

FINAL

**ENVIRONMENTAL ASSESSMENT
FOR THE TRANSFER AND REUSE OF THE
ADRIAN B. RHODES ARMED FORCES RESERVE CENTER
WILMINGTON, NORTH CAROLINA
BRAC 2005**



Prepared for:

**U.S. Army Reserve
81st Regional Support Command**

Prepared by:

**U.S. Army Corps of Engineers
Mobile District
P.O. Box 2288
Mobile, AL 36628**

August 2011

DRAFT
FINDING OF NO SIGNIFICANT IMPACT
ENVIRONMENTAL ASSESSMENT
FOR THE TRANSFER AND REUSE OF THE
ADRIAN B. RHODES ARMED FORCES RESERVE CENTER
WILMINGTON, NORTH CAROLINA
BRAC 2005

The Defense Base Closure and Realignment (BRAC) Commission of 2005, in response to the Defense Base Closure and Realignment Act of 1990, as amended, recommended closing the Army Reserve Adrian B. Rhodes Armed Forces Reserve Center (Rhodes AFRC) in Wilmington, North Carolina (NC) and relocation to a new AFRC and Organizational Maintenance Shop (OMS) in Wilmington, NC, if the Army is able to acquire suitable land for the construction of the facilities.

Pursuant to the Council on Environmental Quality regulations (40 Code of Federal Regulations [CFR] Parts 1500-1508) implementing the procedural provisions of the National Environmental Policy Act (NEPA), 42 United States (U.S.) Code Section 4321 et seq., as amended; 32 CFR Part 651 (Environmental Analysis of Army Actions), the U.S. Army Corps of Engineers, Mobile District, has prepared an Environmental Assessment (EA) and Finding of No Significant Impact (FNSI), which addresses the transfer and reuse of the Rhodes AFRC property and facilities.

Proposed Action

The Proposed Action is to complete the disposal of the Rhodes AFRC property and facilities in Wilmington, NC, after the installation is closed and the forces are realigned as rapidly as possible in order to expedite its reuse. Redevelopment and reuse of the surplus Rhodes AFRC property would occur as a secondary action under disposal. Under BRAC law, the Army must close the Rhodes AFRC no later than September 15, 2011. After the Rhodes AFRC is closed, the Army would dispose of the property. As a part of the disposal process, the Army screened the property for reuse with the Department of Defense and other Federal agencies. No Federal agency expressed an interest in reusing this property for another purpose.

Alternatives Considered

Alternatives to the Proposed Action considered typical methods of disposal, including traditional, accelerated, caretaker status, and reuse by a local redevelopment authority (LRA). Two Alternatives were analyzed in this EA: the Disposal and Reuse Alternative (Preferred Alternative) and the No Action Alternative (caretaker status).

Under the Disposal and Reuse Alternative, the Rhodes AFRC property and facilities would be transferred to an LRA. The City of Wilmington is the recognized LRA for the redevelopment of the Rhodes AFRC facilities for the transfer and reuse process. The LRA would receive the Rhodes AFRC property and facilities through a zero-cost conveyance. The proposed redevelopment includes the transfer and demolition of all the existing Rhodes AFRC institutional-style structures (4 buildings totaling approximately 30,000 square feet [SF]) and replacement with new residential-style structures (8 buildings totaling approximately 51,000 SF) as permanent support housing for the homeless.

Under the No Action Alternative, the Rhodes AFRC property and facilities would continue to be owned by the Federal government, and the property would be placed in caretaker status for overall maintenance of the property. However, since the closure of Rhodes AFRC has been mandated by Congress and the President, the No Action Alternative is not a viable alternative, but will serve as a baseline against which the impacts of the Proposed Action and other Alternatives can be evaluated.

Two additional alternatives were identified, but eliminated from further consideration: the Accelerated Disposal Alternative and the Traditional Disposal Alternative. The Army has decided not to take advantage of various property transfer and disposal methods which would allow the reuse of the Rhodes AFRC property to occur before environmental remediation action has been taken, or exercise a property transfer and disposal of individual parcels (e.g., only the Administration Building) of the Rhodes AFRC property after environmental clearance is complete. An Accelerated Disposal was not pursued since no reuse options were made available prior to the Army performing their environmental remediation actions. Because the Department of Housing and Urban Development (HUD)-approved reuse by the City of Wilmington LRA was made available prior to exercising a Traditional Disposal, this option was not pursued. Therefore, these transfer and disposal methods and the alternatives that would include them were eliminated from further consideration.

Factors Considered in Determining That No Environmental Impact Statement is Required

Implementation of the Disposal and Reuse Alternative would not result in long-term or significant impacts on wildlife, hazardous materials, or socioeconomic resources. Temporary and insignificant impacts on air quality and noise would occur during demolition and construction activities. No violations of the region's air standards would be expected. Emissions expected to be generated during demolition and construction are well below the *de minimis* thresholds, even though New Hanover County is considered in attainment for all priority pollutants.

Traffic patterns at the new site would be slightly altered by the proposed construction and use of the permanent supportive housing. Temporary increases of vehicle traffic would be expected during the construction period, particularly along West Lake Shore Drive, as construction crews commute to the project site. Traffic patterns after the completion of the permanent support housing are anticipated to be similar to preconstruction conditions or result in less vehicular traffic use.

Minor, permanent effects on vegetation, aesthetics, and land use would be experienced; however, the reuse of the 4.26 acres of the Rhodes AFRC property and facilities would result in a very similar landscape and vegetated environment. No impacts would occur on Federal or state protected species, cultural resources, water quality, or water supply. Best management practices would be implemented to ensure that stormwater during and after construction is controlled and downstream sedimentation is either eliminated or is negligible.

Minor benefits for local and regional employment and personal income would be expected during the construction period; however, no long-term significant adverse impacts on the region's economy would be expected to occur.

The cumulative effects of the Disposal and Reuse Alternative and other planned or reasonably foreseeable projects in the project region would also be considered insignificant.

Conclusions

Based on information gathered and presented in the EA, it has been determined that the Disposal and Reuse Alternative would have no significant direct, indirect, or cumulative adverse impacts on the quality of the natural and human environment. Consequently, an Environmental Impact Statement is not required and will not be prepared.

Public Comment

The Army invites the public and all interested and affected parties to review and comment on this EA and the draft FNSI within 30 days of publication of the Notice of Availability, which is scheduled to occur on August 30, 2011. Comments and requests for information should be submitted to the Environmental Protection Specialist of the U.S. Army Reserve (USAR), 81st Regional Support Command (RSC): Ms. Michelle Hook at (803) 751-9998 or michelle.hook@usar.army.mil. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807.

Requests for copies should be directed to Mr. Dennis Peters, GSRC, 815 Bayshore Drive, Suite B, Niceville, Florida 32578. A limited number of copies of the EA are available to fill single copy requests. The EA and draft FNSI are made available during the public review period at the *New Hanover County Public Library*, 201 Chestnut Street, Wilmington, NC 28401 (910-798-6300); and on the BRAC website at: http://www.hqda.army.mil/acsim/brac/env_ea_review.htm.

William H. Gerety, Major General
U.S. Army Reserve, Commanding

Date

FINAL

**ENVIRONMENTAL ASSESSMENT
FOR THE TRANSFER AND REUSE OF THE
ADRIAN B. RHODES ARMED FORCES RESERVE CENTER
WILMINGTON, NORTH CAROLINA
BRAC 2005**

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LEAD AGENCY: Mobile District, United States (U.S.) Army Corps of Engineers

TITLE OF PROPOSED ACTION: Transfer and Reuse of the Adrian B. Rhodes Armed Forces Reserve Center (AFRC), Wilmington, North Carolina, BRAC 2005

AFFECTED JURISDICTION: New Hanover County, North Carolina

PREPARED BY: Steven J. Roemhildt, Colonel, U.S. Army Corps of Engineers, Mobile District, Commanding

TECHNICAL ASSISTANCE FROM: Gulf South Research Corporation

APPROVED BY: William H. Gerety, Major General, U.S. Army Reserve, Commanding

ABSTRACT: This Environmental Assessment (EA) addresses the potential effects of the proposed transfer and reuse of the Adrian B. Rhodes AFRC (Rhodes AFRC) in Wilmington, North Carolina, as directed by the Defense Base Closure and Realignment Commission's recommendation. The existing Rhodes AFRC in Wilmington, North Carolina would be closed and the units would be relocated to the new AFRC. The Proposed Action is to complete the disposal of the Rhodes AFRC property and facilities after the installation is closed and the forces are realigned (July 2011), as rapidly as possible in order to expedite its reuse. The Preferred Alternative is for the Rhodes AFRC property and facilities to be transferred to a local redevelopment authority (LRA). The City of Wilmington is recognized by the Department of Defense Office of Economic Adjustment as the LRA for the redevelopment of the Rhodes AFRC facilities for the transfer and reuse process. Through an extensive public outreach process, the redevelopment plan focuses on the need for reducing homelessness through permanent public housing as identified in the "Ten Year Plan to End Chronic Homelessness and Reduce Homelessness in the Cape Fear Region" of Wilmington, North Carolina. The project proposed by the Lakeside Partnership Center (LPC) to redevelop the Rhodes AFRC property into permanent supportive housing for the homeless was adopted by the LRA. The redevelopment by LPC includes the demolition and replacement of all the existing Rhodes AFRC institutional-style structures (4 buildings totaling approximately 30,000 square feet) with new residential-style structures (8 buildings totaling approximately 51,000 square feet). No long-term or significant impacts on wildlife protected species, cultural resources, water quality, hazardous materials, or socioeconomic resources would occur as a result of the Preferred Alternative. Temporary and insignificant impacts on air quality and noise would occur during construction activities. Traffic patterns at the new site would be slightly altered by the proposed construction and use of the permanent supportive housing. The No Action Alternative (caretaker status) was the only additional alternative identified and evaluated during the preparation of the EA.

REVIEW PERIOD: The EA and draft Finding of No Significant Impact are available for review for a period of 30 days. Copies of this document can be obtained from Ms. Michelle Hook, Environmental Protection Specialist, 81st Regional Support Command, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807 or by phone at (803) 751-9998. Copies are also available for review at the New Hanover County Public Library, 201 Chestnut Street, Wilmington, North Carolina 28401, (910) 798-6301. Written comments must be submitted no later than September 30, 2011 to Michelle Hook at the 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807.

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**EXECUTIVE SUMMARY
ENVIRONMENTAL ASSESSMENT
FOR THE TRANSFER AND REUSE OF THE
ADRIAN B. RHODES ARMED FORCES RESERVE CENTER (AFRC)
WILMINGTON, NORTH CAROLINA
BRAC 2005**

Introduction: In accordance with the National Environmental Policy Act of 1969 (NEPA), the United States (U.S.) Army Corps of Engineers (USACE), Mobile District has prepared this Environmental Assessment (EA) for the transfer and reuse of the Adrian B. Rhodes Armed Forces Reserve Center (Rhodes AFRC), Wilmington, North Carolina. This EA discusses the potential environmental effects of the proposed transfer, demolition, construction, and reuse activities on the human and natural environment at and surrounding the Rhodes AFRC site in Wilmington, North Carolina.

Background/Setting: The Rhodes AFRC is located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina. The actions of this EA are required to implement the Defense Base Closure and Realignment Commission (BRAC Commission) recommendations to realign and transform Reserve Component facilities in Wilmington, North Carolina. The actual transfer of units, facilities, and mission activities of the Rhodes AFRC to the new AFRC and Organizational Maintenance Shop location have been addressed in another EA. As such, these activities are not addressed in the analyses of this document. Final implementation of the BRAC recommendation would complete the disposal of the Rhodes AFRC property and facilities in Wilmington, North Carolina after the installation is closed and the forces are realigned. Surrounding properties contiguous with the Rhodes AFRC include: the Legion Stadium Sports Complex to the south and west, Greenfield Lake to the east, and Woodlawn Subdivision to the north. The property is not zoned.

Proposed Action: The Proposed Action is to complete the disposal of the Rhodes AFRC property and facilities in Wilmington, North Carolina after the installation is closed and the forces are realigned, as rapidly as possible in order to expedite its reuse. Redevelopment and reuse of the surplus Rhodes AFRC property would occur as an action secondary to disposal. Under BRAC law, the Army must close the Rhodes AFRC no later than September 15, 2011. After the Rhodes AFRC is closed, the Army would dispose of the property. As a part of the disposal process, the Army screened the property for reuse by the Department of Defense and other Federal agencies. No Federal agency expressed an interest in reusing this property for another purpose.

Alternatives: Alternatives to the Proposed Action considered typical methods of disposal, including traditional, accelerated, caretaker status, and reuse by a local redevelopment authority (LRA). Two alternatives were analyzed in this EA: the Disposal and Reuse Alternative and the No Action Alternative (caretaker status).

Under the Disposal and Reuse Alternative, the Rhodes AFRC property and facilities would be transferred to an LRA. The City of Wilmington is the recognized LRA for the redevelopment of the Rhodes AFRC facilities for the transfer and reuse process. The LRA would receive the Rhodes AFRC property and facilities through a zero-cost conveyance. The proposed redevelopment includes the transfer and demolition of all the existing Rhodes AFRC institutional-style structures (4 buildings totaling approximately 30,000 square feet [SF]) and replacement with new residential-style structures (8 buildings totaling approximately 51,000 SF) as permanent support housing for the homeless.

Under the No Action Alternative, Rhodes AFRC property and facilities would continue to be owned by the Federal government, and the property would be placed in caretaker status for overall maintenance of the property. However, since the closure of Rhodes AFRC has been mandated by Congress and the President, the No Action Alternative is not a viable alternative, but will serve as a baseline against which the impacts of the Proposed Action and other Alternatives can be evaluated.

Environmental Consequences: The transfer to the LRA, demolition of all the existing Rhodes AFRC institutional-style structures, and the redevelopment of new residential-style structures as permanent support housing would occur on the original 4.26 acres of property, including approximately 1 acre of impervious parking areas. No long-term or significant impacts on wildlife, hazardous materials, or socioeconomic resources would occur as a result of the Disposal and Reuse Alternative. Temporary and insignificant impacts on air quality and noise would occur during the demolition and construction activities. Traffic patterns at the new permanent support housing would be slightly altered by the proposed demolition and construction activities. Additionally, insignificant impacts on aesthetic and visual resources and utilities would occur as a result of the establishment of the permanent support housing. No impacts would occur on Federal or state protected species, cultural resources, water quality, or water supply.

Best Management Practices (BMPs): After completion of the construction activities, all temporarily disturbed sites would be reseeded as soon as practicable to control erosion and sedimentation. For those areas that would not be landscaped or routinely maintained, native vegetation seeds would be used for reseeded activities, in accordance with Section 7(a)(1) of the Endangered Species Act. A Stormwater Pollution Prevention Plan (SWPPP) and Notice of Intent would need to be prepared and submitted prior to construction. The SWPPP would identify BMPs to be implemented for erosion and sedimentation control during construction. If straw bales are used, weed seed-free straw would be used to avoid introduction of invasive or noxious weeds.

Wetting solutions, including water, would be applied to disturbed soils within the construction site to control fugitive dust. All construction equipment and material would be properly maintained and stored to reduce air emissions and avoid potential spills of hazardous materials.

If the breeding/nesting season for migratory birds cannot be avoided during the initial grubbing and clearing of the site, breeding bird pairs and nests would need to be identified and avoided in accordance with the Migratory Bird Treaty Act.

Conclusion: The data presented in the EA documents that the best transfer and reuse of the Rhodes AFRC property and facilities is the proposed redevelopment by the City of Wilmington LRA, and would result in insignificant adverse impacts on the area's human and natural environment.

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ACRONYMS AND ABBREVIATIONS

ACM	Asbestos-Containing Material
ADT	Average Daily Trips
AEC	Area of Environmental Concern
AFRC	Armed Forces Reserve Center
AST	Aboveground Storage Tank
BEA	Bureau of Economic Analysis
BGS	Below Ground Surface
BIA	Bureau of Indian Affairs
BMP	Best Management Practices
BRAC	Base Closure and Realignment
CEC	California Energy Commission
CEQ	Council on Environmental Quality
CFC	Chlorofluorocarbons
CFPUA	Cape Fear Public Utility Authority
CFR	Code of Federal Regulations
CH ₄	Methane
CO	Carbon monoxide
CO ₂	Carbon dioxide
CO ₂ e	CO ₂ Equivalency
CWA	Clean Water Act
dB	Decibel
dBA	Decibel A-weighted scale
DoD	Department of Defense
DOPAA	Description of Proposed Action and Alternatives
EA	Environmental Assessment
ECP	Environmental Condition of Property
EIS	Environmental Impact Statement
EO	Executive Order
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FNSI	Finding of No Significant Impact
GHG	Greenhouse Gas
GIS	Geographic Information System
GSRC	Gulf South Research Corporation
HAZMAT	Hazardous Materials
HFC	Hydrofluorocarbons
HQ	Headquarters
HUD	U.S. Housing and Urban Development
LBP	Lead-Based Paint
LPC	Lakeside Partnership Center
LRA	Local Redevelopment Authority
MBTA	Migratory Bird Treaty Act
MSA	Metropolitan Statistical Area
N ₂ O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standards
NCD CR	North Carolina Department of Cultural Resources
NCDENR	North Carolina Department of Environment and Natural Resources
NCNHP	North Carolina Natural Heritage Program

NEPA	National Environmental Policy Act of 1969
NO ₂	Nitrogen Dioxide
NOI	Notice of Intent
NO _x	Nitrous Oxides
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O ₃	Ozone
OMS	Organizational Maintenance Shop
OSHA	Occupational Safety and Health Administration
OWS	Oil-Water Separator
PCPI	Per Capita Personal Income
PL	Public Law
PM-10	Particulate Matter less than 10 microns
PM-2.5	Particulate Matter less than 2.5 microns
POL	Petroleum, Oils, and Lubricants
RCRA	Resource Conservation and Recovery Act
RSC	Regional Support Command
SF	Square Feet
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
SPCCP	Spill Prevention Control and Countermeasures Plan
SQG	Small Quantity Generator
SSWWTP	Southside Waste Water Treatment Plant
SWPPP	Stormwater Pollution Prevention Plan
TPI	Total Personal Income
U.S.	United States
USACE	U.S. Army Corps of Engineers
USAR	U.S. Army Reserve
USARC	U.S. Army Reserve Center
USC	United States Code
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UST	Underground Storage Tank
VPD	Vehicles Per Day
°F	Degree Fahrenheit

SECTION 1.0
PURPOSE, NEED, AND SCOPE



1.0 Purpose, Need, and Scope

1.1 Introduction

On May 16, 2005, the Defense Base Realignment and Closure Commission (BRAC Commission) recommended the transformation (closure and/or relocation) of certain actions concerning United States (U.S.) Army Reserve Centers (USARC) in North Carolina. These recommendations were approved by the President on September 23, 2005, and forwarded to Congress. The Congress did not alter any of the BRAC Commission's recommendations and, on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law [PL] 101-510), as amended (BRAC 2005).

The BRAC Commission recommended the closure of the Adrian B. Rhodes Armed Forces Reserve Center (Rhodes AFRC) and relocation to a new AFRC and Organizational Maintenance Shop (OMS) in Wilmington, North Carolina (Figure 1-1). To enable implementation of this recommendation, the Army proposes to transfer ownership of the Rhodes AFRC facilities. On behalf of the U.S. Department of the Army, the U.S. Army Corps of Engineers (USACE), Mobile District, prepared an Environmental Assessment (EA) for transfer and reuse of the Rhodes AFRC property and facilities in accordance with the BRAC Commission's 2005 recommendation. The intent of the EA is to assess and disclose the known and potential environmental consequences, both beneficial and adverse, of the proposed transfer and reuse of the Rhodes AFRC. Details on the Proposed Action are presented later in Section 2.0.

1.2 Purpose and Need

The purpose of the Proposed Action is to implement the BRAC Commission's recommendation pertaining to disposal and reuse of the Rhodes AFRC. The transfer of units, facilities, and mission activities of the Rhodes AFRC to the new AFRC and OMS location have been addressed in another EA, and are not part of the analyses within this document.

The actions of this EA are required to implement the BRAC Commission recommendations to realign and transform Reserve Component facilities in Wilmington, North Carolina. The Army is legally bound to defend the U.S. and its territories, support National policies and objectives, and defeat nations responsible for aggression that endangers the peace and security of the U.S. To carry out these tasks, the Army must adapt to changing world conditions and must improve its capabilities to respond to a variety of circumstances across the full spectrum of military operations.

In previous rounds of BRAC, the explicit goal was to save money and downsize the military in order to reap a "peace dividend." In the 2005 BRAC round, the Department of Defense (DoD) sought to reorganize its installation infrastructure to most efficiently support its forces, increase operational readiness, and facilitate new ways of doing business. Thus, BRAC represents more than cost savings. It supports advancing the goals of transformation, improving military capabilities, and enhancing military value. The Army needs to carry out the BRAC recommendations at Wilmington, North Carolina to achieve the objectives for which Congress established the BRAC process.

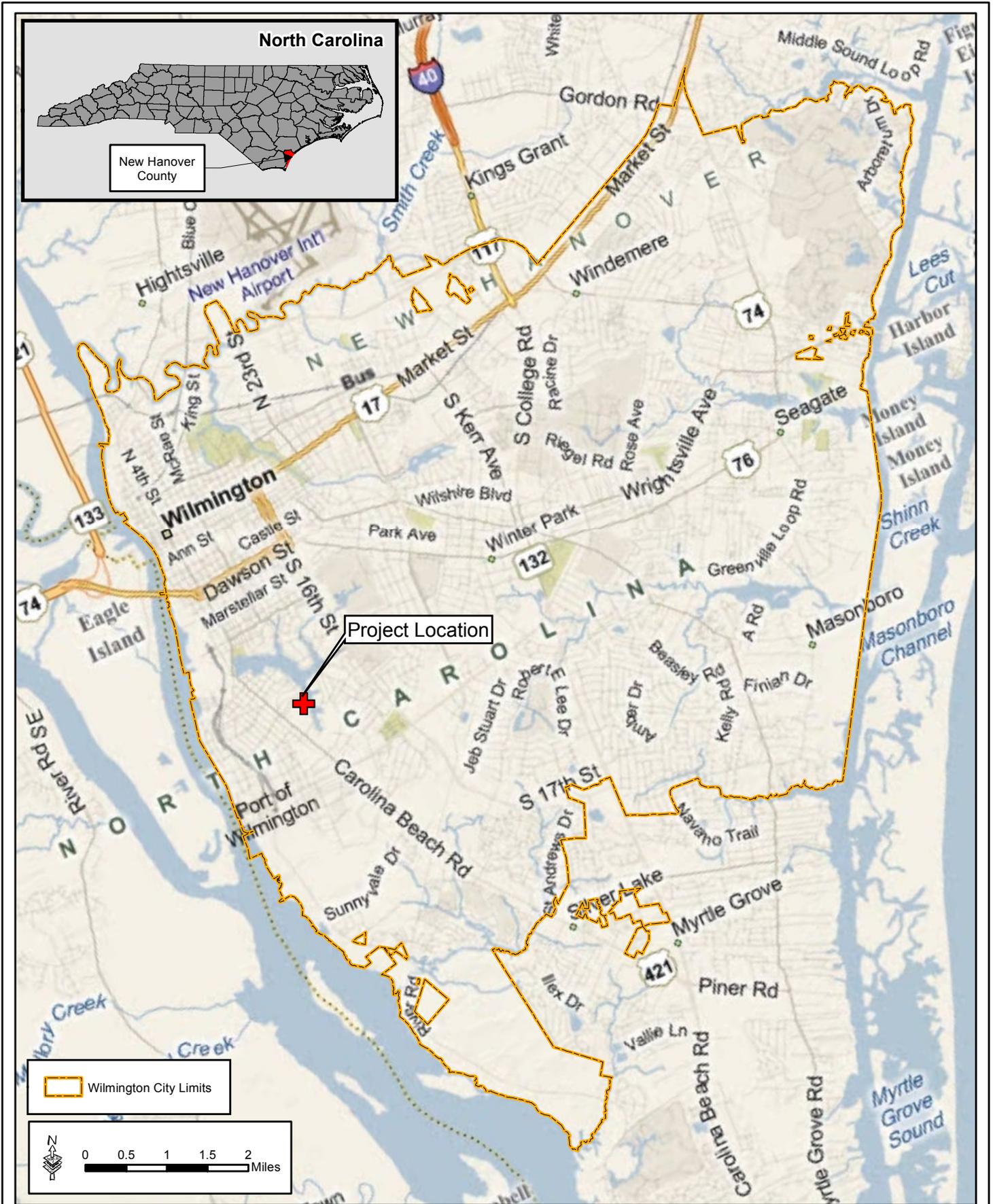


Figure 1-1: Vicinity Map



June 2011

1.3 Scope

This EA is developed in accordance with the National Environmental Policy Act (NEPA) of 1969, the implementing regulations issued by the President's Council on Environmental Quality (CEQ), and the Army Regulations, 32 Code of Federal Regulations [CFR] Part 651. Its purpose is to inform decision makers and the public of the likely environmental consequences of the Proposed Action and Alternatives.

The EA identifies, documents, and evaluates environmental effects of the disposal and reuse of the Rhodes AFRC property and facilities. The City of Wilmington Local Redevelopment Authority (LRA) is the proposed transfer recipient. The Rhodes AFRC is located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina. An interdisciplinary team of environmental scientists, biologists, planners, economists, engineers, archaeologists, historians, and military technicians analyzed the Proposed Action and Alternatives in light of existing conditions at the Rhodes AFRC and identified relevant beneficial and adverse effects associated with the action. The Proposed Action is described in Section 2.0, and Alternatives, including the No Action Alternative, are described in Section 3.0. Conditions existing as of April 2011, considered to be the "baseline" conditions, are described in Section 4.0, Affected Environment and Environmental Consequences of the EA. The expected effects of the alternatives are presented immediately following the description of baseline conditions for each environmental resource addressed in the EA. Section 4.0 addresses the potential for cumulative effects and mitigation measures that are identified, where appropriate.

The Defense Base Closure and Realignment Act of 1990 specifies that NEPA does not apply to decisions of the President, the Commission, or the DoD, except "(i) during the process of property disposal, and (ii) during the process of relocating functions from a military installation being closed or realigned to another military installation after the receiving installation has been selected but before the functions are relocated" (Sec. 2905(c)(2)(A), PL 101-510, as amended). The law further specifies that in applying the provisions of NEPA to the process, the Secretary of Defense and the secretaries of the military departments concerned do not have to consider "(i) the need for closing or realigning the military installation which has been recommended for closure or realignment by the Commission, (ii) the need for transferring functions to any military installation which has been selected as the receiving installation, or (iii) military installations alternative to those recommended or selected" (Sec. 2905(c)(2)(B)). The Commission's deliberation and decision, as well as the need for closing or realigning a military installation, are exempt from NEPA.

1.4 Public Involvement

The Army is committed to open decision making. The collaborative involvement of other agencies, organizations, and individuals in the NEPA process enhances issue identification and problem solving. In preparing this EA, the Army consulted or coordinated with the North Carolina State Historic Preservation Officer (SHPO), U.S. Fish and Wildlife Service (USFWS), USACE, North Carolina Department of Environment and Natural Resources (NCDENR), North Carolina Wildlife Resources Commission, Native American Tribes, and others as appropriate. The 30-day, public review period begins by publishing a Notice of Availability of the final EA and a draft Finding of No Significant Impact (FNSI) in a local Wilmington newspaper (*Star News*). The EA and draft FNSI are made available during the public-review period at the New Hanover County Public Library, 201 Chestnut Street, Wilmington, North Carolina, 28401; and on the BRAC website at: http://www.hqda.army.mil/acsim/brac/env_ea_review.htm. The Army invites the public and all interested and affected parties to review and comment on this EA and the

draft FNSI. Comments and requests for information should be submitted to the Environmental Protection Specialist of the U.S. Army Reserve (USAR), 81st Regional Support Command (RSC): Ms. Michelle Hook at (803) 751-9998 or michelle.hook@usar.army.mil.

At the end of the public review period, the Army will review all comments received; compare environmental impacts associated with reasonable alternatives; revise the FNSI or the EA, if necessary; supplement the EA, if needed; and make a decision. If the impacts of the proposed action are not significant, the Army will execute the FNSI and the action can proceed immediately. If potential impacts are found to be significant, the Army may decide not to implement the Proposed Action, commit in the revised Final FNSI to mitigation reducing the anticipated impact to a less than significant impact, or publish a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) in the Federal Register.

1.5 Regulatory Framework

A decision on whether to proceed with the Proposed Action rests on numerous factors, such as mission requirements, schedule, availability of funding, and environmental considerations. In addressing environmental considerations, the USACE Mobile District and the 81st RSC Headquarters (HQ) are guided by relevant statutes (and their implementing regulations) and Executive Orders (EO) that establish standards and provide guidance on environmental and natural resources management and planning. The transfer and reuse of the Rhodes AFRC requires compliance with the Federal regulations and EOs presented below in Table 1-1. The current compliance status is also presented. These authorities are addressed in various sections throughout the EA when relevant to particular environmental resources and conditions. The full text of the laws, regulations, and EOs is available on the Defense Environmental Network & Information Exchange Web site at <http://www.denix.osd.mil>.

