to air quality. Examples of construction equipment that may be used include excavators, bulldozers, backhoes, graders, front-end loaders, dump trucks, roller compactors, water trucks, pump trucks, cranes, paving machines, and concrete mixer trucks. Measures such as using newer construction equipment with emissions controls and reducing idling of construction equipment would minimize emissions.

Operation of the outpatient clinic would have long-term and minor impacts to air quality. Emissions from equipment, such as boilers and generators, and exhaust from vehicles used by patients and staff would generate emissions. It is anticipated that there would be approximately 450 staff and up to 500 patient visits per day. These emissions would be expected to have a minor impact to air quality. Regional vehicle emissions related to the outpatient clinic would be similar to current emissions as patients and staff that would use the outpatient clinic currently travel to the existing three clinics that would be consolidated.

A Title V operating permit is not anticipated to be required for the proposed outpatient clinic. However, VA's selected developer would secure any required air emissions permits.

Construction and operation of the outpatient clinic would result in less than significant impacts to air quality.

### **3.2.2.2 No Action Alternative**

Under the no action alternative, no construction by VA's selected developer would occur. No impacts to air quality would occur as a result of VA's actions. However, the proposed sites could be developed by others with the potential for impacts to air quality specific to that potential development.

## **3.3 Cultural and Historic Resources**

Cultural resources are defined by the National Historic Preservation Act of 1966 (NHPA) as historic properties including prehistoric and historic sites, structures, buildings, objects, districts, or any other physical evidence of human activity associated with important historic events, with persons important in history, representing the work of a master or exemplary as a type, or have or may yield information important to history or prehistory. Cultural resources are protected through several federal laws and associated regulations, including the NHPA, the Archaeological and Historic Preservation Act of 1974, the American Indian Religious Freedom Act of 1978, the Archaeological Resources Protection Act of 1979, and the Native American Graves Protection and Repatriation Act of 1990.

Section 106 of the NHPA and its implementing regulations, 36 CFR Part 800, requires an assessment of the potential impact of an undertaking on historic properties that are within the proposed project's area of potential effect, which is defined as the geographic area(s) "within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist."

### **3.3.1 Affected Environment**

#### **3.3.1.1 Alternative A**

Alternative A is approximately 16.76 acres of undeveloped and wooded land with three residential structures. Alternative A is not listed on the National Register of Historic Places (NRHP). A review of the North Carolina State Historic Preservation Office (SHPO) files indicated no above-ground historic resources within the Alternative A area of potential effect and that the area had not been previously surveyed for cultural resources.

Therefore, VA conducted a cultural resources survey on Alternative A in June 2020. The survey consisted of a Phase I archaeological investigation and a visual effects analysis. The Phase I archaeological investigation and visual effects analysis determined that no cultural resources were identified on Alternative A or within the area of potential effect (Figure 3-1).

#### **3.3.1.2 Alternative B**

Alternative B is approximately 32.88 acres of cleared agricultural and wooded land with two residential structures. Alternative B is entirely contained within the boundaries of an NRHP eligible property, the George Williams Farm (WA1212), (Figure 3-2). The George Williams Farm was determined eligible for

listing on the NRHP by the North Carolina SHPO under Criterion A and C, due to its association with historic agriculture practices and the architecture of the buildings within the property. The farm originally dates to the early 20<sup>th</sup> century and consists of the main farm complex at the northeast corner of Old Stage Road and Ten Ten Road, a tenant house located in the northeastern portion of Alternative B, and approximately 155 acres of farmland (including Alternative B) east and south of the complex.

In addition, in 1995, an avocational archaeologist recorded a 14.6-acre archaeological site (31WA1202) on Alternative B that contained Late Paleoindian through Woodland period artifacts (generally 10,500 to 300 years ago). No NRHP eligibility determination was made at the time.

Therefore, VA conducted a cultural resources survey on Alternative B in June 2020. The survey consisted of a Phase I archaeological investigation and a visual effects analysis. The previously recorded archaeological site was identified, and the boundaries of the archaeological site were expanded to include evidence of a 27-acre site, 12.4 acres larger than initially recorded in 1995. Additional investigation will be required to determine if 31WA1202 is also eligible for listing on the NRHP.

### **3.3.2 Environmental Consequences**

#### **3.3.2.1 Alternative A**

Based on the findings of the Phase I archaeological investigation and the lack of historic properties at Alternative A, VA has concluded that the construction and operation of the outpatient clinic would result in a finding of no historic properties effected under Section 106 of NHPA, per 36 CFR 800.4(d)(1).

The results of the Phase I archaeological investigation were included in Section 106 consultation letters with a VA determination of no historic properties effected; these letters were sent to the North Carolina SHPO, the Catawba Indian Nation, and appropriate consulting parties in July 2020, requesting their concurrence or feedback. On August 7, 2020, VA received a letter from the North Carolina SHPO concurring that construction and operation of the outpatient clinic at Alternative A would not affect any properties or archaeological sites eligible for listing on the NRHP. VA did not receive a response from the Catawba Indian Nation or consulting parties. In addition, the inadvertent discovery requirements outlined in Section 4 would further ensure that no historic properties are affected. The construction and operation of the outpatient clinic would result in a less than significant effect on cultural resources.

#### **3.3.2.2 Alternative B**

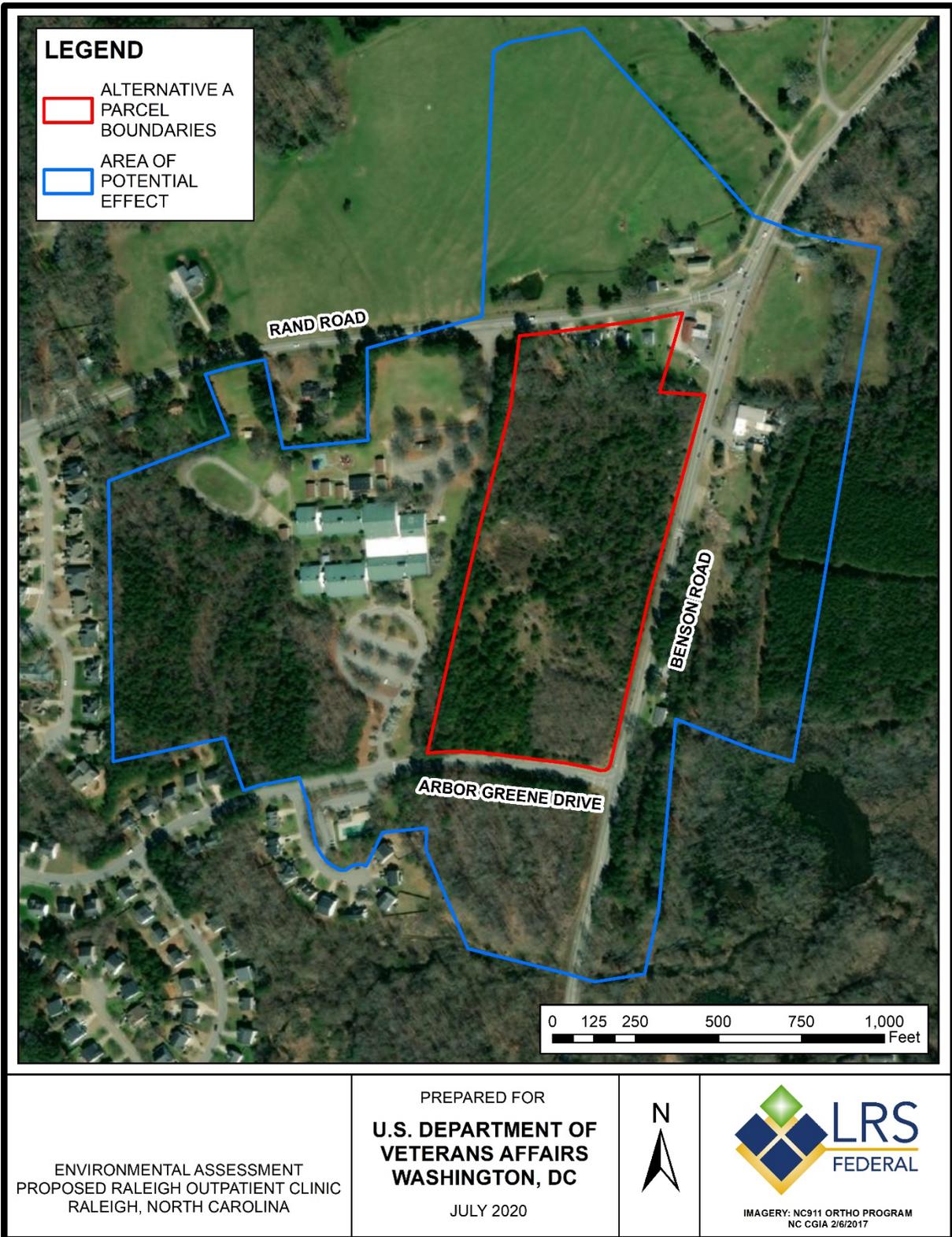
The construction and operation of the outpatient clinic would result in an adverse effect to historic properties at Alternative B. Additional investigation is required to better understand the potential effects on the George Williams Farm and potential mitigation strategies. In addition, a Phase II archaeological survey is required to determine the NRHP eligibility of the archaeological site. Until further investigation is conducted, the NRHP status of the archaeological site and determination of effect on the site is unknown.

The results of the Phase I archaeological investigation were included in Section 106 consultation letters with a VA determination of adverse effect on cultural resources and a recommendation for further investigation and consultation. These letters were sent to the North Carolina SHPO, the Catawba Indian Nation, and appropriate consulting parties in July 2020, requesting their concurrence and feedback. On August 7, 2020, VA received a letter from the North Carolina SHPO. The North Carolina SHPO concurred with the adverse effect determination for the George Williams Farm and agreed further investigation is necessary to determine whether site 31WA1202 is eligible for listing in the National Register. In addition, the SHPO advised that if Alternative B is selected, adverse effects may be addressed in a memorandum of agreement (MOA). VA did not receive a response from the Catawba Indian Nation or consulting parties.

Therefore, if Alternative B is selected, a Phase II archaeological investigation would be conducted to determine if 31WA1202 is eligible for listing on the NRHP. VA, North Carolina SHPO, and other consulting parties would develop, negotiate, and execute an MOA to address adverse effects to the George Williams Farm and, if determined eligible, site 31WA1202. With the executed MOA, implementation of agreed measures in the MOA, and the inadvertent discovery requirements outlined in Section 4, the construction and operation of the outpatient clinic would result in a less than significant effect on cultural resources.

### **3.3.2.3 No Action Alternative**

Under the no action alternative, no construction by VA's selected developer would occur. No impacts to cultural resources would occur as a result of VA's actions. However, the proposed sites could be developed by others with the potential for impacts to cultural resources specific to that potential development.



**Figure 3-1. Alternative A and Area of Potential Effect**

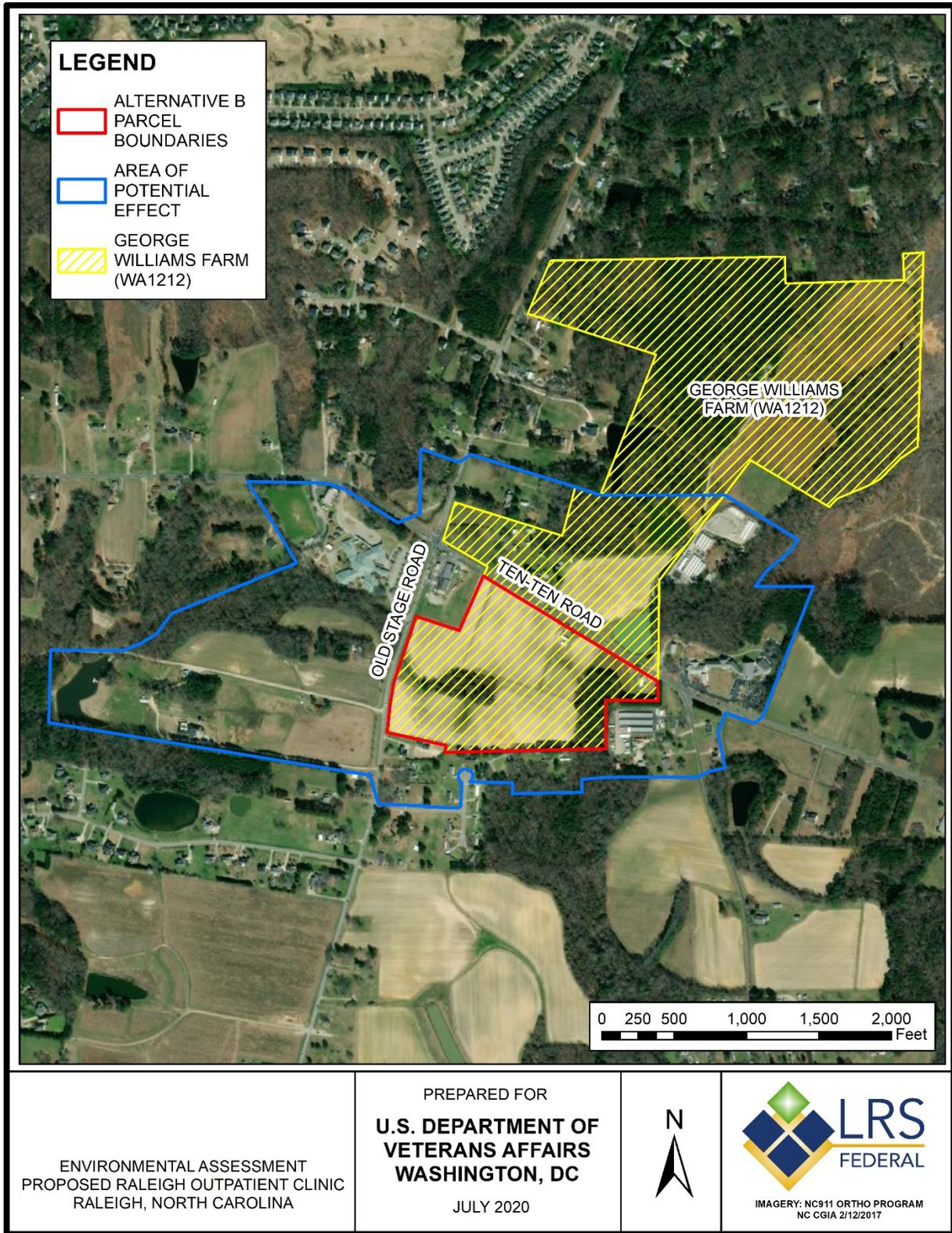


Figure 3-2. Alternative B and Area of Potential Effect

## 3.4 Geology and Soils

### 3.4.1 Affected Environment

Alternative A and Alternative B are in the Piedmont Province, which lies between the Coastal Plain and the Blue Ridge physiographic provinces. This province is characterized by gently rolling well-rounded hills and long low ridges. There is typically a few hundred feet of elevation difference between the hills and valleys. The sites are in the Raleigh terrane and near the border of the Coastal Plain. The Raleigh terrane includes mostly metamorphosed sedimentary rocks and the Coastal Plain is mostly marine sedimentary rocks. (North Carolina Department of Environmental Quality, 2020)

#### 3.4.1.1 Alternative A

The topography is gently sloping with the elevation ranging from approximately 229 feet above mean sea level in the northeast corner to 289 feet in the southwest corner (USGS, 2020).

Four soil types are present at the site and are identified in Table 3-1. Altavista fine sandy loam is in the northeast corner. Cecil sandy loam is in the southwest portion of the site. Pacolet sandy loam is located through the central portion of the site. There is a small area of urban land along the southwest boundary. The three major soil types are classified as prime farmland. The soils are not hydric soils meaning that they are not formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part of the soil profile. (USGS, 2020)

**Table 3-1. Soil Types, Alternative A**

Soil Name	Drainage Class	Frequency of Flooding/ Ponding	Depth to Water Table (inches)	Prime Farmland Soil	Percentage of Alternative A
Altavista fine sandy loam	Moderately well drained	Rare/None	18 to 30	Yes	5.3%
Cecil sandy loam	Well drained	None/None	>80	Yes	28.8%
Pacolet sandy loam	Well drained	None/None	>80	Yes	63.3%
Urban land	Not applicable	Not applicable	Not applicable	No	2.6%

(USGS, 2020)

#### 3.4.1.2 Alternative B

The topography is relatively flat with the elevation ranging from approximately 395 to 412 feet above mean sea level (USGS, 2020).

Two soil types are present at the site and are identified in Table 3-2. Fuquay loamy sand occurs through most of the area with a portion in the east corner. Rains sandy loam is found in the eastern and west-central portions of the area. These soil types are classified as prime farmland. Rains sandy loam is hydric meaning it was formed under conditions of saturation, flooding, or ponding long enough during the growing season to develop anaerobic conditions in the upper part of the soil profile (USGS, 2020).

**Table 3-2. Soil Types, Alternative B**

<b>Soil Name</b>	<b>Drainage Class</b>	<b>Frequency of Flooding/ Ponding</b>	<b>Depth to Water Table (inches)</b>	<b>Prime Farmland Soil</b>	<b>Percentage of Alternative B</b>
Fuquay loamy sand	Well drained	None/None	34 to 40	Yes	72.6%
Rains sandy loam	Poorly drained	None/None	12 to 36	Yes, if drained	27.4%

(USGS, 2020)

### 3.4.2 Environmental Consequences

#### 3.4.2.1 Action Alternatives

Construction of the outpatient clinic and parking areas at Alternative A and Alternative B would have minor changes to topography. The design of the outpatient clinic incorporates the current topography. While some grading would be required, it is anticipated that the outpatient facility, parking areas, and landscaped areas would be constructed near current grades.