Table 1-1. Summary of Relevant Regulations Including Potential Permits or Licensing Requirements

Issue	Action Requiring Permit, Approval, or Review	Agency	Permit, License, Compliance, or Review/Status	Status of Compliance with Relevant Laws and Regulations
FEDERAL				
General	National Environmental Policy Act of 1969 (42 United States Code [USC] 4321 et seq.)	CEQ	Compliance with NEPA, in accordance with CEQ regulations (40 CFR 1500-1508)	Full compliance would be achieved upon issuance of signed FNSI (if appropriate)
	32 CFR 651 (Environmental Analysis of Army Actions)	Department of the Army	Compliance with regulations specified in 32 CFR 551	Full compliance would be achieved upon issuance of signed FNSI (if appropriate)
Sound/ Noise	Noise Control Act of 1972 (42 USC 4901 et seq.), as amended by Quiet Communities of 1978 (PL 95-609)	United States Environmental Protection Agency (USEPA)	Compliance with surface carrier noise emissions	Full compliance would be achieved upon implementation of construction activities
Air	Clean Air Act and amendments of 1990 (42 USC 7401-7671q) 40 CFR 50, 52, 93.153(b)	USEPA	Compliance with National Ambient Air Quality Standards (NAAQS) and emission limits and/or reduction measures	Full compliance; emissions would be below <i>de minimis</i> thresholds
Water	Clean Water Act of 1977 (33 USC 1342) 40 CFR 122	USEPA and NCDENR	Section 402(b) National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges for Construction Activities-Stormwater Pollution Prevention Plan (SWPPP)	SWPPP and NOI would be prepared prior to construction. Full compliance would be achieved prior to implementation of construction activities
	EO 11988 (Floodplain Management), as amended by EO 12608	Water Resources Council, Federal Emergency Management Agency (FEMA), CEQ	Compliance	Short-term, minor adverse effects on floodplains may occur during construction of the new facilities
	EO 11990 (Protection of Wetlands), as amended by EO 12608	USACE and USFWS	Compliance	Full compliance
	Clean Water Act of 1977 (33 USC 1341 et seq.)	USACE and NCDENR	Section 401/404 Permit	No permits needed
	Coastal Zone Management Act of 1972 (16 USC 1456[c]) Section 307	National Oceanic and Atmospheric Administration	Compliance	Although the project is located in a coastal county, it is not located in an Area of Environmental Concern; therefore, a Coastal Zone Management Act consistency determination is not required

Table 1-1, continued

Issue	Action Requiring Permit, Approval, or Review	Agency	Permit, License, Compliance, or Review/Status	Status of Compliance with Relevant Laws and Regulations
Soils	Resource Conservation and Recovery Act (RCRA) of 1976 (42 USC 6901-6992k), as amended by Hazardous and Solid Waste Amendments of 1984 (PL 98-616; 98 Stat. 3221)	USEPA	Proper management, and in some cases, permit for remediation	Full compliance would be achieved prior to transfer, demolition, construction, and reuse activities
	Comprehensive, Environmental Response, Compensation, Liability Act of 1980 (42 USC. 9601-9675), as amended Emergency Planning and Community Right-To-Know-Act of 1986 (42 USC 11001 et seq.) Release or threatened release of a hazardous substance	USEPA	Development of emergency response plans, notification, and cleanup	Full compliance
	Farmland Protection Policy Act of 1981 (7 USC. 4201 et seq.) 7 CFR 657-658 Prime and unique farmlands	Natural Resources Conservation Service (NRCS)	NRCS determination via Form AD-1006	Full Compliance. No prime farmlands. DoD acquisition is exempt from completing Form AD-1006
Natural Resources	Endangered Species Act (ESA) of 1973, as amended (16 USC 1531-1544)	USFWS	Compliance by lead agency and/or consultation to assess impacts and, if necessary, develop mitigation measures	Full compliance. No protected species would be impacted. Concurrence received from USFWS on July 6, 2011.
	Migratory Bird Treaty Act of 1918	USFWS	Compliance by lead agency and/or consultation to assess impacts and, if necessary, develop mitigation measures	Full compliance would be achieved prior to transfer, demolition, construction, and reuse activities
	Bald and Golden Eagle Act of 1940, as amended	USFWS	Compliance by lead agency and/or consultation to assess impacts and, if necessary, obtain permit	No effects on bald or golden eagles; full compliance
Health and Safety	Occupational Safety and Health Act of 1970	Occupational Safety and Health Administration (OSHA)	Compliance with guidelines including Material Safety Data Sheets	Full compliance would be achieved prior to transfer, demolition, construction, and reuse activities

Table 1-1, continued

Issue	Action Requiring Permit, Approval, or Review	Agency	Permit, License, Compliance, or Review/Status	Status of Compliance with Relevant Laws and Regulations
Cultural/ Archaeological	National Historic Preservation Act of 1966	Advisory Council on Historic Preservation through SHPO	Section 106 Consultation	Full compliance; no historic properties would be affected. Concurrence from North Carolina Department of Cultural Resources SHPO was received on July 1, 2011.
	Archaeological Resources Protection Act of 1979	Affected land-managing agency	Permits to survey and excavate/remove archaeological resources on Federal lands; Native American tribes with interests in resources must be consulted prior to issue of permits.	Full compliance
	EO 13175 <i>(Consultation and Coordination with Indian Tribal Governments)</i>	Bureau of Indian Affairs (BIA)	Coordinate directly with Tribes claiming cultural affinity to project areas	Full compliance
Social/ Economic	EO 12898 <i>(Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations)</i> of 1994	USEPA	Compliance	Full compliance since no minority or low-income populations would be affected
	EO 13045 <i>(Protection of Children from Environmental Health Risks and Safety Risks)</i>	USEPA	Compliance	Full compliance since no children would be exposed to the construction activities
	EO 13423 <i>(Strengthening Federal Environmental, Energy, and Transportation Management)</i>	USEPA	Compliance	Full compliance

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SECTION 2.0
DESCRIPTION OF PROPOSED ACTION



2.0 Description of Proposed Action

2.1 Background

This section describes the Army's Proposed Action for carrying out the BRAC Commission's recommendations. The BRAC Commission approved the following recommendation concerning the Rhodes AFRC:

“Close the Army Reserve Adrian B. Rhodes Armed Forces Reserve Center in Wilmington, North Carolina...and relocate all Army and Navy units to a new Armed Forces Reserve Center (AFRC) and Organizational Maintenance Shop (OMS) in Wilmington, North Carolina, if the Army is able to acquire suitable land for the construction of the facilities.”

The transfer of units, facilities, and mission activities of the Rhodes AFRC to the new AFRC and OMS location would be completed by July 2011. Final implementation of the BRAC recommendation would complete the disposal of the Rhodes AFRC property and facilities in Wilmington, North Carolina. The BRAC disposal would be completed after the installation is closed and the forces are realigned as rapidly as possible in order to expedite its reuse. There are approximately 225 reservists and 12 full-time personnel located at the Rhodes AFRC.

2.2 Rhodes AFRC Facilities

The Rhodes AFRC property and facilities are located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina. The Rhodes AFRC installation consists of three primary buildings, a privately owned vehicle parking area, a military vehicle parking area, a vehicle wash rack, and several small structures, all situated on 4.26 acres of property. Surrounding properties contiguous with the Rhodes AFRC include: the Legion Stadium Sports Complex to the south and west, Greenfield Lake to the east, and Woodlawn Subdivision to the north.

Figure 2-1 provides an aerial view of the installation layout, building structures, and surrounding adjacent properties. The dominant structure of the installation is the Administration building, a 2-story, 22,581-square-foot (SF) building primarily utilized for training and other administrative functions (Photograph 2-1). Originally constructed in 1955, this facility was expanded to its current size in 1976. The warehouse/storage facility is an unheated, 3,500-SF metal building erected on a concrete slab (Photograph 2-2). This facility stores unit supplies and equipment.



**Photograph 2-1. Administration/
Training Facility**



**Photograph 2-2. Warehouse/Storage
Facility**



- 1 = Admin/Training Facility
- 2 = Warehouse/Storage Facility
- 3 = Organizational Maintenance Shop (OMS)
- 4 = Vehicle Wash Rack
- 5 = Hazmat Storage Unit (top building) and POL Shed (bottom building)

Figure 2-1: Project Area



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The OMS is a 3,696-SF single-story cinder block and brick block building constructed on a concrete slab in 1967 (Photograph 2-3). The building is divided into two vehicle maintenance bays, a battery storage room, and three office spaces. Flammable storage lockers and parts washers are also located within the maintenance bays. The vehicle wash rack is the remaining permanent structure located on the installation property (Photograph 2-4). The wash rack is equipped with an underground oil/water separator (OWS). Other outdoor facilities include the hazardous materials (HAZMAT) storage unit and the petroleum, oils, and lubricants (POL) shed (Photograph 2-5).



Photograph 2-3. Organizational Maintenance Shop (workshop)



Photograph 2-4. Vehicle Wash Rack



Photograph 2-5. HAZMAT Storage Unit (left) and POL Shed (right)

2.3 Proposed Action

The Proposed Action is to complete the disposal of the Rhodes AFRC property and facilities in Wilmington, North Carolina after the installation is closed and the forces are realigned (July 2011) as rapidly as possible in order to expedite its reuse. Redevelopment and reuse of the surplus Rhodes AFRC property would occur as a secondary action under disposal. Under BRAC law, the Army must close the Rhodes AFRC no later than September 15, 2011. After the Rhodes AFRC is closed, the Army would dispose of the property. As a part of the disposal process, the Army screened the property for reuse with the DoD and other Federal agencies. No Federal agency expressed an interest in reusing this property for another purpose.

2.4 Schedule

Under the BRAC law, the Army must have initiated all realignments no later than September 15, 2007, and must complete all realignments no later than September 15, 2011. Implementation of the Proposed Action is proposed to occur over approximately 7 to 9 months, with DoD's decision to close the Rhodes AFRC in September, 2011, and concluding with the property transfer by the first quarter of 2012.

SECTION 3.0
ALTERNATIVES



3.0 Alternatives

3.1 Introduction

A basic principle of NEPA is that an agency should consider reasonable alternatives to a Proposed Action. Considering alternatives helps to avoid unnecessary impacts and allows analysis of reasonable ways to achieve the stated purpose. To warrant detailed evaluation, an alternative must be reasonable and viable. To be considered reasonable, an alternative must be ready for decision making (any necessary preceding events having taken place), affordable, capable of implementation, and satisfactory with respect to meeting the purpose of and need for the action. The following discussion identifies alternatives considered by the Army and identifies whether they are feasible and, hence, subject to detailed evaluation in the EA.

3.2 Alternatives Considered

This section presents the Army's development of alternatives and addresses alternatives available for the Proposed Action. The section also describes the No Action Alternative.

3.2.1 Alternative 1: Disposal and Reuse Alternative (Preferred Alternative)

Under the Disposal and Reuse Alternative, the Rhodes AFRC property and facilities would be transferred to an LRA. The Federal government has provided a list of the LRAs recognized by the Secretary of Defense, acting through the DoD Office of Economic Adjustment. The City of Wilmington is the recognized LRA for the redevelopment of the Rhodes AFRC facilities for the transfer and reuse process.

On July 6, 2010, the City of Wilmington LRA adopted the "Addendum to Adrian B. Rhodes AFRC Redevelopment Plan." Under this redevelopment plan, all existing structures would be demolished and replaced with permanent supportive housing. Through an extensive public outreach process, the redevelopment plan focuses on the need for reducing homelessness through permanent public housing as identified in the "Ten Year Plan to End Chronic Homeless and Reduce Homelessness in the Cape Fear Region" of Wilmington, North Carolina. Representatives of state and local governments, providers for the homeless, and other parties interested in the redevelopment were encouraged to contact the City of Wilmington during this process. The project proposed by the Lakeside Partnership Center (LPC) to redevelop the Rhodes AFRC property into permanent supportive housing for the homeless was adopted by the LRA.

Under the Disposal and Reuse Alternative, the Rhodes AFRC property and facilities would be transferred to the City of Wilmington LRA. The City of Wilmington would receive the Rhodes AFRC property and facilities through a zero-cost conveyance. The property would then be transferred to the LPC for redevelopment into permanent supportive housing units and ultimate reuse as a facility to serve the region's homeless population. The redevelopment by LPC includes the replacement of the existing Rhodes AFRC institutional-style structures with new residential-style structures. The Department of Housing and Urban Development (HUD) has rendered a final determination (February 18, 2011) to accept the amended redevelopment plan for the reuse of the Rhodes AFRC as proposed by the LPC.

The LPC project site plan (Figure 3-1) includes the construction of the following permanent supportive housing units:

- Two 2-unit single-story buildings (~5,120 SF per duplex)
 - Three bedrooms per unit
- Two 4-unit two-story buildings (~7,870 SF per quadraplex)
 - One bedroom per unit
 - One unit for support staff
- Three 4-unit two-story building structures (~7,098 SF per quadraplex)
 - Two structures with one bedroom per unit
 - One structure with two bedrooms per unit
 - One unit for support staff
- One single-story structure designed as a shared office space, common space, laundry facility, and storage (~3,549 SF)

3.2.2 Alternative 2: No Action Alternative

CEQ's regulations require that a No Action Alternative be evaluated. Under the No Action Alternative, Rhodes AFRC property and facilities would continue to be owned by the Federal government, and the property would be placed in caretaker status for overall maintenance of the property. However, since the closure of Rhodes AFRC has been mandated by Congress and the President, the No Action Alternative is not a viable alternative, but will serve as a baseline against which the impacts of the Proposed Action and other Alternatives can be evaluated.

3.3 Alternatives Eliminated from Further Consideration

Accelerated Disposal Alternative: The Army has decided not to take advantage of various property transfer and disposal methods which would allow the reuse of the Rhodes AFRC property to occur before environmental remediation action has been taken. There were no reuse options made available prior to the Army performing their environmental remediation actions. Therefore, this transfer and disposal method and the alternative that would include them were eliminated from further consideration.

Traditional Disposal Alternative: The Army has decided not to exercise a property transfer and disposal of individual parcels (e.g., only the Administration Building) of the Rhodes AFRC property after environmental clearance is complete. The HUD-approved reuse by the City of Wilmington LRA was made available prior to exercising a traditional disposal option. Therefore, this transfer and disposal method and the alternative that would include them were eliminated from further consideration.

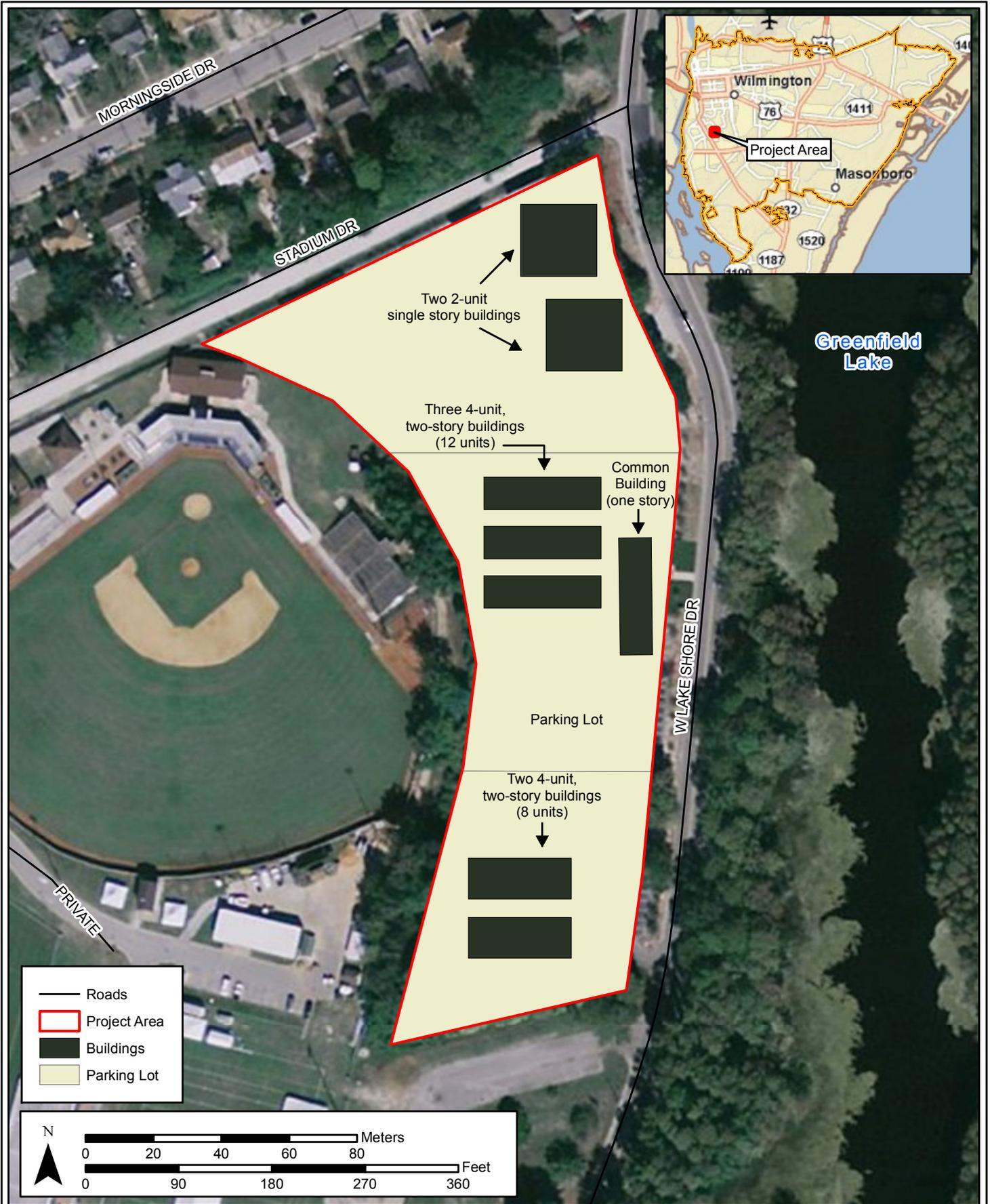


Figure 3-1: Redevelopment Site Plan

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SECTION 4.0
AFFECTED ENVIRONMENT AND CONSEQUENCES



4.0 Affected Environment and Consequences

4.1 Introduction

This section of the EA describes the natural and human environment that exists at and surrounding the Rhodes AFRC, and the potential effects on those resources as a result of the Proposed Action and Alternatives. For the purposes of this EA, the project site is defined as the 4.26 acres of the Rhodes AFRC property and facilities, located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina. The project area of interest includes Wilmington and the lands surrounding the project site. The project region of influence or vicinity is New Hanover County.

Only those parameters that have the potential to be affected by the Proposed Action and Alternatives are described, as per CEQ guidance (40 CFR 1501.7 [3]). Therefore, resources and items such as climate, airspace, energy sources, geology, communication systems, and solid waste are not addressed for the following reasons:

- Climate - the proposed project would neither affect nor be affected by climate. Therefore, further analysis of climate impacts is not necessary for this EA.
- Airspace - the proposed project does not involve any aircraft training, and thus, airspace would not be affected. Therefore, further analysis of airspace impacts is not necessary for this EA.
- Energy Sources - slight increases in energy consumption would occur during the construction of the permanent support housing. However, the majority of the energy demands at the project site would be met by the same regional grid as currently utilized at the existing Rhodes AFRC. Therefore, further analysis of energy sources impacts is not necessary for this EA.
- Communication systems - the project would have negligible additional demand or other impact on local or regional communication systems. Therefore, further analysis of communication systems impacts is not necessary for this EA.
- Geology - there are no significant or unique geologic resources located at the Rhodes AFRC, and the Proposed Action would not disturb resources deeper than surface soils; therefore, there would be no impacts from any alternative actions on geologic resources. Therefore, further analysis of geology impacts is not necessary for this EA.
- Solid waste - the Proposed Action would not result in increased production of solid waste in the region since the homeless residents would be relocated from the existing shelters or other locations within Wilmington, North Carolina. Therefore, further analysis of solid waste impacts is not necessary for this EA.
- Coastal Zone - although the project site is located in a coastal county, it is not located in an Area of Environmental Concern. In North Carolina, a Coastal Zone Management Act consistency determination is required only when a construction site is located in a coastal county and an Area of Environmental Concern (Subchapter H of North Carolina Code does not apply, but subchapter M does apply. Subchapter M relates to water quality concerns for the transfer recipient).

An impact (consequence or effect) is defined as a modification of the human or natural environment that would result from the implementation of an action. The impacts can be either beneficial or adverse, and can be either directly related to the action or indirectly caused by the action (secondary, indirect, or synergistic effects). The effects can be temporary (short-term), long lasting (long-term), or permanent. For purposes of this EA, temporary effects are defined

as those that would last less than 3 years after completion of the action. Long-term impacts are defined as those that would last up to 20 years. Permanent impacts are those that may reasonably be expected to endure beyond the 20-year time frame established for long-term impacts.

Impacts can vary in degree or magnitude from a slightly noticeable change to a total change in the environment. The significance of the impacts presented in this EA is based upon existing regulatory standards, scientific and environmental knowledge, and/or best professional opinions of the authors of the EA. The significance of the impacts on each resource will be described as significant, moderate, minimal, insignificant (or negligible), or no impact. Significant impacts are those effects that would result in substantial changes to the environment, and should receive the greatest attention in the decision-making process.

4.2 Land Use

4.2.1 Affected Environment

This section describes existing land use conditions on and surrounding the Rhodes AFRC. It considers natural land uses (e.g., forests or undeveloped areas) and land uses that reflect human modification (e.g., residential, commercial, agricultural, or other developed uses). Management plans, policies, ordinances, and regulations determine the types of uses that are allowable, or protect specially designated or environmentally sensitive uses. The following sections discuss the regional geographic setting, location, climate, installation land use, and current and future development.

4.2.1.1 Regional Geographic Setting, Location, and Climate

The Rhodes AFRC is located in Wilmington, North Carolina between the Atlantic Ocean and the Cape Fear River (New Hanover County 2011). Wilmington's climate is hot during the summer when temperatures tend to be in the 80s, and cold during winter when temperatures tend to be in the 40s. The warmest month of the year is July, with an average maximum temperature of approximately 90 degrees Fahrenheit (°F), while the coldest month of the year is January, with an average minimum temperature of approximately 36°F. The annual average precipitation at Wilmington City is approximately 57 inches. Summer months tend to be wetter than winter months (IDcide 2011).

4.2.1.2 Land Use

The Rhodes AFRC site was formerly used as an administrative, logistical, and educational facility. Limited maintenance of military vehicles and equipment occurred in the OMS building. The site has been used by reservists for drill activities throughout its existence. In 2007, the facility was occupied by the USAR 650th and 993rd Transportation Companies. In addition, the U.S. Navy Reserve and Coast Guard have used the facility for training (USACE Louisville District 2007).

Currently, three primary buildings, a privately owned vehicle parking area, a military vehicle parking area, a vehicle wash rack, and several small structures are present on the property. The majority of the property is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and building footprints. A small natural area is located on the southwest corner of the property.

4.2.1.3 Surrounding Land Use

The adjacent property to the south and west is occupied by the Legion Stadium Sports Complex. To the east of the property is Greenfield Lake, and to the North is the Woodlawn Subdivision.

4.2.1.4 Current and Future Development in the Region of Influence

Current and future development in the region of influence is unknown at this time.

4.2.2 Environmental Consequences

Considerations for impacts on land use include the land on and adjacent to the Proposed Action project area, the physical features that influence current or proposed uses, pertinent land use plans and regulations, and land availability.

Potential impacts on land use are considered significant if the Proposed Action would:

- Conflict with applicable ordinances and/or permit requirements;
- Cause nonconformance with the current general plans and land use plans, or preclude adjacent or nearby properties from being used for existing activities; or
- Conflict with established uses of an area requiring mitigation.

4.2.2.1 Disposal and Reuse Alternative

Potential land use impacts from closure, demolition, construction, and reuse would not be significant. Land use would change from a military installation (currently not zoned) to residential use. This use would not conflict with surrounding land uses, as both the site and surrounding land would be zoned R-7 residential. Under the Disposal and Reuse Alternative, Rhodes AFRC would be transferred to the LRA to be redeveloped into permanent supportive housing units and ultimate reuse as a facility to serve the region's homeless population. Overall, there would be no adverse impacts on land use resulting from implementation of the Disposal and Reuse Alternative.

4.2.2.2 No Action Alternative

Under this alternative, designated land use would not change, the status of the property would change from active to inactive (caretaker status). Maintenance activities to preserve and protect the facilities would take place. These activities would not conflict with surrounding land use; however, if the property remains vacant for an extended period of time, it may detract from the overall appearance of the neighborhood.

4.3 Aesthetics and Visual Resources

4.3.1 Affected Environment

This section describes the existing aesthetic and visual resource conditions in the area of the Rhodes AFRC. Visual resources include natural and man-made physical features that provide the landscape with its character and value as an environmental resource. Landscape features that form a viewer's overall impression about an area include landform, vegetation, water, color, adjacent scenery, scarcity, and constructed modifications to the natural setting.

The 4.26-acre site consists of three primary buildings, a privately owned vehicle parking area, a military vehicle parking area, a vehicle wash rack, and several small structures, all situated on the property. A natural area is present at the southwest corner of the property.

Surrounding properties adjacent to the Rhodes AFRC include the Legion Stadium Sports Complex to the south and west, Greenfield Lake to the east, and Woodlawn Subdivision to the north.

4.3.2 Environmental Consequences

Potential impacts on aesthetic and visual resources are considered significant if the Proposed Action would substantially degrade the natural or constructed physical features in the area of the action that provide the area with its character and value as an environmental resource. The magnitude of any impact would be primarily determined by the number of viewers affected, viewer sensitivity to changes, distance of viewing, and compatibility with existing land use.

4.3.2.1 Disposal and Reuse Alternative

Potential impacts on aesthetics and visual resources from the closure, demolition, construction, and reuse of the Rhodes AFRC would not be significant. Short-term adverse impacts on aesthetics would occur from ground disturbance, the presence of workers, vehicles, and equipment and the generation of dust and vehicle exhaust associated with the demolition of the structures on-site. However, these impacts would be temporary, and once demolition and construction are complete, the reclamation of the site would remove these visual impacts.

The proposed supportive housing units would consist of two single-story duplex structures, two 2-story quadraplex structures, three 2-story quadraplex structures, and one single-story structure designed as a shared office, common space, laundry facility, and storage space. These structures would be in character with surrounding residential housing near the northwest corner of the site, thus creating negligible long-term aesthetic impacts. From a traffic and nighttime light perspective, the reuse of the site would cause minor adverse impacts on aesthetics. Daily usage of the property would increase overall from people residing on the property.

4.3.2.2 No Action Alternative

Under this alternative, the Rhodes AFRC property and facilities would enter into caretaker status. Impacts on aesthetics would not occur, as maintenance would be performed to preserve and protect the facilities; however, if the property remains vacant for an extended period of time, it may detract from the overall appearance of the neighborhood.

4.4 Air Quality

4.4.1 Affected Environment

The USEPA established the NAAQS for specific pollutants determined to be of concern with respect to the health and welfare of the general public. Ambient air quality standards are classified as either "primary" or "secondary." The major pollutants of concern, or criteria pollutants, are carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), ozone (O₃), particulate matter less than 10 microns (PM-10), particulate matter less than 2.5 microns (PM-2.5), and lead. NAAQS represent the maximum levels of background pollution that are considered safe, with an adequate margin of safety, to protect the public health and welfare. Areas that do not meet these NAAQS standards are called non-attainment areas; areas that meet both primary and secondary standards are known as attainment areas. The Federal Conformity Final Rule (40 CFR Parts 51 and 93) specifies criteria or requirements for conformity determinations for Federal projects.

The Federal Conformity Rule was first promulgated in 1993 by USEPA, following the passage of Amendments to the Clean Air Act in 1990. The rule mandates that a conformity analysis must

be performed when a Federal action generates air pollutants in a region that has been designated a non-attainment or maintenance area for one or more NAAQS.

A conformity analysis is the process used to determine whether a Federal action meets the requirements of the General Conformity Rule. It requires that the responsible Federal agency evaluate the nature of a proposed action and associated air pollutant emissions, and calculate emissions as a result of the proposed action. If the emissions exceed established limits, known as *de minimis* thresholds, the proponent is required to implement appropriate mitigation measures.

The project site is located in New Hanover County, which is in attainment for all NAAQS.

Asbestos

Some buildings that would be demolished may contain asbestos. If the structures do contain asbestos, an Asbestos Dust Mitigation Plan would be implemented to mitigate the exposure and migration of the asbestos. The mitigation of asbestos is discussed in more detail in the Hazardous Waste Section 4.12.

4.4.1.1 Greenhouse Gases and Climate Change

Global climate change refers to a change in the average weather on the earth. Greenhouse gases (GHGs) are gases that trap heat in the atmosphere. They include water vapor, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), fluorinated gases including chlorofluorocarbons (CFC) and hydrofluorocarbons (HFC), halons, as well as ground-level O₃ (California Energy Commission [CEC] 2007).

The GHGs covered by EO 13514 are CO₂, CH₄, N₂O, HFC, perfluorocarbons, and sulfur hexafluoride. These GHGs have varying heat-trapping abilities and atmospheric lifetimes. CO₂ equivalency (CO₂e) is a measuring methodology used to compare the heat-trapping impact from various GHG relative to CO₂. Some gases have a greater global warming potential than others. Nitrous oxides (NO_x), for instance, have a global warming potential that is 310 times greater than an equivalent amount of CO₂, and CH₄ is 21 times greater than an equivalent amount of CO₂.

The major GHG-producing sectors in society include transportation, utilities (e.g., coal and gas power plants), industry/manufacturing, agriculture, and residential. End-use sector sources of GHG emissions include transportation (41 percent), electricity generation (22 percent), industry (21 percent), agriculture and forestry (8 percent), and other (8 percent) (CEC 2007). The main sources of increased concentrations of GHG due to human activity include the combustion of fossil fuels and deforestation (contributing CO₂), livestock and rice farming, land use and wetland depletions, landfill emissions (contributing CH₄), refrigeration system and fire suppression system use and manufacturing (contributing CFC), and agricultural activities, including the use of fertilizers (CEC 2007).

4.4.1.2 GHG Threshold of Significance

The CEQ provided draft guidelines for determining meaningful GHG decision-making analysis. The CEQ GHG guidance is currently undergoing public comment at this time; however, the draft guidance states that if the proposed action would be reasonably anticipated to cause direct emissions of 27,557 U.S. tons or more of CO₂ GHG emissions on an annual basis, agencies should consider this an indicator that a quantitative and qualitative assessment may be meaningful to decision makers and the public. For long-term actions that have annual direct emissions of less than 27,557 U.S. tons of CO₂, CEQ encourages Federal agencies to consider

whether the action's long-term emissions should receive similar analysis. CEQ does not propose this as an indicator of a threshold of significant effects, but rather as an indicator of a minimum level of GHG emissions that may warrant some description in the appropriate NEPA analysis for agency actions involving direct emissions of GHGs (CEQ 2010).

4.4.2 Environmental Consequences

4.4.2.1 Disposal and Reuse Alternative

Temporary and minor increases in air pollution would occur from the use of construction equipment and delivery trucks (combustible emissions) and the disturbance of soils (fugitive dust) during construction activities. The following paragraphs describe the air calculation methodologies utilized to estimate air emissions produced by the planned construction activities.

Fugitive dust emissions were calculated using the emission factor of 0.19 ton per acre-month (Midwest Research Institute 1996), which is a more current standard than the 1985 PM-10 emission factor of 1.2 tons per acre-month presented in AP-42 Section 13 Miscellaneous Sources 13.2.3.3 (USEPA 2001).

USEPA's NONROAD Model (USEPA 2005a) was used, as recommended by USEPA's *Procedures Document for National Emission Inventory, Criteria Air Pollutants, 1985-1999* (USEPA 2001), to calculate emissions from construction equipment. Combustible emission calculations were made for standard construction equipment, such as front-end loaders, backhoes, bulldozers, and cement trucks. Assumptions were made regarding the total number of days each piece of equipment will be used, and the number of hours per day each type of equipment would be used.

Construction workers would temporarily increase the combustible emissions in the airshed during their commute to and from the project area. Emissions from delivery trucks would also contribute to the overall air emission budget. Emissions from delivery trucks and construction worker commuters traveling to the job site were calculated using the USEPA MOBILE6.2 Model (USEPA 2005b, 2005c and 2005d).

The total air quality emissions were calculated for the construction activities to compare to the General Conformity Rule. Summaries of the total emissions for Alternative 1 are presented in Table 4-1. Details of the analyses are presented in Appendix A.

Table 4-1. Total Air Emissions (tons/year) from the Disposal and Reuse Alternative Construction and Maintenance Activities versus the *de minimis* Threshold Levels

Pollutant	Total (tons/year)	<i>de minimis</i> Thresholds (tons/year) ⁽¹⁾
CO	11.70	100
Volatile Organic Compounds	2.16	100
NO _x	13.76	100
PM-10	4.20	100
PM-2.5	1.60	100
SO ₂	1.74	100
CO ₂ e (equivalency)	5,738	27,557

Source: 40 CFR 51.853 and Gulf South Research Corporation (GSRC) model projections.

⁽¹⁾ Note that New Hanover County is in attainment for all NAAQS (USEPA 2010b).

Several sources of air pollutants would contribute to the overall air impacts of the construction project. The air emissions results in Table 4-1 included emissions from:

1. Combustible engines of construction equipment
2. Construction workers' commute to and from job site
3. Supply trucks delivering materials to construction site
4. Fugitive dust from job site ground disturbances

As can be seen from the tables above, the proposed construction and maintenance activities do not exceed Federal *de minimis* thresholds and, thus, would not require a Conformity Determination. As there are no violations of air quality standards and no conflicts with the state implementation plans (SIPs), the impacts on air quality from the implementation of the Preferred Alternative would be less than significant. During the proposed construction activities, proper and routine maintenance of all vehicles and other construction equipment would be implemented to ensure that emissions are within the design standards of all construction equipment. Dust suppression methods should be implemented to minimize fugitive dust. In particular, wetting solutions would be applied to the construction area to minimize the emissions of fugitive dust.

4.4.2.2 No Action Alternative

Implementation of the No Action Alternative would require that the facilities would continue to be owned by the Federal government, and minor impacts on ambient air quality from routine traffic would continue in the region.

4.5 Noise

4.5.1 Affected Environment

Noise is generally described as unwanted sound, which can be based either on objective impacts (i.e., hearing loss, damage to structures) or subjective judgments (e.g., community annoyance). Sound is usually represented on a logarithmic scale with a unit called the decibel (dB). Sound on the decibel scale is referred to as sound level. The threshold of human hearing is approximately 3 dB, and the threshold of discomfort or pain is around 120 dB.

Noise levels occurring at night generally produce a greater annoyance than the same levels occurring during the day. It is generally agreed that people perceive intrusive noise at night as being 10 dBA (A-weighted decibel is a measure of noise at a given, maximum level or constant state level) louder than the same level of intrusive noise during the day, at least in terms of its potential for causing community annoyance. This perception is largely because background environmental sound levels at night in most areas are also about 10 dBA lower than those during the day.

Acceptable noise levels have been established by HUD for construction activities in residential areas (HUD 1984):

Acceptable (not exceeding 65 dBA) – The noise exposure may be of some concern, but common building construction would make the indoor environment acceptable, and the outdoor environment would be reasonably pleasant for recreation and play.

Normally Unacceptable (above 65 but not greater than 75 dBA) – The noise exposure is more severe; barriers may be necessary between the site and prominent noise

sources to make the outdoor environment acceptable; special building construction may be necessary to ensure that people indoors are sufficiently protected from outdoor noise.

Unacceptable (greater than 75 dBA) – The noise exposure at the site is so severe that the construction costs to make the indoor noise environment acceptable may be prohibitive, and the outdoor environment would still be unacceptable.

As a general rule, noise generated by a stationary noise source, or “point source,” will decrease by approximately 6 dBA over hard surfaces and 9 dBA over soft surfaces for each doubling of the distance. For example, if a noise source produces a noise level of 85 dBA at a reference distance of 50 feet over a hard surface, then the noise level would be 79 dBA at a distance of 100 feet from the noise source, 73 dBA at a distance of 200 feet, and so on. To estimate the attenuation of the noise over a given distance, the following relationship is utilized:

$$\text{Equation 1: } dBA_2 = dBA_1 - 20 \log^{(d_2/d_1)}$$

Where:

- dBA₂ = dBA at distance 2 from source (predicted)
- dBA₁ = dBA at distance 1 from source (measured)
- d₂ = Distance to location 2 from the source
- d₁ = Distance to location 1 from the source

Source: California Department of Transportation 1998

Residential homes are located north of the project site and a baseball park is located on the west side.

4.5.2 Environmental Consequences

Potential noise impacts on the residential community are considered significant if common building construction noise exceeds 65 dBA. A noise exposure of 65 dBA or less may be of some concern, but the indoor environment would be acceptable, and the outdoor environment would be reasonably pleasant for recreation and play.

4.5.2.1 Disposal and Reuse Alternative

The proposed construction activities would require the use of common construction equipment. Table 4-2 presents noise emission levels for construction equipment expected to be used during the proposed construction activities. Anticipated sound levels at 50 feet range from 78 dBA to 81 dBA based on data from the Federal Highway Administration (FHWA) (2007).

Table 4-2. A-Weighted (dBA) Sound Levels of Construction Equipment and Modeled Attenuation at Various Distances¹

Noise Source	50 feet	100 feet	200 feet	500 feet	1,000 feet
Backhoe	78	72	68	58	52
Crane	81	75	69	61	55
Excavator	81	75	69	61	55
Front-end loader	79	73	67	59	53
Concrete mixer truck	79	73	67	59	53

Source: FHWA 2007

The dBA at 50 feet is a measured noise emission. The 100 to 1,000-foot results are GSRC modeled estimates.

Construction would involve the use of an excavator and crane, which have a noise emission level of 81 dBA at 50 feet from the source. Assuming the worst case scenario of 81 dBA for the proposed construction activities, the noise model projected that a noise level of 81 dBA from the excavator and crane would have to travel 300 feet before it would attenuate to an acceptable level of 65 dBA.

Depending upon the number of construction hours, and the number, type, and distribution of construction equipment being used, the noise levels near the project area could temporarily exceed 65 dBA up to 300 feet from the project area. Geographic Information System (GIS) was used to determine the number of sensitive noise receptors within 300 feet of the edge of the project property. Approximately 23 residential sensitive receptors and a recreational park may experience temporary noise intrusion equal to or greater than 65 dBA from construction equipment.

To minimize these noise impacts, construction activities, when operating near residential neighborhoods, should be limited to daylight hours during the workweek, between 8:00 am and 5:00 pm on Monday through Friday. Noise impacts should be minor if these timing restrictions are implemented in residential neighborhoods. Noise generated by the construction activities would be intermittent and last for approximately 6 months, after which noise levels would return to ambient levels. Therefore, the noise impacts from construction activities would be considered minor.

4.5.2.2 No Action Alternative

Noise impacts associated with the implementation of the No Action Alternative would be less than the current levels due to the lack of regular use of the property (caretaker status).

4.6 Water Resources

4.6.1 Affected Environment

4.6.1.1 Surface Waters

Surface waters from the project site drain through a ditch into Greenfield Lake which is located approximately 110 feet east of the project site. Greenfield Lake eventually flows into Greenfield Creek (0.58 mile long) and then into the Cape Fear River, which is located approximately 1.1 miles west of the project site. The project site is located in the Cape Fear River Basin which drains into the Atlantic Ocean.

Section 303(d) of the Clean Water Act (CWA) requires that states develop a list of surface waters which are not meeting water quality standards and not supporting their designated uses. Greenfield Lake is not monitored by the NCDENR for water quality parameters; however, Greenfield Lake drains into Greenfield Creek which is monitored by NCDENR for compliance with state water quality criteria. Greenfield Creek (NCDENR Index number 18-76) is in attainment for all water quality standards with the exception of mercury. Please note that in North Carolina, there is a state-wide fish consumption advisory for mercury; therefore, all surface waters in the state are considered to be impaired by mercury (NCDENR 2010).

4.6.1.2 Hydrology/Groundwater

The project site is situated on the Coastal Plains of North Carolina. The Wilmington area is underlain by limestone of the Peedee Formation of Cretaceous age and limestone of the Castle Hayne Formation. In a recent hydrologic survey at the Rhodes AFRC project site (see Environmental Condition of Property [ECP] Report 2007 in Appendix D), groundwater was encountered from 7 to 8 feet below ground surface (bgs). Groundwater in the Wilmington area

primarily occurs in two aquifers: the surficial coastal deposits, and the limestone and sands of the Castle Hayne Formation. The Castle Hayne aquifer is the most productive aquifer in the state. It is usually confined within limestone, and is found at a depth of over 90 feet bgs in the Wilmington area. The surface soils are sandy and have high infiltration rates, low water holding characteristics, high hydraulic conductivity, and a coarse texture (USACE 2007).

4.6.1.3 Floodplains

Floodplains are low-lying areas adjacent to or within major waterbodies that serve to contain excess water during rainfall events. The 100-year flood is generally the standard utilized in management of floodplains. This boundary is based on the elevation at which there is a 1 percent chance that floodwater will reach a designated limit during a rainfall event. EO 11988, *Floodplain Management*, directs Federal agencies to avoid developments within floodplains. According to the FEMA's National Flood Insurance Program's Flood Insurance Rate Map, the Rhodes AFRC project site is located in a 100-year floodplain.

4.6.2 Environmental Consequences

Potential impacts on water resources consider the effects on surface water, groundwater, and floodplains. Surface water impacts would be considered significant if the stormwater management controls of the SWPPP failed to protect surface waters from pollutant discharges, including sediment migration. Potential impacts on groundwater would be considered significant if the construction activities resulted in hazardous spills, major changes to impervious surfaces, or large requirements for groundwater use. Potential impacts on floodplains would be considered significant if the construction resulted in a major impairment to the flow of floodwaters.

4.6.2.1 Disposal and Reuse Alternative

4.6.2.1.1 Surface Water

The Disposal and Reuse Alternative would have minimal impacts on surface water quality. Some temporary water quality impairments may occur if there is a major rain event during the demolition of old buildings and construction of new housing. Construction activities would alter habitats and disturb soils (approximately 4.26 acres), which would increase the probability of sediment migration. Contractors would develop and implement a SWPPP, which would include an outline of the stormwater drainage system for each discharge point, actual and potential pollutant contact, and surface water locations. The SWPPP would also incorporate best management practices (BMPs) and other stormwater management controls. Compliance with the SWPPP would minimize potential impacts on surface water quantity and quality.

Care would be taken to avoid impacting the project area with hazardous substances (i.e., anti-freeze and POL) used during construction. A Spill Prevention Control and Countermeasures Plan (SPCCP) would be in place prior to the start of construction, and all personnel would be briefed on the implementation and responsibilities of this plan. The Disposal and Reuse Alternative would not substantially alter existing drainage patterns or substantially affect water quality. Thus, the Preferred Alternative would have minimal impacts on the region's surface waters.

4.6.2.1.2 Hydrology/Groundwater

Hydrologic modifications are defined as those activities that affect natural stream flow. The Preferred Alternative may change the hydrology and impact groundwater infiltration in the project area by introducing impervious surfaces such as rooftops and parking lots. Introduction of impervious surfaces reduces the capacity of the remaining pervious surfaces to capture and absorb rainfall, so a larger percentage of rainfall becomes runoff during any storm. According to

the LRA plans for the site, the area of impervious surfaces would be approximately the same as existing conditions, so the impacts on hydrology and groundwater would be minor.

4.6.2.1.3 Floodplains

The construction associated with the Disposal and Reuse Alternative would have minor impacts on the frequency and intensity of flood flows in the drainage systems. The construction activities would be guided by New Hanover County building codes for new construction in a floodplain area. County building regulations require additional construction standards for new structures in floodplains. Some construction standards include raising the lowest enclosed floor above flood levels, flood-proofing, and anchoring. Please note that any type of development in a floodplain, including land filling and excavation, may require a permit (New Hanover County 2011). Overall, any potential effects would be localized to the vicinity of the affected floodplain. The Disposal and Reuse Alternative may have a short-term, adverse effect on floodplains during construction of the new facilities; however, the likelihood of flooding within the 100-year floodplain would not increase nor would the natural flow of stormwater be impeded.

4.6.2.2 No Action Alternative

Under the No Action Alternative, impacts on surface water, groundwater, or floodplains would not occur. Due to the facility becoming inactive (caretaker status), the chances for POL and other hazardous spills would be eliminated and no changes to surface water, groundwater, and floodplains would be experienced.

4.7 Biological Resources

This section describes existing biological resources at the Rhodes AFRC. It focuses on plant and animal species or habitat types that are typical or are an important element of the ecosystem, are of special category importance (of special interest due to societal concerns), or are protected under state or Federal law or regulatory requirement.

4.7.1 Affected Environment

4.7.1.1 Vegetation

Approximately three-quarters of the property at Rhodes AFRC is covered by impervious surface features such as asphalt parking areas, driveways, concrete walkways, and building footprints. Vegetation within the developed portion of the property is limited to landscaping (shrubs and small trees) and large live oaks (*Quercus virginiana*). An area of natural vegetation is located in the southwestern corner of the property; however, this area will be discussed in Section 4.7.1.4 (Wetlands).

4.7.1.2 Wildlife

Naturally occurring vegetation is limited at the Rhodes AFRC; most wildlife species are transients through the area. Wildlife species likely to exist in this urban area include opossum (*Didelphis virginiana*), raccoon (*Procyon lotor*), and squirrel (*Sciurus* spp.). Avian species in the urban interface habitat include northern mockingbird (*Mimus polyglottos*), red-winged blackbird (*Agelaius phoeniceus*), mourning dove (*Zenaidura macroura*), house sparrow (*Passer domesticus*), and European starling (*Sturnus vulgaris*). Greenfield Lake, across West Lake Shore Drive, is home to numerous bird species, including green heron (*Butorides virescens*), great crested flycatcher (*Myiarchus crinitus*), prothonotary warbler (*Protonotaria citrea*), yellow-throated warbler (*Dendroica dominica*), summer tanager (*Piranga rubra*), anhinga (*Anhinga anhinga*), great blue heron (*Ardea herodias*), great egret (*Ardea alba*), little blue heron (*Egretta caerulea*), wood duck (*Aix sponsa*), barred owl (*Strix varia*), and brown-headed nuthatch (*Sitta pusilla*).

4.7.1.3 Sensitive Species

The USFWS administers the ESA. This law provides Federal protection for species designated as Federally endangered or threatened. An endangered species is “in danger of extinction throughout all or a significant portion of its range,” and a threatened species “is likely to become an endangered species within the foreseeable future” (USFWS 2005). Special status species are listed as threatened or endangered, are proposed for listing, or are candidates for listing by the state and/or Federal government.

Under Section 7 of the ESA, the Army is mandated to use its authority to ensure that actions are approved, funded, or carried out to protect both flora and fauna that are considered threatened or endangered species or proposed for listing as threatened or endangered species on the Rhodes AFRC. Eleven Federally listed species have been recorded within New Hanover County, North Carolina (Table 4-3) (USFWS 2011); however, habitat is not available at the Rhodes AFRC to support any Federally listed species. In compliance with the ESA, informal consultation has been conducted (June 6, 2011) with USFWS, whereby a July 1, 2011 letter of concurrence agrees that no impacts on Federally listed species would occur as a result of the disposal and reuse of the Rhodes AFRC property. The North Carolina Natural Heritage Program (NCNHP) does not list any rare, threatened, or endangered species as occurring within 2 miles of the project site (NCNHP 2011).

Table 4-3. Federally Listed Threatened and Endangered Species of New Hanover County, North Carolina

Common/Scientific Name	Federal Status	Habitat	Potential to occur within Project Site
BIRDS			
Red-cockaded woodpecker (<i>Picoides borealis</i>)	Endangered	Mature longleaf/loblolly pine forests with minimal sub-canopy layer and open understory.	No – no suitable habitat and nesting sites at or near the project site.
Wood stork (<i>Mycteria americana</i>)	Endangered	Freshwater marshes, swamps, lagoons, ponds, flooded fields. Nests mostly in upper parts of cypress trees or dead hardwoods over water or on islands along streams or adjacent to shallow lakes.	Not known to nest in nearby Greenfield Lake or on project site.
Piping plover (<i>Charadrius melodus</i>)	Threatened	Primarily on intertidal beaches with sand and/or mud flats with no or very sparse vegetation.	No – no suitable habitat and nesting sites at or near the project site.
REPTILES			
Green sea turtle (<i>Chelonia mydas</i>)	Threatened	Warm tropical, shallow coastal waters.	No – no coastal waters at or near the project site.
Hawksbill sea turtle (<i>Eretmochelys imbricata</i>)	Endangered	The most tropical of all sea turtles; found near coral reefs and rocky outcroppings in tropical, shallow coastal waters.	No – no coastal waters at or near the project site.
Leatherback sea turtle (<i>Dermochelys coriacea</i>)	Endangered	Highly oceanic; utilize coastal waters only during breeding season.	No – no coastal waters at or near the project site.
Loggerhead sea turtle (<i>Caretta caretta</i>)	Threatened	Coastal tropical and subtropical waters, ventures into temperate waters to boundaries of warm currents, but prefers coastal bays, also found in coastal streams, creeks, and open ocean.	No – no coastal waters at or near the project site.
MAMMALS			
West Indian manatee (<i>Trichechus manatus</i>)	Endangered	Rivers, estuaries, and coastal areas of the southeastern U.S. coast along Central America and the West Indies to the northern coastline of South America.	No – no riverine, estuarine, or coastal waters at or near the project site.

Table 4-3, continued

Common/Scientific Name	Federal Status	Habitat	Potential to occur within Project Site
PLANTS			
Cooley's meadowrue (<i>Thalictrum cooleyi</i>)	Endangered	Grass-sedge bogs, wet pine savannahs and savannah like areas.	No – not likely due to lack of appropriate habitat at project site.
Seabeach amaranth (<i>Amaranthus pumilus</i>)	Threatened	Barrier island beaches, primary habitat consists of overwash flats.	No – no barrier island beaches at or near the project site.
Rough-leaved loosestrife (<i>Lysimachia asperulaefolia</i>)	Endangered	Found along ecotones or edges between longleaf pine uplands and pond pine pocosins.	No – not likely due to lack of appropriate habitat at or near the project site.

Source: USFWS 2011.

4.7.1.4 Wetlands

Wetlands are classified by USACE based on three criteria: hydrology, soil characteristics, and vegetation. Specifically, wetlands are defined as those areas that are saturated or inundated by water that is sufficient to support vegetation typically adapted to saturated soils (USACE 1987). Wetlands and other surface water features, which may include intermittent and perennial streams, are generally considered “waters of the United States” by USACE, and under their definition of “jurisdictional waters/features,” are protected under Section 404 of the CWA. The National Wetlands Inventory Map (Figure 4-1) indicates that the undeveloped portion of the property comprises a palustrine (freshwater) forested wetland dominated by deciduous and evergreen needle-leaved trees. The natural area located on the southwestern corner of the property is dominated by bald cypress (*Taxodium distichum*), swamp tupelo (*Nyssa sylvatica* var. *biflora*), redbay (*Persea borbonia*), red maple (*Acer rubrum*), and swamp titi (*Cyrilla racemiflora*). Scattered loblolly pine (*Pinus taeda*) and Carolina willow (*Salix caroliniana*) are also found in this system. Ground cover includes cinnamon fern (*Osmunda cinnamomea*), pickerel weed (*Pontederia cordata*), and jack in the pulpit (*Arisaema triphyllum*).

The U.S. Department of Agriculture (USDA) NRCS maps Murville fine sand in the undeveloped area of the project site (Figure 4-2) (USDA 2011). This soil is described as very poorly drained and is found in flat or slightly depressional areas. Murville fine sand is considered a hydric (wetland) soil by NRCS. This wetland is connected to Greenfield Lake by a culvert under West Lake Shore Drive and would be considered jurisdictional by USACE.

4.7.2 Environmental Consequences

Potential impacts on biological resources are considered significant if the proposed activities would:

- Affect a threatened or endangered species;
- Substantially diminish habitat for a plant or animal species;
- Substantially diminish a regionally or locally important plant or animal species;
- Interfere substantially with wildlife movement or reproductive behavior;
- Result in a substantial infusion of exotic plant or animal species; or
- Destroy, lose, or degrade jurisdictional wetlands (as defined by Section 404 of the CWA).

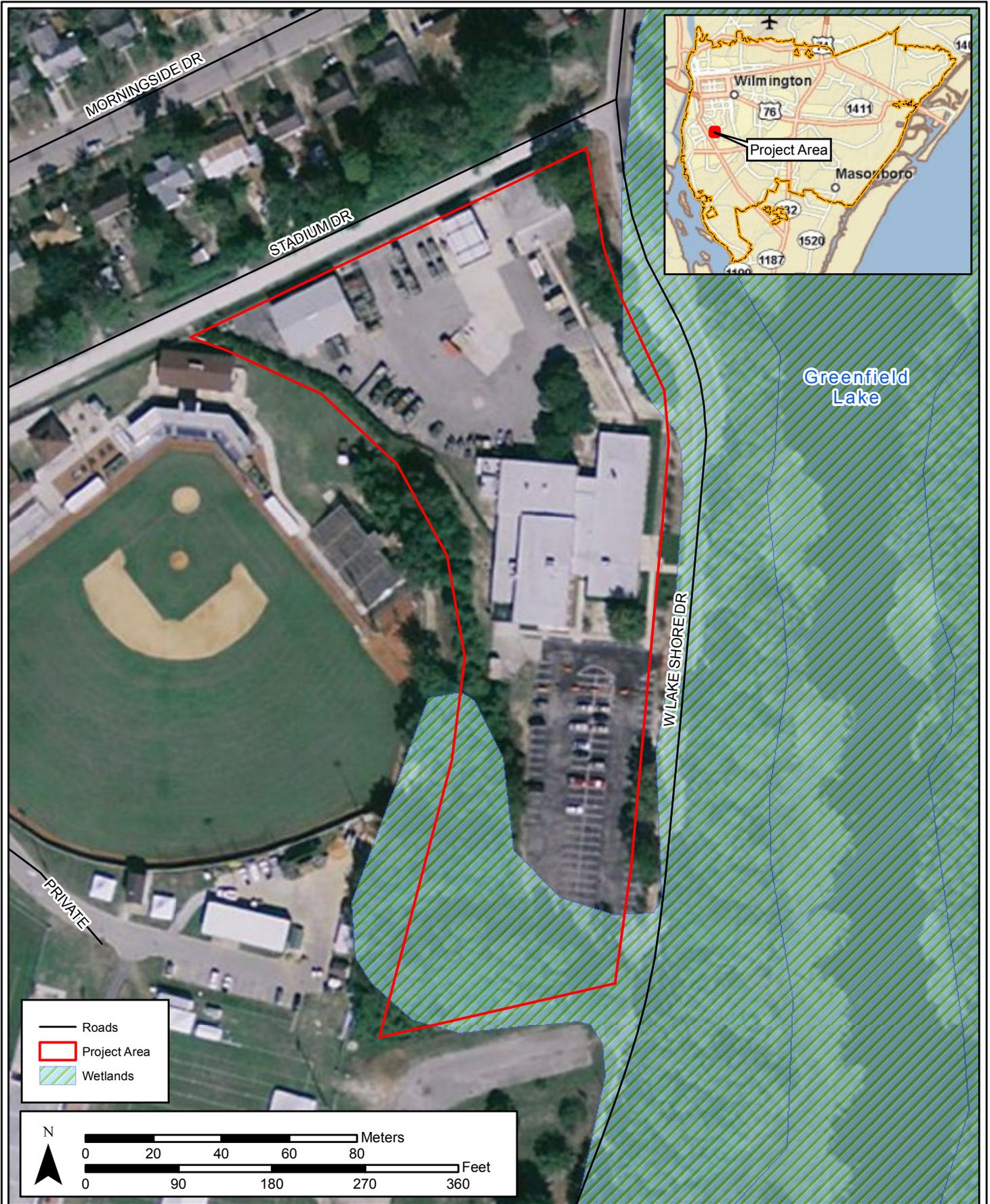


Figure 4-1: Wetland Map



June 2011

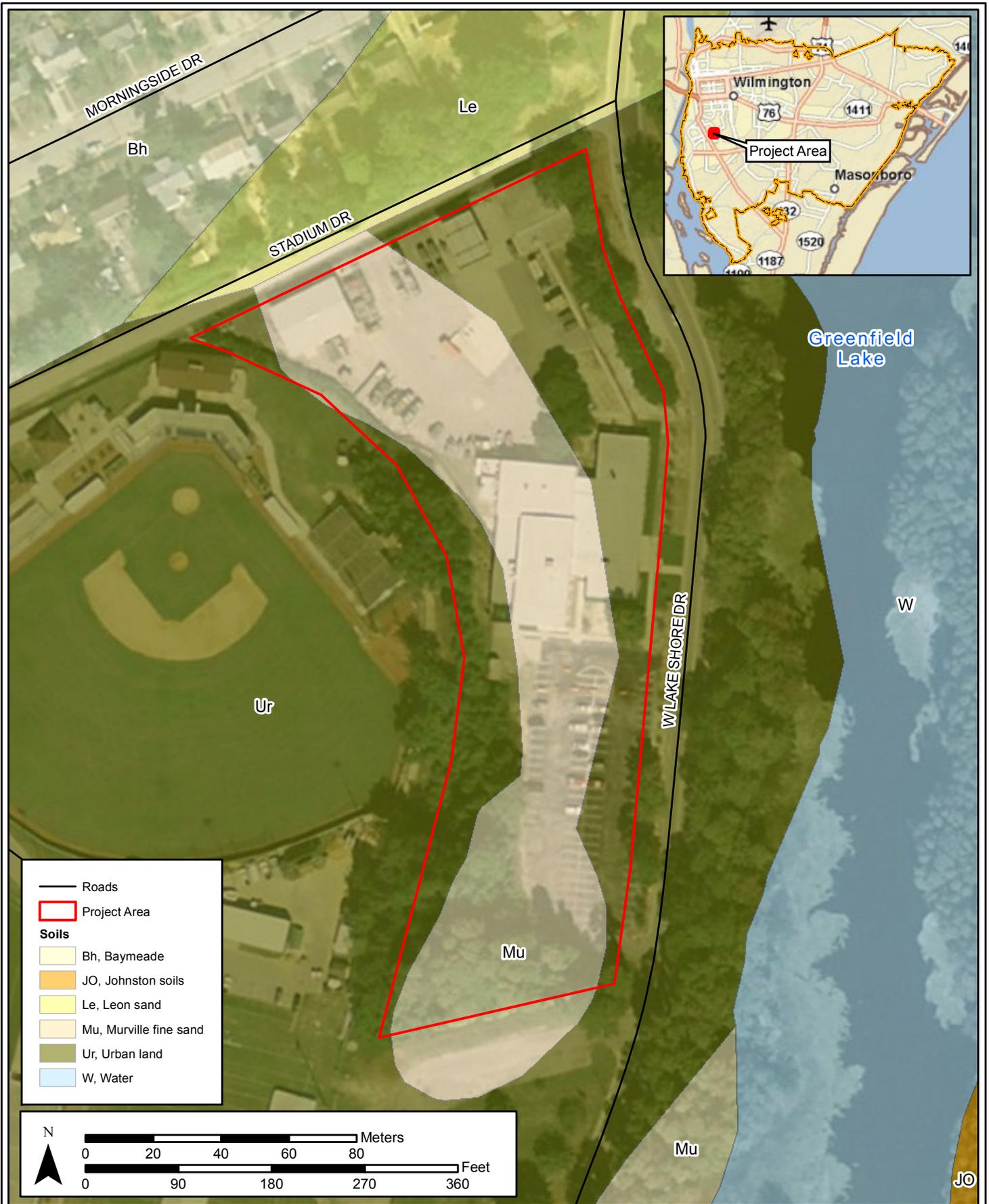


Figure 4-2: Soils

4.7.2.1 Disposal and Reuse Alternative

Potential impacts on biological resources from the transfer and reuse of the Rhodes AFRC would not be significant. The Disposal and Reuse Alternative would not cause adverse impacts on any Federally listed threatened or endangered species, since no such species are known to occur at the Rhodes AFRC.

Short-term impacts on wildlife would occur from the noise and dust generated by the demolition and construction activities. The majority of wildlife utilizing the property is transient and likely utilizes other areas for nesting, roosting, denning, and foraging. Wildlife may avoid the area due to the increase in noise during demolition and construction, and an increased chance of wildlife-vehicle interactions may occur with the increase in vehicles and construction equipment. BMPs to reduce the amount of airborne dust would help minimize potential short-term impacts on the biological resources.

Landscaping of the property after construction would provide a positive benefit for wildlife by providing some additional areas for foraging and nesting on the project site. Any minor adverse impacts during construction would be balanced by the potential increase in available habitat as the area of landscaping increases and nocturnal wildlife use of the areas potentially increases.

EO 11990, *Protection of Wetlands*, requires Federal agencies to avoid actions, to the extent practicable, which would result in the location of facilities in wetlands. The current site plan supporting the LRA redevelopment is hypothetical and not necessarily to scale; therefore, a reasonable opportunity exists to avoid wetlands with the final architectural design and construction. Unavoidable wetland impacts would require Section 404 permitting through USACE and Section 401 permitting through NCDENR. Compensatory mitigation would likely be required for any unavoidable wetland impacts. Both USACE and NCDENR stress avoidance and minimization of wetland impacts prior to consideration of wetland mitigation. Mitigation options would include mitigation banks, in-lieu fees, and on-site, project-specific mitigation.

4.7.2.2 No Action Alternative

Under the No Action Alternative, no changes or impacts would occur on biological resources.

4.8 Cultural Resources

4.8.1 Affected Environment

4.8.1.1 Historic Background

The property for the Rhodes AFRC was purchased by the U.S. Government in 1957 and consists of approximately 4.26 acres of land. The construction of the Rhodes AFRC building and OMS occurred in 1958. Since its purchase, the site has served as a reserve and mobilization center for the USAR. The site has been used by reservists, including the USAR 650th and 993rd Transportation Companies, for drill activities throughout its history and also by the U.S. Navy Reserve and Coast Guard for training. The OMS was utilized to perform maintenance activities on military vehicles and equipment which were limited to preventative maintenance checks and light maintenance activities. Vehicle wash was conducted in the wash rack, which is located to the west of the OMS building (USACE 2007).

4.8.1.2 Status of Cultural Resource Inventories and Section 106

An architectural survey of the resources located at the Rhodes AFRC in Wilmington, North Carolina was conducted by Brockington and Associates, Inc. (Stallings 2005). The survey found that, although the existing buildings at the Rhodes AFRC were built during the Cold War, they were not constructed as part of any specific mission associated with the Cold War, nor

were there any significant persons associated with the facility. In addition, the buildings did not represent any architectural style or coherent pattern, nor do they meet the 50-year age requirement. Finally, neither the architecture nor the historic associations of the facility meet any of the criteria for exceptional significance. As a result, Stallings (2005) recommended that the Rhodes AFRC facility was not eligible for listing in the National Register of Historic Places (NRHP). The North Carolina Department of Cultural Resources (NCDCCR), SHPO concurred with these findings, stating that Rhodes AFRC property was not eligible for listing in the NRHP on June 9, 2005. As a result, the facilities located at the Rhodes AFRC property are not considered historic properties and are not considered significant cultural resources. Consultation was also conducted with the NCDCCR SHPO on June 6, 2011, whereby a July 1, 2011 letter of concurrence agrees that the Rhodes AFRC properties are not eligible for listing in the NRHP and the transfer would have no effect on historic properties.