Construction activities, such as site preparation, grading, movement of heavy equipment, and paving of parking areas, could temporarily increase sedimentation and erosion. These activities would disturb the soil, compact the soil, and remove vegetation which could make the soil more susceptible to erosion by wind and water runoff. These activities would expose soil surfaces and could increase the potential for sedimentation and surface runoff. However, the implementation of approved measures from the approved erosion and sedimentation plan, and the North Carolina-issued National Pollutant Discharge Elimination System (NPDES) permit would prevent erosion and sedimentation impacts. In addition, a review of the construction stormwater under the North Carolina general permit (NCG01) would be required prior to land disturbance and construction.

During operation of the outpatient clinic, the impervious and hardened surfaces would increase surface runoff with the potential for erosion and sedimentation. However, the proposed landscaping and appropriately designed stormwater system would minimize these effects.

The construction and operation of the outpatient clinic would have less than significant impacts to geology and soils.

#### 3.4.2.2 No Action Alternative

Under the no action alternative, no construction by VA's selected developer would occur. No impacts to geology or soils would occur as a result of VA's actions. However, the proposed sites could be developed by others with the potential for impacts to geology and soils specific to that potential development.

## 3.5 Hydrology and Water Quality

### 3.5.1 Affected Environment

The major watershed for Garner, North Carolina, is the Upper Neuse watershed, covering 770 square miles. The watershed includes reservoirs that provide a source of drinking water and recreation opportunities.

The Piedmont aquifer is the major groundwater aquifer in the Garner, North Carolina, area. The aquifer is characterized by crystalline rock with water suitable for drinking (USGS, 1997).

### 3.5.1.1 Alternative A

Alternative A is in the Mahlers Creek-Swift Creek subwatershed. There are no waterbodies considered impaired under Section 303(d) of the Clean Water Act (CWA) on Alternative A.

In May 2020, a field investigation identified two surface water features and two ephemeral channels (Appendix D). More detail about wetlands is included in Section 3.9.1.1. There is a surface water feature (0.02 acres) near the western border of Alternative A that appears to be manmade or altered. A small relic stormwater basin is in the east-central portion of Alternative A. An ephemeral channel originates from the water feature and is approximately 2 feet wide and 0.5 to 1 foot deep. Historic aerial photos suggest that the feature was manmade and has naturalized over time. A second ephemeral channel is immediately south of and behind the residential properties in the northern portion of Alternative A.

In July 2020, USACE made a field determination that the two surface water features on Alternative A are man-made upland ponds and therefore non-jurisdictional. Additionally, USACE determined that both ephemeral channels are non-jurisdictional. A request was submitted and is under review for USACE to concur with an Approved Jurisdictional Determination that Alternative A is comprised entirely of upland and therefore would not require Section 404 permitting (Appendix D).

Water wells in the area are typically 100 to 245 feet deep and the groundwater generally flows east. Depth to the water table is generally from 2 to 10 feet, but may be up to 35 feet in some locations (EDR, 2020a).

### 3.5.1.2 Alternative B

Alternative B is in the Middle Middle Creek subwatershed. There are no waterbodies considered impaired under Section 303(d) of the CWA on Alternative B.

In May 2020, a field investigation identified two water features and an ephemeral channel (Appendix D). More detail is included in Section 3.9.1.2. The first water feature (0.96 acres) is in the western portion of Alternative B. The second water feature (1.62 acres) is in the eastern portion of Alternative B. The ephemeral channel appears to be a manmade ditch that connects two portions of the first wetland area.

In July 2020, USACE made a field determination that a portion of the first wetland area that extends into the cultivated field could be prior converted cropland and could be non-jurisdictional and/or exempt from permitting. USACE is reviewing a request for concurrence with an Approved Jurisdictional Determination of this area. Additionally, USACE determined the ephemeral channel to be a jurisdictional linear wetland, so a revised request was submitted to USACE for concurrence with a Preliminary Jurisdictional Determination for this feature. Both requests remain in review by USACE at this time (Appendix D).

There is a septic field and two water supply wells associated with the residential houses along Ten Ten Road. In January 2020, a Phase I environmental site assessment (ESA) determined that the septic field and water supply wells were not a recognized environmental condition (REC).

Depth to the water table at an adjacent property is generally 3 to 16 feet and groundwater flows to the southeast (Terracon, 2020a) (Terracon, 2020b). Water wells in the area range from 180 to 560 feet deep (EDR, 2020b).

## 3.5.2 Environmental Consequences

Potential impacts to wetland areas are described in Section 3.9.2.

Construction activities at Alternative A and Alternative B, such as site preparation, grading, movement of heavy equipment, and paving of parking areas, could temporarily increase sedimentation and erosion. These activities would expose soil surfaces and could increase the potential for sedimentation and surface runoff. Implementation of measures from the approved erosion and sedimentation plan, the required North Carolina issued NPDES permit, and the stormwater pollution prevention plan (SWPPP) would

prevent erosion and sedimentation impacts. The NPDES permit and SWPPP identify potential stormwater contaminants and address how to minimize stormwater pollution. The SWPPP would contain best management practices (BMPs) designed to prevent stormwater pollution such as temporary construction entrances, silt fences, inlet protection, ditch checks, slope protection, and sediment barriers.

During operation of the outpatient clinic, the impervious and hardened surfaces, such as the outpatient facility, parking areas, and other paved areas, would increase surface runoff with the potential for erosion and sedimentation. However, landscaping and vegetation cover and the stormwater system included in the design of the outpatient clinic would reduce these effects. Landscaping and vegetation cover would stabilize soil and prevent erosion and sedimentation. The stormwater system would capture runoff from storm events and reduce the potential risk of contaminants entering the watershed.

### **3.5.2.1 Alternative A**

The outpatient clinic would be a slab-on-grade building and would be connected to the municipal water supply. If shallow groundwater is encountered during construction, appropriate groundwater control and dewatering measures, such as sump pumps, wellpoint systems, or deep well systems, would be implemented.

Operation of the outpatient clinic is not anticipated to impact groundwater resources. There would not be any actions that would disturb groundwater sources. As a result, impacts to groundwater would be minor and temporary.

Stormwater from the outpatient facility would be collected by underground stormwater inlets and discharged to underground stormwater basins below the proposed surface parking. The underground stormwater basin would be designed to detain runoff and discharge it at the appropriate release rate.

The construction and operation of the outpatient clinic would have less than significant impacts to hydrology and water quality.

### **3.5.2.2 Alternative B**

The outpatient clinic would be a slab-on-grade building and would be connected to the municipal water supply. As a result, the septic field and two drinking water wells would no longer be used. The septic field and tank would be closed and the wells would be abandoned according to local regulations and code to avoid potential contamination of groundwater.

During construction, if shallow groundwater is encountered, appropriate groundwater control and dewatering measures would be implemented. Operation of the outpatient clinic is not anticipated to impact groundwater resources. There would not be any actions that would disturb groundwater sources. As a result, impacts to groundwater would be minor and temporary.

Stormwater from the outpatient facility would be collected by a stormwater sewer pipe network and four proposed bioretention areas and then conveyed to two wet pond stormwater control measure facilities. One wet pond would be in the far eastern corner of Alternative B near Ten Ten Road. The second wet pond would be on the far western side of Alternative B by Old Stage Road. The wet ponds would detain and treat collected stormwater before conveying it to the existing pipe that flows offsite under Old Stage Road.

The construction and operation of the outpatient clinic would have less than significant impacts to hydrology and water quality.

### **3.5.2.3 No Action Alternative**

Under the no action alternative, no construction by VA's selected developer would occur. No impacts to hydrology and water quality would occur as a result of VA's actions. However, the proposed sites could

be developed by others with the potential for impacts to hydrology and water quality specific to that potential development.

## 3.6 Wildlife and Habitat

### 3.6.1 Affected Environment

Wildlife, vegetation, habitat, and federally and state listed protected species is described separately for each alternative. The summary of migratory birds below is the same for Alternative A and Alternative B.

A review of the United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool for Migratory Birds Conservation Concern (BCC) identified three species with the potential to occur in Alternative A and Alternative B (Table 3-3) . Data maintained by eBird indicates that these 3 species have been recorded in proximity to Alternative A and Alternative B (TheCornellLab of Ornithology, 2020). The potential for occurrence category of “Likely” means that the project study area is in the species’ known range and contains suitable habitat; records of species’ occurrence in proximity to the project study area, but no records within the project area.

**Table 3-3. Migratory Bird Species of Conservation Concern that May Occur in Alternative A and Alternative B**

Common Name	Scientific Name	Listing Status	Habitat Description	Potential for Occurrence
American kestrel	<i>Falco sparverius paulus</i>	BCC	Breed in open or partly open habitat; prairies, deserts, wooded streams, burned forest, cultivated lands and farmland with scattered trees, open woodland, along roads, sometimes in cities.	Likely
Red-headed woodpecker	<i>Melanerpes erythrocephalus</i>	BCC	Breed in deciduous woodlands with oak or beech, groves of dead or dying trees, river bottoms, burned areas, recent clearings, beaver swamps, orchards, parks, farmland, grasslands with scattered trees, forest edges, and roadsides.	Likely
Wood thrush	<i>Hylocichla mustelina</i>	BCC	Breed throughout mature deciduous and mixed forests in eastern North America, most commonly those with American beech, sweet gum, red maple, black gum, eastern hemlock, flowering dogwood, American hornbeam, oaks, or pines.	Likely

BCC = Bird of Conservation Concern

### 3.6.1.1 Alternative A

Alternative A is approximately 16.76 acres of scrub growth and new growth forest with a few rural residences in the northern portion of the site. There are three terrestrial communities in Alternative A including a forested upland community, a scrub-shrub upland community, and a palustrine forested wetland (PFO) community. These three communities, both natural and disturbed, support a diversity of wildlife and plant species.

The forested upland community consists of non-wetland areas dominated by woody vegetation 20 feet or greater in height and 3 inches or greater in diameter at breast height. Dominant trees include American sweetgum (*Liquidambar styraciflua*), loblolly pine (*Pinus taeda*), red maple (*Acer rubrum*), water oak (*Quercus nigra*), and white oak (*Quercus alba*). Forested upland is the most dominant terrestrial community, comprising approximately 82% of Alternative A.

The scrub-shrub upland community consists of non-wetland areas with woody vegetation less than 20 feet in height. Dominant woody species include sweetgum, red maple, loblolly pine, common persimmon (*Diospyros virginiana*), and eastern red cedar (*Juniperus virginiana*). Dominant herbaceous or non-woody species include broomsedge (*Andropogon virginicus*), goldenrods (*Solidago* sp.), and raspberry (*Rubus* sp.). The scrub-shrub upland community comprises approximately 11% of Alternative A.

The PFO wetland community consists of a prevalence of hydrophytic or water-loving woody vegetation 20 feet or greater in height and 3 inches or greater in diameter at breast height. Dominant tree species are American sweetgum, red maple, and loblolly pine. This community consists of vegetation in the immediate proximity of a 0.02-acre inundated wetland. The palustrine forested wetland comprises less than 0.5% of Alternative A. More information about the wetland is in Section 3.9.

The residences in the northern portion of Alternative A comprise approximately 6% of Alternative A.

During a field survey in May 2020, several wildlife species were observed and recorded. They include the American crow (*Corvus brachyrhynchos*), Canada goose (*Branta canadensis*), eastern bluebird (*Sialia sialis*), eastern gray squirrel (*Sciurus carolinensis*), northern cardinal (*Cardinalis cardinalis*), turkey vulture (*Cathartes aura*), and white-tailed deer (*Odocoileus virginianus*).

Available information from USFWS, North Carolina Wildlife Resource Commission (NCWRC), and North Carolina National Heritage Program (NCNHP) was reviewed to identify potential federally or state listed protected species on or in the vicinity of Alternative A. The USFWS IPaC tool was reviewed for federally listed species. Data from NCNHP were reviewed, such as occurrence records for protected species, critical habitat, and documented natural areas known to occur in or within one mile of Alternative A. The species identified from these sources and the potential for habitat at the site are listed in Table 3-4.

**Table 3-4. Federally and State Listed Protected Species that May Occur in Alternative A**

Common Name	Scientific Name	Listing Status <sup>1</sup>	Habitat Description	Potential Habitat Present
Birds				
Red-cockaded woodpecker	<i>Picoides borealis</i>	FE, SE	Open, mature stands of southern pines, particularly longleaf pine ( <i>Pinus palustris</i> ), for foraging and nesting/roosting habitat.	No
Bald eagle	<i>Haliaeetus leucocephalus</i>	BGEPA, ST	Breeds near wetland habitats such as seacoasts, rivers, large lakes and marshes where fish are abundant; winters in upland terrestrial habitats.	No

Common Name	Scientific Name	Listing Status <sup>1</sup>	Habitat Description	Potential Habitat Present
Amphibians				
Neuse River waterdog	<i>Necturus lewisi</i>	PT, SC	Found among large accumulations of submerged leaves in eddies, or backwaters of streams.	No
Fish				
Carolina madtom	<i>Noturus furiosus</i>	PE, ST	Habitat includes sand-, gravel-, and detritus-bottomed riffles and runs of small to medium rivers. Usually occurs in very shallow water with little or no current over fine to coarse sand bottom.	No
Bivalves				
Atlantic pigtoe	<i>Fusconaia masoni</i>	PT, SE	Requires fast flowing, well oxygenated streams and is restricted to fairly pristine habitats.	No
Creepers	<i>Strophitus undulatus</i>	ST	Streams and rivers in a range of flow conditions but can tolerate lakes and ponds, particularly in outlets.	No
Dwarf wedgemussel	<i>Alasmidonta heterodon</i>	FE, SE	Creek and river areas with a slow to moderate current and sand, gravel, or firm silt bottoms.	No
Eastern lampmussel	<i>Lampsilis radiata</i>	ST	Inhabits a variety of aquatic habitats, including small streams, large rivers, ponds, and lakes.	No
Roanoke slabshell	<i>Elliptio roanokensis</i>	SC	Usually found in near-shore trough habitats in sand / gravel substrates.	No
Triangle floater	<i>Alasmidonta undulata</i>	ST	Typically occurs in coarse to fine gravel with sand and mud in smaller streams with slow current.	No
Yellow lance	<i>Elliptio lanceolata</i>	FT, SE	Prefers clean, coarse to medium sized sands as substrate, on occasion, specimens are also found in gravel substrates.	No
Plants				

Common Name	Scientific Name	Listing Status <sup>1</sup>	Habitat Description	Potential Habitat Present
Michaux's sumac	<i>Rhus michauxii</i>	FE, SE	Habitat consists of sandy or rocky open woods in association with basic soils. Survives best in areas where some form of disturbance has provided an open area.	Yes

Sources: (NCNHP, 2020) (USFWS, 2020)

<sup>1</sup> FE = Federal-endangered; FT = Federal-threatened; PE = Federal-proposed endangered; PT = Federal-proposed threatened; SE = State-endangered; ST = State-threatened; SC = State-special concern, BGEPA = Bald and Golden Eagle Protection Act

Suitable habitat for Michaux's sumac is present in Alternative A. In May 2020, a pedestrian survey was conducted of the open and disturbed areas, including roadsides, areas of early successional growth, and open wooded areas. No stems of Michaux's sumac were observed. Additionally, a review of NCNHP records on May 18, 2020, indicated no known occurrences of this species within one mile of the study area. Based on the survey results and lack of known occurrences, it is unlikely that Michaux's sumac is present at Alternative A.

No other suitable habitat or federally or state listed protected species were identified onsite during the May 2020 survey.

A Significant Natural Heritage Area, Swift Creek, is within one mile of Alternative A. NCNHP identifies Swift Creek, downstream of the project study area, as a Significant Natural Heritage Area. According to NCNHP, Swift Creek aquatic habitat is significant because it supports numerous rare mussel and fish species. Federally listed species include the dwarf wedgemussel, yellow lance, Atlantic pigtoe, and Carolina madtom. Other rare species known to occur in Swift Creek include green floater (*Lasmigona subviridis*), triangle floater, creeper, notched rainbow (*Villosa constricta*), Cape Fear spike (*Elliptio marsupiobesa*), Roanoke slabshell, and the eastern lampmussel.

### 3.6.1.2 Alternative B

Alternative B is approximately 32.88 acres of cleared agricultural and wooded land with two residential structures in the northeast portion of the site. There are four terrestrial communities in Alternative B including a palustrine emergent wetland (PEM), a PFO wetland, a herbaceous upland community, and a forested community. These three communities, both natural and disturbed, support a diversity of wildlife and plant species.

The PEM wetland community is dominated by hydrophytic non-woody vegetation less than 3 feet in height. Dominant herbaceous species include broomsedge, lamp rush (*Juncus effusus*), cottongrass bulrush (*Scirpus cyperinus*), and goldenrod species. The PEM wetland community comprises approximately 1.5% of Alternative B.

The PFO wetland community consists of a prevalence of hydrophytic woody species 20 feet or greater in height and 3 inches or greater in diameter at breast height. Dominant tree species are American sweetgum, red maple, and loblolly pine. The PFO wetland community comprises approximately 6.5% of Alternative B. During a field survey conducted in May 2020, one small area of ponding/inundation was documented in this community. More information about the wetland is in Section 3.9.