No previously recorded archaeological sites are located on the Rhodes AFRC property. A large portion of the Rhodes AFRC property comprises impervious surface features (i.e., asphalt parking areas, driveways, concrete walkways, and building footprints). A review of available aerial photography shows that the vegetated area located in the southwestern corner of the property has been altered for water drainage and is bordered by a man-made linear drainage ditch. In addition, this portion of the property is identified as a wetland per the National Wetland Inventory (see Figure 4-1). Due to these factors and in consultation with the NCDCCR SHPO, it has been determined that there is no potential for intact archaeological resources across the Rhodes AFRC property. As a result, no archaeological survey was warranted.

Consultation has been conducted with the Federally recognized Eastern Band of Cherokee Indians. In addition, consultation has been conducted with the Coharie Tribe, the Cumberland County Association for Indian People, the Guildford Native American Association, the Haliwa-Saponi Indian Tribe, the Lumbee Tribe of North Carolina, the Meherrin Indian Tribe, the Metrolina Native American Association, the Occaneechi Band of Saponi Nation, the Sappony, the Triangle Native American Society, and the Waccama Siouan Tribe. Consultation letters to the different Native American Tribes and Associations can be found in Appendix B of this document. To date, no responses have been received from the Native American Tribes and Associations consulted.

4.8.2 Environmental Consequences

Potential impacts on cultural resources would be considered significant if historic buildings were identified to be formerly constructed as part of a specific mission associated with the Cold War, or if there were any significant persons associated with the facilities. Further, the buildings would have to represent a particular architectural style or coherent pattern and meet the 50-year age requirement.

4.8.2.1 Disposal and Reuse Alternative

None of the buildings at the Rhodes AFRC property are considered historic properties or significant cultural resources, therefore no adverse impacts on cultural resources are anticipated from the implementation of the Disposal and Reuse Alternative.

4.8.2.2 No Action Alternative

Under the No Action Alternative the facilities located at the Rhodes AFRC property would continue to be owned by the Federal government, and the property would be placed into caretaker status for overall maintenance of the property. The property would be maintained and controlled by the Federal government; any cultural resources located on the property would be protected. No impacts on cultural resources would occur under the No Action Alternative.

4.9 Socioeconomics

4.9.1 Affected Environment

4.9.1.1 Population

The Rhodes AFRC is located in Wilmington, North Carolina which is within New Hanover County. In 2009, the population of the City of Wilmington was 101,350. This is less than the New Hanover County and the state of North Carolina 2009 populations which were 195,085 and 9,380,884, respectively. There was a 45 percent increase in populations for the City of Wilmington, a 38 percent increase in population for New Hanover County, and a 29 percent increase in population for the state of North Carolina from 1990 to 2009 (U.S. Census Bureau 2009, 2009a, and 2009b). The population of the City of Wilmington, New Hanover County, and the state of North Carolina for 1990 through 2009 is presented in Table 4-4.

Table 4-4. Population Census 1990 to 2009

Geographic Area	2009	2000	1990	Difference in population from 1990 – 2009 (percent)
City of Wilmington	101,350	75,838	55,530	82.5
New Hanover County	195,085	160,307	120,284	62
State of North Carolina	9,380,884	8,049,313	6,628,637	41.5

Sources: U.S. Census Bureau, 2009, 2009a, and 2009b

According to the 2005 to 2009 U.S. Census Bureau American Community Survey, the racial mix of the City of Wilmington, New Hanover County, and the state of North Carolina consists predominantly of Caucasians and African Americans. The remainder is divided among Asians, people claiming to be two or more races, some other race, and Native Americans. Compared to the City of Wilmington and Hanover County, a higher percentage of African Americans and Asians live in the state of North Carolina (U.S. Census Bureau 2009c, 2009d, and 2009e). The racial mixture of the City of Wilmington, New Hanover County, and the state of North Carolina for 2009 is presented in Table 4-5.

Table 4-5. Race Mixture of the City of Wilmington, New Hanover County, and the State of North Carolina

Geographic Area	Total Population	Race					
		Caucasian (%)	African American (%)	Native American (%)	Asian (%)	Some Other Race (%)	Two or more Races (%)
City of Wilmington	99,317	74.1	20.8	0.3	1.0	2.5	1.3
New Hanover County	189,463	79.5	15.5	0.4	1.2	2.1	1.3
State of North Carolina	9,045,705	70.5	21.1	1.1	1.9	3.6	1.7

Sources: U.S. Census Bureau, 2009c, 2009d and 2009e American Community Survey

4.9.1.2 Housing

According to the U.S. Census Bureau's 2009 American Community Survey Report, the total number of housing units in the City of Wilmington was 50,787 (Table 4-6), of which 89 percent were occupied. Compared to New Hanover County and the state of North Carolina, a higher percentage of housing units were occupied. The majority (59 percent) of the housing units within the state were owner-occupied. Comparatively, the total number of occupied housing units for New Hanover County and the City of Wilmington was at 52 and 45 percent, respectively (U.S. Census Bureau 2009f, 2009g, and 2009h). There are approximately 225 reservists and 12 full-time personnel located at the Rhodes AFRC.

Table 4-6. Housing Units for the City of Wilmington, New Hanover County, and the State of North Carolina

Geographic Area	Total Housing Units	Status		
		Occupied		Vacant
		Owned	Rented	
City of Wilmington	50,787	22,335	22,790	5,662
New Hanover County	97,235	50,500	31,656	15,079
State of North Carolina	4,120,599	2,410,327	1,131,480	578,792

Source: U.S. Census Bureau 2009f, 2009g and 2009h

4.9.1.3 Income and Employment Trends

In 2009, New Hanover County had a per capita personal income (PCPI) of \$36,662. This PCPI ranked 14th in the state and was 105 percent of the state average, \$34,879, and 92 percent of the National average, \$39,635. The 2009 PCPI reflected a decrease of 3.1 percent from 2008. The state change from 2008 to 2009 was -2.3 percent and the National change was -2.6 percent. In 1999, the PCPI of New Hanover County was \$27,649 and ranked 12th in the state. The 1999 to 2009 average annual growth rate of PCPI was 2.9 percent. The average annual growth rate for the state was 2.9 percent, and for the Nation was 3.4 percent (Bureau of Economic Analysis [BEA] 2011a). PCPI for New Hanover County, the state of North Carolina, and the Nation is presented in Table 4-7.

Table 4-7. PCPI for New Hanover County, the State of North Carolina, and the Nation

Geographic Area	Per Capita Personal Income (PCPI) 2009	State Rank	Percent State Average	Percent National Average	Average Annual Growth Rate 1999-2009 (%)
New Hanover County	\$36,662	14	105	92	2.9
State of North Carolina (Average)	\$34,879	NA	100	88	2.9
Nation (Average)	\$39,635	NA	NA	100	3.4

NA=Not Applicable, Source: BEA 2011

Total personal income (TPI) includes net earnings by place of residence; dividends, interest, and rent; and personal current transfer receipts received by the residents of New Hanover County (Table 4-8). In 2009, New Hanover County had a TPI of \$7,152,155. This TPI ranked 9th in the state and accounted for 2.2 percent of the state total. In 1999, the TPI of New Hanover County was \$4,389,932 and ranked 9th in the state (BEA 2011b).

Table 4-8. TPI for New Hanover County and the State of North Carolina

Geographic Area	TPI		2009 State Rank	Percent State Total (%)	Average Annual Growth Rate 1999-2009 (%)
	1999	2009			
New Hanover County	\$4,389,932	\$7,152,155	9	2.2	5.0
State of North Carolina	\$209,278,087	\$327,199,075	NA	100	4.6

NA=Not Applicable, Source: BEA 2011 and 2011a

According to BEA, the total number of jobs in New Hanover County in 2009 was approximately 127,178 (Table 4-9). The number of jobs in New Hanover County has decreased by 6 percent from the number of jobs in 2007; however, there was a 9 percent increase in jobs from 2005 to 2007 (BEA 2011b). The City of Wilmington is classified by the U.S. Census Bureau as a “metropolitan statistical area (MSA)” and includes geographic components of New Hanover, Brunswick, and Pender counties and not just the confines of the incorporated city.

In 2009, the largest employment classification was the management industry, followed by the sales, professional, and service industries (U.S. Census Bureau 2009i). New Hanover County averages a weekly wage of \$798 and was below the National average of \$942 (Bureau of Labor Statistics 2010).

Table 4-9. Total Number for Jobs for the City of Wilmington, New Hanover County, and the State of North Carolina

Geographic Area	Total Number of Jobs				
	2005	2007	2009	Change from 2005 – 2007 (%)	Change from 2007 – 2009 (%)
City of Wilmington	179,955	197,901	187,155	10	-5
New Hanover County	123,726	135,321	127,178	9	-6
State of North Carolina	5,093,408	5,436,636	5,201,929	7	-4

Source: BEA 2011b

In 2009, the unemployment rate in New Hanover County was 9.3 percent; in 2010, the unemployment rate increased to 9.8 percent. The unemployment rate decreased as of March 2011 to 9.0 percent (Employment Security Commission of North Carolina 2011).

4.9.1.4 Environmental Justice and Special Risks to Children

EO 12898, *Environmental Justice*, requires all Federal agencies to identify and address disproportionately high and adverse effects of their programs, policies, and activities on minority and low-income populations. As indicated previously, the majority of the population in New Hanover County is Caucasian, about 16 percent claim to be African American, and about 1 percent claim to be Asian. In addition, approximately 14.5 percent of the New Hanover County population is considered to live below the poverty level (U.S. Census Bureau 2009j).

EO 13045, *Protection of Children*, requires each Federal agency “to identify and assess environmental health risks and safety risks that may disproportionately affect children” and “ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks.” In New Hanover County,

about 6 percent of the population are 5 years old or less and 14 percent are younger than 18 years (U.S. Census Bureau 2009k). Lead-Based Paint (LBP) and Asbestos-Containing Material (ACM) are known to occur in structures at the Rhodes AFRC facility. Furthermore, there are residential areas near the facility; thus, there are potential health or safety effects on children. However, with property mitigation procedures, children would not be impacted.

4.9.1.5 Homeless Assistance

PL 103-421 (*Base Closure Community Redevelopment and Homeless Assistance Act of 1994*) provides a fair process that would result in the timely closure and realignment of military installations inside the U.S. The process begins when the military service in possession of the Rhodes AFRC facility alerts other DoD branches that the property is available. If a DoD branch determines that it requires the property and the Secretary of Defense concurs, the property is transferred. If no DoD branch requires the property or requests the property in a timely manner, then a notice of availability is sent to all other Federal agencies. Pursuant to PL 103-421, if no agency requests the property, or if it is not requested in a timely manner, or if the request is not granted, the property is then determined to be surplus and the disposal process begins. As part of the disposal process, the Secretary of Defense is directed to publish a notice of the available property and to submit any information on that property to the local redevelopment authority (*Base Closure Community Redevelopment and Homeless Assistance Act of 1994*).

The Reuse Plan for the Rhodes AFRC facility would need to meet the requirements of the local community. One of these needs is the assistance of homeless individuals and families. Based on the homeless solicitation, information about the homeless within the Cape Fear Region of Wilmington, North Carolina would be identified, notices of interest would be considered, legally binding agreements would be explored, and the balance and outreach within the local community would be incorporated. The homeless assistance plan was submitted to the City of Wilmington from the LPC for review and approval. HUD's review of the base closure plans is subject to the expressed interest and requests of representatives of the homeless. HUD determined that the plan appropriately balances the needs of the City of Wilmington for economic redevelopment and other development with the needs of the homeless in the community (Appendix C). On February 18, 2011, HUD rendered a final determination to accept the amended redevelopment plan for the reuse of the Rhodes AFRC (Appendix C).

4.9.2 Environmental Consequences

Potential impacts on socioeconomics would be considered significant if the proposed activities resulted in a marked reduction of the PCPI and/or decrease in the number of jobs in New Hanover County. Impacts on socioeconomics would also be considered significant if the proposed activities resulted in environmental health risks and safety risks that disproportionately affected children.

4.9.2.1 Disposal and Reuse Alternative

Under the Disposal and Reuse Alternative, there would be activities involving construction and replacement of the existing four structures in the Rhodes AFRC project area. The equipment, supplies, and personnel used during construction would likely come from the surrounding area, providing a short-term beneficial impact by providing construction-related jobs.

In the long-term, persons taking up residence in the area will add to the local employment, population, tax base, retail activity, and housing demand. Minor long-term economic development could result from additional personnel relocating from other areas.

Environmental justice would not be an issue as a result of implementing the Disposal and Reuse Alternative, as there would be no disproportionately high or adverse human health or environmental effects on minority or low-income populations. Overall, beneficial impacts should occur as a result of the Disposal and Reuse Alternative. Additionally, the Disposal and Reuse Alternative would not have adverse impacts on children in the area. Disposition of the site would not create emissions or the potential for release of toxic materials that would impact children in the area, although, as noted in Section 4.4 (Air Quality), all LBP and ACM which may potentially be in buildings slated for modification or demolition would need to be surveyed and mitigated prior to construction or modification. Should incorrect procedures be used, LBP and ACM could affect the surrounding community.

Overall community cohesion would potentially be increased through implementation of the Disposal and Reuse Alternative as the Rhodes AFRC property and facilities become a more integrated part of the overall City of Wilmington. Although difficult to quantify, the reintegration of the site into the greater City of Wilmington community may beneficially affect a range of socioeconomic factors. Under this alternative, there would not be temporary or long-term minor negative impacts on socioeconomic resources.

4.9.2.2 No Action Alternative

The No Action Alternative would result in the Rhodes AFRC property and facilities being placed in caretaker status. This would have a potential adverse impact on the homeless by not providing a housing facility for this population segment.

4.10 Transportation

4.10.1 Affected Environment

4.10.1.1 Roadways and Traffic

The Rhodes ARFC is located on West Lake Shore Drive and is served by many state and local roads. Vehicular traffic access to the project site is available through U.S. Route 421 (Carolina Beach Road) and local roads. The state provides actual traffic counts along various highways for years 2005 – 2010. Traffic counts are given in units of Average Daily Traffic (number of vehicles per day [VPD]) and average three weekly counts. In 2010, the average traffic volume on Carolina Beach Road (U.S. 421) between Stadium Drive and Southern Boulevard was 39,904 VPD (an increase of 7,875 VPD from 2009) (Wilmington Urban Area Metropolitan Planning Organization 2010). Approximately 225 reservists and 12 full-time personnel commute daily to and from the Rhodes AFRC.

4.10.1.2 Public Transportation

Numerous modes of transportation are available in the vicinity of the Rhodes AFRC, including air, bus, and highway access. The Wilmington New Hanover County International Airport is located approximately 6.8 miles northeast and provides general aviation services for small commuter planes and passenger flights to many U.S. destinations, as well as international cities. Wave Transit operates in the Cape Fear Region and provides a variety of public transportation options including fixed bus routes, shuttles, and a free downtown trolley. Wilmington does not currently have a station for passenger rail service. However, Amtrak's Carolinian/Piedmont travels daily between Charlotte and New York City, with stops in Raleigh, Richmond, Washington, DC, Baltimore, and Philadelphia (Amtrak 2011).

4.10.2 Environmental Consequences

Potential impacts on transportation would be considered significant if the proposed activities resulted in the degradation of public roads, restriction of site access, or increase in traffic levels.

4.10.2.1 Disposal and Reuse Alternative

Under this alternative, no significant adverse impacts on public roads, site access, or traffic levels are anticipated. There would be a temporary minor increase in the volume of traffic associated with site preparation, construction, and installation of permanent supportive housing units. This construction traffic could potentially result in slower traffic flow for the duration of the construction phase. To minimize any adverse impacts on traffic, construction vehicles and equipment would be stored on-site during project construction, appropriate signage would be posted on affected roadways, and adjacent residential neighborhoods and commercial/industrial areas will be notified in advance of construction activities. Since there would be fewer people using the new support housing units than the Rhodes AFRC, traffic volumes should be less than pre-construction levels upon completion of construction.

4.10.2.2 No Action Alternative

Under the No Action Alternative the Rhodes AFRC property and facilities would continue to be owned by the Federal government, and the property would be placed in caretaker status for maintenance. The No Action Alternative would likely result in a reduction of local traffic.

4.11 Utilities

4.11.1 Affected Environment

4.11.1.1 Potable Water Supply

The Rhodes AFRC site receives drinking water supply from the Nano Groundwater Treatment Plant, which produces over 6 million gallons of treated water. The plant contains state-of-the-art membrane technology, which is recognized as one of the best available technologies for removing organic material in the water and is effective at reducing the formation of disinfection byproducts. The Nano plant provides high-quality water that meets current and future drinking water standards (Cape Fear Public Utility Authority [CFPUA] 2011b).

4.11.1.2 Wastewater System

Wastewater services for the City of Wilmington are provided by the Southside Wastewater Treatment Plant (SSWWTP), which is owned and operated by CFPUA. SSWWTP is a 12 million-gallon-per-day secondary treatment level facility serving New Hanover County (CFPUA 2011a).

4.11.1.3 Stormwater System

A drainage ditch on the Rhodes AFRC site flows beneath West Lake Shore Drive and discharges into Greenfield Lake. The outlet stream from Greenfield Lake eventually discharges into the Cape Fear River, which is located approximately one mile to the west (USACE 2007).

4.11.1.4 Energy Sources

The Progress Energy service territory covers about 34,000 square miles, supplies electricity in the neighborhood where the project site is located, and would likely be the provider to the new LPC facility. Piedmont Natural Gas provides natural gas to the site.

4.11.1.5 Communications

Telecommunication service providers servicing the Wilmington area include AT&T, Comcast, Cox, Dish Network, Vonage, Verizon, and Time Warner Cable. Services provided include digital cable TV, high-speed online internet, and digital home phone services.

4.11.1.6 Solid Waste

There are several solid waste service providers in Wilmington, including the City of Wilmington, Waste Industries USA, Inc., East Coast Sanitation, and Go Eco Disposal. The City of Wilmington provides curbside trash pickup for all residents within the city limits. Waste Industries provides collection, transfer, disposal, and recycling to commercial as well as residential customers. East Coast Sanitation serves New Hanover County exclusively, offering curb trash and recycling curb services. Go Eco Disposal offers residential garbage and recycling services biweekly. There is also a city-managed recycling program for recyclable plastic, paper, and glass household waste.

4.11.2 Environmental Consequences

Potential impacts on utilities would be considered significant if the proposed activities resulted in a reduction of the potable water supply, burden to the wastewater treatment system, drain on sources of energy, impairment to communications, and/or increases to stormwater discharges.

4.11.2.1 Disposal and Reuse Alternative

Under the Disposal and Reuse Alternative, the demolition and construction activities would result in temporary and minimal effects on the potable water supply, wastewater treatment system, sources of energy, communications, and stormwater discharges. Construction crews would bring water on-site for their personnel, and portable latrines would collect sanitary waste. The new permanent support housing would have less demand on utilities than the previous Rhodes AFRC facility because fewer citizens would be using the site. Therefore, impacts on utilities would be minor.

4.11.2.2 No Action Alternative

Under the No Action Alternative, the Rhodes AFRC property and facilities would continue to be owned by the Federal government, and the property would be placed in caretaker status for maintenance. This alternative would result in a reduced usage of most utilities, including the potable water supply, wastewater treatment system, sources of energy, communications, and stormwater system.

4.12 Hazardous and Toxic Substances

4.12.1 Affected Environment

This Section describes the existing conditions of hazardous and toxic substances at the Rhodes AFRC. Details of existing conditions are taken from an ECP report completed for the base in 2007 (USACE 2007). Since that report was prepared, some existing conditions have changed, and those changes are included where observed and reported more recently.

4.12.1.1 Past Use and Storage of Hazardous Substances

The Rhodes AFRC had previously employed underground storage tanks (USTs) for storage and use of heating oil at the site. Those USTs were removed in 1993, and one tank had a documented leak, which was remediated, with a no further action letter issued by the NCDENR in 2001. While low-level petroleum contamination remains in the soil and groundwater at the site, it has been naturally attenuated to below NCDENR risk standards, but restrictions were placed on the property use to prevent extraction or use of groundwater at the site for human consumption (NCDENR 2001).

The Rhodes AFRC operates under an SPCCP developed in 2005, and is listed as a conditionally exempt RCRA registered small quantity generator, indicating use and storage of small quantities of hazardous and toxic materials with no transportation or disposal of those

materials on site. Hazardous materials kept and used on the base include paints, solvents, and lubricants in small containers stored in containment lockers and cabinets. There are currently two aboveground storage tanks (ASTs) present on the site with no spills observed. One AST is used for oil storage and the other for anti-freeze; both ASTs are located within the secondary containment area (USACE 2007).

Wash water from the cleaning of vehicles is collected in underground sumps with an OWS located in the maintenance shop, and the discharge from the OWS meets regulatory standards. All hazardous waste disposal is conducted in accordance with the SPCCP, and no violations have been recorded for the base in the past.

There was an ACM survey conducted for the Rhodes AFRC in 1998 (U.S. Army Reserve 1998), and ACM was documented in several buildings. A subsequent ACM survey was conducted in 2002 (U.S. Army Reserve 2002), which confirmed that all friable ACM had been removed, but non-friable ACM remained in several buildings in the form of floor tiles and mastic.

A LBP survey was conducted for the Rhodes AFRC on February 6, 2004 (U.S. Army Reserve Center 2004), which found LBP on most metal doors, windows, and window lintels. A total of 223 x-ray fluorescence samples and calibrations were taken throughout the buildings. The components that contained significant detectable amounts of lead were found in the Administration/Training Facility building on the interior and exterior doors and casings, exterior painted lintels, structural steel components, and exterior metal fixtures, as well as in the OMS building on the exterior doors, overhead doors, frames, lintels, and structural steel components.

No radon exposure risk was found at the Rhodes AFRC in surveys conducted in 1989-1990, and no radiological materials have been kept or used at the base.

4.12.2 Environmental Consequences

It is the intention of the Army to remove all moveable equipment, fuel, and stored hazardous and toxic materials prior to transfer of the Rhodes AFRC to the LRA. Therefore, there would be no remaining moveable hazardous or toxic materials on the site that would have an impact on future LRA use of the property. Potential impacts from hazardous and toxic substances would be considered significant if the proposed activities resulted in a POL or other hazardous spill.

4.12.2.1 Disposal and Reuse Alternative

This alternative would transfer the Rhodes AFRC to the LRA for reuse as a permanent housing project for the homeless. It would require demolition of the existing buildings and parking areas by the LRA and construction of new residential and support buildings on the site. Demolition of the existing buildings would require compliance with regulatory requirements for disposal of ACM and LBP materials, where present. No significant environmental impacts would be anticipated, if the appropriate ACM and LBP BMPs are implemented according to the regulations. The residual petroleum contamination of groundwater and soil from the prior UST would remain; however, no significant exposure or impact would occur, because no groundwater use is anticipated.

4.12.2.2 No Action Alternative

Under the No Action Alternative, the Rhodes AFRC would be placed in caretaker status, but all equipment and hazardous and toxic materials would still be removed from the property. Since no demolition of structures would occur, there would be no exposure to ACM or LBP, and there would be no impacts from hazardous and toxic materials.

4.13 Cumulative Effects Summary

This section of the EA addresses the potential cumulative impacts associated with the implementation of the alternatives and other projects/programs that are planned for the region. The CEQ defines cumulative impacts as the incremental impacts of multiple present and future actions with individually minor, but collectively significant effects. Cumulative impacts can be concisely defined as the total effect of multiple land uses and developments, including their interrelationships, on the environment.

Searches for planned development and improvement projects for the vicinity of the Rhodes AFRC did not yield any immediate projects; however, the greater downtown area of the City of Wilmington is host to multiple redevelopment projects. The transfer, demolition, construction, and operation of the LRA redevelopment project would not result in cumulative impacts on air space, ambient noise levels, water quality or supply, or air quality. Demands on local transportation routes would decrease due to the reduced occupancy of the permanent support housing with respect to the current Rhodes AFRC occupancy.

The establishment of the permanent support housing, when combined with other proposed developments, would have insignificant cumulative impacts on land use or biological resources at the Rhodes AFRC area due to the geographic location of the project area relative to the redevelopment projects of the greater downtown area of the City of Wilmington.

Cumulative effects on air quality from the Disposal and Reuse Alternative, when combined with other ongoing projects, would be insignificant and would remain below *de minimis* thresholds. Operation of the permanent support housing would reduce the cumulative amount of hazardous wastes generated in the project area. All wastes are disposed of by licensed contractors in accordance with state and Federal regulations; consequently, insignificant cumulative adverse impacts would be expected.

4.14 Best Management Practices

This section of the EA describes those measures that could be implemented to further reduce or eliminate potential adverse impacts on the human and natural environment. The BMPs are presented for each resource category that could be potentially affected. These proposed measures would be coordinated through the appropriate regulatory agencies.

4.14.1 Vegetation and Wildlife

Native seeds or plants, which are compatible with the enhancement of protected species, would be used to the extent feasible, as required under Section 7(a)(1) of the ESA, to reseed temporarily disturbed areas once construction is complete. This effort would apply only to those areas that would not be expected to be part of the permanent landscaped or maintained areas of the LRA project.

If the construction activity is scheduled during the nesting season, typically March 15 through September 15, then surveys for migratory bird nests are recommended and active nests found would need to be identified and avoided. Another environmental protective measure that would be considered is to schedule all construction activities outside the nesting season. If birds need to be relocated, then consultation with USFWS would be required, and a permit would be necessary.

Additional measures would include BMPs during construction, as described previously, to minimize or prevent erosion and soil loss. If straw bales are used as part of the BMPs, weed-seed-free straw bales would be used to eliminate the potential for spreading invasive species.

4.14.2 Air Quality

As mentioned previously, emissions associated with demolition and construction activities would be insignificant and well below *de minimis* thresholds. Proper and routine maintenance of all vehicles and other equipment would be implemented to ensure that emissions are within the design standards of all construction equipment. Dust suppression methods would be implemented to minimize fugitive dust.

4.14.3 Water Resources

The proposed demolition and construction activities would require a SWPPP, which would be prepared and submitted to the NCDENR, as part of the NPDES permit process. The SWPPP would identify BMPs that would be implemented before, during, and after construction.

Wetland boundaries should be identified prior to construction activities so that unauthorized impacts on wetlands can be avoided. If impacts resulting from the Reuse Plan on water resources cannot be avoided, all appropriate CWA permits would have to be obtained from USACE and NCDENR prior to construction.

4.14.4 Cultural Resources

Once disposal and transfer of the property are completed the LRA will be responsible for determining their own requirements and procedures to follow in the event of an unexpected discovery of cultural resources during demolition and construction. Since the disposal and transfer of the property would have been completed, the Army would not need to be contacted.

4.14.5 Hazardous and Toxic Substances

Hazardous and toxic materials/wastes present at the Rhodes AFRC during demolition and construction would likely consist of POL. If hazardous waste is generated, it would be disposed of according to Federal, state, and local regulations, as well as existing Army regulations and procedures. No maintenance of construction equipment would be conducted on-site, minimizing the potential for spills or direct contact with POL. Equipment and vehicles parked overnight, or left for lengthy periods on-site, would be fitted with drip pans. On-site use of construction equipment, use of chemical products, and wastes generated during construction would comply with all Federal, state, and local regulations related to protecting the environment from hazardous materials and containing spills. No large quantities of hazardous wastes would be stored on the site.

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SECTION 5.0
FINDINGS AND CONCLUSIONS

5.0 Findings and Conclusions

5.1 Findings

5.1.1 Consequences of the Disposal and Reuse Alternative

Implementation of the Disposal and Reuse Alternative would result in the demolition of all the existing Rhodes AFRC institutional-style structures (4 buildings totaling approximately 30,000 SF) with the replacement of new residential-style structures (8 buildings totaling approximately 51,000 SF). No impacts on Federal- or state-protected species would occur. No violations of air or water quality standards would be expected; BMPs would be implemented to ensure that stormwater, during and after construction, is controlled and downstream sedimentation is either eliminated or is negligible. Temporary increases in noise would be expected during the demolition and construction activities. Transportation would be slightly increased during construction, with a slight decrease anticipated after the completion of construction. No long-term impacts relative to utilities or hazardous waste and materials would be expected from the proposed demolition and construction of the permanent support housing.

Some benefits for local and regional employment and personal income would be expected during the demolition, construction, and operation of the permanent support housing. However, these benefits would be insignificant when compared to the Wilmington, North Carolina MSA.

5.1.2 Consequences of the No Action Alternative

Under the No Action Alternative, the existing human and natural environment at the Rhodes AFRC would remain status quo, at least for the short-term.

A summary of the potential effects from the Disposal and Reuse Alternative and No Action Alternative is presented in Table 5-1.

Table 5-1. Summary Matrix of Potential Impacts

Affected Resource	No Action Alternative	Disposal and Reuse Alternative
Land Use	No impacts on land use are expected.	Demolition of all the existing Rhodes AFRC institutional-style structures (4 buildings totaling approximately 30,000 SF) with replacement of new residential style structures (8 buildings totaling approximately 51,000 SF). The permanent support housing is consistent with the City of Wilmington's zoning and planned development.
Aesthetics	No adverse impacts are expected.	Slight degradation during construction, but no significant long-term impacts would occur on the project area's visual qualities.
Air Quality	No adverse effects are anticipated.	Negligible temporary effects on air quality during construction would occur. Pre-project conditions would return upon cessation of construction activities. All emissions would be below <i>de minimis</i> thresholds.
Noise	No adverse impacts are expected.	Negligible temporary increases in ambient noise levels during construction. Pre-project conditions would return upon cessation of construction activities. Operation of the permanent support housing would be expected to produce negligible decrease in ambient noise levels.
Soils	No impacts on soils are expected.	No significant impacts on soils. No prime farmland soils would be impacted.
Water Resources	No adverse impacts would occur.	No significant impact on the region's water supply, water quality, or floodplains.

Table 5-1, continued

Affected Resource	No Action Alternative	Disposal and Reuse Alternative
Biological Resources	No impacts are expected.	There would be minimal impacts on biological resources, including wetlands. Although wetlands occur on the property, a reasonable opportunity exists to avoid wetlands with the final architectural design and construction. There is no suitable habitat to support Federally threatened or endangered species at the project location; therefore, there would be no impacts on Federally listed or state-listed species.
Cultural Resources	No effects are anticipated.	No impacts on cultural resources are expected.
Socioeconomics	No effect on the regional or local economy would be expected.	Negligible temporary, but beneficial, effects for the City of Wilmington during construction.
Transportation	No adverse impacts are expected.	No significant impacts on local traffic patterns, routes, or usage are anticipated.
Utilities	No adverse impacts are expected.	No impacts are expected to occur.
Hazardous Materials	No adverse impacts are expected.	No impacts are expected to occur.