The herbaceous upland community consists of non-wetland areas dominated by non-woody vegetation. Dominant herbaceous species include broomsedge, goldenrods, raspberry, henbit (*Lamium amplexicaule*), and meadow false rye grass (*Schedonorus pratensis*). The May 2020 field survey observed that this community included recently plowed agricultural fields, likely planned to be planted with crops such as

soybeans (*Glycine max*) or corn (*Zea mays*). Due to the abundance of agricultural fields, herbaceous upland is the most prevalent terrestrial community at the site, comprising approximately 82.5% of Alternative B.

The forested upland communities consist of non-wetland areas dominated by woody species 20 feet or greater in height and 3 inches or greater in diameter at breast height. Dominant trees include American sweetgum, loblolly pine, red maple, water oak, and white oak. The forested upland community comprises approximately 6.5% of the project study area.

The residences in the northeast portion of Alternative B comprise approximately 3% of Alternative A.

During a field survey in May 2020, several wildlife species were observed and recorded. They include the American crow, eastern bluebird, eastern gray squirrel, northern cardinal, rat snake (*Pantherophis obsoletus*), red-tailed hawk (*Buteo jamaicensis*), red-winged blackbird (*Agelaius phoeniceus*), turkey vulture, and white-tailed deer.

Available information from USFWS, NCWRC, and NCNHP was reviewed to identify potential federally or state listed protected species on or in the vicinity of Alternative B. The USFWS IPaC tool was reviewed for federally listed species. Data from NCNHP were reviewed, such as occurrence records for protected species, critical habitat, and documented natural areas known to occur in or within one mile of Alternative B. The species identified from these sources and the potential for habitat at the site are listed in Table 3-5.

**Table 3-5. Federally and State Listed Protected Species that May Occur in Alternative B**

Common Name	Scientific Name	Listing Status <sup>1</sup>	Habitat Description	Potential Habitat Present
Birds				
Red-cockaded woodpecker	<i>Picoides borealis</i>	FE, SE	Open, mature stands of southern pines, particularly longleaf pine ( <i>Pinus palustris</i> ), for foraging and nesting/roosting habitat.	No
Bald eagle	<i>Haliaeetus leucocephalus</i>	BGEPA, ST	Breeds near wetland habitats such as seacoasts, rivers, large lakes and marshes where fish are abundant; winters in upland terrestrial habitats.	No
Amphibians				
Neuse River waterdog	<i>Necturus lewisi</i>	PT, SC	Found among large accumulations of submerged leaves in eddies, or backwaters of streams.	No
Fish				
Carolina madtom	<i>Noturus furiosus</i>	PE, ST	Habitat includes sand-, gravel-, and detritus-bottomed riffles and runs of small to medium rivers. Usually occurs in very shallow water with little or no current over fine to coarse sand bottom.	No
Bivalves				

Common Name	Scientific Name	Listing Status <sup>1</sup>	Habitat Description	Potential Habitat Present
Atlantic pigtoe	<i>Fusconaia masoni</i>	PT, SE	Requires fast flowing, well oxygenated streams and is restricted to fairly pristine habitats.	No
Dwarf wedgemussel	<i>Alasmidonta heterodon</i>	FE, SE	Creek and river areas with a slow to moderate current and sand, gravel, or firm silt bottoms.	No
Yellow lance	<i>Elliptio lanceolata</i>	FT, SE	Prefers clean, coarse to medium sized sands as substrate, on occasion, specimens are also found in gravel substrates.	No
Plants				
Michaux's sumac	<i>Rhus michauxii</i>	FE, SE	Habitat consists of sandy or rocky open woods in association with basic soils. Survives best in areas where some form of disturbance has provided an open area.	Yes

Sources: (NCNHP, 2020) (USFWS, 2020)

<sup>1</sup> FE = Federal-endangered; FT = Federal-threatened; PE = Federal-proposed endangered; PT = Federal-proposed threatened; SE = State-endangered; ST = State-threatened; SC = State-special concern, BGEPA = Bald and Golden Eagle Protection Act

Suitable habitat for Michaux's sumac is present in Alternative B. In May 2020, a pedestrian survey was conducted of the open and disturbed areas, including roadsides, field edges, areas of early successional growth, and open wooded areas. No stems of Michaux's sumac were observed. Additionally, a review of NCNHP records on May 18, 2020, indicated no known occurrences of this species within one mile of the study area. Based on the survey results and lack of known occurrences, it is unlikely that Michaux's sumac is present at Alternative B.

No other suitable habitat or federally or state listed protected species were identified onsite during the May 2020 survey.

A search of NCNHP occurrence records do not indicate a Significant Natural Heritage Areas within one mile of Alternative B.

## 3.6.2 Environmental Consequences

### 3.6.2.1 Alternative A

The construction and operation of the outpatient clinic would modify vegetation, wildlife habitats, and terrestrial communities. The landscape design would incorporate trees, shrubs, and grasses which would provide habitat for wildlife species, including some wildlife species recorded during the May 2020 field survey. These impacts would be long-term and minor.

The May 2020 field survey confirmed that, while potential habitat for Michaux's sumac exists in Alternative A and the surrounding area, no federally or state listed protected species were observed. Based upon reviews of available information, species habitat requirements, field evaluations and known

species' temporal and spatial occurrence, the proposed project would not impact federal or state listed protected species, resulting in a less than significant impact.

### **3.6.2.2 Alternative B**

The construction and operation of the outpatient clinic would modify vegetation, wildlife habitats, and terrestrial communities. The landscape design would incorporate trees, shrubs, and grasses which would provide habitat for wildlife species, including some wildlife species recorded during the May 2020 field survey. These impacts would be long-term and minor.

The May 2020 field survey confirmed that, while potential habitat for Michaux's sumac exists in Alternative B and the surrounding area, no federally or state listed protected species were observed. Based upon reviews of available information, species habitat requirements, field evaluations and known species' temporal and spatial occurrence, the proposed project would not impact federal or state listed protected species, resulting in a less than significant impact.

### **3.6.2.3 No Action Alternative**

Under the no action alternative, no construction by VA's selected developer would occur. No impacts to wildlife and habitat would occur as a result of VA's actions. However, the proposed sites could be developed by others with the potential for impacts to wildlife and habitat specific to that potential development.

## **3.7 Noise**

### **3.7.1 Affected Environment**

The Town of Garner and Wake County have noise ordinances that apply to construction-related noise. The Town of Garner ordinance does not allow construction noise in residential districts from 6 PM to 7 AM (Town of Garner, 2006). The Wake County ordinance does not allow construction-related noise from 11 PM to 7 AM (Wake County, 2004).

Typical quiet daytime noise levels in rural areas with no substantial noise sources might be 30 to 40 dB(A) (A-weighted decibels), while quiet daytime noise levels in suburban areas might be 40 to 50 dB(A) (Federal Highway Administration, 2018). For comparison purposes, Table 3-6 lists typical noise levels from construction equipment that could likely be used in construction of the outpatient facility.

**Table 3-6. Construction Equipment Noise Emission Levels**

Equipment	Typical Noise Level 50 Feet from Source dB(A)
Air compressor	81
Backhoe	80
Concrete pump	82
Dozer	85
Generator	81
Grader	85
Loader	85
Paver	89
Pneumatic tool	85
Pump	76
Roller	74
Saw	76
Scraper	89
Truck	88

(Federal Highway Administration, 2017)

### 3.7.1.1 Alternative A

The noise environment around Alternative A is characterized as relatively quiet with vehicle traffic noise along Rand Road and Benson Road. The noise environment can be described as that of a typical suburban area and is expected to be in the 40 to 50 dB(A) range.

Sensitive receptors are defined as locations where occupants might be more susceptible to adverse effects of noise. Sensitive receptors around Alternative A include an elementary school, two churches, a senior citizen center, and a nursing home. The Rand Road Elementary School is adjacent to the west boundary of Alternative A. One church is approximately 0.5 miles south of Alternative A on Benson Road and the second church is approximately 1 mile north on Benson Road. The senior citizen center is 1 mile south of Alternative A on Benson Road and the nursing home is about 1 mile north of Alternative A on Benson Road.

### 3.7.1.2 Alternative B

The noise environment around Alternative B is characterized as relatively quiet with vehicle traffic noise along Old Stage Road and Ten Ten Road. The noise environment can be described as that of a typical suburban area. The noise environment can be described as that of a typical suburban area and is expected to be in the 40 to 50 dB(A) range.

Sensitive receptors in the area include an elementary school and four churches. The Vance Elementary School is 0.2 miles northwest of Alternative B on Ten Ten Road. Three churches are 0.2 miles, 0.8 miles, and 1.4 miles southeast of Alternative A. The fourth church is about 1 mile south on Old Stage Road.

## **3.7.2 Environmental Consequences**

### **3.7.2.1 Action Alternatives**

Construction activities are expected to generate noise and the noise levels can be variable depending on the construction phase; activity; and type, number and schedule of construction equipment. Construction noise would last through the duration of construction activities and would end once construction is completed. Consistent with local ordinances, construction noise would occur during the daytime and would peak during periods of high activity and heavy use of construction equipment.

Construction of the outpatient facility would occur in stages with each having a unique combination of noise characteristics, intensities, and magnitudes. Each construction stage would have varying combinations of equipment, construction activities, and construction workers. These combinations would directly affect the magnitude and intensity of the construction-related noise levels. Noise generated from the construction of the outpatient clinic is anticipated to be typical of similar construction projects. Prominent construction-related noise sources would be internal combustion engines, construction vehicles, removal of trees and vegetation, grading, and excavation. Examples of construction equipment with engines that could be used includes, excavators, bulldozers, backhoes, graders, front-end loaders, dump trucks, roller compactors, water trucks, pump trucks, cranes, paving machines, and concrete mixer trucks.

Peak noise levels associated with construction would be noticeably higher than current noise levels. Based on the noise levels in Table 3-6, construction noise could be in the 75 to 95 dB(A) range compared to current noise levels of 40 to 50 dB(A). The magnitude and intensity of these levels would depend on the time of day, duration, and frequency of the noise event. The noise level would depend on the distance from the noise source to the receptor, topography, structures, and vegetative cover. If a sensitive receptor is shielded from the noise source by topography, structures, or vegetation, then noise levels would be lower than by distance alone. Construction activities would comply with local noise ordinances and would result in temporary and less than significant impacts.

Operation of the outpatient clinic would have less than significant noise impacts. Operational noise sources would include vehicle traffic; heating, ventilation, and air conditioning systems; and landscape maintenance activities such as lawn mowers and leaf blowers. These noises would be consistent with medical facilities of similar size and would result in less than significant impacts because they would be consistent with ambient noise typical of a suburban area.

### **3.7.2.2 No Action Alternative**

Under the no action alternative, no construction by VA's selected developer would occur. There would be no noise impacts as a result of VA's actions. However, the proposed sites could be developed by others with the potential for noise impacts specific to that potential development.

## **3.8 Land Use**

### **3.8.1 Affected Environment**

#### **3.8.1.1 Alternative A**

Alternative A is approximately 16.76 acres of undeveloped and wooded land along the west site of Benson Road (Highway 50) between Rand Road and Arbor Greene in Garner. Surrounding land uses are residential, agricultural, and commercial. Adjacent properties include farmland, wooded land, a gas station and convenience store, an auto repair shop, undeveloped land for office and institutional use, residential neighborhoods, and an elementary school. According to the City of Raleigh and Wake County iMAPs tool, the residential parcels at the north of Alternative A are zoned Residential Single Family (R-

40) and the rest of the site is zoned Community Retail (CR) (Figure 3-3) (City of Raleigh and Wake County, 2020).

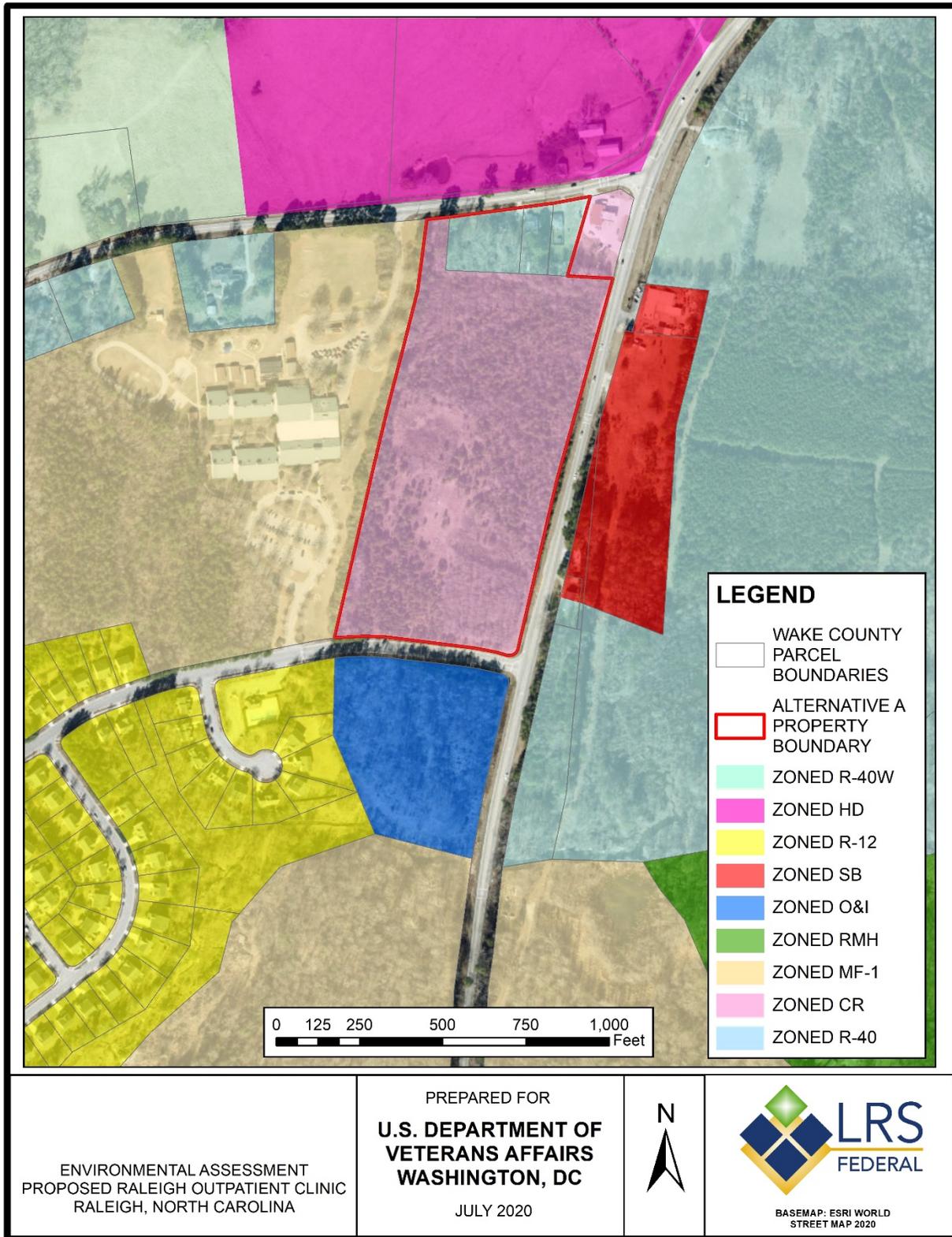
Properties to the north of Alternative A, across Rand Road, are zoned Highway District (HD) by Wake County. The adjoining property northeast of Alternative A is zoned Community Retail (CR) by the Town of Garner. Properties east of Alternative A, across Benson Road, are zoned Service Business (SB) and Residential Single Family (R-40). Properties south and across Arbor Greene Drive are zoned Office and Institutional (O&I) and Residential Single Family (R-12). Adjoining property west of Alternative A is Multi-family 1 (MF-1) (City of Raleigh and Wake County, 2020).

### **3.8.1.2 Alternative B**

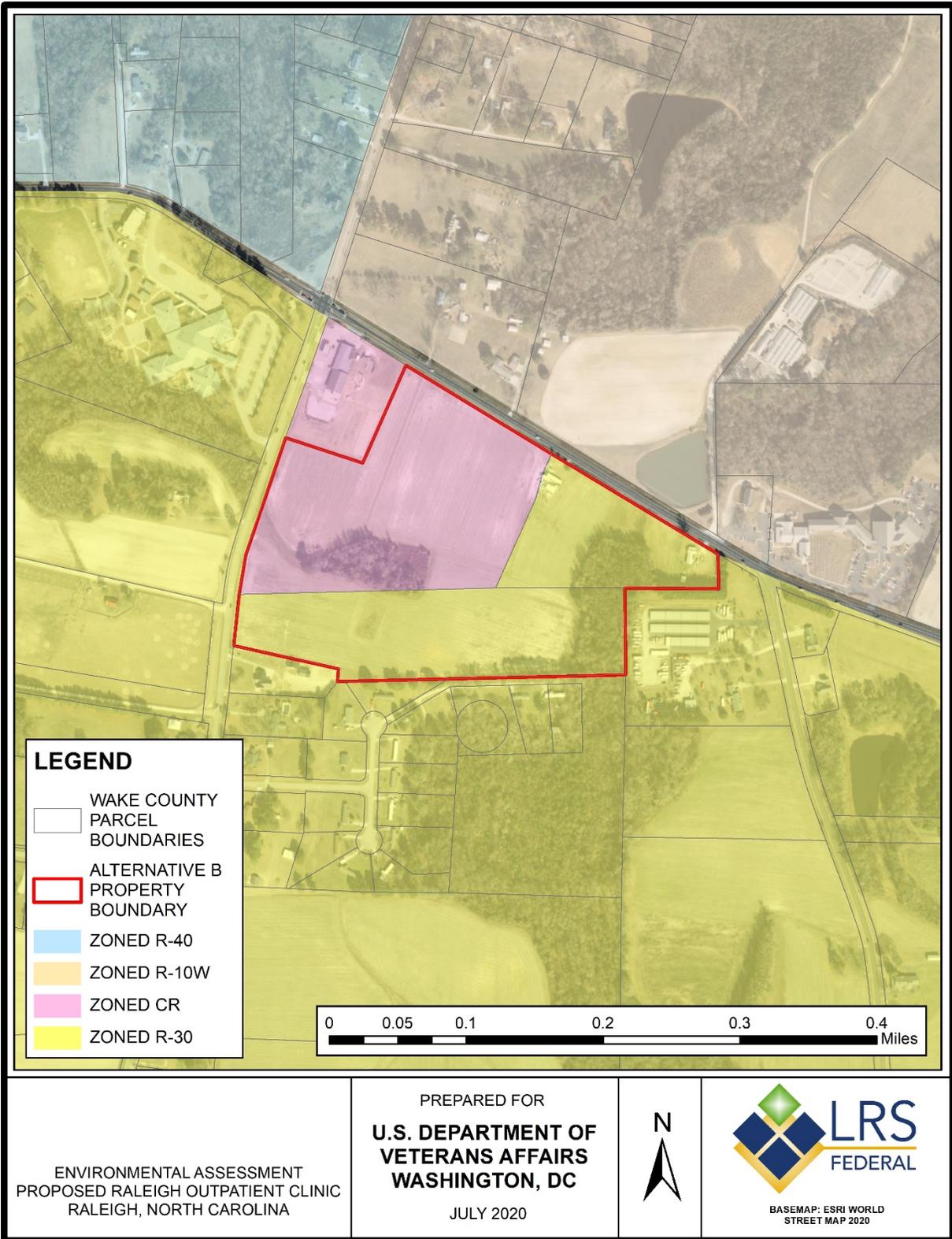
Alternative B is approximately 32.88 acres of cleared agricultural and wooded land with two residential structures (Figure 2-3). The site is located at the intersection of Old Stage Road and Ten Ten Road and is approximately 10 miles south of the Raleigh metro area, in a developing suburban area. The site consists of two parcels and part of a third parcel. One full 15.37-acre parcel is within the Town of Garner, and the remaining areas are currently within unincorporated Wake County.

Surrounding land uses are residential, agricultural, and commercial. Adjacent properties include a gas station and convenience store, retail, farmland, wooded land, storage units, a pond, places of worship, residential neighborhoods, and an elementary school. According to the City of Raleigh and Wake County iMAPs tool, Alternative B is zoned Community Retail (CR) by the Town of Garner and Residential-30 (R-30) by Wake County (Figure 3-4) (City of Raleigh and Wake County, 2020).

Properties north of Alternative B and across Ten Ten Road are zoned Residential-40W (R-40W) and Residential-40 (R-40) by Wake County. Adjoining properties east, south, and west of Alternative B are zoned Residential-30 (R-30) by Wake County (City of Raleigh and Wake County, 2020).



**Figure 3-3. Current Zoning Around Alternative A**



**Figure 3-4. Current Zoning Around Alternative B**

### **3.8.2 Environmental Consequences**

The outpatient clinic at either Alternative would be compatible with surrounding land use and would have a minor impact on land use. The design and construction of the outpatient clinic would be in accordance with building codes and zoning ordinances.

#### **3.8.2.1 Alternative A**

Construction and operation of the outpatient clinic would require rezoning the north portion of Alternative A from Residential Single Family (R-40) to Commercial Retail (CR). The portion of Alternative A currently zoned Community Retail (CR) would not require rezoning. The Town of Garner initially supports this type of use at Alternative A (Town of Garner, 2020a). The Town of Garner Comprehensive Plan identifies the area as a Neighborhood Commerce Center (Town of Garner, 2018). The construction and operation of the outpatient clinic would have less than significant impacts to land use.

#### **3.8.2.2 Alternative B**

Construction and operation of the outpatient clinic would require rezoning the portion of Alternative B from Residential-30 (R-30) to a zoning ordinance consistent with a medical facility, such as Office & Institutional (O&I), approval of a Special Use Permit, and annexing the unincorporated Wake County portions of the site to the Town of Garner. The Town of Garner initially supports this annexation and this type of use at the site (Town of Garner, 2020b). The Town of Garner Comprehensive Plan identifies the area as a Neighborhood Commerce Center (Town of Garner, 2018). The construction and operation of the outpatient clinic would have less than significant impacts to land use.

#### **3.8.2.3 No Action Alternative**

Under the no action alternative, no construction by VA's selected developer would occur. No impacts to land use would occur as a result of VA's actions. However, the proposed sites could be developed by others with the potential for impacts to land use specific to that potential development.

## **3.9 Floodplains, Wetlands, and Coastal Management**

### **3.9.1 Affected Environment**

The North Carolina Department of Environmental Quality (NCDEQ), Division of Coastal Management protects, conserves, and manages North Carolina's coastal resources. They implement laws and regulations including the state Coastal Management Act and the federal Coastal Zone Management Act in 20 coastal counties. Alternative A and Alternative B are in Wake County, which is not one of the 20 coastal counties and is outside the coastal zone management area.

Site-specific floodplain and wetlands information is provided below.

#### **3.9.1.1 Alternative A**

The Federal Emergency Management Agency (FEMA) is the official source for flood hazard information. FEMA flood maps show that Alternative A is in an area of minimal flood hazard (Zone X). East of Alternative A and across Benson Road is a 100- and 500-year floodplain (FEMA, 2019).

The USFWS National Wetlands Inventory, United States Geological Survey (USGS) National Hydrography Dataset, and NCDEQ wetland mapping system were reviewed for wetlands or waterbody features in Alternative A. These sources did not identify wetlands or waterbody features in Alternative A.

In May 2020, a field investigation delineated one distinct surface water feature (0.02 acres) near the western border of Alternative A. The water feature appears to be a manmade or man-altered. The water

feature could possibly be a relic stormwater retention device or upland pond that has naturalized over time. Figures of the features and more detail about the field investigation are included in Appendix D.

During the field investigation, one small surface water feature and two ephemeral channels were identified. The small surface water feature, in the southeastern portion of Alternative A, appeared to be a relic stormwater basin used to manage stormwater runoff. Ponded water was present but did not have hydrophytic vegetation or hydric soils.

The first ephemeral channel originates at the first surface water feature and is approximately 2 feet wide and 0.5 to 1 foot deep. The channel appears to have been manmade and has naturalized over time. There was no baseflow in the channel during the May 2020 field investigation.

The second ephemeral channel is located behind the houses in the northern portion of Alternative A. The channel is approximately 3 feet wide and 6 inches deep and has been culverted in sections.

In June 2020, as part of the field investigation, a request was submitted to USACE for a Preliminary Jurisdictional Determination of the current conditions at Alternative A. In July 2020, USACE made a field determination that the surface water features on Alternative A are man-made upland ponds and therefore non-jurisdictional. Additionally, USACE determined that both ephemeral channels are non-jurisdictional. A request for an Approved Jurisdictional Determination is being reviewed by USACE to concur that Alternative A is comprised entirely of upland and therefore would not require Section 404 permitting (Appendix D).

In North Carolina, wetlands or waters that the USACE determines are not jurisdictional under Section 404 of the CWA are subject to review as Isolated and Other Non-404 Jurisdictional Wetlands and Waters by NCDEQ, Division of Water Resources, under Section 401 of the CWA. In August 2020, NCDEQ confirmed that Alternative A would be exempt from Section 401 water quality certifications.

### **3.9.1.2 Alternative B**

FEMA flood maps show that Alternative B is in an area of minimal flood hazard (Zone X). There are no floodplains adjacent to Alternative B (FEMA, 2019).

The USFWS National Wetlands Inventory, USGS National Hydrography Dataset, and NCDEQ wetland mapping system were reviewed for wetlands or waterbody features in Alternative B. These sources did not identify wetlands or waterbody features in Alternative B.

In May 2020, a field investigation delineated two features (2.58 acres) in Alternative B. The first feature (0.96 acres) is in the western portion of Alternative B. The second feature (1.62 acres) is in the eastern portion of Alternative B. Figures of the features and more detail about the field investigation are included in Appendix D.

No surface water was identified in Alternative B. There is one ephemeral channel that connects two portions of the first feature. The channel appears to be a manmade ditch approximately 3 to 5 feet wide and 2 feet deep. No water or vegetation was present during the May 2020 field investigation.

In June 2020, as part of the field investigation, a request was submitted to USACE for a Preliminary Jurisdictional Determination of the current conditions at Alternative B. In July 2020, USACE made a field determination that a portion of the first feature that extends into the cultivated field could be prior converted cropland and would be non-jurisdictional and/or exempt from permitting. USACE is reviewing a request for concurrence with an Approved Jurisdictional Determination of this area. Additionally, USACE determined the ephemeral channel to be a jurisdictional linear wetland, so a revised request for concurrence was submitted to USACE for a Preliminary Jurisdictional Determination for this feature. Both requests remain in review by USACE at this time (Appendix D).

### **3.9.2 Environmental Consequences**

Alternative A and Alternative B would not result in impacts to floodplains and coastal management. Both locations are in areas of minimal flood hazard (Zone X). Both locations are outside the coastal zone management area.

#### **3.9.2.1 Alternative A**

USACE is reviewing the request for an Approved Jurisdictional Determination to document that Alternative A is comprised entirely of upland and therefore would not require Section 404 permitting. Additionally, NCDEQ confirmed that Alternative A would be exempt from Section 401 water quality general certifications. Based on the anticipated concurrence from USACE and the concurrence from NCDEQ, Alternative A would not include jurisdictional wetlands. Therefore, the impact would be less than significant.

#### **3.9.2.2 Alternative B**

USACE is reviewing the request for a Preliminary Jurisdictional Determination of the two features and an Approved Jurisdictional Determination of a portion of the first feature in Alternative B. A field review determined the features are jurisdictional wetlands under Section 404 of the CWA.

The current site plans and designs appear to affect more than 0.5 cumulative acres of the wetland areas. Depending on USACE's final determination and the final site plan, compliance with Nationwide Permit 39 (NWP 39) could be required if wetland impacts are 0.5 acres or less. If the impacts to wetlands are greater than 0.5 acres, then an Individual Permit could be required by USACE.

If the wetland areas are filled under either type of USACE permit, meeting all permit conditions would ensure the impact would be less than significant.

#### **3.9.2.3 No Action Alternative**

Under the no action alternative, no construction by VA's selected developer would occur. No impacts to floodplains, wetlands, and coastal management would occur as a result of VA's actions. However, the proposed sites could be developed by others with the potential for impacts to wetlands specific to that potential development.

## **3.10 Socioeconomics**

### **3.10.1 Affected Environment**

Socioeconomics can be characterized as the demographics, employment, and income of a region. The descriptions in this section apply to both Alternative A and Alternative B. U.S. Census Bureau data from the 2018 American Community Survey 5-year estimates were used.

North Carolina, Wake County, and the Town of Garner have similar population characteristics (Table 3-7). The percentage of individuals under 18 years is relatively the same. The percentage of individuals 65 years and over in Wake County is lower than it is in North Carolina and the Town of Garner. Minority population information specific to Alternative A and Alternative B is presented in Section 3.15 (Environmental Justice). The percentage of Veterans is higher in the Town of Garner than in the county or state.

**Table 3-7. Population and Veteran Status**

<b>Geographic Area</b>	<b>Population</b>	<b>Population Under 18 Years</b>	<b>Population 65 Years and Over</b>	<b>Minority</b>	<b>Veterans</b>
North Carolina	10,155,624	22.6%	15.5%	31.1%	6.6%
Wake County	1,046,558	24.4%	10.9%	34.2%	4.9%
Town of Garner	28,731	22.6%	14.3%	35%	7.7%

(U.S. Census Bureau, 2018a) (U.S. Census Bureau, 2018b)

The median household incomes in Wake County and the Town of Garner are higher than the income statewide (Table 3-8). The percent of households below the poverty level and the unemployment rate are lower in Wake County and the Town of Garner when compared to statewide data. Low-income populations specific to Alternative A and Alternative B are presented in in Section 3.15 (Environmental Justice).

**Table 3-8. Income, Poverty, and Employment**

<b>Geographic Area</b>	<b>Number of Households</b>	<b>Median Household Income</b>	<b>Percent Below Poverty Level</b>	<b>Unemployment Rate</b>
North Carolina	3,918,597	\$52,413	15.4%	6.2%
Wake County	390,498	\$76,956	9.8%	4.3%
Town of Garner	11,338	\$61,873	10.5%	5.2%

(U.S. Census Bureau, 2018c) (U.S. Census Bureau, 2018d)

Near Alternative A and Alternative B there are elementary schools and children are present especially when school is in session. Rand Road Elementary School, west of Alternative A, has approximately 522 students. Vance Elementary School, west of Alternative B, has approximately 422 students (Wake County Public School System, 2020).

### 3.10.2 Environmental Consequences

#### 3.10.2.1 Action Alternatives

Construction of the outpatient clinic would likely result in short-term and beneficial impacts to local employment and personal income. Construction would provide temporary construction jobs and a minor increase in spending at local restaurants, convenience stores, and gas stations. This would likely result in temporary socioeconomic benefits.

Operation of the outpatient clinic would enhance health care for Veterans in the region. The facility would offer state-of-the-art health services and would have long-term beneficial impacts to the health of Veterans in the region. It is anticipated the staff employed at existing VA medical facilities would be allowed to transfer to the new outpatient clinic.

Adverse health and safety risks to child populations would not likely result from the construction and operation of the outpatient clinic. Securing construction areas, fencing service areas and equipment pads outside the outpatient clinic, and using landscaping around the perimeter of the property would prevent unauthorized access and associated risks.

The construction and operation of the outpatient clinic would have less than significant adverse impacts on socioeconomics.

### **3.10.2.2 No Action Alternative**

Under the no action alternative, no construction by VA's selected developer would occur. No impacts to socioeconomics would occur as a result of VA's actions. However, the proposed sites could be developed by others with the potential for impacts to socioeconomics specific to that potential development.

Not constructing and operating the outpatient clinic would limit VA's ability to provide adequate medical facilities to meet anticipated future needs. This could result in a long-term impact to Veterans in the region.

## **3.11 Community Services**

### **3.11.1 Affected Environment**

#### **3.11.1.1 Alternative A**

Alternative A is in the Wake County Public School System. The Rand Road Elementary School is immediately west of Alternative A and has approximately 522 students (Wake County Public School System, 2020).

The nearest emergency medical services are at WakeMed Garner Healthplex about 4.6 miles from Alternative A. The Garner Healthplex has a full-service emergency department. Ambulance services are provided by Wake County Emergency Medical Services. Garner Volunteer Fire Department provides fire protection to Alternative A. The closest fire station is approximately 2.5 miles away. The Wake County Sheriff's Office provides emergency services.

Public transportation via bus is available within 1.5 miles of Alternative A. The current bus service provided by GoRaleigh does not reach Alternative A. The Wake County/GoWake Access Transportation Program provides transportation to Wake County Citizens who reside in rural areas, are over 60 years old or disabled, need work-related transportation, or participate in a sponsored eligible service (Medicaid, Public Health, Work First). The program confirmed that it will provide service for Veterans accessing care at the outpatient clinic at Alternative A. The service is available by request.

#### **3.11.1.2 Alternative B**

Alternative B is in the Wake County Public School System. The Vance Elementary School is west of Alternative B and across from Old Stage Road and has approximately 422 students (Wake County Public School System, 2020).

The nearest emergency medical services are at WakeMed Garner Healthplex about 7 miles from Alternative B. The Garner Healthplex has a full-service emergency department. Ambulance services are provided by Wake County Emergency Management Services. Garner Fire Department provides fire protection to Alternative B. The closest fire station is approximately 2.4 miles away. The Garner Police Department provides emergency services.

Public transportation via bus is available within 3 miles of Alternative B. The current bus service provided by GoRaleigh does not reach Alternative B. The Wake County/GoWake Access Transportation Program, available by request, confirmed that it will provide service for Veterans accessing care at the outpatient clinic at Alternative B.

## 3.11.2 Environmental Consequences

### 3.11.2.1 Action Alternatives

The construction and operation of the outpatient clinic would have a minor increase in the demand for fire protection, police services, and emergency services. During construction, there could be an increase in the potential for workplace accidents related to construction activities. The implementation of best construction practices and health and safety procedures by the construction and work crews would minimize such hazards. Construction and work crews would be required to comply with Occupational Safety and Health Administration (OSHA) safety and health regulations for construction detailed in 29 CFR Part 1926. The operation of the outpatient clinic could slightly increase the number of calls for fire protection, police services, or emergency services, but is not expected to increase the demand to service levels that would require additional fire, police or emergency staff or facilities.

Coordination with local agencies would be required to expand public transportation and bus service to the outpatient clinic. Adding public transportation and bus service would improve access to the outpatient facility for Veterans in the region and individuals using public transportation.