5.2 Conclusions

Based on the information presented in the previous sections, it is concluded that the best transfer and reuse alternative for the Rhodes AFRC property and facilities is the proposed redevelopment by the City of Wilmington LRA, and would result in insignificant adverse impacts on the area's human and natural environment. Therefore, issuance of a FNSI is warranted, and no additional NEPA documentation (i.e., Environmental Impact Statement) is required.

SECTION 6.0
REFERENCES



6.0 References

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SECTION 7.0
LIST OF PREPARERS



7.0 List of Preparers

The following people were primarily responsible for preparing this Environmental Assessment.

NAME	AGENCY/ORGANIZATION	DISCIPLINE/EXPERTISE	EXPERIENCE	ROLE IN PREPARING EA
Larry Olliff	USACE Mobile/Savannah District	Environmental Studies	21 years in environmental and NEPA studies	USACE Technical Manager
Dennis Peters	GSRC	Biology/Ecology	30 years NEPA and natural resources	Project Manager, Description of the Proposed Action and Alternatives (DOPAA), EA Technical Review
Chris Ingram	GSRC	Wildlife/Biology	33 years NEPA and natural resources	EA review
John Lindemuth	GSRC	Archaeology	6 years archaeology/GIS	EA preparation; cultural resources
Todd Wilkinson	GSRC	Forestry/Wildlife	19 years natural resources and NEPA studies	EA preparation; biological resources
Missy Singleton	GSRC	Ecology	2 years NEPA and natural resources	EA preparation; land use, socioeconomics, and aesthetics
Steve Kolian	GSRC	Environmental Studies	13 years environmental and marine science	EA preparation; air and water quality, and noise
Steve Oivanki	GSRC	Geology	32 years environmental and NEPA studies	EA preparation; hazardous waste, geology/soils
Shalise Hadden	GSRC	Biology/Ecology	1 year natural resources	EA preparation; transportation and utilities

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APPENDIX A
AIR EMISSION CALCULATIONS



CALCULATION SHEET-COMBUSTIBLE EMISSIONS-CONSTRUCTION

Assumptions for Combustible Emissions					
Type of Construction Equipment	Num. of Units	HP Rated	Hrs/day	Days/yr	Total hp-hrs
Water Truck	1	300	8	160	384000
Diesel Road Compactors	0	100	8	160	0
Diesel Dump Truck	2	300	8	160	768000
Diesel Excavator	1	300	8	15	36000
Diesel Hole Trenchers	1	175	8	15	21000
Diesel Bore/Drill Rigs	0	300	8	160	0
Diesel Cement & Mortar Mixers	1	300	8	30	72000
Diesel Cranes	0	175	8	160	0
Diesel Graders	1	300	8	15	36000
Diesel Tractors/Loaders/Backhoes	2	100	8	160	256000
Diesel Bull Dozers	1	300	8	30	72000
Diesel Front End Loaders	2	300	8	30	144000
Diesel Fork Lifts	1	100	8	160	128000
Diesel Generator Set	2	40	8	160	102400

Emission Factors							
Type of Construction Equipment	VOC g/hp-hr	CO g/hp-hr	NOx g/hp-hr	PM-10 g/hp-hr	PM-2.5 g/hp-hr	SO2 g/hp-hr	CO2 g/hp-hr
Water Truck	0.440	2.070	5.490	0.410	0.400	0.740	536.000
Diesel Road Compactors	0.370	1.480	4.900	0.340	0.330	0.740	536.200
Diesel Dump Truck	0.440	2.070	5.490	0.410	0.400	0.740	536.000
Diesel Excavator	0.340	1.300	4.600	0.320	0.310	0.740	536.300
Diesel Trenchers	0.510	2.440	5.810	0.460	0.440	0.740	535.800
Diesel Bore/Drill Rigs	0.600	2.290	7.150	0.500	0.490	0.730	529.700
Diesel Cement & Mortar Mixers	0.610	2.320	7.280	0.480	0.470	0.730	529.700
Diesel Cranes	0.440	1.300	5.720	0.340	0.330	0.730	530.200
Diesel Graders	0.350	1.360	4.730	0.330	0.320	0.740	536.300
Diesel Tractors/Loaders/Backhoes	1.850	8.210	7.220	1.370	1.330	0.950	691.100
Diesel Bull Dozers	0.360	1.380	4.760	0.330	0.320	0.740	536.300
Diesel Front End Loaders	0.380	1.550	5.000	0.350	0.340	0.740	536.200
Diesel Fork Lifts	1.980	7.760	8.560	1.390	1.350	0.950	690.800
Diesel Generator Set	1.210	3.760	5.970	0.730	0.710	0.810	587.300

CALCULATION SHEET-TRANSPORTATION COMBUSTIBLE EMISSIONS-CONSTRUCTION

Construction Worker Personal Vehicle Commuting to Construction Site-Passenger and Light Duty Trucks									
Pollutants	Emission Factors		Assumptions				Results by Pollutant		
	Passenger Cars g/mile	Pick-up Trucks, SUVs g/mile	Mile/day	Day/yr	Number of cars	Number of trucks	Total Emissions Cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	1.36	1.61	60	160	15	15	0.22	0.26	0.47
CO	12.4	15.7	60	160	15	15	1.97	2.49	4.46
NOx	0.95	1.22	60	160	15	15	0.15	0.19	0.34
PM-10	0.0052	0.0065	60	160	15	15	0.00	0.00	0.00
PM 2.5	0.0049	0.006	60	160	15	15	0.00	0.00	0.00
CO2	369	511	60	160	15	15	58.56	81.09	139.65

Heavy Duty Trucks Delivery Supply Trucks to Construction Site									
Pollutants	Emission Factors		Assumptions				Results by Pollutant		
	10,000-19,500 lb Delivery Truck	33,000-60,000 lb semi trailer rig	Mile/day	Day/yr	Number of trucks	Number of trucks	Total Emissions Cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	0.29	0.55	60	120	2	2	0.00	0.01	0.01
CO	1.32	3.21	60	120	2	2	0.02	0.05	0.07
NOx	4.97	12.6	60	120	2	2	0.08	0.20	0.28
PM-10	0.12	0.33	60	120	2	2	0.00	0.01	0.01
PM 2.5	0.13	0.36	60	120	2	2	0.00	0.01	0.01
CO2	536	536	60	120	2	2	8.51	8.51	17.01

Daily Commute New Staff Associated with Proposed Action									
Pollutants	Emission Factors		Assumptions				Results by Pollutant		
	Passenger Cars g/mile	Pick-up Trucks, SUVs g/mile	Mile/day	Day/yr	Number of Cars	Number of trucks	Total Emissions cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	1.36	1.61	40	365	15	15	0.33	0.39	0.72
CO	12.4	15.7	40	365	15	15	2.99	3.79	6.78
NOx	0.95	1.22	40	365	15	15	0.23	0.29	0.52
PM-10	0.0052	0.0065	40	365	15	15	0.00	0.00	0.00
PM 2.5	0.0049	0.006	40	365	15	15	0.00	0.00	0.00
CO2	369	511	40	365	15	15	89.05	123.32	212.38

Truck Emission Factor Source: MOBILE6.2 USEPA 2005 Emission Facts: Average annual emissions and fuel consumption for gasoline-fueled passenger cars and light trucks. EPA 420-F-05-022 August 2005. Emission rates were generated using MOBILE.6 highway.

CALCULATION SHEET-TRANSPORTATION COMBUSTIBLE EMISSIONS-CONSTRUCTION

Conversion factor:	gms to tons
	0.000001102

Carbon Equivalents	Conversion Factor
N2O or NOx	311
Methane or VOCs	25

Source: EPA 2010 Reference, Tables and Conversions, Inventory of U.S. Greenhouse Gas Emissions and Sinks;
<http://www.epa.gov/climatechange/emissions/usinventoryreport.html>

CARBON EQUIVALENTS

Construction Commuters	Conversion	Emissions CO2 tons/yr	Total CO2
VOCs	25	11.78	
NOx	311	0.34	
Total		12.13	151.77

Delivery Trucks	Conversion	Emissions CO2 tons/yr	Total CO2
VOCs	25	0.33	
NOx	311	86.71	
Total		87.04	104.06

Kirtland AFB staff and Students	Conversion	Emissions CO2 tons/yr	Total CO2
VOCs	25	17.92	
NOx	311	162.87	
Total		180.79	393.17

CALCULATION SHEET-TRANSPORTATION COMBUSTIBLE EMISSIONS-CONSTRUCTION

Conversion factor:	gms to tons
	0.000001102

Carbon Equivalents	Conversion Factor
N2O or NOx	311
Methane or VOCs	25

Source: EPA 2010 Reference, Tables and Conversions, Inventory of U.S. Greenhouse Gas Emissions and Sinks;
<http://www.epa.gov/climatechange/emissions/usinventoryreport.html>

CARBON EQUIVALENTS

Construction Commuters	Conversion	Emissions CO2 tons/yr	Total CO2
VOCs	25	11.78	
NOx	311	0.34	
Total		12.13	151.77

Delivery Trucks	Conversion	Emissions CO2 tons/yr	Total CO2
VOCs	25	0.33	
NOx	311	86.71	
Total		87.04	104.06

Kirtland AFB staff and Students	Conversion	Emissions CO2 tons/yr	Total CO2
VOCs	25	17.92	
NOx	311	162.87	
Total		180.79	393.17

CALCULATION SHEET-FUGITIVE DUST-CONSTRUCTION

Construction Fugitive Dust Emissions

Construction Fugitive Dust Emission Factors

Emission Factor	Units	Source
General Construction Activities	0.19 ton PM10/acre-month	MRI 1996; EPA 2001; EPA 2006
New Road Construction	0.42 ton PM10/acre-month	MRI 1996; EPA 2001; EPA 2006

PM2.5 Emissions

PM2.5 Multiplier	0.10 (10% of PM10 emissions assumed to be PM2.5)	EPA 2001; EPA 2006
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Control Efficiency

0.50 (assume 50% control efficiency for PM10 and PM2.5 emissions)	EPA 2001; EPA 2006
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Project Assumptions

Construction Area (0.19 ton PM10/acre-month)

Duration of Construction Project	6	months
Length		miles
Length (converted)		feet
Width		feet
Area	5.00	acres

Conversion Factors

0.000022957	acres per feet
5280	feet per mile

Staging Areas

Duration of Construction Project	6	months
Length		miles
Length (converted)		feet
Width		feet
Area	0.00	acres

	Project Emissions (tons/year)			
	PM10 uncontrolled	PM10 controlled	PM2.5 uncontrolled	PM2.5 controlled
Construction Area (0.19 ton PM10/ac)	5.70	2.85	0.57	0.29
Staging Areas	0.00	0.00	0.00	0.00
Total	5.70	2.85	0.57	0.29

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Construction Fugitive Dust Emission Factors

General Construction Activities Emission Factor

0.19 ton PM10/acre-month Source: MRI 1996; EPA 2001; EPA 2006

The area-based emission factor for construction activities is based on a study completed by the Midwest Research Institute (MRI) Improvement of Specific Emission Factors (BACM Project No. 1), March 29, 1996. The MRI study evaluated seven construction projects in Nevada and California (Las Vegas, Coachella Valley, South Coast Air Basin, and the San Joaquin Valley). The study determined an average emission factor of 0.11 ton PM10/acre-month for sites without large-scale cut/fill operations. A worst-case emission factor of 0.42 ton PM10/acre-month was calculated for sites with active large-scale earth moving operations. The monthly emission factors are based on 168 work-hours per month (MRI 1996). A subsequent MRI Report in 1999, Estimating Particulate Matter Emissions from Construction Operations, calculated the 0.19 ton PM10/acre-month emission factor by applying 25% of the large-scale earthmoving emission factor (0.42 ton PM10/acre-month) and 75% of the average emission factor (0.11 ton PM10/acre-month).

The 0.19 ton PM10/acre-month emission factor is referenced by the EPA for non-residential construction activities in recent procedures documents for the National Emission Inventory (EPA 2001; EPA 2006). The 0.19 ton PM10/acre-month emission factor represents a refinement of EPA's original AP-42 area-based total suspended particle (TSP) emission factor in Section 13.2.3 Heavy Construction Operations. In addition to the EPA, this methodology is also supported by the South Coast Air Quality Management District and the Western Regional Air Partnership (WRAP) which is funded by the EPA and is administered jointly by the Western Governor's Association and the National Tribal Environmental Council. The emission factor is assumed to encompass a variety of non-residential construction activities including building construction (commercial, industrial, institutional, governmental), public works, and travel on unpaved roads. The EPA National Emission Inventory documentation assumes that the emission factors are uncontrolled and recommends a control efficiency of 50% for PM10 and PM2.5 in PM nonattainment areas.

New Road Construction Emission Factor

0.42 ton PM10/acre-month Source: MRI 1996; EPA 2001; EPA 2006

The emission factor for new road construction is based on the worst-case conditions emission factor from the MRI 1996 study described above (0.42 tons PM10/acre-month). It is assumed that road construction involves extensive earthmoving and heavy construction vehicle travel resulting in emissions that are higher than other general construction projects. The 0.42 ton PM10/acre-month emission factor for road construction is referenced in recent procedures documents for the EPA National Emission Inventory (EPA 2001; EPA 2006).

PM2.5 Multiplier

0.10

PM2.5 emissions are estimated by applying a particle size multiplier of 0.10 to PM10 emissions. This methodology is consistent with the procedures documents for the National Emission Inventory (EPA 2006).

Control Efficiency for PM10 and PM2.5

0.50

The EPA National Emission Inventory documentation recommends a control efficiency of 50% for PM10 and PM2.5 in PM nonattainment areas. Wetting controls will be applied during project construction (EPA 2006).

References:

EPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999*. EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

EPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants*. Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1)*. Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

CALCULATION SHEET-SUMMARY OF EMISSIONS

Alternative 1 Construction Emissions for Criteria Pollutants (tons per year)									
Emission Source	VOC	CO	NOx	PM-10	PM-2.5	SO2	CO2	CO2 Equivalents	Total CO2
Combustible Emissions	1.67	7.16	13.14	1.34	1.31	1.74	1263.76	4128.63	5392.39
Construction Site-Fugitive PM-10	NA	NA	NA	2.85	0.29	NA	NA	NA	NA
Construction Workers Commuter & Trucking	0.48	4.53	0.62	0.01	0.01	NA	139.65	205.92	345.57
Total emissions-CONSTRUCTION	2.16	11.70	13.76	4.20	1.60	1.74	1,403	4,335	5,738
De minimis Threshold (1)	100	100	100	100	100	100	NA	NA	27,557

1. New Hanover County is in attainment for all NAAQS

Carbon Equivalents	Conversion Factor
N2O or NOx	311
Methane or VOCs	25

Source: EPA 2010 Reference, Tables and Conversions, Inventory of U.S. Greenhouse Gas Emissions and Sinks;
<http://www.epa.gov/climatechange/emissions/usinventoryreport.html>

APPENDIX B
CORRESPONDENCE





REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

ARRC-SSC-DPW

June 6, 2011

Mr. Pete Benjamin
U.S. Fish and Wildlife Service
Raleigh, North Carolina Ecological Services Field Office
P.O. Box 33726
Raleigh, NC 27630-3726

Dear Mr. Benjamin:

On May 16, 2005, the Defense Base Realignment and Closure Commission (BRAC Commission) recommended the transformation (closure and/or relocation) of certain actions concerning United States Army Reserve Centers (USARC) in North Carolina. These recommendations were approved by the President on September 23, 2005, and forwarded to Congress. The Congress did not alter any of the BRAC Commission's recommendations, and on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended.

The BRAC Commission recommended the closure of the Adrian B. Rhodes Armed Forces Reserve Center (Rhodes AFRC) and relocation to a new AFRC and Operational Maintenance Shop in Wilmington, New Hanover County, North Carolina. To enable implementation of this recommendation, the Army proposes to transfer ownership of the Rhodes AFRC facilities (Aerial view detailed in Enclosure A). The recipient of the Rhodes AFRC will be the City of Wilmington Local Redevelopment Authority (LRA). The U.S. Army Corps of Engineers (USACE), Mobile District is in the process of preparing an Environmental Assessment (EA), which will assess the potential environmental impacts of disposal and reuse of the Rhodes AFRC.

A search of the U.S. Fish and Wildlife Service's website indicated 11 Federally listed species within New Hanover County. Enclosure B displays those species, their preferred habitat, and their potential to occur within or near the project site. No Critical Habitat has been designated for these species within New Hanover County. Additionally, no suitable habitat for any of these species was observed on or near the project site. Enclosure A is an aerial photograph showing the developed nature of the site and adjacent development.

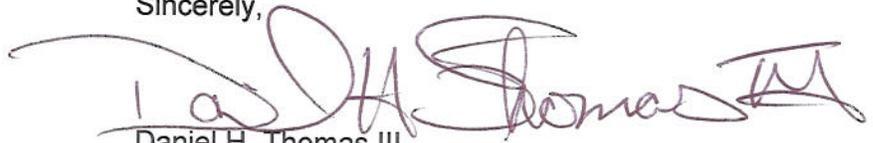
Although the North Carolina Natural Heritage Program lists 101 endangered, threatened or species of special concern known to occur or that could occur in New Hanover County, none are listed to occur within two miles of the project site. Due to the high levels of disturbance and development on the site and surrounding area, it is very unlikely that any of these species would occur within the project site.

Pedestrian surveys have been completed at the project site and none of these Federally listed species or suitable habitats capable of supporting these species were observed. The site largely consists of buildings and paved parking areas. An area of natural vegetation is located in the southwestern corner of the property. Vegetation within this area consists of bald cypress (*Taxodium distichum*), Carolina willow (*Salix caroliniana*), various pine species (*Pinus* spp.) and other trees and shrubs.

Based on these surveys and the existing conditions at and surrounding the project site, we have determined that the EA's proposed action would have no effect on Federal or state-listed species. Because of the limited size of the proposed construction footprint and the low quality of habitat at the site, insignificant impacts on general wildlife populations would occur as a result of implementing the proposed action for the Rhodes AFRC.

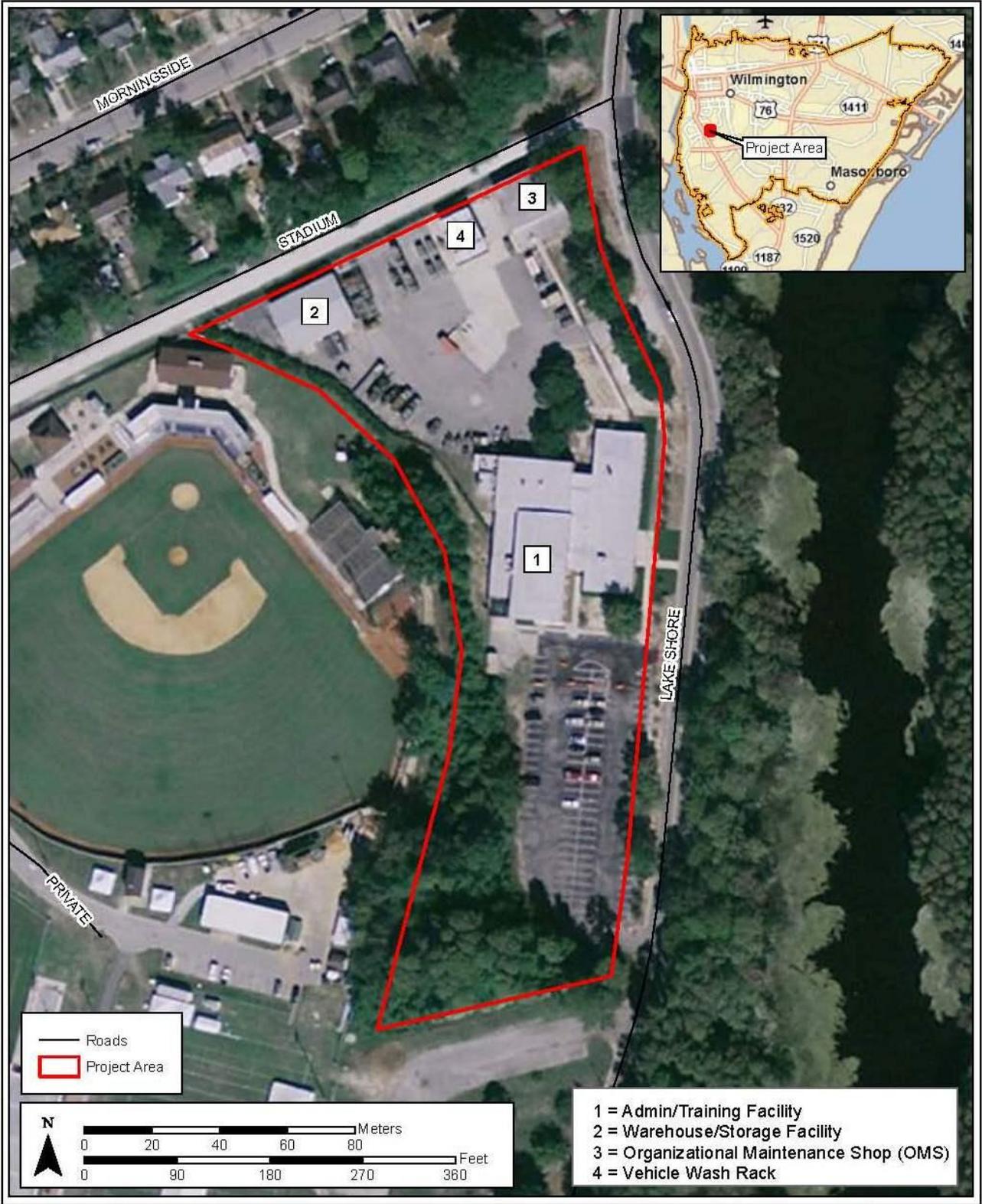
We respectfully request that you provide a written concurrence with our determination. Your prompt attention and cooperation would be greatly appreciated. If you have questions or concerns about this project, please contact Ms. Michelle Hook, Environmental Protection Specialist, 81st Regional Support Command at (803) 751-9998, within thirty (30) days of receipt of this letter. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,



Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



Enclosure A: Aerial view of the Rhodes AFRC property and facilities.

Enclosure B. Federally Listed Species Potentially Occurring Within New Hanover County, North Carolina

Common/Scientific Name	Federal Status	Habitat	Potential to occur within Project Site
BIRDS			
Red-cockaded woodpecker <i>(Picoides borealis)</i>	Endangered	Mature longleaf/loblolly pine forests with minimal sub-canopy layer and open understory.	No – no suitable habitat and nesting sites at or near the project site.
Wood stork <i>(Mycteria Americana)</i>	Endangered	Freshwater marshes, swamps, lagoons, ponds, flooded fields. Nests mostly in upper parts of cypress trees or dead hardwoods over water or on islands along streams or adjacent to shallow lakes.	Not known to nest in nearby Greenfield Lake or on project site.
Piping plover <i>(Charadrius melodus)</i>	Threatened	In Texas, primarily on intertidal beaches with sand and/or mud flats with no or very sparse vegetation.	No – no suitable habitat and nesting sites at or near the project site.
REPTILES			
Green sea turtle <i>(Chelonia mydas)</i>	Threatened	Warm tropical, shallow coastal waters.	No – no coastal waters at or near the project site.
Hawksbill sea turtle <i>(Eretmochelys imbricata)</i>	Endangered	The most tropical of all sea turtles; found near coral reefs and rocky outcroppings in tropical, shallow coastal waters.	No – no coastal waters at or near the project site.
Leatherback sea turtle <i>(Dermochelys coriacea)</i>	Endangered	Highly oceanic, utilize coastal waters only during breeding season.	No – no coastal waters at or near the project site.
Loggerhead sea turtle <i>(Caretta caretta)</i>	Threatened	Coastal tropical and subtropical waters, ventures into temperate waters to boundaries of warm currents, but prefers coastal bays, also found in coastal streams, creeks, and open ocean	No – no coastal waters at or near the project site.
MAMMALS			
West Indian manatee <i>(Trichechus manatus)</i>	Endangered	Rivers, estuaries, and coastal areas of the southeastern US coast along Central America and the West Indies to the northern coastline of South America.	No – no riverine, estuarine, or coastal waters at or near the project site.
PLANTS			
Cooley's meadowrue <i>(Thalictrum cooleyi)</i>	Endangered	Grass-sedge bogs, wet pine savannas and savanna like areas.	No – not likely due to lack of appropriate habitat at project site.
Seabeach amaranth <i>(Amaranthus pumilus)</i>	Threatened	Barrier island beaches, primary habitat consists of overwash flats	No – no barrier island beaches at or near the project site
Rough-leaved loosestrife <i>Lysimachia asperulaefolia)</i>	Endangered	Found along ecotones or edges between longleaf pine uplands and pond pine pocosins	No – not likely due the lack of appropriate habitat at or near the project site.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Raleigh Field Office
Post Office Box 33726
Raleigh, North Carolina 27636-3726

July 6, 2011

Ms. Michelle Hook
81st Regional Support Command, HQ
1525 Marion Avenue
Fort Jackson, South Carolina 29207-6807

Dear Ms. Hook:

We have reviewed your request for information about endangered and threatened species and their habitats in relation to the proposed closing of the Adrian B. Rhodes Armed Forces Reserve Center, located at 2144 Lake Shore Drive, Wilmington, in New Hanover County, North Carolina. Based on the project description and location, the Fish and Wildlife Service concurs with your determination that no impacts to federally listed species will occur as a result of the proposed action. Should project plans change, or if additional information on the distribution of listed or proposed species becomes available, this determination may be reconsidered.

If you have further questions, please contact me at 919-856-4520 (Ext. 28). Thank you for your cooperation with our agency.

Sincerely,

John S. Hammond
Endangered Species Coordinator



DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

REPLY TO
ATTENTION OF:

ARRC-SSC-DPW

June 6, 2011

Dr. Jeffrey Crow, SHPO
Deputy Secretary, North Carolina Office of Archives and History
4610 Mail Service Center
Raleigh NC 27699-4610

Dear Dr. Crow:

In accordance with 36 Code of Federal Regulations, Part 800 and Army Regulation 200-1, the 81st Regional Support Command (RSC) is requesting written concurrence from your office on the enclosed determination of National Register eligibility and assessment of effects. The 81st RSC is transferring the Adrian B. Rhodes Armed Forces Reserve Center (Rhodes AFRC) located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina out of Department of Army ownership.

The property consists of an administration/training building, an organizational maintenance shop (OMS), an unheated storage building, and one vehicle wash rack situated on 4.26 acres of land. The property is bounded on the south and east by Legion Stadium Sports Complex, to the north by Greenfield Lake and to the west by Woodlawn Subdivision. A site map is included in Enclosure A.

The administration/training building is a two-story, 22,581 square-foot brick building originally built in 1955 and expanded to its current size in 1976. The storage building is an unheated, 3,500 square-foot metal building erected on a concrete slab. The OMS is a 3,696 square-foot single story cinder and brick block building constructed in 1967. The vehicle wash rack is the remaining permanent structure on the property. The wash rack is equipped with an underground oil/water separator. A large portion of the Rhodes AFRC property comprises impervious surface features (i.e. asphalt parking areas, driveways, concrete walkways, and building footprints). A review of available aerial photography shows that the vegetated area located in the southwestern corner of the property has been altered for water drainage and is bordered by a manmade linear drainage ditch. No archaeological testing is recommended due to previous disturbance.

Although the facility is more than 50 years old, a letter from the North Carolina State Historic Preservation Office, dated June 9, 2005, states that the property is not eligible for listing in the National Register of Historic Places (Enclosure B). This determination is based on survey findings, which found that the facility has undergone significant architectural alterations and no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

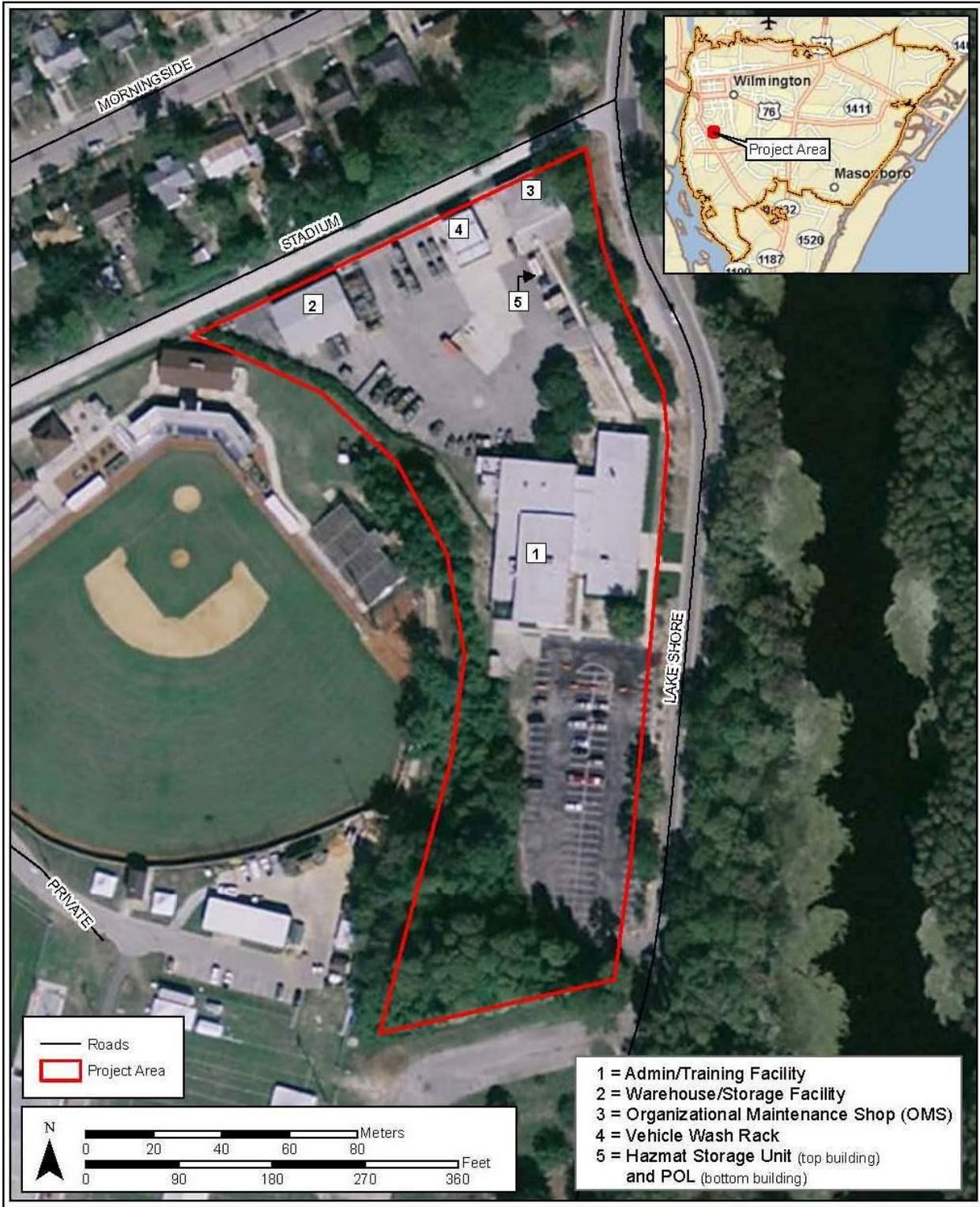
The 81st RSC is seeking concurrence and comments on the enclosed determination of eligibility, assessment of effects, and the proposed building transfer, within 30 days of receiving this letter and its supporting materials. If you should have any further questions, please contact Michelle Hook at the 81st RSC via telephone, 803-751-9998, e-mail, michelle.hook@us.army.mil, or mailing address, 81st RSC, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel H. Thomas III", written over a horizontal line.

Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

June 9, 2005

Steven Francis, Chief, Environmental Division
Deputy Chief of Staff
Installation Management
Department of the Army
Headquarters, 81ST Regional Readiness Command
255 West Oxmoor Road
Birmingham, AL 35209-6383

Re: 81ST Regional Readiness Command Facilities, Architectural Survey Findings, United States Army
Reserve Centers, Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, and South
Carolina, ER 03-3053

Dear Mr. Francis:

Thank you for your letter of April 7, 2005 transmitting the survey report concerning the above project. We appreciate the opportunity to comment on the survey findings and apologize for our delayed response. Our comments are limited to the following US Army Reserve Centers:

◆ NC 001	Nivens	Albemarle
◆ NC 004	Walter Lee Hatch	Asheville
◆ NC 007/100 # 1 AMS # 22		Charlotte
◆ NC 022	Rives	Greensboro
◆ NC 032	Thomas Erwin Allen	Lumberton
◆ NC 040	Uriah G. Lucas	Salisbury
◆ NC 045	Rhodes	Wilmington

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the above referenced properties are not eligible for listing in the National Register of Historic Places. This assessment is based on the survey findings, which indicate that all of the facilities have undergone significant architectural alterations. The facilities thus no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

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

	Location	Mailing Address	Telephone/Fax
ADMINISTRATION	507 N. Blount Street, Raleigh NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-4763/733-8653
RESTORATION	515 N. Blount Street, Raleigh NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6547/715-4801
SURVEY & PLANNING	515 N. Blount Street, Raleigh, NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6545/715-4801

Enclosure B1: 2005 SHPO Concurrence Letter for Rhodes AFRC.

Thank you for your cooperation and consideration. If you have questions concerning this comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763. In all future communication concerning this project, please cite the above tracking number.

Sincerely,



 Peter Sandbeck

Enclosure B2: 2005 SHPO Concurrence Letter for Rhodes AFRC.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Claudia Brown, Acting Administrator

Beverly Faves Perdue, Governor
Linda A. Carlisle, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

July 1, 2011

Daniel H. Thomas, III
Department of the Army
81st Regional Support Command
1525 Marion Avenue
Fort Jackson, SC 29207-6807

Re: Determination of Eligibility for Rhodes Armed Forces Reserve Center, 2144 West Lake Shore Drive, Wilmington, New Hanover County, ER 11-1292

Dear Mr. Thomas:

Thank you for your letter of June 6, 2011, which we received on June 27, 2011, concerning the transfer of the Adrian B. Rhodes Armed Forces Reserve Center (Rhodes AFRC) and determining its eligibility for listing in the National Register of Historic Places..

Given that the Rhodes AFRC has undergone significant architectural alterations and no longer conveys its period of significance, we concur with your finding that the Rhodes AFRC is *not* eligible for listing in the National Register of Historic Places. Thus, transferring the Rhodes AFRC will have no effect on historic properties.

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

Thank you for your cooperation and consideration. If you have questions concerning the above comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919-807-6579. In all future communication concerning this project, please cite the above-referenced tracking number.

Sincerely,

Renee Gledhill-Earley

for Claudia Brown



DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

REPLY TO
ATTENTION OF:

ARRC-SSC-DPW

June 6, 2011

Ms. Brenda Shumbarger
North Carolina Department of Environment and Natural Resources
Wilmington Regional Office
127 Cardinal Drive Extension
Wilmington, NC 28405

Dear Ms. Shumbarger:

On May 16, 2005, the Defense Base Closure and Realignment Commission (BRAC Commission) recommended the transformation (closure and/or relocation) of certain actions concerning United States Army Reserve Centers (USARC) in North Carolina. These recommendations were approved by the President on September 23, 2005, and forwarded to Congress. The Congress did not alter any of the BRAC Commission's recommendations, and on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended.

The BRAC Commission recommended the closure of the Adrian B. Rhodes Armed Forces Reserve Center (Rhodes AFRC) and relocation to a new AFRC and Operational Maintenance Shop in Wilmington, North Carolina. To enable implementation of this recommendation, the Army proposes to transfer ownership of the Rhodes AFRC facilities. The recipient of the Rhodes AFRC will be the City of Wilmington Local Redevelopment Authority (LRA). The U.S. Army Corps of Engineers (USACE), Mobile District is in the process of preparing an Environmental Assessment (EA), which will assess the potential environmental impacts of disposal and reuse of the Rhodes AFRC.

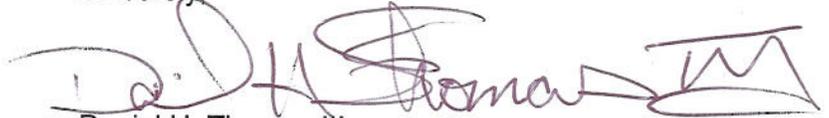
A search of the North Carolina Natural Heritage Program website provided a list of 22 plants and animals listed as endangered, threatened, or as a species of special concern that are known to occur within two miles of the project site. Due to the high levels of disturbance and development on the site and surrounding area, it is very unlikely that any of these species would occur within the project site. Enclosure A is an aerial photograph showing the developed nature of the site and adjacent development.

Pedestrian surveys have been completed at the project site and none of these species or suitable habitats capable of supporting these species were observed. The site largely consists of buildings and paved parking areas. An area of natural vegetation is located in the southwestern corner of the property. Vegetation within this area consists of bald cypress (*Taxodium distichum*), swamp tupelo (*Nyssa sylvatica* var. *biflora*), red bay (*Persea borbonia*), Carolina willow (*Salix caroliniana*), various pine species (*Pinus* spp.) and other trees and shrubs.

Based on these surveys and the existing conditions at and surrounding the project site, we have determined that the EA's proposed action would have insignificant impacts on general wildlife populations as a result of implementing the proposed action for the Rhodes AFRC.

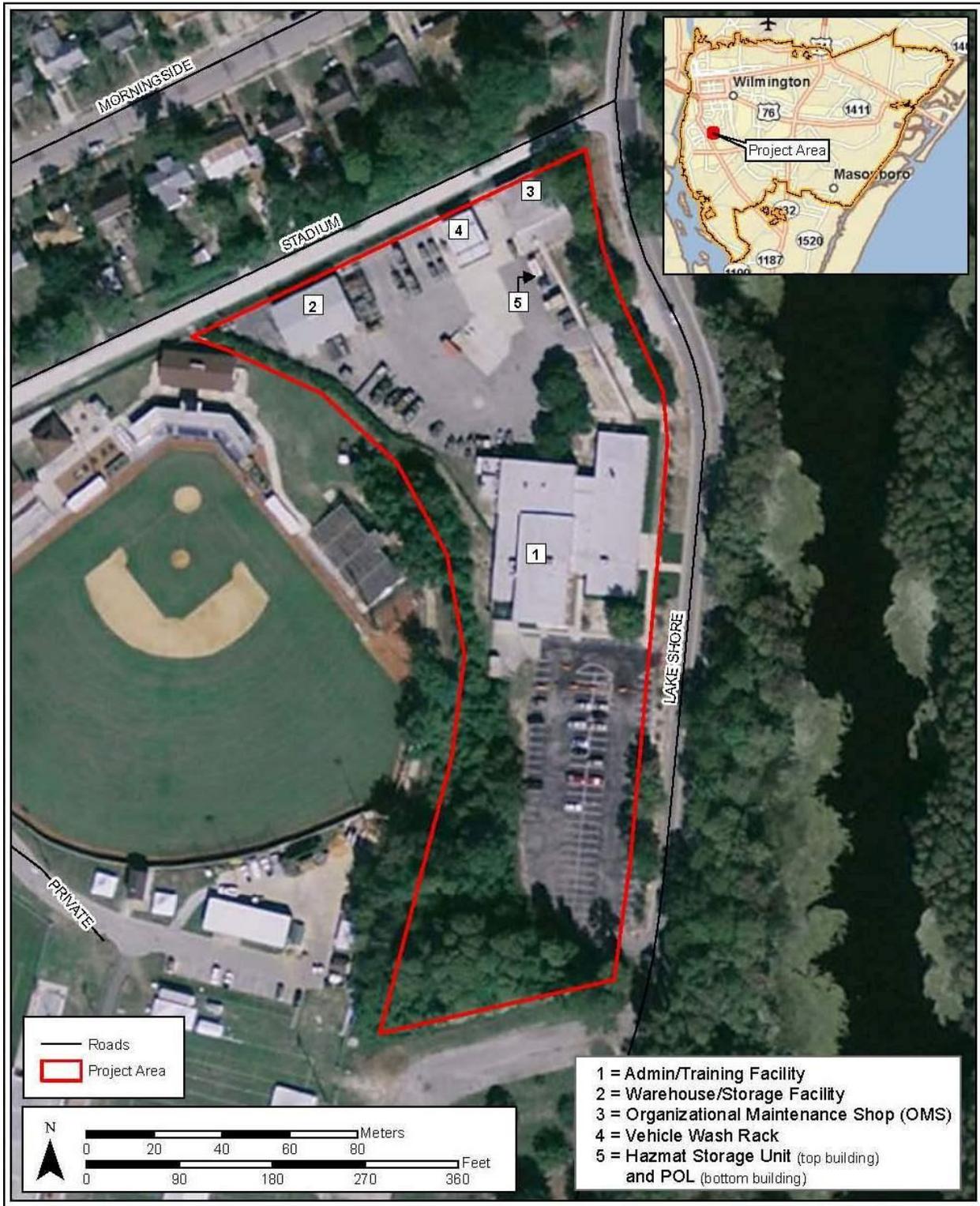
We respectfully request that you provide a written concurrence with our determination. Your prompt attention and cooperation would be greatly appreciated. If you have questions or concerns about this project, please contact Ms. Michelle Hook, Environmental Protection Specialist, 81st Regional Support Command at (803) 751-9998, within thirty (30) days of receipt of this letter. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,



Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosure



- 1 = Admin/Training Facility
- 2 = Warehouse/Storage Facility
- 3 = Organizational Maintenance Shop (OMS)
- 4 = Vehicle Wash Rack
- 5 = Hazmat Storage Unit (top building)
and POL (bottom building)

Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

ARRC-SSC-DPW

June 6, 2011

Mr. David Cobb, Division Chief
North Carolina Wildlife Resources Commission
Wildlife Management Services
1722 Mail Service Center
Raleigh, NC 27699

Dear Mr. Cobb:

On May 16, 2005, the Defense Base Realignment and Closure Commission (BRAC Commission) recommended the transformation (closure and/or relocation) of certain actions concerning United States Army Reserve Centers (USARC) in North Carolina. These recommendations were approved by the President on September 23, 2005, and forwarded to Congress. The Congress did not alter any of the BRAC Commission's recommendations, and on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended.

The BRAC Commission recommended the closure of the Adrian B. Rhodes Armed Forces Reserve Center (Rhodes AFRC) and relocation to a new AFRC and Operational Maintenance Shop in Wilmington, New Hanover County, North Carolina. To enable implementation of this recommendation, the Army proposes to transfer ownership of the Rhodes AFRC facilities (Aerial view detailed in Enclosure A). The recipient of the Rhodes AFRC will be the City of Wilmington Local Redevelopment Authority (LRA). The U.S. Army Corps of Engineers (USACE), Mobile District is in the process of preparing an Environmental Assessment (EA), which will assess the potential environmental impacts of disposal and reuse of the Rhodes AFRC.

A search of the U.S. Fish and Wildlife Service's website indicated 11 Federally listed species within New Hanover County. Enclosure B displays those species, their preferred habitat, and their potential to occur within or near the project site. No Critical Habitat has been designated for these species within New Hanover County. Additionally, no suitable habitat for any of these species was observed on or near the project site. Enclosure A is an aerial photograph showing the developed nature of the site and adjacent development.

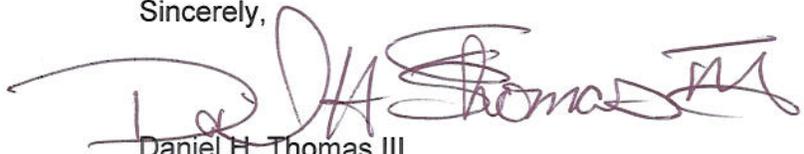
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Pedestrian surveys have been completed at the project site and none of these Federally listed species or suitable habitats capable of supporting these species were observed. The site largely consists of buildings and paved parking areas. An area of natural vegetation is located in the southwestern corner of the property. Vegetation within this area consists of bald cypress (*Taxodium distichum*), Carolina willow (*Salix caroliniana*), various pine species (*Pinus* spp.) and other trees and shrubs.

Based on these surveys and the existing conditions at and surrounding the project site, we have determined that the EA's proposed action would have no effect on Federal or state-listed species. Because of the limited size of the proposed construction footprint and the low quality of habitat at the site, insignificant impacts on general wildlife populations would occur as a result of implementing the proposed action for the Rhodes AFRC.

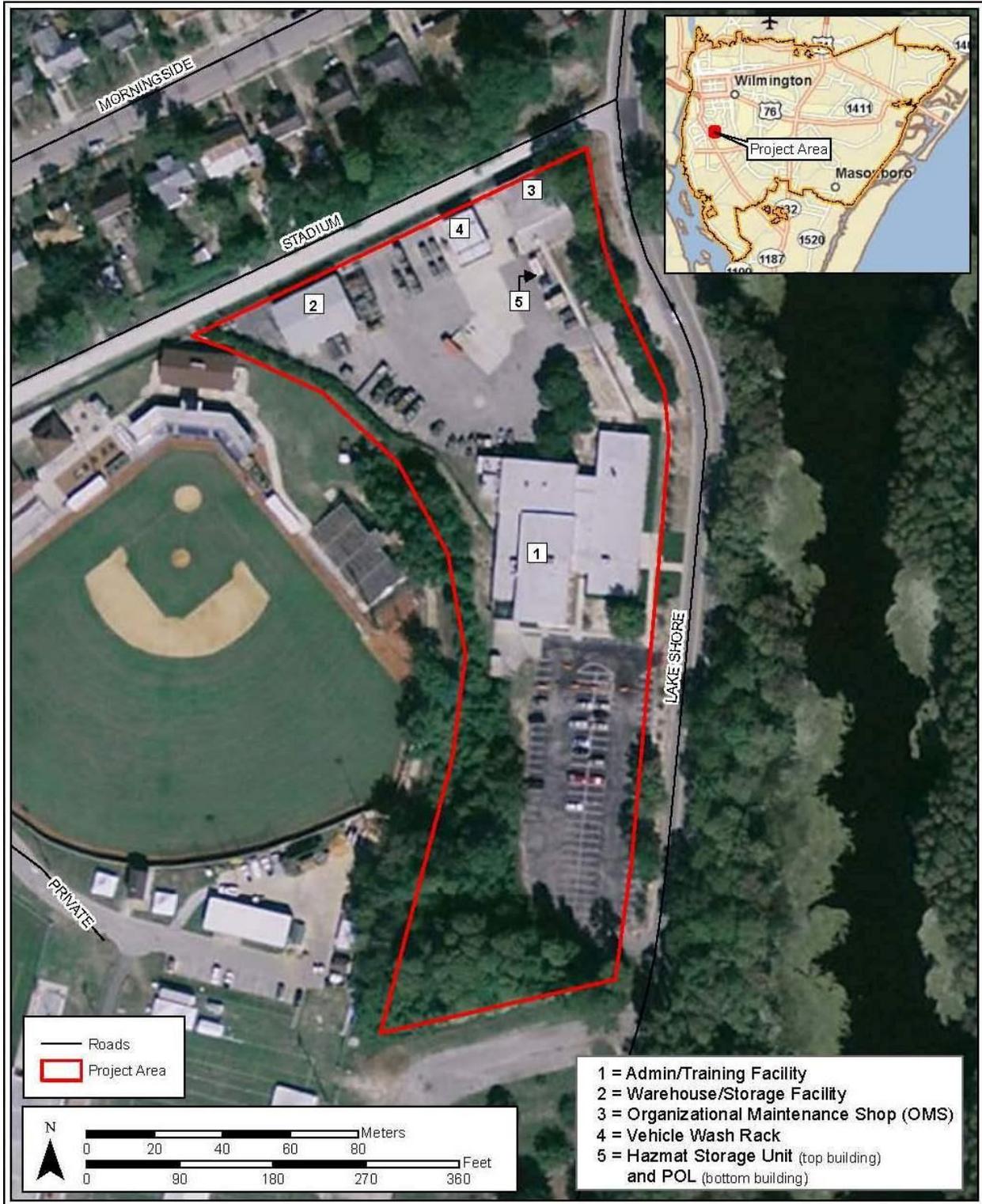
We respectfully request that you provide a written concurrence with our determination. Your prompt attention and cooperation would be greatly appreciated. If you have questions or concerns about this project, please contact Ms. Michelle Hook, Environmental Protection Specialist, 81st Regional Support Command at (803) 751-9998, within thirty (30) days of receipt of this letter. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in purple ink, appearing to read "D. H. Thomas III". The signature is stylized and cursive, with a large initial "D" and "H".

Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



Enclosure A: Aerial view of the Rhodes AFRC property and facilities.

Enclosure B. Federally Listed Species Potentially Occurring Within New Hanover County, North Carolina

Common/Scientific Name	Federal Status	Habitat	Potential to occur within Project Site
BIRDS			
Red-cockaded woodpecker <i>(Picoides borealis)</i>	Endangered	Mature longleaf/loblolly pine forests with minimal sub-canopy layer and open understory.	No – no suitable habitat and nesting sites at or near the project site.
Wood stork <i>(Mycteria Americana)</i>	Endangered	Freshwater marshes, swamps, lagoons, ponds, flooded fields. Nests mostly in upper parts of cypress trees or dead hardwoods over water or on islands along streams or adjacent to shallow lakes.	Not known to nest in nearby Greenfield Lake or on project site.
Piping plover <i>(Charadrius melodus)</i>	Threatened	In Texas, primarily on intertidal beaches with sand and/or mud flats with no or very sparse vegetation.	No – no suitable habitat and nesting sites at or near the project site.
REPTILES			
Green sea turtle <i>(Chelonia mydas)</i>	Threatened	Warm tropical, shallow coastal waters.	No – no coastal waters at or near the project site.
Hawksbill sea turtle <i>(Eretmochelys imbricata)</i>	Endangered	The most tropical of all sea turtles; found near coral reefs and rocky outcroppings in tropical, shallow coastal waters.	No – no coastal waters at or near the project site.
Leatherback sea turtle <i>(Dermochelys coriacea)</i>	Endangered	Highly oceanic, utilize coastal waters only during breeding season.	No – no coastal waters at or near the project site.
Loggerhead sea turtle <i>(Caretta caretta)</i>	Threatened	Coastal tropical and subtropical waters, ventures into temperate waters to boundaries of warm currents, but prefers coastal bays, also found in coastal streams, creeks, and open ocean	No – no coastal waters at or near the project site.
MAMMALS			
West Indian manatee <i>(Trichechus manatus)</i>	Endangered	Rivers, estuaries, and coastal areas of the southeastern US coast along Central America and the West Indies to the northern coastline of South America.	No – no riverine, estuarine, or coastal waters at or near the project site.
PLANTS			
Cooley's meadowrue <i>(Thalictrum cooleyi)</i>	Endangered	Grass-sedge bogs, wet pine savannas and savanna like areas.	No – not likely due to lack of appropriate habitat at project site.
Seabeach amaranth <i>(Amaranthus pumilus)</i>	Threatened	Barrier island beaches, primary habitat consists of overwash flats	No – no barrier island beaches at or near the project site
Rough-leaved loosestrife <i>Lysimachia asperulaefolia</i>	Endangered	Found along ecotones or edges between longleaf pine uplands and pond pine pocosins	No – not likely due the lack of appropriate habitat at or near the project site.



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

ARRC-SSC-DPW

June 6, 2011

Eastern Band of Cherokee
Mr. Jeremy Hyatt, Tribal Administrator
P.O. Box 455
Cherokee, NC 28719

Dear Mr. Hyatt:

In accordance with 36 Code of Federal Regulations, Part 800 and Army Regulation 200-1, the 81st Regional Support Command (RSC) is writing to inform the Eastern Band of Cherokee of the transfer out of Department of the Army ownership of the Adrian B. Rhodes Armed Forces Reserve Center (AFRC) located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina.

The property consists of an administration/training building, an organizational maintenance shop, an unheated storage building, and one vehicle wash rack situated on 4.26 acres of land. The property is bounded on the south and east by Legion Stadium Sports Complex, to the north by Greenfield Lake and to the west by Woodlawn Subdivision (Enclosure A).

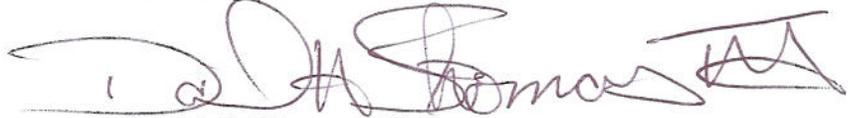
The administration/training building is a two-story, 22,581 square-foot brick building originally built in 1955 and expanded to its current size in 1976. The storage building is an unheated, 3,500 square-foot metal building erected on a concrete slab. The OMS is a 3,696 square-foot single story cinder and brick block building constructed in 1967. The vehicle wash rack is the remaining permanent structure on the property. The wash rack is equipped with an underground oil/water separator. A large portion of the Rhodes AFRC property comprises impervious surface features (i.e. asphalt parking areas, driveways, concrete walkways, and building footprints). A review of available aerial photography shows that the vegetated area located in the southwestern corner of the property has been altered for water drainage and is bordered by a manmade linear drainage ditch. No archaeological testing is recommended due to previous disturbance.

Although the facility is more than 50 years old, a letter from the North Carolina State Historic Preservation Office, dated June 9, 2005, states that the property is not eligible for listing in the National Register of Historic Places (Enclosure B). This determination is based on survey findings, which found that the facility has undergone significant architectural alterations and no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

In accordance with the 2005 Defense Base Closure and Realignment Committee (BRAC) legislation, the 81st RSC is requesting any information as to whether the transfer property is of religious or cultural significance to any Federally Recognized Native American Tribes with ancestral ties to this area of North Carolina.

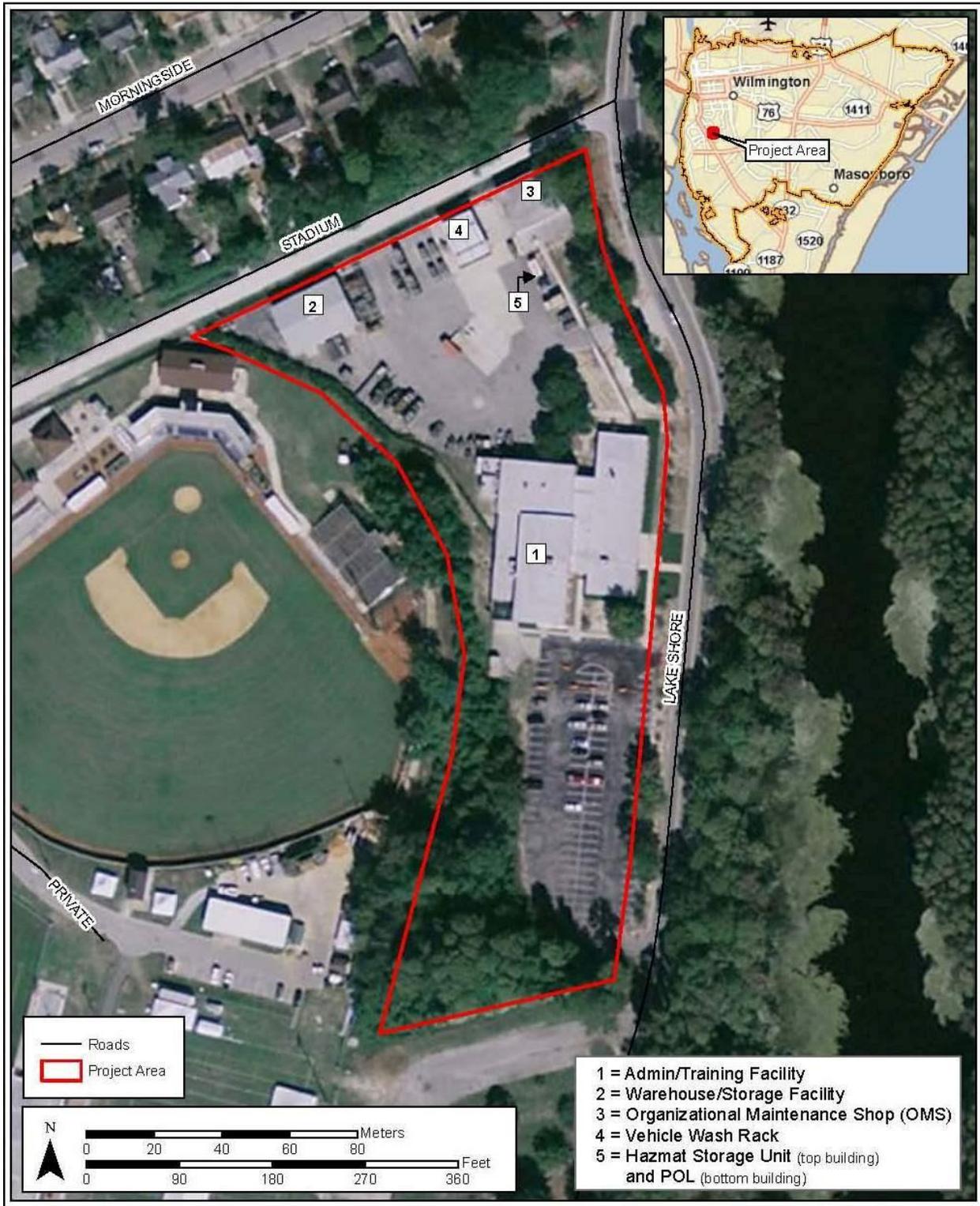
Through this letter, the 81st RSC is seeking consultation with the Eastern Band of Cherokee regarding the proposed property transfer. We request your concurrence and comments on the enclosed determination of eligibility, assessment of effects, and the proposed property transfer, within 30 days of receiving this letter and its supporting materials. If you should have any further questions, please contact Michelle Hook at the 81st RSC via telephone, 803-751-9998, or e-mail, michelle.hook@usar.army.mil. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel H. Thomas III", written over a horizontal line.

Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

June 9, 2005

Steven Francis, Chief, Environmental Division
Deputy Chief of Staff
Installation Management
Department of the Army
Headquarters, 81ST Regional Readiness Command
255 West Oxmoor Road
Birmingham, AL 35209-6383

Re: 81ST Regional Readiness Command Facilities, Architectural Survey Findings, United States Army Reserve Centers, Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, and South Carolina, ER 03-3053

Dear Mr. Francis:

Thank you for your letter of April 7, 2005 transmitting the survey report concerning the above project. We appreciate the opportunity to comment on the survey findings and apologize for our delayed response. Our comments are limited to the following US Army Reserve Centers:

◆ NC 001	Nivens	Albemarle
◆ NC 004	Walter Lee Hatch	Asheville
◆ NC 007/100 # 1 AMS # 22		Charlotte
◆ NC 022	Rives	Greensboro
◆ NC 032	Thomas Erwin Allen	Lumberton
◆ NC 040	Uriah G. Lucas	Salisbury
◆ NC 045	Rhodes	Wilmington

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the above referenced properties are not eligible for listing in the National Register of Historic Places. This assessment is based on the survey findings, which indicate that all of the facilities have undergone significant architectural alterations. The facilities thus no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

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

	Location	Mailing Address	Telephone/Fax
ADMINISTRATION	507 N. Blount Street, Raleigh NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-4763/733-8653
RESTORATION	515 N. Blount Street, Raleigh NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6547/715-4801
SURVEY & PLANNING	515 N. Blount Street, Raleigh, NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6545/715-4801

Enclosure B1: 2005 SHPO Concurrence Letter for Rhodes AFRC.

Thank you for your cooperation and consideration. If you have questions concerning this comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763. In all future communication concerning this project, please cite the above tracking number.

Sincerely,

A handwritten signature in cursive script that reads "Renee Gledhill-Earley".A handwritten signature in cursive script that reads "Peter Sandbeck".

Peter Sandbeck

Enclosure B2: 2005 SHPO Concurrence Letter for Rhodes AFRC.



DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

REPLY TO
ATTENTION OF:

ARRC-SSC-DPW

June 6, 2011

Coharie Tribe
Greg Jacob, Executive Director
7531 N. US Highway 421
Clinton, NC 28328

Dear Mr. Jacob:

In accordance with 36 Code of Federal Regulations, Part 800 and Army Regulation 200-1, the 81st Regional Support Command (RSC) is writing to inform the Coharie Tribe of the transfer out of Department of the Army ownership of the Adrian B. Rhodes Armed Forces Reserve Center (AFRC) located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina.

The property consists of an administration/training building, an organizational maintenance shop, an unheated storage building, and one vehicle wash rack situated on 4.26 acres of land. The property is bounded on the south and east by Legion Stadium Sports Complex, to the north by Greenfield Lake and to the west by Woodlawn Subdivision (Enclosure A).

The administration/training building is a two-story, 22,581 square-foot brick building originally built in 1955 and expanded to its current size in 1976. The storage building is an unheated, 3,500 square-foot metal building erected on a concrete slab. The OMS is a 3,696 square-foot single story cinder and brick block building constructed in 1967. The vehicle wash rack is the remaining permanent structure on the property. The wash rack is equipped with an underground oil/water separator. A large portion of the Rhodes AFRC property comprises impervious surface features (i.e. asphalt parking areas, driveways, concrete walkways, and building footprints). A review of available aerial photography shows that the vegetated area located in the southwestern corner of the property has been altered for water drainage and is bordered by a manmade linear drainage ditch. No archaeological testing is recommended due to previous disturbance.

Although the facility is more than 50 years old, a letter from the North Carolina State Historic Preservation Office, dated June 9, 2005, states that the property is not eligible for listing in the National Register of Historic Places (Enclosure B). This determination is based on survey findings, which found that the facility has undergone significant architectural alterations and no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

In accordance with the 2005 Defense Base Closure and Realignment Committee (BRAC) legislation, the 81st RSC is requesting any information as to whether the transfer property is of religious or cultural significance to any Federally Recognized Native American Tribes with ancestral ties to this area of North Carolina.