The operation of the outpatient clinic would improve access to high quality health care to Veterans in the region. The facility would offer state-of-the-art health services and would have long-term beneficial impacts to the health of Veterans in the region and would have less than significant adverse impacts.

### 3.11.2.2 No Action Alternative

Under the no action alternative, no construction by VA's selected developer would occur. No impacts to community services would occur as a result of VA's actions. However, the proposed sites could be developed by others with the potential for impacts to community services specific to that potential development.

## 3.12 Solid Waste and Hazardous Materials

### 3.12.1 Affected Environment

#### 3.12.1.1 Alternative A

A Phase I ESA and vapor encroachment screening (VES) of Alternative A was conducted by Emerald, Inc. The Phase I ESA was originally conducted in February 2020 and a follow-up site visit was conducted in May 2020. The VES was completed in May 2020. The Phase I ESA confirmed there are no current or historic underground storage tanks (USTs) or aboveground storage tanks (ASTs), except for residential propane ASTs, on Alternative A. A convenience store (Swift Creek Mini Mart) with multiple petroleum USTs is located adjacent to the property to the northeast. In 1990, a potential release was reported to NCDEQ when a strong petroleum odor was noted during excavation of a ditch across the street. The VES, conducted separately from the Phase I ESA, determined that a vapor encroachment condition does not exist for Alternative A based on groundwater flow direction; corrective action (groundwater remediation) is ongoing. The Phase I ESA and VES did not identify environmental concerns or RECs associated with Alternative A (Emerald, Inc., 2020a) (Emerald, Inc., 2020b).

NCDEQ identified a pre-regulatory landfill that operated in the 1960s and 1970s, the "Garner Trash Dump," located approximately 0.67 miles south of Alternative A (Marshall Miller & Associates, 2011). The dump site area topography slopes to the east-southeast, indicating the dump site is down- to cross-gradient away from Alternative A. Groundwater sampling in 2012 of two potable water wells west of the dump site identified no exceedances of state standards (Marshall Miller & Associates, 2012). The distance between the Garner trash dump and Alternative A indicates there would be no concern for direct contamination or vapor encroachment (soil gas) conditions at Alternative A from the dump site.

### **3.12.1.2 Alternative B**

A Phase I ESA, Tier 2 VES, and a Limited Site Investigation of Alternative B was conducted by Terracon Consultants, Inc. The Phase I ESA was conducted in January 2020, the non-invasive Tier 2 VES was completed in May 2020, and the Limited Site Investigation was completed in June 2020. The Phase I ESA confirmed one propane AST, a septic field, and a pole-mounted transformer were present at the subject property. These items were noted but are not RECs. A convenience store with three petroleum USTs is located adjacent to the property to the northwest. The site is listed as having an open Leaking Underground Storage Tank (LUST) incident (Terracon, 2020a). Based on the open LUST case and a lack of current groundwater sampling data, the Tier 2 VES recommended additional investigation (Terracon, 2020c). In June 2020, the Limited Site Investigation was conducted to determine if groundwater on Alternative B was contaminated as a result of the LUST at the adjacent property. Sampling did not identify contaminants of concern in groundwater at Alternative B; therefore, the LUST at the adjacent property was determined to not constitute a vapor encroachment condition to Alternative B (Terracon, 2020b).

## **3.12.2 Environmental Consequences**

### **3.12.2.1 Action Alternatives**

Construction of the outpatient clinic would increase the presence and use of petroleum and hazardous materials and would result in short-term and minor impacts. The operation of construction equipment requires petroleum and hazardous materials such as oil, diesel, gasoline, hydraulic fluids, and lubricants. The use and presence of these substances could increase the potential risk for unintentional releases. BMPs such as proper storage and labeling of these substances in approved containers, storage of the containers on a level and impervious surface, and providing a secondary containment system around fuel storage containers and during refueling activities would reduce the potential for unintentional releases.

Wastes generated as part of construction activities would be properly managed and disposed of according to federal, state, and local regulations. Wastes would be collected and properly disposed of by a waste disposal company at an approved disposal facility.

Operation of the outpatient clinic would generate solid waste, hazardous materials, and medical waste. These wastes would be managed and disposed of in compliance with federal, state, and local regulations. The wastes would be collected and properly disposed of by approved waste disposal companies at approved disposal facilities.

Based on the Phase I ESAs and the previous and current uses of Alternative A and Alternative B, no contamination is known or suspected at the sites. Construction and operation waste handling would comply with all applicable requirements. As a result, impacts related to solid waste and hazardous materials would be less than significant.

### **3.12.2.2 No Action Alternative**

Under the no action alternative, no construction by VA's selected developer would occur. No solid waste and hazardous materials impacts would occur as a result of VA's actions. However, the proposed sites could be developed by others with the potential for solid waste and hazardous materials impacts specific to that potential development.

### 3.13 Traffic, Transportation, and Parking

#### 3.13.1 Affected Environment

Traffic studies were conducted in June 2020 for Alternative A and Alternative B (Appendix E). Prior to the traffic studies, a meeting was held with representatives from North Carolina Department of Transportation (NCDOT) and the Town of Garner to determine the scope of the studies and to agree on the assumptions and methodologies for the studies. The assumptions and methodologies include traffic data, site access, site trip generation and distribution, and mitigations. These are documented in the Memorandum of Understanding for each traffic study (Appendix B).

The traffic studies describe the current capacity of the roads and the existing level of service (LOS) for the study intersections. The traffic studies also modeled future LOS in 2024 without the outpatient clinic. The LOS is based on the estimated delay at the intersection and ranges from A, the best, to F, which is the worst (EPR PC, 2020). Table 3-9 lists the description of each level of service rating.

**Table 3-9. Level of Service Descriptions**

Level of Service	Description
A	Little or no delay
B	Little to no delay
C	Average delay
D	Delay is increasing and noticeable
E	Limit of acceptable delay
F	Major delay; characteristic of oversaturated conditions

##### 3.13.1.1 Alternative A

Alternative A is 16.76 acres of undeveloped land along the west site of Benson Road (Highway 50) between Rand Road to the north and Arbor Greene to the south. Since the site is undeveloped there currently is no parking. There is access to the residences at the northern edge of Alternative A, but no defined access locations to the undeveloped land. Public transportation is described and evaluated in Section 3.11 Community Services.

The traffic study evaluated four intersections near Alternative A (Figure 3-5). These intersections were used to determine the current LOS and model the future LOS in 2024 without the proposed outpatient clinic. The four intersections include:

- Benson Road and Timber Drive
- Benson Road and Rand Road
- Benson Road and Arbor Greene Drive
- Benson Road and Cleveland School Road.

The Benson Road and Timber Drive intersection is approximately 2.2 miles north of Alternative A and is signalized. The intersection shows existing operational issues with several traffic movements operating at unsatisfactory LOSs, such as E and F. The overall rating of the intersection is average (LOS C) in the morning with increasing and noticeable delays (LOS D) in the afternoon. Modeling of future growth and traffic in the area without the outpatient clinic indicates that the operation of the intersection would deteriorate. Traffic delays would be increasing and noticeable (LOS D) in the morning and would reach the limit of acceptable delay (LOS E) in the afternoon (EPR PC, 2020).

The Benson Road and Rand Road intersection is immediately north of Alternative A and is signalized. This intersection shows operational issues with some traffic movements operating at unsatisfactory LOSs, such as E and F. The overall rating for the intersection indicates there are increasing and noticeable traffic delays (LOS D) in the morning and little to no delay (LOS B) in the afternoon. Modeling of future LOS without the outpatient clinic indicates that operation of the intersection would deteriorate to major delays (LOS F) in the morning and average delays in the afternoon (LOS C) (EPR PC, 2020).

The Benson Road and Arbor Green Drive intersection is immediately south of Alternative A and is not signalized. Traffic along Benson Road flows with little to no delay (LOS B) throughout the day. The eastbound left turn movement operates at noticeable and increasing delays (LOS D) in the morning and reaching the limit of acceptable delay (LOS E) in the afternoon. Modeling of future LOS without the outpatient clinic indicates that operation of the eastbound left turn movement would delay (LOS E) in the morning and major delays (LOS F) in the afternoon (EPR PC, 2020).

The Benson Road and Cleveland School Road intersection is 2.9 miles south of Alternative A and is signalized. This intersection currently operates satisfactorily in the morning (LOS B) and afternoon (LOS A) and will continue to operate satisfactorily under future conditions without the outpatient clinic in the morning (LOS B) and afternoon (LOS C).

Table 3-10 summarizes the current and future LOS without the outpatient clinic during the morning and afternoon for the study intersections.

**Table 3-10. Current and Future Level of Service at Alternative A Intersections**

<b>Intersection</b>	<b>Current Level of Service (AM/PM)</b>	<b>Future Level of Service without the Outpatient Clinic (AM/PM)</b>
Benson Road and Timber Drive	C/D	D/E
Benson Road and Rand Road	D/B	F/C
Benson Road and Arbor Greene Drive	D/E	E/F
Benson Road and Cleveland School Road	B/A	B/C

(EPR PC, 2020)

### 3.13.1.2 Alternative B

Alternative B is 32.88 acres of cleared agricultural and wooded land and is located at the intersection of Old Stage Road and Ten Ten Road. There are two residential structures. Since the site is relatively undeveloped there currently is no parking. Public transportation is described and evaluated in Section 3.11 Community Services.

The traffic study evaluated two intersections near Alternative B (Figure 3-6). These intersections were used to determine the current LOS and model the future LOS in 2024 without the proposed outpatient clinic. The two intersections include:

- Old Stage Road and Ten Ten Road
- Ten Ten Road and Rand Road

The Old Stage Road and Ten Ten Road intersection is immediately northwest of Alternative B and is signalized. The intersection has existing operational issues with several traffic movements operating at unsatisfactory LOSs, such as E and F. The overall rating of the intersection shows major delays (LOS F)

reaching oversaturation in the morning and reaching the limit of acceptable delays (LOS E) in the afternoon. Modeling of future growth and traffic without the outpatient clinic indicates that the operation of the intersection would deteriorate to major delays and oversaturation (LOS F) throughout the day (EPR PC, 2020).

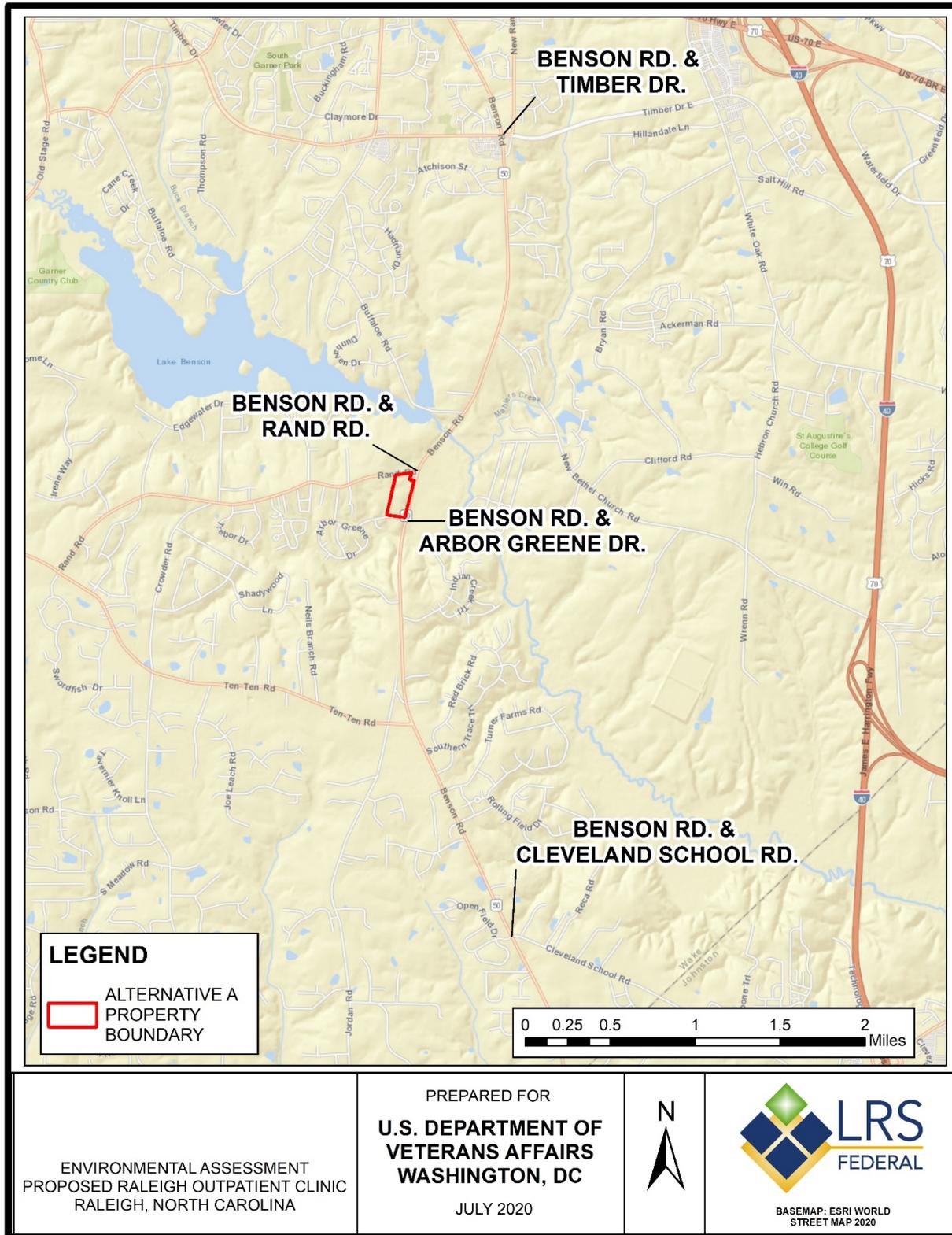
The Ten Ten Road and Rand Road intersection, 1 mile southeast of Alternative B, is not signalized. Along Ten Ten Road traffic flows with little to no delay (LOS B) throughout the day. Traffic along Rand Road has major delays and oversaturation (LOS F) throughout the day. Even though the traffic volumes are low along this road, the traffic volume on Ten Ten Road does not allow enough gaps for traffic from Rand Road to cross Ten Ten Road. Modeling of future growth and traffic without the outpatient clinic does not change the LOS for Rand Road (LOS F).

Table 3-11 summarizes the current and future LOS without the outpatient clinic during the morning and afternoon for the study intersections.

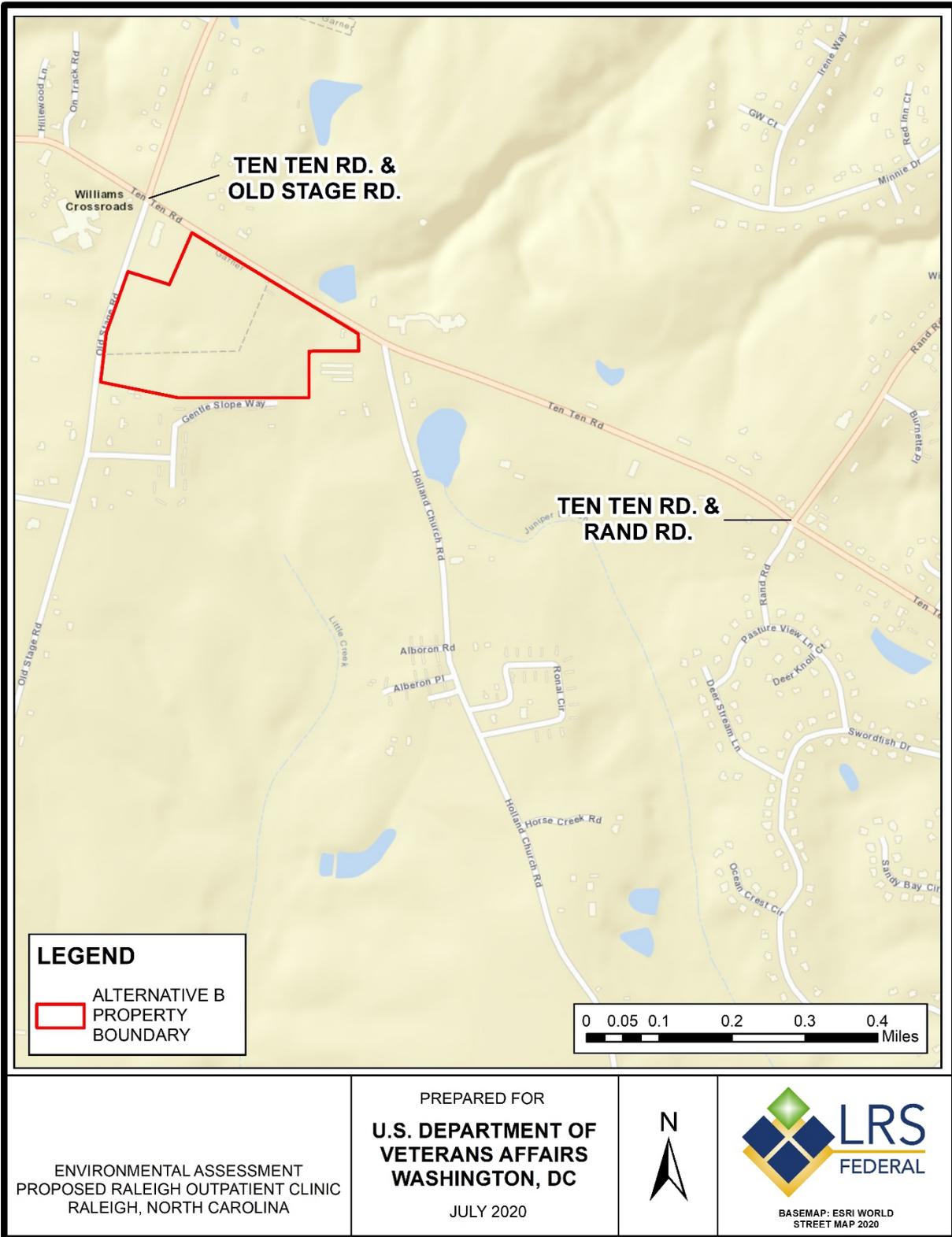
**Table 3-11. Current and Future Level of Service at Alternative B Intersections**

<b>Intersection</b>	<b>Current Level of Service (AM/PM)</b>	<b>Future Level of Service without the Outpatient Clinic (AM/PM)</b>
Old Stage Road and Ten Ten Road	F/E	F/F
Ten Ten Road and Rand Road	F/F	F/F

(EPR PC, 2020)



**Figure 3-5. Intersections near Alternative A**



**Figure 3-6. Intersections near Alternative B**

### 3.13.2 Environmental Consequences

The traffic studies completed in June 2020 modeled:

- Future LOS without the outpatient clinic (described in Section 3.13.1.1 and Section 3.13.1.2),
- Projected LOS with the outpatient clinic, and
- Projected LOS with the outpatient clinic and transportation improvements to mitigate traffic impacts.

The transportation improvements are based on discussions with NCDOT and the Town of Garner which are documented in the Memorandum of Understanding for each study (Appendix B). The studies do not represent the final design of the outpatient clinic. The purpose of each study was to determine if there is a development scenario that may be built without negatively impacting traffic operations compared to the no build scenario. NCDOT reviewed and provided comments on the traffic studies and mitigation strategies (Appendix E).

It is noted that the peak hour vehicle trip generation estimates utilized in the traffic study are conservative and are based on standard operating hours for similar VA facilities. The Raleigh outpatient clinic may provide extended hours of operation on weekdays and Saturdays to provide more flexibility to patients. In addition, telehealth visits are expected to increase to provide more convenience to patients as advancements in technology are made. These factors may result in a reduction of peak hour trips during standard morning and evening commuter peak hours weekdays since patients can be served outside of commuter peak periods or conduct doctor visits virtually.

The selected developer would be responsible for addressing NCDOT comments in the final design and coordinating with NCDOT and the local jurisdiction to implement appropriate requirements to mitigate traffic congestion.

Construction of the outpatient clinic at either Alternative would increase traffic associated with construction equipment, construction crews' personal vehicles, and trucks. The short-term increased traffic volumes could cause delays if they occur during morning and afternoon peak times and would contribute to congestion of the roadways and intersections.

Installation and connection of utility lines could further contribute to short-term congestion and delays. These delays would slow traffic and make travel along the neighboring roads more difficult.

#### 3.13.2.1 Alternative A

The operation of the outpatient clinic would contribute to higher traffic volumes, congestion, and delays. Modeling of future traffic conditions at the four intersections was based on the operation of the outpatient clinic and the configuration of the following three access points to enter and exit the outpatient clinic:

- Rand Road access—right turn only to enter and right and left turns to exit
- Benson Road access—right and left turns to enter and right turn only to exit
- Arbor Greene Drive access—right and left turns to enter and exit

Mitigation measures at intersections and access points were included in modeling the projected LOS during the operation of the outpatient clinic. The measures are designed to reduce delays and improve the LOS. These mitigation measures, or similar measures accepted by NCDOT and the local jurisdiction, would be the responsibility of the developer.

- Benson Road and Rand Road intersection—provide a second eastbound left turn lane shared with the right turn movement
- Benson Road access—construct an exclusive right turn lane with 200 feet of storage and an exclusive left turn lane with 200 feet of storage for ingress

- Arbor Greene Drive access—construct an exclusive right turn lane with 200 feet of storage for ingress
- Benson Road—widen southbound Benson Road with an additional through lane and half of the median to match the four-lane divided cross section planned in the Garner Forward Transportation Plan

NCDOT and Town of Garner have plans for future transportation improvements. These projects are not part of the proposed project and are not the responsibility of the developer. These future improvements were included in modeling the projected LOS and would further improve traffic flow, reduce delays, and improve the LOS. Definitive plans and a timetable for these future improvements are not currently available.

- Benson Road and Timber Drive intersection—provide a second northbound left turn lane, a second westbound left turn lane and a second northbound thru lane shared with the right turn movement
- Benson Road and Cleveland School Road intersection—Modify the southbound left turn phasing to protected only

Table 3-12 compares the current and future LOSs without the outpatient clinic against the projected LOS with the outpatient clinic with and without improvements to mitigate traffic impacts. With the exception of the Benson Road and Cleveland School Road intersection, operation of the outpatient clinic would deteriorate the LOS for the intersections by one to two LOSs when compared to the future LOS without the outpatient clinic. The projected delays at the intersections during the operation of the outpatient clinic would reach the limit of acceptable delays (LOE E) and major delays (LOS F).

**Table 3-12. Comparison of Levels of Service at Alternative A Intersections**

<b>Intersection</b>	<b>Current Level of Service (AM/PM)</b>	<b>Future Level of Service without the Outpatient Clinic (AM/PM)</b>	<b>Projected Level of Service with the Outpatient Clinic - No Improvements (AM/PM)</b>	<b>Projected Level of Service with the Outpatient Clinic - With Improvements (AM/PM)</b>
Benson Road and Timber Drive	C/D	D/E	E/E	D/D
Benson Road and Rand Road	D/B	F/C	F/E	D/D
Benson Road and Arbor Greene Drive	D/E	E/F	F/E	F/E
Benson Road and Cleveland School Road	B/A	B/C	B/C	B/C

(EPR PC, 2020)

Modeling the projected LOS with the mitigation measures and improvements identified above would improve the LOS to acceptable levels. The LOS at the Benson Road and Arbor Greene Drive intersection

would not change. Due to traffic pattern constraints, there are no available mitigation measures to apply to the Benson Road and Arbor Greene Drive intersection.

The constructed outpatient clinic would include 1,331 parking spaces including 911 spaces for visitors 400 for staff, and 20 for government vehicles. The 911 visitor parking spaces include 100 ADA accessible spaces, 20 motorcycle spaces, and 577 covered parking spaces in the six-level parking garage. The remaining parking spaces for visitors would be surface parking spaces north and east of the outpatient clinic. The 400 staff parking spaces would be on the top levels of the parking garage and secured by keycard-activated gates.

The construction and operation of the outpatient clinic would result in less than significant impacts to traffic, transportation, and parking.

### 3.13.2.2 Alternative B

The operation of the outpatient clinic would contribute to higher traffic volumes, congestion, and delays. Modeling of future traffic conditions at the two intersections was based on the operation of the outpatient clinic and the configuration of the following three access points to enter and exit the outpatient clinic along Ten Ten Road and one along Old Stage Road:

- Ten Ten Road access A—modeled as right turn only to enter and exit
- Ten Ten Road access B—modeled as right and left turns to enter and right turn only to exit
- Ten Ten Road access C—modeled as right turn only to enter and exit
- Old Stage Road access—modeled as right turn only to enter and exit

Mitigation measures at intersections and access points were included in modeling the projected LOS during the operation of the outpatient clinic. The measures are designed to reduce delays and improve the LOS. These mitigation measures, or similar measures accepted by NCDOT and the local jurisdiction, would be the responsibility of the developer.

- Ten Ten Road access A, B, and C—construct an exclusive right turn lane with 200 feet of storage for ingress
- Ten Ten Road access B—construct an exclusive left turn lane with 200 feet of storage for ingress
- Old Stage Road—widen northbound Old Stage Road with an additional through lane and half of the median to match the four-lane divided cross section planned in the Garner Forward Transportation Plan
- Ten Ten Road—widen eastbound Ten Ten Road with an additional through lane and half of the median to match the four-lane divided cross section planned in the Garner Forward Transportation Plan

NCDOT and Town of Garner have plans for future transportation improvements. These projects are not part of the proposed project and are not the responsibility of the developer. These future improvements were included in modeling the projected LOS and would further improve traffic flow, reduce delays, and improve the LOS. Definitive plans and a timetable for these future improvements are not currently available.

- Old Stage Road and Ten Ten Road intersection—provide a second eastbound through lane shared with the right turn movement, a second northbound through lane, a second westbound through lane, add an overlap signal phase to the westbound right turn movement, change the northbound left turn phasing to protected-permitted, add a second southbound through lane shared with the right turn movement, and add a second southbound left turn lane
- Ten Ten Road and Rand Road intersection—provide an exclusive southbound right turn lane and signalization

Table 3-13 compares the current and future LOSs without the outpatient clinic against the projected LOS with the outpatient clinic with and without improvements to mitigate traffic impacts. Operation of the

outpatient clinic would not affect the LOS when compared to the future LOS without the outpatient clinic. The intersections would continue to operate at unsatisfactory LOSs. These levels are consistent with current operating LOS.

Modeling the projected LOS with the mitigation measures and improvements identified above would improve the Old Stage Road and Ten Ten Road intersection LOS to acceptable levels. The LOS at the Ten Ten Road and Rand Road intersection would not change (LOS F). Due to low traffic volumes, there are no appropriate mitigation measures to apply to the Ten Ten Road and Rand Road intersection.

**Table 3-13. Comparison of Levels of Service at Alternative B Intersections**

<b>Intersection</b>	<b>Current Level of Service (AM/PM)</b>	<b>Future Level of Service without the Outpatient Clinic (AM/PM)</b>	<b>Projected Level of Service with the Outpatient Clinic – No Improvements (AM/PM)</b>	<b>Projected Level of Service with the Outpatient Clinic – With Improvements (AM/PM)</b>
Old Stage Road and Ten Ten Road	F/E	F/F	F/F	C/D
Ten Ten Road and Rand Road	F/F	F/F	F/F	F/F

(EPR PC, 2020)

The constructed outpatient clinic would include 1,310 spaces including 890 spaces for visitors, 400 for staff, and 20 for government vehicles. The visitor spaces would include 132 ADA accessible spaces and 20 motorcycle spaces. All parking would be surface parking.

The construction and operation of the outpatient clinic would result in less than significant impacts to traffic, transportation, and parking.

### **3.13.2.3 No Action Alternative**

Under the no action alternative, no construction by VA's selected developer would occur. No impacts to traffic, transportation, and parking would occur as a result of VA's actions. However, the proposed sites could be developed by others with the potential for impacts to traffic and transportation specific to that potential development. With no development and no mitigation, traffic conditions at the intersections analyzed would range from LOS B to LOS F, as described in the future projections presented in the Affected Environment discussions for each alternative (Sections 3.13.1.1 and 3.13.1.2).

## **3.14 Utilities**

### **3.14.1 Affected Environment**

#### **3.14.1.1 Alternative A**

The Town of Garner confirmed that water, wastewater, and electric service are located in the vicinity. Natural gas would be provided by Dominion Energy and they will extend the gas line to Alternative A from the main line along Benson Road and Rand Road.

### **3.14.1.2 Alternative B**

The City of Raleigh confirmed that there is an existing 12-inch water main at Old Stage Road and Ten Ten Road. An existing 4-inch wastewater main operated by the City of Raleigh exists along Old Stage Road west of Alternative B.

Natural gas would be provided by Dominion Energy and is not currently available at Alternative B. The closest natural gas service is on Old Stage Road and is approximately 550 feet from Alternative B. Once a site plan is available, Dominion Energy and the developer would coordinate on extending natural gas facilities to the site.

Electric service would be provided by Duke Energy. They confirmed that service to the site can be provided dependent on necessary easements, permits, and rights-of-way.

## **3.14.2 Environmental Consequences**

### **3.14.2.1 Alternative A**

The construction and operation of the outpatient facility would increase consumption of utilities such as domestic water, wastewater, electricity, and natural gas. The capacity of existing utilities would be reviewed when site plans, construction plans, and loads are finalized.

These utilities are available in the vicinity of Alternative A and would require extending service to the outpatient clinic. Extending and connecting utility services could result in surface disturbing activities in adjacent easements and rights-of-way. It is anticipated that these impacts would be short-term and minor.

Stormwater from the outpatient facility would be collected by underground stormwater inlets and discharged to underground stormwater basins below the proposed surface parking. The underground stormwater basin would be designed to detain runoff and discharge it at the appropriate release rate.

The construction and operation of the outpatient clinic would result in less than significant impacts to utilities.

### **3.14.2.2 Alternative B**

Domestic water service would come from the 12-inch water main at Old Stage Road and Ten Ten Road. Alternative B would tie into the existing public water system at this location and extend 16-inch water mains along both street frontages to the far property corners. This would facilitate connections for adjacent future developments. The proposed 16-inch water mains would have connections for fire protection and domestic water service for the outpatient facility.

The existing 4-inch wastewater main would not have enough capacity for the outpatient facility. To increase capacity, Alternative B would construct a public wastewater pump station and a new 6-inch wastewater main to connect to the existing wastewater system north of Alternative B. This option has been reviewed and approved by the Town of Garner and the City of Raleigh.

Capacity for natural gas and electrical services would be reviewed by utility providers when site plans, construction plans, and loads are finalized. Connection to these utility services could result in surface disturbing activities in adjacent easements and rights-of-way. It is anticipated that these impacts would be short-term and minor.

Stormwater from the outpatient facility would be collected by a stormwater sewer pipe network, routed to four proposed bioretention areas for sediment and pollutant removal, and then conveyed to two wet pond stormwater control measure facilities. One wet pond would be in the far eastern corner of Alternative B near Ten Ten Road. The second wet pond would be on the far western side of Alternative B by Old Stage Road. The wet ponds would detain and treat collected stormwater before conveying it to the existing pipe that flows offsite under Old Stage Road.

The construction and operation of the outpatient clinic would result in less than significant impacts to utilities.

### 3.14.2.3 No Action Alternative

Under the no action alternative, no construction by VA's selected developer would occur. No impacts to utilities would occur as a result of VA's actions. However, the proposed sites could be developed by others with the potential for impacts to utilities specific to that potential development.

## 3.15 Environmental Justice

### 3.15.1 Affected Environment

The USEPA-developed environmental justice screening and mapping tool, EJSCREEN, was used to identify and compare minority and low-income populations. These populations in the vicinity of the sites were compared to statewide data. A 5-mile buffer was applied around each site location. Table 3-14 summarizes the data from EJSCREEN (USEPA, 2019).

**Table 3-14. Summary of Environmental Justice Data**

Demographic Indicator	North Carolina	Alternative A	Alternative B
Minority Population	36%	39%	35%
Low-income Population	37%	29%	25%

Based on the population data, Alternative A and Alternative B are not in areas with disproportionately highly minority or low-income populations when compared to North Carolina.

### 3.15.2 Environmental Consequences

#### 3.15.2.1 Action Alternatives

Alternative A and Alternative B would have minor impacts to environmental justice. There would not be impacts to minority and low-income populations from the construction and operation of the outpatient clinic. During construction, there would be impacts from noise, fugitive dust, and traffic to nearby populations. The operation of the outpatient clinic could increase noise and traffic. These impacts would affect nearby populations and would not be disproportionately high impacts on minority and low-income populations. Veterans who are members of minority or low-income populations would have timely access to high-quality health care services. This would be a beneficial impact to Veterans in minority and low-income populations.

The construction and operation of the outpatient clinic would result in less than significant impacts to environmental justice.

#### 3.15.2.2 No Action Alternative

Under the no action alternative, no construction by VA's selected developer would occur. No impacts to environmental justice would occur as a result of VA's actions. Veterans in the area who are members of minority and low-income populations would continue to be served by undersized and inadequate outpatient clinics.

### 3.16 Cumulative Impacts

Cumulative impacts are defined as 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). Reasonably foreseeable future actions include the following:

- I-540 expansion
- Neighborhood activity center in the vicinity of Alternative A
- Improvements to the intersection at Benson Road and Timber Drive
- Future developments in the vicinity of Alternative A and Alternative B

The expansion of I-540, also known as the Southeast Extension, extends the Triangle Expressway to complete the I-540 outer loop around the greater Raleigh area. The 28-mile extension will link communities such as Garner to Raleigh. Construction started in 2019 with completion expected in 2023.

A neighborhood activity center in the vicinity of Alternative A is anticipated. At the time of publishing this EA, limited details were available.

The Town of Garner's long-range plans include improvements to the intersection at Benson Road and Timber Drive. Improvements could include widening the intersection to accommodate four lanes divided. Definitive design plans are not currently available.

Future developments in the vicinity of Alternative A and Alternative B are anticipated. The operation of the outpatient clinic could spur additional developments in the area. Land surrounding Alternative A is currently zoned Highway District (HD), Community Retail (CR), Service Business (SB), Office and Institutional (O&I), and Residential. Land surrounding Alternative B is currently zoned Residential. While no known development is currently planned for these areas, examples of potential future developments could include residential developments, retail businesses, service businesses, and businesses providing professional and service occupations.

Alternative A and Alternative B are in developing suburban areas with undeveloped and agricultural properties in the vicinity. The construction and operation of the outpatient clinic would have a minor incremental impact when added to the reasonably foreseeable future actions. The outpatient clinic and the reasonably foreseeable future actions could increase traffic, affect socioeconomic conditions, and change existing land use patterns.