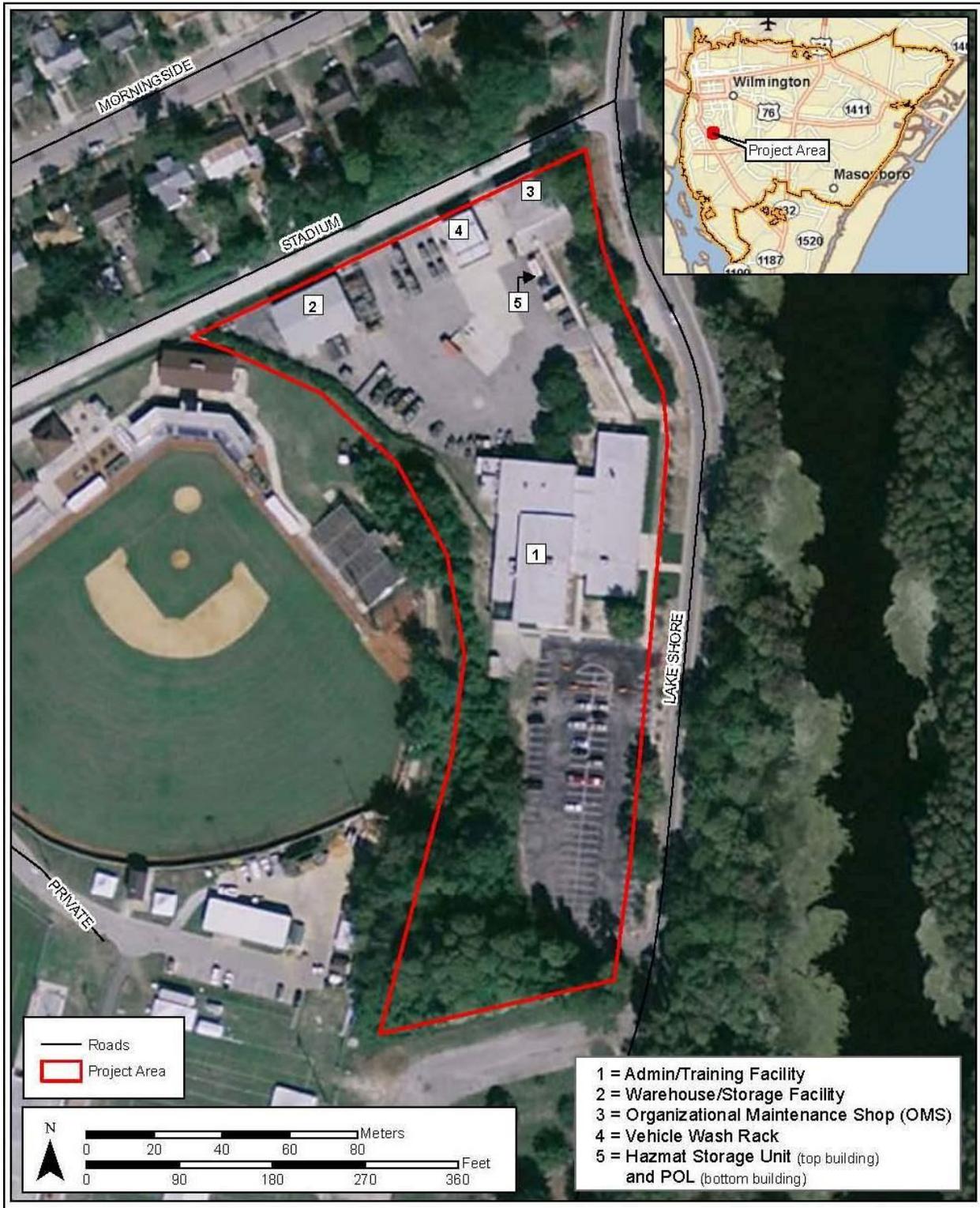
Through this letter, the 81st RSC is seeking consultation with the Coharie Tribe regarding the proposed property transfer. We request your concurrence and comments on the enclosed determination of eligibility, assessment of effects, and the proposed property transfer, within 30 days of receiving this letter and its supporting materials. If you should have any further questions, please contact Michelle Hook at the 81st RSC via telephone, 803-751-9998, or e-mail, michelle.hook@usar.army.mil. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel H. Thomas III", written in a cursive style.

Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



- 1 = Admin/Training Facility
- 2 = Warehouse/Storage Facility
- 3 = Organizational Maintenance Shop (OMS)
- 4 = Vehicle Wash Rack
- 5 = Hazmat Storage Unit (top building) and POL (bottom building)

Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

June 9, 2005

Steven Francis, Chief, Environmental Division
Deputy Chief of Staff
Installation Management
Department of the Army
Headquarters, 81ST Regional Readiness Command
255 West Oxmoor Road
Birmingham, AL 35209-6383

Re: 81ST Regional Readiness Command Facilities, Architectural Survey Findings, United States Army Reserve Centers, Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, and South Carolina, ER 03-3053

Dear Mr. Francis:

Thank you for your letter of April 7, 2005 transmitting the survey report concerning the above project. We appreciate the opportunity to comment on the survey findings and apologize for our delayed response. Our comments are limited to the following US Army Reserve Centers:

◆ NC 001	Nivens	Albemarle
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◆ NC 007/100 # 1 AMS # 22		Charlotte
◆ NC 022	Rives	Greensboro
◆ NC 032	Thomas Erwin Allen	Lumberton
◆ NC 040	Uriah G. Lucas	Salisbury
◆ NC 045	Rhodes	Wilmington

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the above referenced properties are not eligible for listing in the National Register of Historic Places. This assessment is based on the survey findings, which indicate that all of the facilities have undergone significant architectural alterations. The facilities thus no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

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

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SURVEY & PLANNING	515 N. Blount Street, Raleigh, NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6545/715-4801

Enclosure B1: 2005 SHPO Concurrence Letter for Rhodes AFRC.

Thank you for your cooperation and consideration. If you have questions concerning this comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763. In all future communication concerning this project, please cite the above tracking number.

Sincerely,



 Peter Sandbeck

Enclosure B2: 2005 SHPO Concurrence Letter for Rhodes AFRC.



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

ARRC-SSC-DPW

June 6, 2011

Cumberland County Association for Indian People
Gladys Hunt, Executive Director
2173 Downing Road
Fayetteville, NC 28301

Dear Ms. Hunt:

In accordance with 36 Code of Federal Regulations, Part 800 and Army Regulation 200-1, the 81st Regional Support Command (RSC) is writing to inform the Cumberland County Association for Indian People of the transfer out of Department of the Army ownership of the Adrian B. Rhodes Armed Forces Reserve Center (AFRC) located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina.

The property consists of an administration/training building, an organizational maintenance shop, an unheated storage building, and one vehicle wash rack situated on 4.26 acres of land. The property is bounded on the south and east by Legion Stadium Sports Complex, to the north by Greenfield Lake and to the west by Woodlawn Subdivision (Enclosure A).

The administration/training building is a two-story, 22,581 square-foot brick building originally built in 1955 and expanded to its current size in 1976. The storage building is an unheated, 3,500 square-foot metal building erected on a concrete slab. The OMS is a 3,696 square-foot single story cinder and brick block building constructed in 1967. The vehicle wash rack is the remaining permanent structure on the property. The wash rack is equipped with an underground oil/water separator. A large portion of the Rhodes AFRC property comprises impervious surface features (i.e. asphalt parking areas, driveways, concrete walkways, and building footprints). A review of available aerial photography shows that the vegetated area located in the southwestern corner of the property has been altered for water drainage and is bordered by a manmade linear drainage ditch. No archaeological testing is recommended due to previous disturbance.

Although the facility is more than 50 years old, a letter from the North Carolina State Historic Preservation Office, dated June 9, 2005, states that the property is not eligible for listing in the National Register of Historic Places (Enclosure B). This determination is based on survey findings, which found that the facility has undergone significant architectural alterations and no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

In accordance with the 2005 Defense Base Closure and Realignment Committee (BRAC) legislation, the 81st RSC is requesting any information as to whether the transfer property is of religious or cultural significance to any Federally Recognized Native American Tribes with ancestral ties to this area of North Carolina.

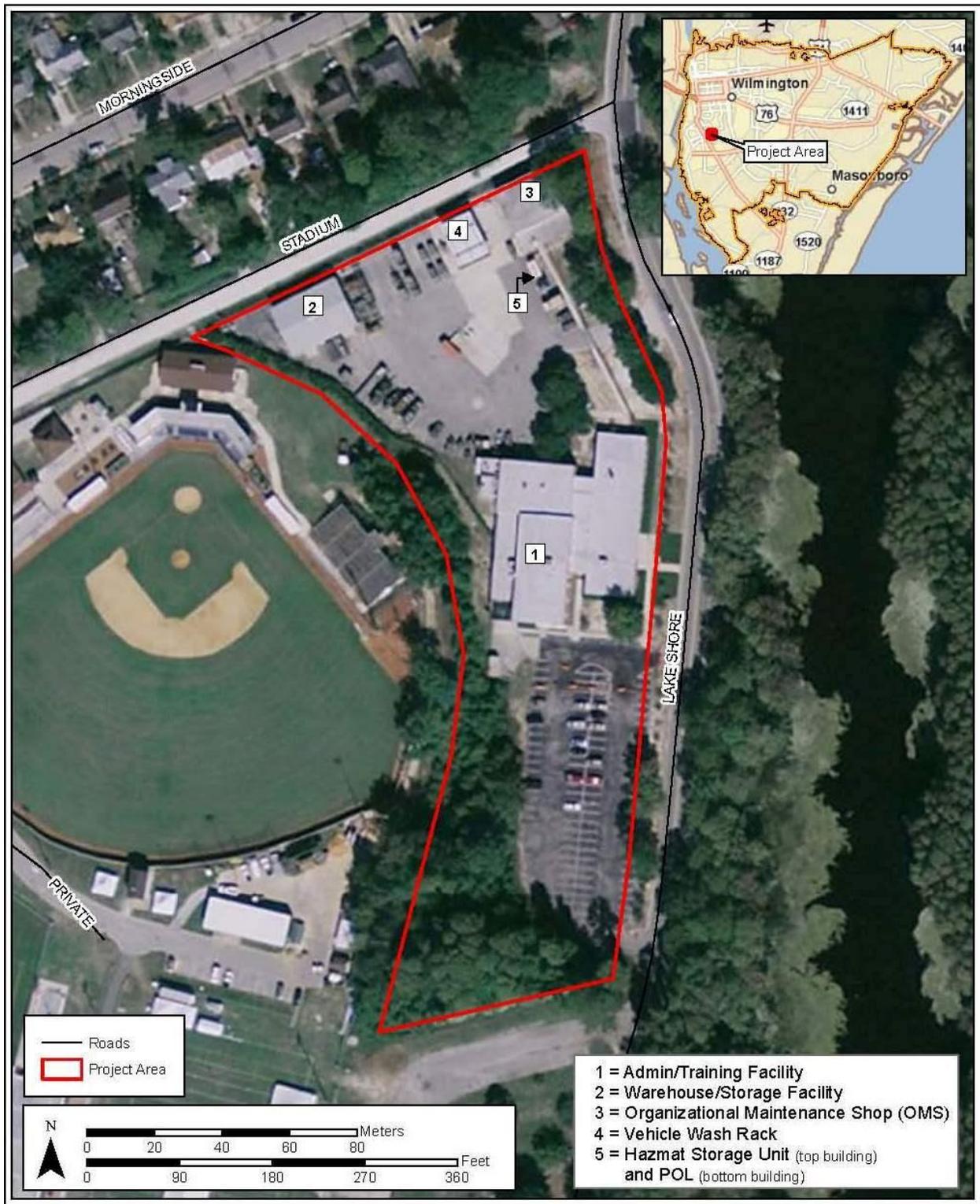
Through this letter, the 81st RSC is seeking consultation with the Cumberland County Association for Indian People regarding the proposed property transfer. We request your concurrence and comments on the enclosed determination of eligibility, assessment of effects, and the proposed property transfer, within 30 days of receiving this letter and its supporting materials. If you should have any further questions, please contact Michelle Hook at the 81st RSC via telephone, 803-751-9998, or e-mail, michelle.hook@usar.army.mil. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

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Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

June 9, 2005

Steven Francis, Chief, Environmental Division
Deputy Chief of Staff
Installation Management
Department of the Army
Headquarters, 81ST Regional Readiness Command
255 West Oxmoor Road
Birmingham, AL 35209-6383

Re: 81ST Regional Readiness Command Facilities, Architectural Survey Findings, United States Army Reserve Centers, Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, and South Carolina, ER 03-3053

Dear Mr. Francis:

Thank you for your letter of April 7, 2005 transmitting the survey report concerning the above project. We appreciate the opportunity to comment on the survey findings and apologize for our delayed response. Our comments are limited to the following US Army Reserve Centers:

◆ NC 001	Nivens	Albemarle
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◆ NC 007/100 # 1 AMS # 22		Charlotte
◆ NC 022	Rives	Greensboro
◆ NC 032	Thomas Erwin Allen	Lumberton
◆ NC 040	Uriah G. Lucas	Salisbury
◆ NC 045	Rhodes	Wilmington

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the above referenced properties are not eligible for listing in the National Register of Historic Places. This assessment is based on the survey findings, which indicate that all of the facilities have undergone significant architectural alterations. The facilities thus no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

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SURVEY & PLANNING	515 N. Blount Street, Raleigh, NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6545/715-4801

Enclosure B1: 2005 SHPO Concurrence Letter for Rhodes AFRC.

Thank you for your cooperation and consideration. If you have questions concerning this comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763. In all future communication concerning this project, please cite the above tracking number.

Sincerely,

A handwritten signature in cursive script that reads "Renee Gledhill-Earley".A handwritten signature in cursive script that reads "Peter Sandbeck".

Peter Sandbeck

Enclosure B2: 2005 SHPO Concurrence Letter for Rhodes AFRC.



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

ARRC-SSC-DPW

June 6, 2011

Guilford Native American Association
Rick Oxendine, Executive Director
P.O. Box 5623
Greensboro, NC 27435

Dear Mr. Oxendine:

In accordance with 36 Code of Federal Regulations, Part 800 and Army Regulation 200-1, the 81st Regional Support Command (RSC) is writing to inform the Guilford Native American Association of the transfer out of Department of the Army ownership of the Adrian B. Rhodes Armed Forces Reserve Center (AFRC) located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina.

The property consists of an administration/training building, an organizational maintenance shop, an unheated storage building, and one vehicle wash rack situated on 4.26 acres of land. The property is bounded on the south and east by Legion Stadium Sports Complex, to the north by Greenfield Lake and to the west by Woodlawn Subdivision (Enclosure A).

The administration/training building is a two-story, 22,581 square-foot brick building originally built in 1955 and expanded to its current size in 1976. The storage building is an unheated, 3,500 square-foot metal building erected on a concrete slab. The OMS is a 3,696 square-foot single story cinder and brick block building constructed in 1967. The vehicle wash rack is the remaining permanent structure on the property. The wash rack is equipped with an underground oil/water separator. A large portion of the Rhodes AFRC property comprises impervious surface features (i.e. asphalt parking areas, driveways, concrete walkways, and building footprints). A review of available aerial photography shows that the vegetated area located in the southwestern corner of the property has been altered for water drainage and is bordered by a manmade linear drainage ditch. No archaeological testing is recommended due to previous disturbance.

Although the facility is more than 50 years old, a letter from the North Carolina State Historic Preservation Office, dated June 9, 2005, states that the property is not eligible for listing in the National Register of Historic Places (Enclosure B). This determination is based on survey findings, which found that the facility has undergone significant architectural alterations and no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

In accordance with the 2005 Defense Base Closure and Realignment Committee (BRAC) legislation, the 81st RSC is requesting any information as to whether the transfer property is of religious or cultural significance to any Federally Recognized Native American Tribes with ancestral ties to this area of North Carolina.

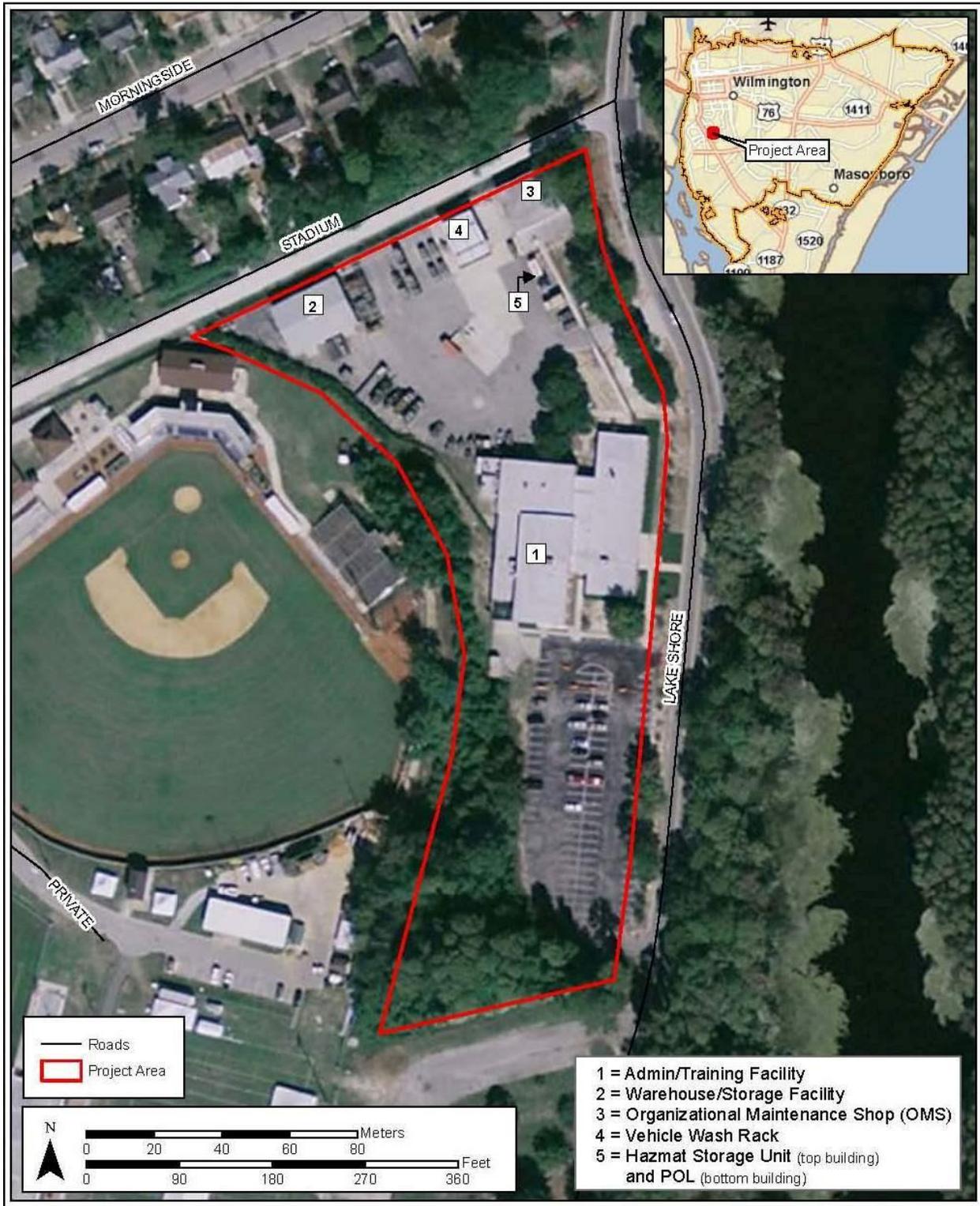
Through this letter, the 81st RSC is seeking consultation with the Guilford Native American Association regarding the proposed property transfer. We request your concurrence and comments on the enclosed determination of eligibility, assessment of effects, and the proposed property transfer, within 30 days of receiving this letter and its supporting materials. If you should have any further questions, please contact Michelle Hook at the 81st RSC via telephone, 803-751-9998, or e-mail, michelle.hook@usar.army.mil. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel H. Thomas III", written over a horizontal line.

Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

June 9, 2005

Steven Francis, Chief, Environmental Division
Deputy Chief of Staff
Installation Management
Department of the Army
Headquarters, 81ST Regional Readiness Command
255 West Oxmoor Road
Birmingham, AL 35209-6383

Re: 81ST Regional Readiness Command Facilities, Architectural Survey Findings, United States Army Reserve Centers, Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, and South Carolina, ER 03-3053

Dear Mr. Francis:

Thank you for your letter of April 7, 2005 transmitting the survey report concerning the above project. We appreciate the opportunity to comment on the survey findings and apologize for our delayed response. Our comments are limited to the following US Army Reserve Centers:

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◆ NC 022	Rives	Greensboro
◆ NC 032	Thomas Erwin Allen	Lumberton
◆ NC 040	Uriah G. Lucas	Salisbury
◆ NC 045	Rhodes	Wilmington

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the above referenced properties are not eligible for listing in the National Register of Historic Places. This assessment is based on the survey findings, which indicate that all of the facilities have undergone significant architectural alterations. The facilities thus no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

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SURVEY & PLANNING	515 N. Blount Street, Raleigh, NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6545/715-4801

Enclosure B1: 2005 SHPO Concurrence Letter for Rhodes AFRC.

Thank you for your cooperation and consideration. If you have questions concerning this comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763. In all future communication concerning this project, please cite the above tracking number.

Sincerely,



 Peter Sandbeck

Enclosure B2: 2005 SHPO Concurrence Letter for Rhodes AFRC.



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

ARRC-SSC-DPW

June 6, 2011

Haliwa-Saponi Indian Tribe
Alfred R. Richardson, Tribal Administrator
P.O. Box 99
Hollister, NC 27844

Dear Mr. Richardson:

In accordance with 36 Code of Federal Regulations, Part 800 and Army Regulation 200-1, the 81st Regional Support Command (RSC) is writing to inform the Haliwa-Saponi Indian Tribe of the transfer out of Department of the Army ownership of the Adrian B. Rhodes Armed Forces Reserve Center (AFRC) located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina.

The property consists of an administration/training building, an organizational maintenance shop, an unheated storage building, and one vehicle wash rack situated on 4.26 acres of land. The property is bounded on the south and east by Legion Stadium Sports Complex, to the north by Greenfield Lake and to the west by Woodlawn Subdivision (Enclosure A).

The administration/training building is a two-story, 22,581 square-foot brick building originally built in 1955 and expanded to its current size in 1976. The storage building is an unheated, 3,500 square-foot metal building erected on a concrete slab. The OMS is a 3,696 square-foot single story cinder and brick block building constructed in 1967. The vehicle wash rack is the remaining permanent structure on the property. The wash rack is equipped with an underground oil/water separator. A large portion of the Rhodes AFRC property comprises impervious surface features (i.e. asphalt parking areas, driveways, concrete walkways, and building footprints). A review of available aerial photography shows that the vegetated area located in the southwestern corner of the property has been altered for water drainage and is bordered by a manmade linear drainage ditch. No archaeological testing is recommended due to previous disturbance.

Although the facility is more than 50 years old, a letter from the North Carolina State Historic Preservation Office, dated June 9, 2005, states that the property is not eligible for listing in the National Register of Historic Places (Enclosure B). This determination is based on survey findings, which found that the facility has undergone significant architectural alterations and no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

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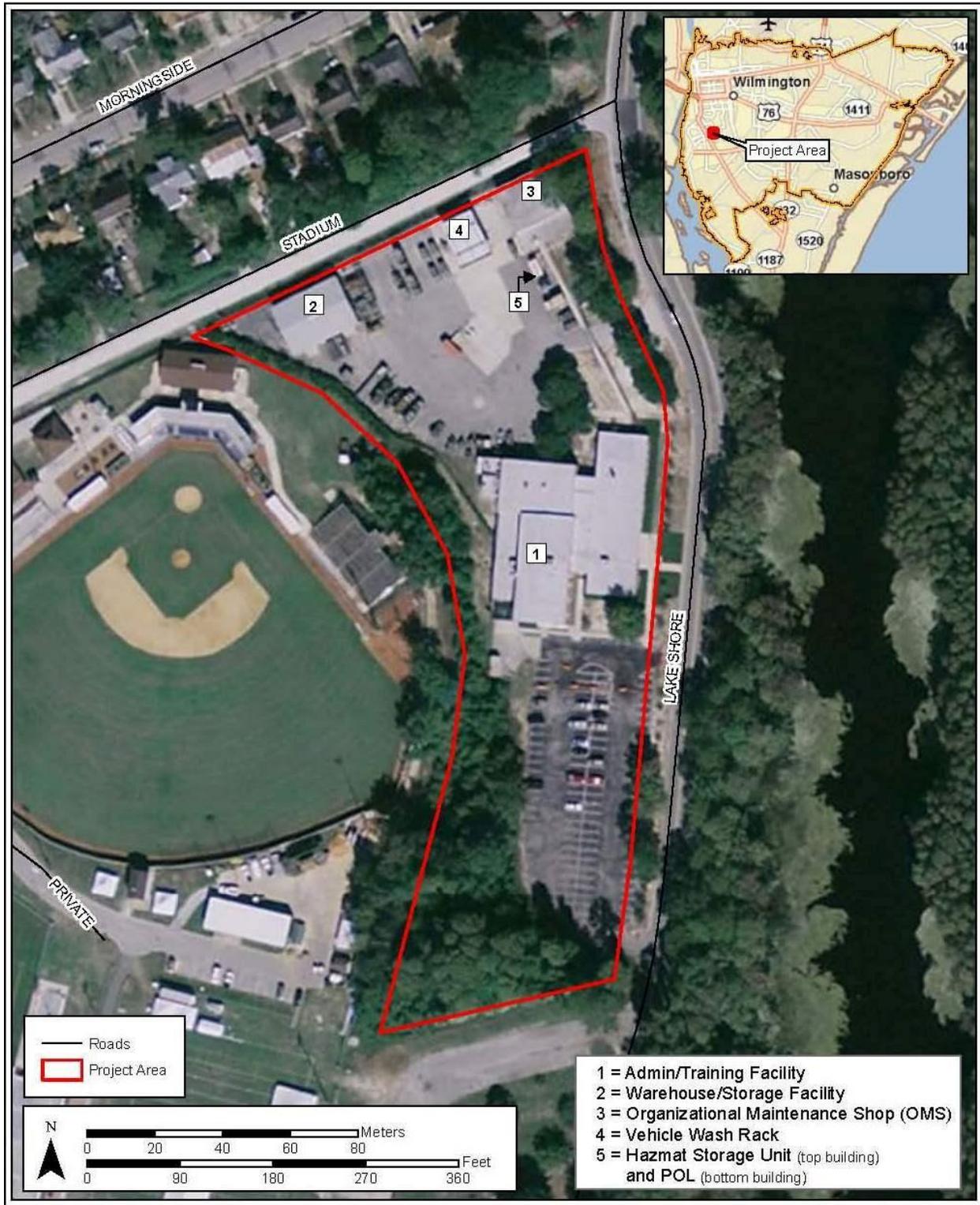
Through this letter, the 81st RSC is seeking consultation with the Haliwa-Saponi Indian Tribe regarding the proposed property transfer. We request your concurrence and comments on the enclosed determination of eligibility, assessment of effects, and the proposed property transfer, within 30 days of receiving this letter and its supporting materials. If you should have any further questions, please contact Michelle Hook at the 81st RSC via telephone, 803-751-9998, or e-mail, michelle.hook@usar.army.mil. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

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Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

June 9, 2005

Steven Francis, Chief, Environmental Division
Deputy Chief of Staff
Installation Management
Department of the Army
Headquarters, 81ST Regional Readiness Command
255 West Oxmoor Road
Birmingham, AL 35209-6383

Re: 81ST Regional Readiness Command Facilities, Architectural Survey Findings, United States Army Reserve Centers, Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, and South Carolina, ER 03-3053

Dear Mr. Francis:

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◆ NC 040	Uriah G. Lucas	Salisbury
◆ NC 045	Rhodes	Wilmington

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the above referenced properties are not eligible for listing in the National Register of Historic Places. This assessment is based on the survey findings, which indicate that all of the facilities have undergone significant architectural alterations. The facilities thus no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

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

	Location	Mailing Address	Telephone/Fax
ADMINISTRATION	507 N. Blount Street, Raleigh NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-4763/733-8653
RESTORATION	515 N. Blount Street, Raleigh NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6547/715-4801
SURVEY & PLANNING	515 N. Blount Street, Raleigh, NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6545/715-4801

Enclosure B1: 2005 SHPO Concurrence Letter for Rhodes AFRC.

Thank you for your cooperation and consideration. If you have questions concerning this comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763. In all future communication concerning this project, please cite the above tracking number.

Sincerely,

Handwritten signature of Renee Gledhill-Earley in cursive script.

Handwritten signature of Peter Sandbeck in cursive script, with an arrow pointing to the name.
Peter Sandbeck

Enclosure B2: 2005 SHPO Concurrence Letter for Rhodes AFRC.



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

ARRC-SSC-DPW

June 6, 2011

Lumbee Tribe of North Carolina
Dr. Rose Marie Lowery-Townsend, Tribal Administrator
P.O. Box 2701
Pembroke, NC 28372

Dear Dr. Lowery-Townsend:

In accordance with 36 Code of Federal Regulations, Part 800 and Army Regulation 200-1, the 81st Regional Support Command (RSC) is writing to inform the Lumbee Tribe of North Carolina of the transfer out of Department of the Army ownership of the Adrian B. Rhodes Armed Forces Reserve Center (AFRC) located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina.

The property consists of an administration/training building, an organizational maintenance shop, an unheated storage building, and one vehicle wash rack situated on 4.26 acres of land. The property is bounded on the south and east by Legion Stadium Sports Complex, to the north by Greenfield Lake and to the west by Woodlawn Subdivision (Enclosure A).

The administration/training building is a two-story, 22,581 square-foot brick building originally built in 1955 and expanded to its current size in 1976. The storage building is an unheated, 3,500 square-foot metal building erected on a concrete slab. The OMS is a 3,696 square-foot single story cinder and brick block building constructed in 1967. The vehicle wash rack is the remaining permanent structure on the property. The wash rack is equipped with an underground oil/water separator. A large portion of the Rhodes AFRC property comprises impervious surface features (i.e. asphalt parking areas, driveways, concrete walkways, and building footprints). A review of available aerial photography shows that the vegetated area located in the southwestern corner of the property has been altered for water drainage and is bordered by a manmade linear drainage ditch. No archaeological testing is recommended due to previous disturbance.

Although the facility is more than 50 years old, a letter from the North Carolina State Historic Preservation Office, dated June 9, 2005, states that the property is not eligible for listing in the National Register of Historic Places (Enclosure B). This determination is based on survey findings, which found that the facility has undergone significant architectural alterations and no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

In accordance with the 2005 Defense Base Closure and Realignment Committee (BRAC) legislation, the 81st RSC is requesting any information as to whether the transfer property is of religious or cultural significance to any Federally Recognized Native American Tribes with ancestral ties to this area of North Carolina.