Additional development could increase local and regional travel resulting in the need for additional roadways and infrastructure. Close coordination among federal, state, and local agencies would assist in addressing the need for additional infrastructure.

Development and population growth could affect socioeconomic conditions. The demographics of the area and region could change as residential areas expand and commercial opportunities grow. The careful implementation of local and regional plans would help to maintain and desired socioeconomic conditions.

Existing land use patterns could be affected by the I-540 expansion and future residential and commercial developments. The land use patterns would likely shift from undeveloped agricultural lands and open space to developed land uses. Land use planning and enforcement of zoning districts could assist in creating the desired mosaic of land uses that offer a mix of residential types, open space, services, and businesses.

### 3.17 Potential for Generating Substantial Controversy

Based on the low level of public involvement during the scoping period and the low potential for environmental issues and concerns, the construction and operation of the outpatient clinic has low potential for generating substantial controversy. VA solicited input from various stakeholders and the

public during the scoping period. To date, including during the scoping period, no controversy has been identified. The outpatient clinic would have a beneficial impact as it would improve access to high-quality health care for Veterans in the region.

## 4.0 Protection and Mitigation Measures

Table 4-1 summarizes the protection and mitigation measures identified in Section 3.0. Mitigation measures are typically project-specific requirements, not routinely implemented as part of a development project, that are necessary to reduce potentially adverse environmental impacts.

The table also provides a summary of protection measures, BMPs, and regulatory requirements that are regularly implemented as part of proposed activities, as appropriate. In general, implementation of mitigation measures, protection measures, BMPs, and regulatory requirements would maintain impacts at acceptable levels for the resource areas analyzed.

The measures listed in Table 4-1 would be included by VA's developer in construction and operation of the selected alternative.

**Table 4-1. Description and Type of Measures by Resource Area**

Resource Area	Description	Type
All	The selected developer would review the letters from NCDEQ (7/28/2020, 8/3/2020) and NCWRC (8/5/2020) (see Appendix F.4 of the Final EA) and implement appropriate measures in developing detailed site, construction, and facility operation plans. The recommendations and requirements include implementing low impact development techniques for minimizing stormwater runoff, using non-invasive native vegetation species, incorporating biodegradable and wildlife-friendly sediment and erosion control devices during construction, additional measures to protect aquatic and terrestrial wildlife in developing landscapes, and complying with riparian buffer rules, as well as other recommended measures.	Protection measures, regulatory requirements
Aesthetics	Use the VA design and landscaping criteria outlined in the VA Raleigh, NC Outpatient Clinic Request for Lease Proposals to ensure attractive design of the outpatient clinic and surrounding landscaping.	BMP
	Comply with the Town of Garner Unified Development Ordinance and the Wake County Unified Development Code.	Regulatory requirement
Air Quality	Use appropriate dust suppression measures such as dust suppressants or palliatives (water, clay additives, or polymers), stabilizing disturbed areas with vegetation or mulch, or limiting earth moving construction activities during high wind conditions.	BMP
	Use newer construction equipment with emissions controls.	BMP
	Reduce idling of construction equipment and vehicles to minimize exhaust emissions.	BMP

Resource Area	Description	Type
Cultural and Historic Resources	Should previously unidentified historic or culturally significant items be discovered during project construction, the construction contractor would immediately cease work in the area of the discovery until VA, a qualified archaeologist, NC SHPO, and the consulting Tribes are contacted to properly identify and appropriately treat discovered items in accordance with applicable state and federal law(s).	Regulatory requirement
	Should human remains be identified during ground-disturbing activities, all work in the vicinity of the discovery would cease immediately. An Unanticipated Discovery Plan would be implemented, which would include the VA project representative contacting the Wake County coroner to evaluate any human remains.	Regulatory requirement
	Alternative B: Conduct Phase II archaeological investigation to determine if 31WA1202 is eligible for listing on the NRHP. Develop and execute an MOA between VA, North Carolina SHPO, and other consulting parties to address adverse effects to the George Williams Farm and if determined eligible, site 31WA1202.	Regulatory requirement
Geology and Soils	During construction, implement approved erosion and sedimentation control measures, and obtain a state-issued NPDES permit.	Regulatory requirement
	Implement an erosion and sediment control plan approved by the North Carolina Division of Energy, Mineral, and Land Resources.	Regulatory requirement
	Implement the SWPPP to address runoff during construction.	Regulatory requirement
Hydrology and Water Quality	During construction, implement approved erosion and sedimentation control measures, and obtain a state-issued NPDES permit.	Regulatory requirement
	Implement the SWPPP to address runoff during construction.	Regulatory requirement
	Implement an erosion and sediment control plan approved by the North Carolina Division of Energy, Mineral, and Land Resources.	Regulatory requirement
	Obtain a wastewater permit from Wake County.	Regulatory requirement
	If shallow groundwater is encountered during construction, implement appropriate groundwater control and dewatering measures, such as sump pumps, wellpoint systems, or deep well systems.	BMP
Wildlife and Habitat	Use native species to the extent practicable when vegetating disturbed land to avoid the potential introduction of non-native or invasive species.	BMP

<b>Resource Area</b>	<b>Description</b>	<b>Type</b>
Noise	The Town of Garner ordinance does not allow construction noise in residential districts from 6 PM to 7 AM.	Regulatory requirement
	Wake County ordinance does not allow construction-related noise from 11 PM to 7 AM.	Regulatory requirement
	Reduce idling of noise-generating heavy equipment when it is not needed or in use.	BMP
	Maintain equipment per manufacturers' recommendations to minimize noise generation.	BMP
Land Use	Comply with zoning regulations and development standards.	Regulatory requirement
	Complete a rezoning for the portions of the site that are not permitted under current zoning designations.	Regulatory requirement
Floodplains, Wetlands, and Coastal Zone Management	Alternative B: Apply for NWP 39 to fill no more than 0.5 acres of non-tidal waters of the U.S. and the corresponding North Carolina Water Quality Certification 4139 to demonstrate conformance with Section 401 requirements. Comply with any compensatory mitigation requirements tied to NWP 39.	Regulatory requirement
	Alternative B: As needed, obtain an Individual Permit if more than 0.5 acres of wetlands would be impacted.	Regulatory requirement
Socioeconomics	Secure the construction area to prevent unauthorized access to the property and to reduce the potential of health and safety risks.	Protection measure
	During operation, secure service areas, equipment pads, and other potentially dangerous areas.	Protection measure
Community Services	Comply with OSHA safety and health regulations for construction detailed in 29 CFR Part 1926.	Regulatory requirement
Solid Waste and Hazardous Materials	Use proper storage and labeling of petroleum products and hazardous materials in approved containers.	BMP
	Store containers on a level and impervious surface.	BMP
	Provide a secondary containment system around fuel storage containers and during refueling activities.	BMP
	Manage and dispose of solid waste, hazardous materials, and medical waste in compliance with federal, state, and local regulations. The wastes would be collected and properly disposed of by a waste disposal company at approved disposal facilities.	Regulatory requirement

<b>Resource Area</b>	<b>Description</b>	<b>Type</b>
Traffic, Transportation, and Parking	<p>Alternative A: Coordinate with state and local jurisdictions to implement the following mitigation measures, or similar measures accepted by NCDOT and the local jurisdiction.</p> <ul style="list-style-type: none"> <li>• Benson Road and Rand Road intersection—provide a second eastbound left turn lane shared with the right turn movement.</li> <li>• Benson Road access—construct an exclusive right turn lane with 200 feet of storage and an exclusive left turn lane with 200 feet of storage for ingress.</li> <li>• Arbor Greene Drive access—construct an exclusive right turn lane with 200 feet of storage for ingress.</li> <li>• Benson Road—widen southbound Benson Road with an additional through lane and half of the median to match the four-lane divided cross section planned in the Garner Forward Transportation Plan.</li> </ul>	Mitigation measure
	<p>Alternative B: Coordinate with state and local jurisdictions to implement the following mitigation measures, or similar measures accepted by NCDOT and the local jurisdiction.</p> <ul style="list-style-type: none"> <li>• Ten Ten Road access A, B, and C—construct an exclusive right turn lane with 200 feet of storage for ingress.</li> <li>• Ten Ten Road access B—construct an exclusive left turn lane with 200 feet of storage for ingress.</li> <li>• Old Stage Road—widen northbound Old Stage Road with an additional through lane and half of the median to match the four-lane divided cross section planned in the Garner Forward Transportation Plan.</li> <li>• Ten Ten Road—widen eastbound Ten Ten Road with an additional through lane and half of the median to match the four-lane divided cross section planned in the Garner Forward Transportation Plan.</li> </ul>	Mitigation measure
Utilities	None required.	
Environmental Justice	None required.	

## 5.0 Public Participation

VA invites public participation in decision-making on new proposals through the NEPA process. Public participation is guided by the VA NEPA regulations (38 CFR Part 26) and with additional guidance provided in VA's NEPA Interim Guidance for Projects. Agencies, organizations, and members of the public with a potential interest in the proposed action are encouraged to participate.

### 5.1 Agency Coordination

VA mailed notice of scoping letters and notice of availability letters for the Draft EA to federal, state, and local agencies. The list of these agencies is included in Section 6.0. The purpose of the letters was to request comments and extend an invitation to stakeholder meetings.

In addition to these letters, VA and the contractor team preparing this EA coordinated with specific agencies in preparing this EA. These agencies include:

- USACE
- North Carolina SHPO
- USFWS
- NCWRC
- NCNHP
- NCDOT
- Town of Garner

In June 2020, requests were sent to USACE for Preliminary Jurisdictional Determinations of the current conditions at Alternative A and Alternative B. In July 2020, USACE made a field determination on Alternative A that the delineated wetland and surface water features are man-made upland ponds and therefore non-jurisdictional. Additionally, USACE determined that both ephemeral channels are non-jurisdictional. A request was submitted for USACE concurrence with an Approved Jurisdictional Determination that Alternative A is comprised entirely of upland and therefore would not require Section 404 permitting.

In July 2020, USACE made a field determination on Alternative B that a portion of the first wetland area that extends into the cultivated field could be prior converted cropland and could potentially be non-jurisdictional and/or exempt from permitting. A request for concurrence was submitted to USACE for an Approved Jurisdictional Determination of this area and is in review at this time. Additionally, USACE determined the ephemeral channel to be a jurisdictional linear wetland. As a result, a revised request for USACE concurrence with a Preliminary Jurisdictional Determination for this feature was submitted and is in review at this time.

VA coordinated with the North Carolina SHPO for information and data about known archaeological sites in the respective vicinities of Alternative A and Alternative B. Section 106 consultation letters including determination of effect and the results of the Phase I archaeological investigations for Alternative A and Alternative B were sent to the North Carolina SHPO in July 2020. The SHPO responded on August 7, 2020. The SHPO concurred that construction and operation of the outpatient clinic at Alternative A would not affect any properties or archaeological sites eligible for listing in the NRHP. The SHPO also concurred that construction at Alternative B would result in adverse effects and that development of an MOA would be necessary.

Coordination with NCDOT included submitting a memorandum of understanding for the traffic study and sharing data and information to assist with completion of the traffic study and report. The traffic studies for Alternative A and Alternative B were submitted to NCDOT on July 9, 2020, and NCDOT reviewed and provided comments (Appendix E). Once VA selects the site, the developer will continue to coordinate with NCDOT to implement appropriate traffic congestion mitigation measures.

Coordination with USFWS, NCWRC, and NCNHP included sharing data and information to assist with the completion of the biological survey and report.

The Town of Garner participated in the initial scoping of the traffic study and report. The Town of Garner also provided information regarding reasonably foreseeable actions that could potentially occur in the vicinity of Alternative A and Alternative B.

## 5.2 Native American Consultation

VA consulted with two federally recognized Native American Tribes as part of the NEPA scoping process, in accordance with 36 CFR 800.2 and EA 13175, *Consultation and Coordination with Indian Tribal Governments*, November 6, 2000. The two tribes are the Catawba Indian Nation and the Eastern Band of Cherokee Indians. These Tribes were invited by VA to participate in the EA process as Sovereign Nations per Executive Order 13175. Coordination and consultation letters were sent to the Tribes in February 2020. In July 2020, VA sent letters to the Catawba Indian Nation and the Eastern Band of Cherokee Indians announcing the availability of the Draft EA, the virtual public meeting, and the 30-day public comment period. VA did not receive a response from either of the Tribes.

In July 2020, a consultation letter with the results of the Phase I archeological investigations and determination of effect was sent to the Catawba Indian Nation. VA did not receive a response from the Tribe.

## 5.3 Scoping

VA provided federal, state, and local agencies; the public; and potentially affected parties with an opportunity to participate in scoping. Scoping is a tool for identifying the issues that should be addressed during the NEPA and NHPA compliance processes. Scoping allows the agencies, public, and stakeholders to help define priorities and express stakeholder and community issues to the agency through oral and written comments.

VA published a notice of scoping on February 7 and 9, 2020, in the *News and Observer* newspaper. The notice described the proposed action and provided information to the public for a public scoping meeting held on February 19, 2020. The notice also solicited public comments with a deadline of March 9, 2020.

VA mailed letters to federal, state, and local agencies; public officials; federally recognized Tribes; and special interest groups. Similar to the notices published in the newspaper, the letters included information on the proposed action, the scoping meetings, and the comment period. The letters also extended an invitation to attend stakeholder scoping meetings that were held on February 19, 2020.

VA held two stakeholder scoping meetings on February 19, 2020 in Raleigh. VA presented information on the proposed action, NEPA, and the NHPA Section 106 process and provided opportunities for stakeholders to ask questions and submit comments. Three stakeholders attended the meetings. A public scoping meeting was held on February 19, 2020 in Raleigh. No one from the general public attended the meeting.

During the public scoping period, VA received one written comment. The comment was submitted by the North Carolina SHPO. The submission stated they would comment when potential sites had been identified for the proposed outpatient clinic. They also provided a link to their web-based mapping program that locates properties within the area of consideration.

## 5.4 Public and Agency 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 News and Observer* on July 8 and 12, 2020. Review copies of the Draft EA were made available online at [www.durham.va.gov/pressreleases/RaleighOPC\\_EA.asp](http://www.durham.va.gov/pressreleases/RaleighOPC_EA.asp) and at Garner

Town Hall, 900 7th Avenue, Garner, North Carolina. The published notice announced the availability of the Draft EA, described the proposed action, and provided information for the virtual public meeting held on July 22, 2020. The notice also solicited public comments during the 30-day public comment period from July 8 to August 6, 2020 (Appendix F).

VA notified federal, state, and local agencies; public officials; and federally recognized Tribes about the availability of the Draft EA. Similar to the notices published in The News and Observer, the letter included detailed instructions for obtaining a copy of the Draft EA, described the proposed action, provided information for the public meeting, and solicited public comments (Appendix F).

VA held a virtual public meeting on July 22, 2020. VA presented information on the proposed action, Alternative A, Alternative B, the analysis of potential impacts in the Draft EA, and submitting public comments (Appendix F). Three individuals attended the public meeting, including participants from the Town of Garner, Capital Area Preservation, and the public.

A total of three letters were received during the 30-day public comment period and one question was asked during the virtual public meeting (Appendix F). One letter was a package of multiple responses from North Carolina agencies. These comments and VA's responses are in Table 5-1.

**Table 5-1. Comments and Responses**

<b>Individual/ Organization</b>	<b>Comment</b>	<b>Response</b>
Charles Rhodes	The clinic would be a plus for the area near the intersection of Rand and Benson. The area has several amenities and freeway access.	Thank you for your comment.
Pete Benjamin, USFWS Field Supervisor	We recommend that surveys be conducted to determine the species' presence or absence within the project area. The use of North Carolina Natural Heritage program data should not be substituted for actual field surveys.	In May 2020, field surveys were conducted on Alternative A and Alternative B. The findings of the field surveys and data from the North Carolina Natural Heritage Program are provided in the biological survey reports in Appendix C.
Pete Benjamin, USFWS Field Supervisor	If you determine that the proposed action may affect (i.e., likely to adversely affect or not likely to adversely affect) a federally-protected species, you should notify this office with your determination, the results of your surveys, survey methodologies, and an analysis of the effects of the action on listed species, including consideration of direct, indirect, and cumulative effects, before conducting any activities that might affect the species.	Based on the biological survey reports, available information, species habitat requirements, field evaluations, and known species' temporal and spatial occurrence, VA determined the proposed project would have no effect on federally listed endangered or threatened species or their designated critical habitat (Section 3.6.2).

Individual/ Organization	Comment	Response
Pete Benjamin, USFWS Field Supervisor	We believe that the requirements of section 7(a)(2) of the Act have been satisfied for your project. Please remember that obligations under section 7 consultation must be reconsidered if: (1) new information reveals impacts of this identified action that may affect listed species or critical habitat in a manner not previously considered; (2) this action is subsequently modified in a manner that was not considered in this review; or, (3) a new species is listed or critical habitat determined that may be affected by the identified action.	Should the listed species or proposed action change, VA would re-initiate review of the project as required by Section 7 of the Endangered Species Act.
Pete Benjamin, USFWS Field Supervisor	The Service is concerned about the potential impacts the proposed action might have on aquatic species. Aquatic resources are highly susceptible to sedimentation. Therefore, we recommend that all practicable measures be taken to avoid adverse impacts to aquatic species, including implementing directional boring methods and stringent sediment and erosion control measures. An erosion and sedimentation control plan should be submitted to and approved by the North Carolina Division of Land Resources, Land Quality Section prior to construction. Erosion and sedimentation controls should be installed and maintained between the construction site and any nearby down-gradient surface waters. In addition, we recommend maintaining natural, vegetated buffers on all streams and creeks adjacent to the project site.	Section 4.0 Protection and Mitigation Measures includes the requirement to implement an erosion and sediment control plan approved by the North Carolina Division of Energy, Mineral, and Land Resources. The proposed project would not disturb any offsite vegetation, whether riparian or upland. There are no streams or creeks on or adjacent to Alternative A, where the nearest surface water is Neal Branch, approximately 475 feet to the south, across Arbor Greene Drive. There are likewise no streams or creeks on or adjacent to Site B, where Panther Branch ends approximately 370 feet to the west across Old Stage Road, and an unnamed creek to the northeast ends approximately 100 feet away and is separated from the site by Ten Ten Road.
Pete Benjamin, USFWS Field Supervisor	The North Carolina Wildlife Resources Commission has developed a Guidance Memorandum (a copy can be found on our website at <a href="http://www.fws.gov/raleigh">http://www.fws.gov/raleigh</a> ) to address and mitigate secondary and cumulative impacts to aquatic and terrestrial wildlife resources and water quality. We recommend that you consider this document in the development of your projects and in completing an initiation package for consultation (if necessary).	The North Carolina Wildlife Resources Commission guidance memorandum on addressing and mitigating secondary and cumulative impacts to aquatic and terrestrial wildlife resources will be reviewed and considered by the selected developer as they develop a detailed site plan.

Individual/ Organization	Comment	Response
Jeremy Bradham, Capital Area Preservation	In looking at Alternative B, although the field falls within a National Register Determination of Eligibility property, I see a tenant house in the southeast corner, part of the farming complex for the George Williams Farm. Is that the resource that would likely need a PA for mitigation purposes?	The tenant house may be a contributing resource to the George Williams Farm, a property eligible for listing on the National Register of Historic Places. As described in Section 3.3.2.2 (as updated for this Final EA), if Site B is selected, further consultation under NHPA Section 106 would occur, including developing an MOA to address adverse impacts to NRHP eligible resources; all agreed measures would be implemented.
Gabriela Garrison, NCWRC	For Alternative A, aerial maps and images indicate Neal Branch, a tributary to Swift Creek, flows south of the project area. There are records for the following rare, freshwater mussels downstream of the site in Swift Creek: the federally threatened, yellow lance ( <i>Elliptio lanceolata</i> ); the federal at-risk species and state-endangered, Atlantic pigtoe ( <i>Fusconaia masoni</i> ); the state-threatened, Roanoke slabshell ( <i>Elliptio roanokensis</i> ), eastern lampmussel ( <i>Lampsilis radiata</i> ), triangle floater ( <i>Alasmidonta undulata</i> ) and creeper ( <i>Strophitus undulatus</i> ); and the Atlantic spike ( <i>Elliptio producta</i> ) a species on the Natural Heritage Program's Watch List.	There are no streams or creeks on or adjacent to Alternative A, where the nearest surface water is Neal Branch, approximately 475 feet to the south, across Arbor Greene Drive. Additionally, based on the biological survey reports, available information, species habitat requirements, field evaluations, and known species' temporal and spatial occurrence, VA determined the proposed project would have no effect on federally listed endangered or threatened species or their formally designated critical habitat (Section 3.6.2).  Measures such as implementation of a SWPPP, approved erosion and control measures, and an erosion and sediment control plan would also be included by the developer in construction and operation of the outpatient clinic.

Individual/ Organization	Comment	Response
<p>Gabriela Garrison, NCWRC</p>	<p>The NCWRC is concerned with potentially adverse ecological impacts resulting from project construction. Impervious surface in developing areas results in increased stormwater runoff that can impact stream morphology. This will cause further degradation of aquatic habitat through accelerated stream bank erosion, channel and bedload changes, altered substrates and scouring of stream channels. In addition, pollutants (e.g., sediment, heavy metals, pesticides and fertilizers) washed from developed landscapes can adversely affect and extirpate species downstream. Because of Alternative A’s proximity to sensitive aquatic resources, the NCWRC recommends constructing at the Alternative B site.</p>	<p>There are no streams or creeks on or adjacent to Alternative A, where the nearest surface water is Neal Branch, approximately 475 feet to the south, across Arbor Greene Drive. Stormwater from the outpatient facility at Alternative A would be collected by underground stormwater inlets and discharged to underground stormwater basins below the proposed surface parking. The underground stormwater basin would be designed to detain runoff and discharge it at the appropriate release rate.</p> <p>Likewise, there are no streams or creeks on or adjacent to Alternative B, where Panther Branch ends approximately 370 feet to the west across Old Stage Road, and an unnamed creek to the northeast ends approximately 100 feet away and is separated from the site by Ten Ten Road. Stormwater from the outpatient facility at Alternative B would be collected by a stormwater sewer pipe network and four proposed bioretention areas and then conveyed to two wet pond stormwater control measure facilities. The wet ponds would detain and treat collected stormwater before conveying it to the existing pipe that flows offsite under Old Stage Road.</p> <p>Measures such as implementation of a SWPPP, approved erosion and control measures, and an erosion and sediment control plan would also be included by the developer in construction and operation of the outpatient clinic at either site.</p>

Individual/ Organization	Comment	Response
Gabriela Garrison, NCWRC	The project footprint should be surveyed for wetlands and streams to ensure there are no impacts to surface waters. In addition to providing wildlife habitat, wetland areas and streams aid in flood control and water quality protection. United States Army Corps of Engineers Section 404 Permits and NC Division of Water Resources Section 401 water quality general certifications are required for any impacts to jurisdictional streams or wetlands.	In May 2020, field investigations for wetlands and streams were conducted on Alternative A and Alternative B. The findings of the field investigations are included in the wetlands reports in Appendix D. A request was submitted to USACE for a Preliminary Jurisdictional Determination and an Approved Jurisdictional Determination for Alternative A and Alternative B. Refer to Section 3.9 for additional detail.
Gabriela Garrison, NCWRC	Maintain or establish a minimum 100-foot undisturbed, native forested buffer along each side of perennial streams and 50-foot undisturbed, native forested buffer along each side of intermittent streams and wetlands. In areas where federally listed species are found, maintain a 200-foot native forested buffer along perennial streams and a 100-foot native forested buffer around intermittent streams and wetlands. Forested riparian buffers protect habitat areas and provide travel corridors for wildlife species. In addition, forested riparian buffers protect water quality by stabilizing stream banks and filtering stormwater runoff.	Section 4.0, Protection and Mitigation Measures includes the requirement to implement an erosion and sediment control plan approved by the North Carolina Division of Energy, Mineral, and Land Resources. The proposed project would not disturb any offsite vegetation, whether riparian or upland. There are no streams or creeks on or adjacent to Alternative A, where the nearest surface water is Neal Branch, approximately 475 feet to the south, across Arbor Greene Drive. There are likewise no streams or creeks on or adjacent to Site B, where Panther Branch ends approximately 370 feet to the west across Old Stage Road, and an unnamed creek to the northeast ends approximately 100 feet away and is separated from the site by Ten Ten Road.
Gabriela Garrison, NCWRC	Stormwater runoff to receiving surface waters can be minimized by reducing impervious surfaces and increasing infiltration on site using Low Impact Development (LID) techniques. LID techniques appropriate for this project may include permeable pavement and bioretention areas that can collect stormwater from the parking areas. Additional alternatives include narrower roads, swales versus curbs/gutters and permeable surfaces such as turf stone, brick and cobblestone.	The recommendations in the NCWRC comment letter, including use of low impact development techniques, will be reviewed and considered by the selected developer as they develop detailed site, construction, and facility operation plans.

<b>Individual/ Organization</b>	<b>Comment</b>	<b>Response</b>
Gabriela Garrison, NCWRC	Re-seed disturbed areas with seed mixtures that are beneficial to wildlife. Avoid fescue-based mixtures as fescue is invasive and provides little benefit to wildlife. A list of wildlife-friendly plants is available upon request. In addition, the use of non-invasive, native species is recommended. Using native species instead of ornamentals should reduce the need for water, fertilizers and pesticides.	The recommendations in the NCWRC comment letter, including re-seeding and use of non-invasive native species, will be reviewed and considered by the selected developer as they develop detailed site, construction, and operations plans.
Gabriela Garrison, NCWRC	Insecticides and herbicides should not be used within 100 feet of perennial streams and 50 feet of intermittent streams, or within floodplains and wetlands associated with these streams.	The recommendations in the NCWRC comment letter, including pesticide buffer distances, will be reviewed and considered by the selected developer as they develop detailed site, construction, and operations plans.
Gabriela Garrison, NCWRC	Sediment and erosion control measures should be installed prior to any land-disturbing activity. 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 and similar materials that have been reinforced with plastic or metal mesh should be avoided as they impede the movement of terrestrial wildlife species. Excessive silt and sediment loads can have detrimental effects on aquatic resources including destruction of spawning habitat, suffocation of eggs and clogging of gills.	Section 4.0, Protection and Mitigation Measures includes the requirement to implement an erosion and sediment control plan approved by the North Carolina Division of Energy, Mineral, and Land Resources.  The recommendations in the NCWRC comment letter, including materials for use in erosion control measures, will be reviewed and considered by the selected developer as they develop detailed site, construction, and operations plans.

<b>Individual/ Organization</b>	<b>Comment</b>	<b>Response</b>
Gabriela Garrison, NCWRC	The NCWRC encourages the applicant to consider additional measures to protect aquatic and terrestrial wildlife species in developing landscapes. The NCWRC's Guidance Memorandum to Address and Mitigate Secondary and Cumulative Impacts to Aquatic and Terrestrial Wildlife Resources and Water Quality (August 2002) details measures to minimize secondary and cumulative impacts to aquatic and terrestrial wildlife resources; in addition, the NCWRC's Green Growth Toolbox provides information on nature-friendly planning.	The recommendations in the NCWRC comment letter, including the referenced guidance memorandum and toolbox, will be reviewed and considered by the selected developer as they develop detailed site, construction, and operations plans.
David Wainwright, Division of Water Resources	Sewer extension permit(s) from the State or an authorized delegated program will likely be needed for the construction and operation of the proposed pump station and force main. It appears that they do not have this currently listed under Appendix A: Permits, but they do have an NPDES permit listed which is almost certainly not required based on the provided documentation. They may be considering the wastewater permit from Wake County to be the sewer permit needed, but it appears likely that the sewers will not fall under local jurisdiction due to exceeding flow limitations and other deemed permitted requirements listed in 15A NCAC 02T.0303(a)(1-3). More information is needed to fully evaluate permitting requirements.	The sewer extension permit has been added to the list in Appendix A: Permits, and the NPDES permit has been noted "if needed". The selected developer will work with Wake County and the North Carolina Division of Water Resources to determine the appropriate permit requirements.
Lyn Hardison, NCDEQ	After review of this project it has been determined that DEQ permits and/or approvals may need to be obtained in order for this project to comply with North Carolina Law. Questions regarding these permits should be addressed to the Raleigh Regional Office.	The permits identified by the North Carolina Department of Environmental Quality have been added to the list in Appendix A: Permits.

<b>Individual/ Organization</b>	<b>Comment</b>	<b>Response</b>
Bonnie S. Ware, NCDEQ	One site, named the Garner trash dump, was identified within one mile of Alternative A. The Superfund Section recommends that site files be reviewed to ensure that appropriate precautions are incorporated into any construction activities that encounter potentially contaminated soil or groundwater.	Discussion of the Garner trash dump has been added to Section 3.12.1. This site was not identified in the Phase I ESA records review. Based on this additional information and the Phase I ESAs conducted at Alternative A and Alternative B (summarized in Section 3.12.1), no contamination is known or suspected at the sites.

## 6.0 Agencies and Persons Consulted

<b>Federal Agencies</b>		
Pete Benjamin	Field Supervisor	Raleigh Ecological Services Field Office, US Fish & Wildlife Service
Christopher Militscher	Chief, NEPA Program Office	US Environmental Protection Agency - Region 4
Yves-Marie Daley	Public Affairs Specialist	U.S. Department of Veterans Affairs
Clarence Coleman, P.E.	Preconstruction & Environment Director	North Carolina Division, FHWS, USDOT
Keith Melton	Director, Office of Planning & Program Development	U.S. Federal Transit Administration
<b>Local Government</b>		
Ken Marshburn	Mayor of Garner	Town of Garner
Rodney Dickerson	Town Manager, Garner	Town of Garner
Jeff Triezenberg	Planning Director	Town of Garner
Mary Ann Baldwin	Mayor of Raleigh	City of Raleigh
Ruffin Hall	City Manager, Raleigh	City of Raleigh
Edie Jeffreys	Chair of Planning Commission	City of Raleigh
Kenneth Browsers	Director, City Planning Department	City of Raleigh
Michael Moore	Director, Transportation Department	City of Raleigh
Troy Burton	Administrator, Historic Resources and Museum Program, Dept. of Parks, Recreation and Cultural Resources	City of Raleigh
Tania Tully	Senior Preservation Planner	Raleigh Historic Development Commission
David Ellis	County Manager	Wake County
Joseph Threadcraft	Director, Environmental Services	Wake County
Steven Finn	Land Development Administrator	Wake County
Sharon Peterson	Long-Range Planning Administrator	Wake County

Ed Morris	Chair, Historic Preservation Commission	Wake County
Terry Nolan	Planning, Development & Inspections Division Contact for Historic Preservation Commission	Wake County
Gary Roth	President & CEO, Capital Area Preservation	Wake County Historic Preservation Commission
Denise Hogan	Clerk of the Board	Wake County Board of Commissioners
<b>North Carolina State Agencies</b>		
State Environmental Review Clearinghouse	SEPA Environmental Review Coordinator	North Carolina Department of Administration
Larry D. Hall	Secretary	Department of Military and Veterans Affairs
Martin Falls	Assistant Secretary	Department of Military and Veterans Affairs
Renee Gledhil-Earley	Environmental Review Coordinator	North Carolina Department of Natural and Cultural Resources
John Mintz	State Archaeologist	NC Office of State Archaeology
Ramona Bartos	Administrator and Deputy State Historic Preservation Officer	NC State Historic Preservation Office
Danny Smith	Division Director, Water Resources	NC Department of Environmental Quality
Karen Higgins	Water Planning Section Chief, Water Resources	NC Department of Environmental Quality
Niki Maher	Compliance Assistance Specialist	NC Department of Environmental Quality
Carrie Ruhlman	Section Chief, Conservation Policy & Analysis	NC Wildlife Resources Commission
James H. Rogdon, III	Secretary	NC Department of Transportation
<b>Federally Recognized Tribes</b>		
Dr. Wenonah G. Haire	Tribal Historic Preservation Officer	Catawba Indian Nation
Russell Townsend	Tribal Historic Preservation Officer	Eastern Band of Cherokee Indians

## 7.0 List of Preparers

### 7.1 Department of Veterans Affairs Staff

Ms. Christine Modovsky  
 Environmental Engineer  
 Construction & Facilities Management  
 U.S. Department of Veterans Affairs

Mr. Héctor M. Abreu, AIC  
 Senior Historic Preservation Specialist  
 CFM, Historic Preservation Office  
 U.S. Department of Veterans Affairs

### 7.2 LRS Federal, SWCA, and EPR (Consultants)

Name	Role	Degree	Years of Experience
Erik Anderson	NEPA Specialist	MS, Environmental Policy and Management BS, Civil and Environmental Engineering	20
Kelly Culver	Project Review	MA English	5
Kaye Guille	Project Manager, Solid Waste and Hazardous Materials	MS, Civil and Environmental Engineering BS, Civil Engineering	15
Becky Hoffman	NEPA Specialist	BS, Anthropology	15
Jonathan Libbon	Cultural Resource Specialist	MA, Applied Archaeology, BA, Anthropology	13
Mark Mickley	Natural Resources Specialist	BS, Biology	16
Charles Smith	Transportation Engineer	BS, Civil Engineering	26
William Wuensch	Transportation Engineer	BS, Civil Engineering	28

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## 9.0 Glossary

**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 Clean Air Act to protect health and welfare.

**Aquifer**—An underground geological formation containing usable amounts of groundwater that can supply wells and springs.

**Attainment area**—Region that meets the National Ambient Air Quality Standard (NAAQS) for a criteria pollutant under the Clean Air Act.

**Best management practices (BMPs)**—Methods, measures, or practices to prevent or reduce environmental impacts.

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

**Council on Environmental Quality (CEQ)**—An agency in the 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. Develop and issue guidance for implementing the National Environmental Policy Act.

**Cultural resources**—The physical evidence of our Nation's heritage. Includes 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 the 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 geological agents.

**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.

**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 materials**—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 (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 the Clean Air Act.

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 CFR 302.4.

**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 occurs later in time or farther removed in distance from the action causing it, 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.

**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 a threatened, endangered, special concern, or candidate species.

**Mitigation**—Measures taken to reduce adverse impacts on the environment.

**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. Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, and sulfur dioxide.

**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.

**Remediation**—An action that reduces or eliminates a threat to the environment; often used to refer to “clean up” of chemical contamination in soil or water.

**Sensitive receptors**—Include, but are not limited to 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.

**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.

**Waters of the United States**—Include the following: territorial seas and traditional navigable waters; tributaries; lakes, ponds, and impoundments of jurisdictional waters; and adjacent wetlands.

**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.