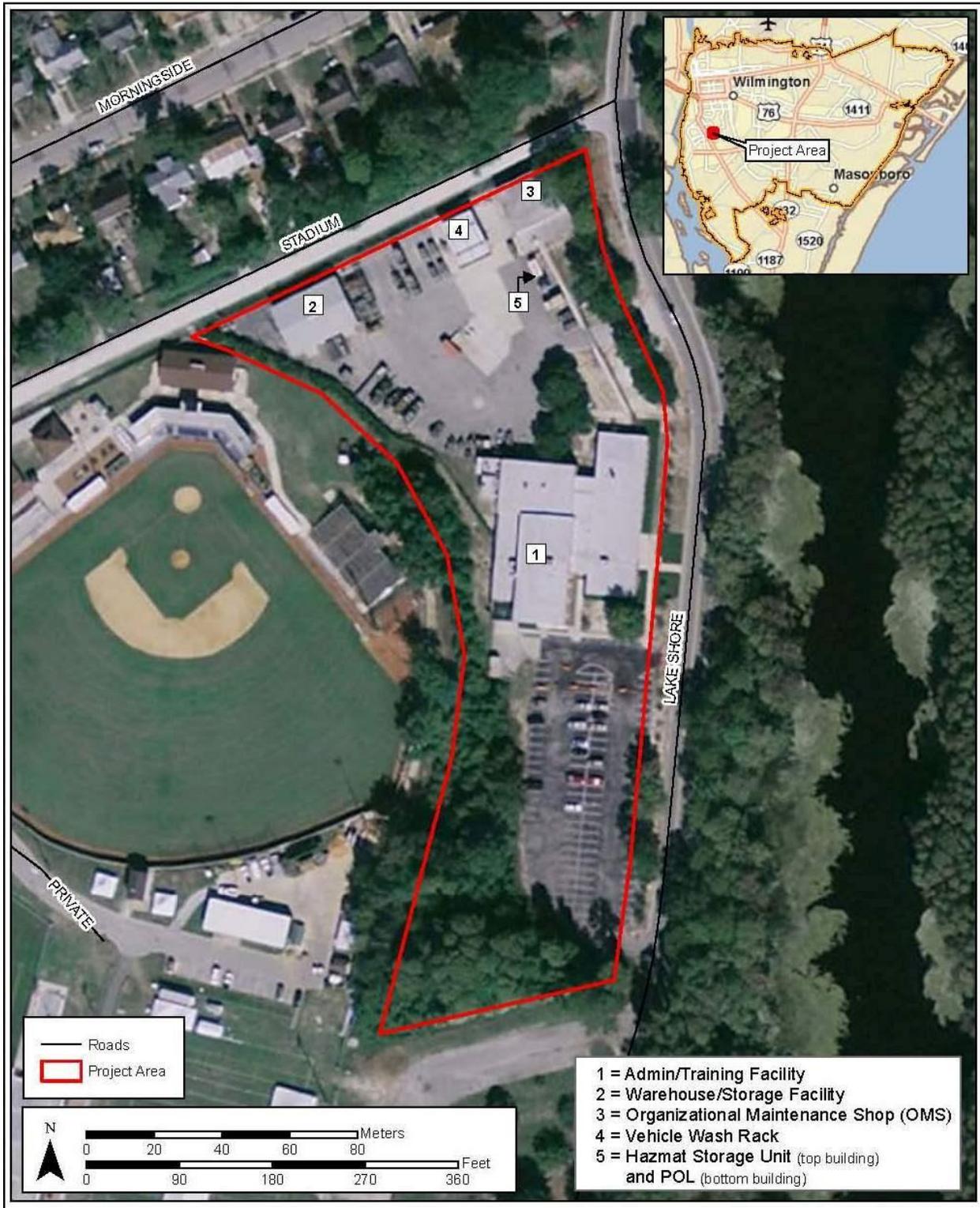
Through this letter, the 81st RSC is seeking consultation with the Lumbee Tribe of North Carolina regarding the proposed property transfer. We request your concurrence and comments on the enclosed determination of eligibility, assessment of effects, and the proposed property transfer, within 30 days of receiving this letter and its supporting materials. If you should have any further questions, please contact Michelle Hook at the 81st RSC via telephone, 803-751-9998, or e-mail, michelle.hook@usar.army.mil. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Daniel H. Thomas III", with a large, sweeping flourish extending to the left.

Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



- 1 = Admin/Training Facility
- 2 = Warehouse/Storage Facility
- 3 = Organizational Maintenance Shop (OMS)
- 4 = Vehicle Wash Rack
- 5 = Hazmat Storage Unit (top building)
and POL (bottom building)

Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

June 9, 2005

Steven Francis, Chief, Environmental Division
Deputy Chief of Staff
Installation Management
Department of the Army
Headquarters, 81ST Regional Readiness Command
255 West Oxmoor Road
Birmingham, AL 35209-6383

Re: 81ST Regional Readiness Command Facilities, Architectural Survey Findings, United States Army Reserve Centers, Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, and South Carolina, ER 03-3053

Dear Mr. Francis:

Thank you for your letter of April 7, 2005 transmitting the survey report concerning the above project. We appreciate the opportunity to comment on the survey findings and apologize for our delayed response. Our comments are limited to the following US Army Reserve Centers:

◆ NC 001	Nivens	Albemarle
◆ NC 004	Walter Lee Hatch	Asheville
◆ NC 007/100 # 1 AMS # 22		Charlotte
◆ NC 022	Rives	Greensboro
◆ NC 032	Thomas Erwin Allen	Lumberton
◆ NC 040	Uriah G. Lucas	Salisbury
◆ NC 045	Rhodes	Wilmington

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the above referenced properties are not eligible for listing in the National Register of Historic Places. This assessment is based on the survey findings, which indicate that all of the facilities have undergone significant architectural alterations. The facilities thus no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

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

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SURVEY & PLANNING	515 N. Blount Street, Raleigh, NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6545/715-4801

Enclosure B1: 2005 SHPO Concurrence Letter for Rhodes AFRC.

Thank you for your cooperation and consideration. If you have questions concerning this comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763. In all future communication concerning this project, please cite the above tracking number.

Sincerely,



 Peter Sandbeck

Enclosure B2: 2005 SHPO Concurrence Letter for Rhodes AFRC.



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

ARRC-SSC-DPW

June 6, 2011

Meherrin Indian Tribe
Tribal Administrator
P.O. Box 508
Winton, NC 27986

Dear Tribal Administrator:

In accordance with 36 Code of Federal Regulations, Part 800 and Army Regulation 200-1, the 81st Regional Support Command (RSC) is writing to inform the Meherrin Indian Tribe of the transfer out of Department of the Army ownership of the Adrian B. Rhodes Armed Forces Reserve Center (AFRC) located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina.

The property consists of an administration/training building, an organizational maintenance shop, an unheated storage building, and one vehicle wash rack situated on 4.26 acres of land. The property is bounded on the south and east by Legion Stadium Sports Complex, to the north by Greenfield Lake and to the west by Woodlawn Subdivision (Enclosure A).

The administration/training building is a two-story, 22,581 square-foot brick building originally built in 1955 and expanded to its current size in 1976. The storage building is an unheated, 3,500 square-foot metal building erected on a concrete slab. The OMS is a 3,696 square-foot single story cinder and brick block building constructed in 1967. The vehicle wash rack is the remaining permanent structure on the property. The wash rack is equipped with an underground oil/water separator. A large portion of the Rhodes AFRC property comprises impervious surface features (i.e. asphalt parking areas, driveways, concrete walkways, and building footprints). A review of available aerial photography shows that the vegetated area located in the southwestern corner of the property has been altered for water drainage and is bordered by a manmade linear drainage ditch. No archaeological testing is recommended due to previous disturbance.

Although the facility is more than 50 years old, a letter from the North Carolina State Historic Preservation Office, dated June 9, 2005, states that the property is not eligible for listing in the National Register of Historic Places (Enclosure B). This determination is based on survey findings, which found that the facility has undergone significant architectural alterations and no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

In accordance with the 2005 Defense Base Closure and Realignment Committee (BRAC) legislation, the 81st RSC is requesting any information as to whether the transfer property is of religious or cultural significance to any Federally Recognized Native American Tribes with ancestral ties to this area of North Carolina.

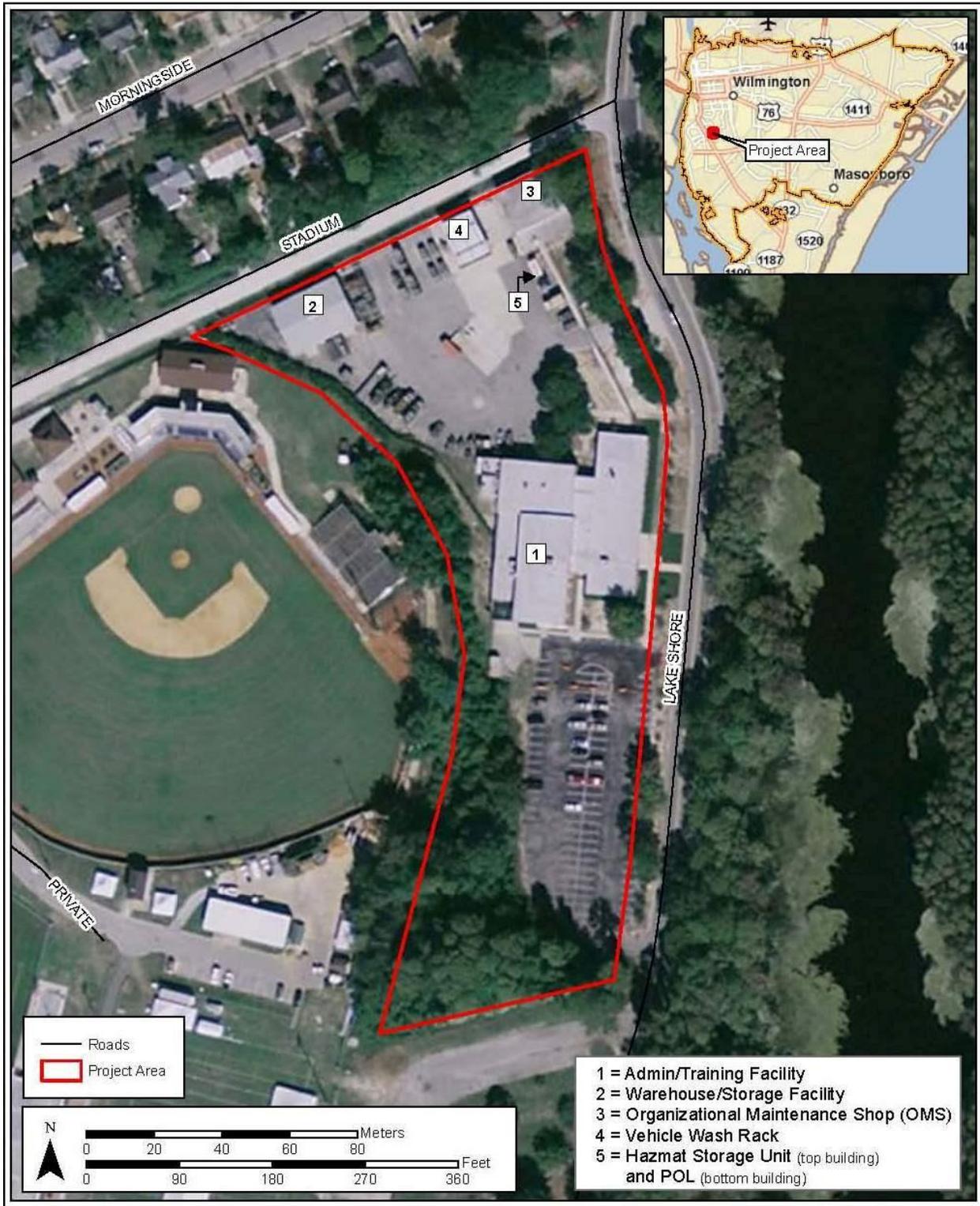
Through this letter, the 81st RSC is seeking consultation with the Meherrin Indian Tribe regarding the proposed property transfer. We request your concurrence and comments on the enclosed determination of eligibility, assessment of effects, and the proposed property transfer, within 30 days of receiving this letter and its supporting materials. If you should have any further questions, please contact Michelle Hook at the 81st RSC via telephone, 803-751-9998, or e-mail, michelle.hook@usar.army.mil. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in purple ink, appearing to read "Daniel H. Thomas III", is written over the typed name.

Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

June 9, 2005

Steven Francis, Chief, Environmental Division
Deputy Chief of Staff
Installation Management
Department of the Army
Headquarters, 81ST Regional Readiness Command
255 West Oxmoor Road
Birmingham, AL 35209-6383

Re: 81ST Regional Readiness Command Facilities, Architectural Survey Findings, United States Army Reserve Centers, Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, and South Carolina, ER 03-3053

Dear Mr. Francis:

Thank you for your letter of April 7, 2005 transmitting the survey report concerning the above project. We appreciate the opportunity to comment on the survey findings and apologize for our delayed response. Our comments are limited to the following US Army Reserve Centers:

◆ NC 001	Nivens	Albemarle
◆ NC 004	Walter Lee Hatch	Asheville
◆ NC 007/100 # 1 AMS # 22		Charlotte
◆ NC 022	Rives	Greensboro
◆ NC 032	Thomas Erwin Allen	Lumberton
◆ NC 040	Uriah G. Lucas	Salisbury
◆ NC 045	Rhodes	Wilmington

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the above referenced properties are not eligible for listing in the National Register of Historic Places. This assessment is based on the survey findings, which indicate that all of the facilities have undergone significant architectural alterations. The facilities thus no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

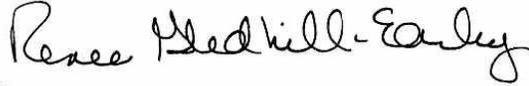
The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

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ADMINISTRATION	507 N. Blount Street, Raleigh NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-4763/733-8653
RESTORATION	515 N. Blount Street, Raleigh NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6547/715-4801
SURVEY & PLANNING	515 N. Blount Street, Raleigh, NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6545/715-4801

Enclosure B1: 2005 SHPO Concurrence Letter for Rhodes AFRC.

Thank you for your cooperation and consideration. If you have questions concerning this comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763. In all future communication concerning this project, please cite the above tracking number.

Sincerely,

A handwritten signature in cursive script that reads "Renee Gledhill-Earley".A handwritten signature in cursive script that reads "Peter Sandbeck".

Peter Sandbeck

Enclosure B2: 2005 SHPO Concurrence Letter for Rhodes AFRC.



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

ARRC-SSC-DPW

June 6, 2011

Metrolina Native American Association
Rebecca Laclaire, Executive Director
8001 N. Tryon Street
Charlotte, NC 28262

Dear Ms. Laclaire:

In accordance with 36 Code of Federal Regulations, Part 800 and Army Regulation 200-1, the 81st Regional Support Command (RSC) is writing to inform the Metrolina Native American Association of the transfer out of Department of the Army ownership of the Adrian B. Rhodes Armed Forces Reserve Center (AFRC) located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina.

The property consists of an administration/training building, an organizational maintenance shop, an unheated storage building, and one vehicle wash rack situated on 4.26 acres of land. The property is bounded on the south and east by Legion Stadium Sports Complex, to the north by Greenfield Lake and to the west by Woodlawn Subdivision (Enclosure A).

The administration/training building is a two-story, 22,581 square-foot brick building originally built in 1955 and expanded to its current size in 1976. The storage building is an unheated, 3,500 square-foot metal building erected on a concrete slab. The OMS is a 3,696 square-foot single story cinder and brick block building constructed in 1967. The vehicle wash rack is the remaining permanent structure on the property. The wash rack is equipped with an underground oil/water separator. A large portion of the Rhodes AFRC property comprises impervious surface features (i.e. asphalt parking areas, driveways, concrete walkways, and building footprints). A review of available aerial photography shows that the vegetated area located in the southwestern corner of the property has been altered for water drainage and is bordered by a manmade linear drainage ditch. No archaeological testing is recommended due to previous disturbance.

Although the facility is more than 50 years old, a letter from the North Carolina State Historic Preservation Office, dated June 9, 2005, states that the property is not eligible for listing in the National Register of Historic Places (Enclosure B). This determination is based on survey findings, which found that the facility has undergone significant architectural alterations and no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

In accordance with the 2005 Defense Base Closure and Realignment Committee (BRAC) legislation, the 81st RSC is requesting any information as to whether the transfer property is of religious or cultural significance to any Federally Recognized Native American Tribes with ancestral ties to this area of North Carolina.

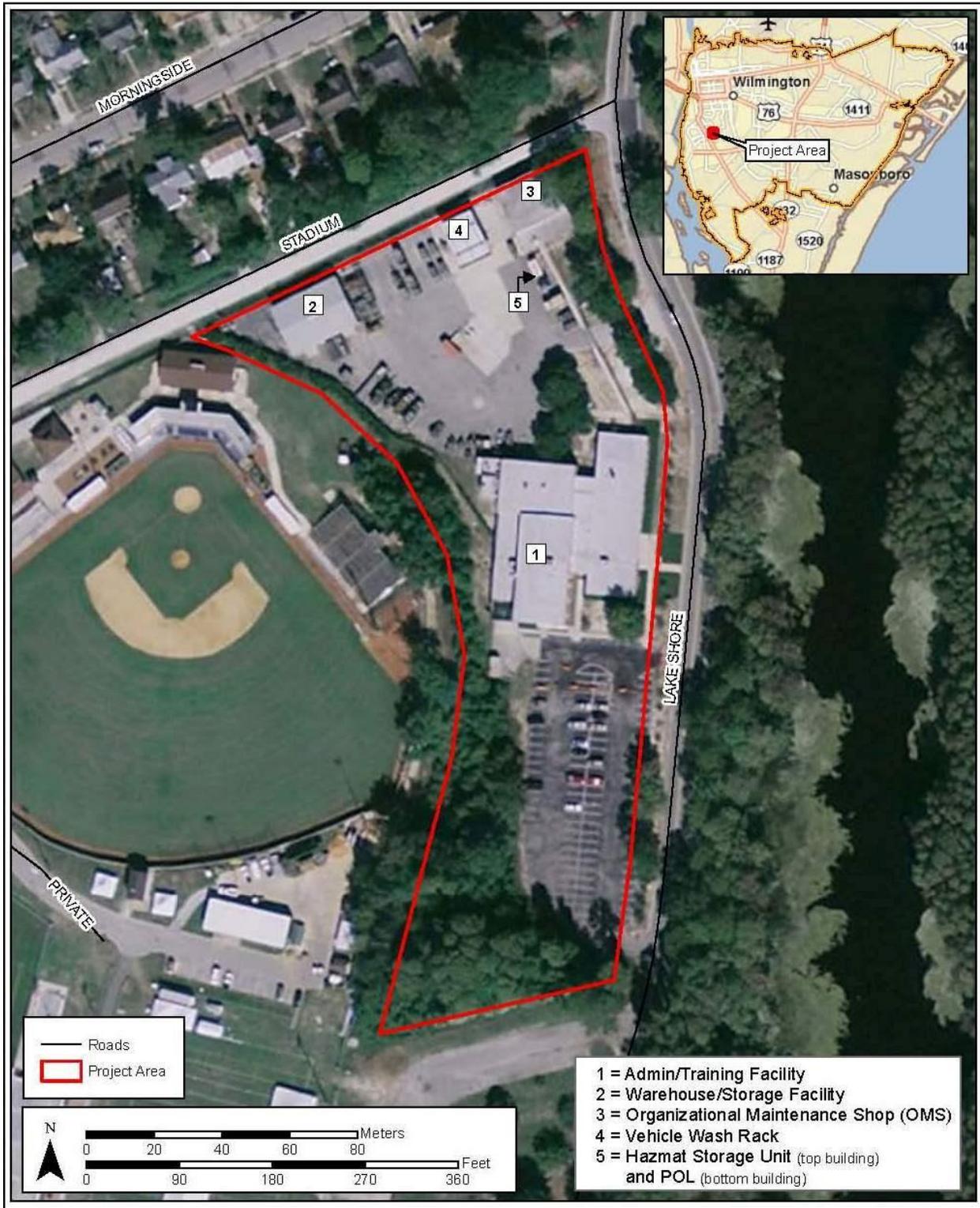
Through this letter, the 81st RSC is seeking consultation with the Metrolina Native American Association regarding the proposed property transfer. We request your concurrence and comments on the enclosed determination of eligibility, assessment of effects, and the proposed property transfer, within 30 days of receiving this letter and its supporting materials. If you should have any further questions, please contact Michelle Hook at the 81st RSC via telephone, 803-751-9998, or e-mail, michelle.hook@usar.army.mil. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel H. Thomas III", written over a horizontal line.

Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

June 9, 2005

Steven Francis, Chief, Environmental Division
Deputy Chief of Staff
Installation Management
Department of the Army
Headquarters, 81ST Regional Readiness Command
255 West Oxmoor Road
Birmingham, AL 35209-6383

Re: 81ST Regional Readiness Command Facilities, Architectural Survey Findings, United States Army Reserve Centers, Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, and South Carolina, ER 03-3053

Dear Mr. Francis:

Thank you for your letter of April 7, 2005 transmitting the survey report concerning the above project. We appreciate the opportunity to comment on the survey findings and apologize for our delayed response. Our comments are limited to the following US Army Reserve Centers:

◆ NC 001	Nivens	Albemarle
◆ NC 004	Walter Lee Hatch	Asheville
◆ NC 007/100 # 1 AMS # 22		Charlotte
◆ NC 022	Rives	Greensboro
◆ NC 032	Thomas Erwin Allen	Lumberton
◆ NC 040	Uriah G. Lucas	Salisbury
◆ NC 045	Rhodes	Wilmington

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the above referenced properties are not eligible for listing in the National Register of Historic Places. This assessment is based on the survey findings, which indicate that all of the facilities have undergone significant architectural alterations. The facilities thus no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

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RESTORATION	515 N. Blount Street, Raleigh NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6547/715-4801
SURVEY & PLANNING	515 N. Blount Street, Raleigh, NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6545/715-4801

Enclosure B1: 2005 SHPO Concurrence Letter for Rhodes AFRC.

Thank you for your cooperation and consideration. If you have questions concerning this comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763. In all future communication concerning this project, please cite the above tracking number.

Sincerely,



 Peter Sandbeck

Enclosure B2: 2005 SHPO Concurrence Letter for Rhodes AFRC.



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

ARRC-SSC-DPW

June 6, 2011

Occanecchi Band of Saponi Nation
Margie P. Watkins, Office Manager
103 E. Center Street
Mebane, NC 27302

Dear Ms. Watkins:

In accordance with 36 Code of Federal Regulations, Part 800 and Army Regulation 200-1, the 81st Regional Support Command (RSC) is writing to inform the Occanecchi Band of Saponi Nation of the transfer out of Department of the Army ownership of the Adrian B. Rhodes Armed Forces Reserve Center (AFRC) located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina.

The property consists of an administration/training building, an organizational maintenance shop, an unheated storage building, and one vehicle wash rack situated on 4.26 acres of land. The property is bounded on the south and east by Legion Stadium Sports Complex, to the north by Greenfield Lake and to the west by Woodlawn Subdivision (Enclosure A).

The administration/training building is a two-story, 22,581 square-foot brick building originally built in 1955 and expanded to its current size in 1976. The storage building is an unheated, 3,500 square-foot metal building erected on a concrete slab. The OMS is a 3,696 square-foot single story cinder and brick block building constructed in 1967. The vehicle wash rack is the remaining permanent structure on the property. The wash rack is equipped with an underground oil/water separator. A large portion of the Rhodes AFRC property comprises impervious surface features (i.e. asphalt parking areas, driveways, concrete walkways, and building footprints). A review of available aerial photography shows that the vegetated area located in the southwestern corner of the property has been altered for water drainage and is bordered by a manmade linear drainage ditch. No archaeological testing is recommended due to previous disturbance.

Although the facility is more than 50 years old, a letter from the North Carolina State Historic Preservation Office, dated June 9, 2005, states that the property is not eligible for listing in the National Register of Historic Places (Enclosure B). This determination is based on survey findings, which found that the facility has undergone significant architectural alterations and no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

In accordance with the 2005 Defense Base Closure and Realignment Committee (BRAC) legislation, the 81st RSC is requesting any information as to whether the transfer property is of religious or cultural significance to any Federally Recognized Native American Tribes with ancestral ties to this area of North Carolina.

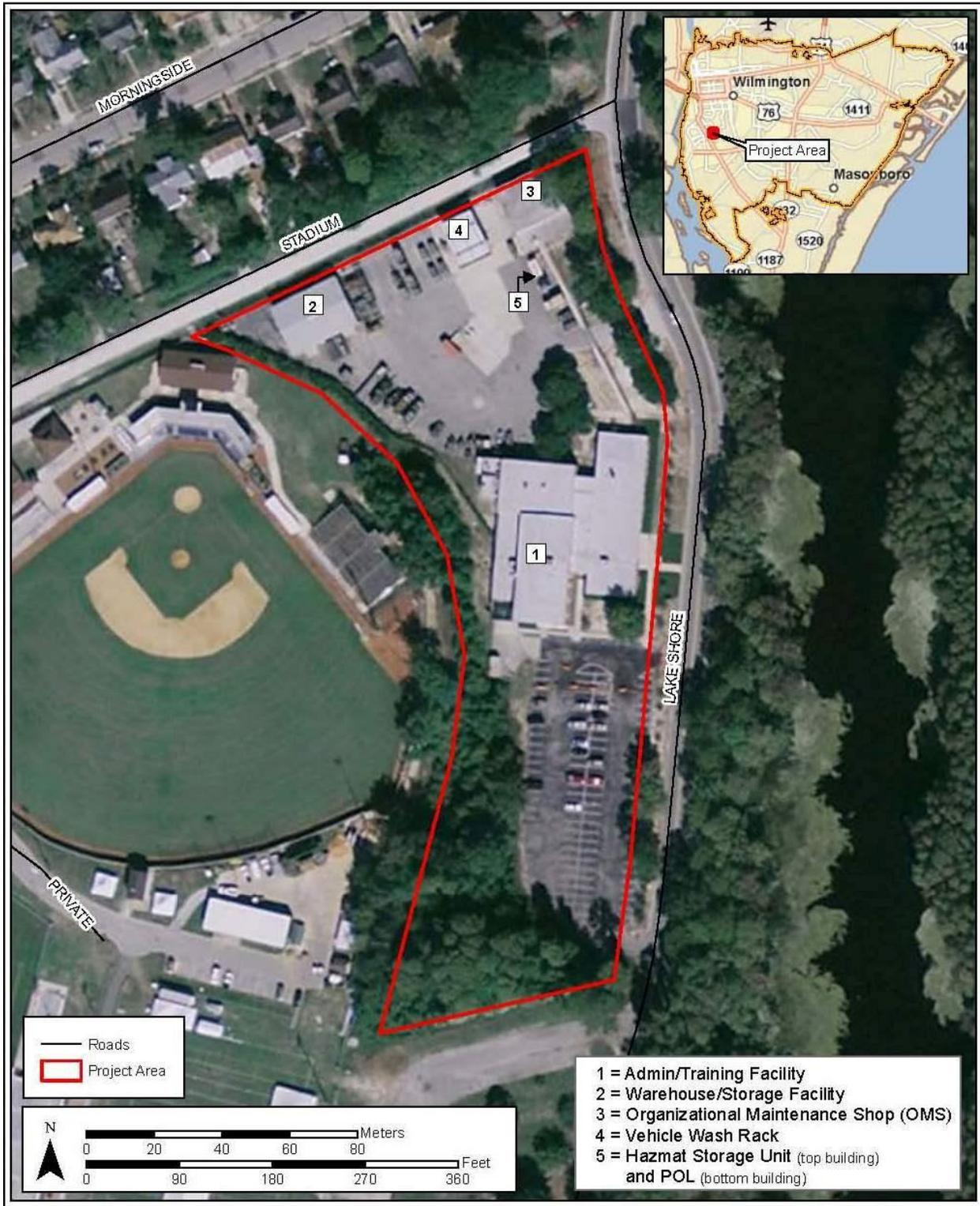
Through this letter, the 81st RSC is seeking consultation with the Occaneechi Band of Saponi Nation regarding the proposed property transfer. We request your concurrence and comments on the enclosed determination of eligibility, assessment of effects, and the proposed property transfer, within 30 days of receiving this letter and its supporting materials. If you should have any further questions, please contact Michelle Hook at the 81st RSC via telephone, 803-751-9998, or e-mail, michelle.hook@usar.army.mil. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in purple ink, appearing to read "D. H. Thomas III", with a large, sweeping flourish extending to the left.

Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

June 9, 2005

Steven Francis, Chief, Environmental Division
Deputy Chief of Staff
Installation Management
Department of the Army
Headquarters, 81ST Regional Readiness Command
255 West Oxmoor Road
Birmingham, AL 35209-6383

Re: 81ST Regional Readiness Command Facilities, Architectural Survey Findings, United States Army Reserve Centers, Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, and South Carolina, ER 03-3053

Dear Mr. Francis:

Thank you for your letter of April 7, 2005 transmitting the survey report concerning the above project. We appreciate the opportunity to comment on the survey findings and apologize for our delayed response. Our comments are limited to the following US Army Reserve Centers:

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◆ NC 040	Uriah G. Lucas	Salisbury
◆ NC 045	Rhodes	Wilmington

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the above referenced properties are not eligible for listing in the National Register of Historic Places. This assessment is based on the survey findings, which indicate that all of the facilities have undergone significant architectural alterations. The facilities thus no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

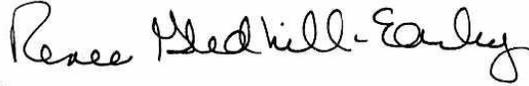
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SURVEY & PLANNING	515 N. Blount Street, Raleigh, NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6545/715-4801

Enclosure B1: 2005 SHPO Concurrence Letter for Rhodes AFRC.

Thank you for your cooperation and consideration. If you have questions concerning this comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763. In all future communication concerning this project, please cite the above tracking number.

Sincerely,

A handwritten signature in cursive script that reads "Renee Gledhill-Earley".A handwritten signature in cursive script that reads "Peter Sandbeck".

Peter Sandbeck

Enclosure B2: 2005 SHPO Concurrence Letter for Rhodes AFRC.



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

ARRC-SSC-DPW

June 6, 2011

Sappony
Dante Desiderio, Executive Director
4218 Virgilina Road
Virgilina, VA 24598

Dear Mr. Desiderio:

In accordance with 36 Code of Federal Regulations, Part 800 and Army Regulation 200-1, the 81st Regional Support Command (RSC) is writing to inform the Sappony of the transfer out of Department of the Army ownership of the Adrian B. Rhodes Armed Forces Reserve Center (AFRC) located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina.

The property consists of an administration/training building, an organizational maintenance shop, an unheated storage building, and one vehicle wash rack situated on 4.26 acres of land. The property is bounded on the south and east by Legion Stadium Sports Complex, to the north by Greenfield Lake and to the west by Woodlawn Subdivision (Enclosure A).

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In accordance with the 2005 Defense Base Closure and Realignment Committee (BRAC) legislation, the 81st RSC is requesting any information as to whether the transfer property is of religious or cultural significance to any Federally Recognized Native American Tribes with ancestral ties to this area of North Carolina.

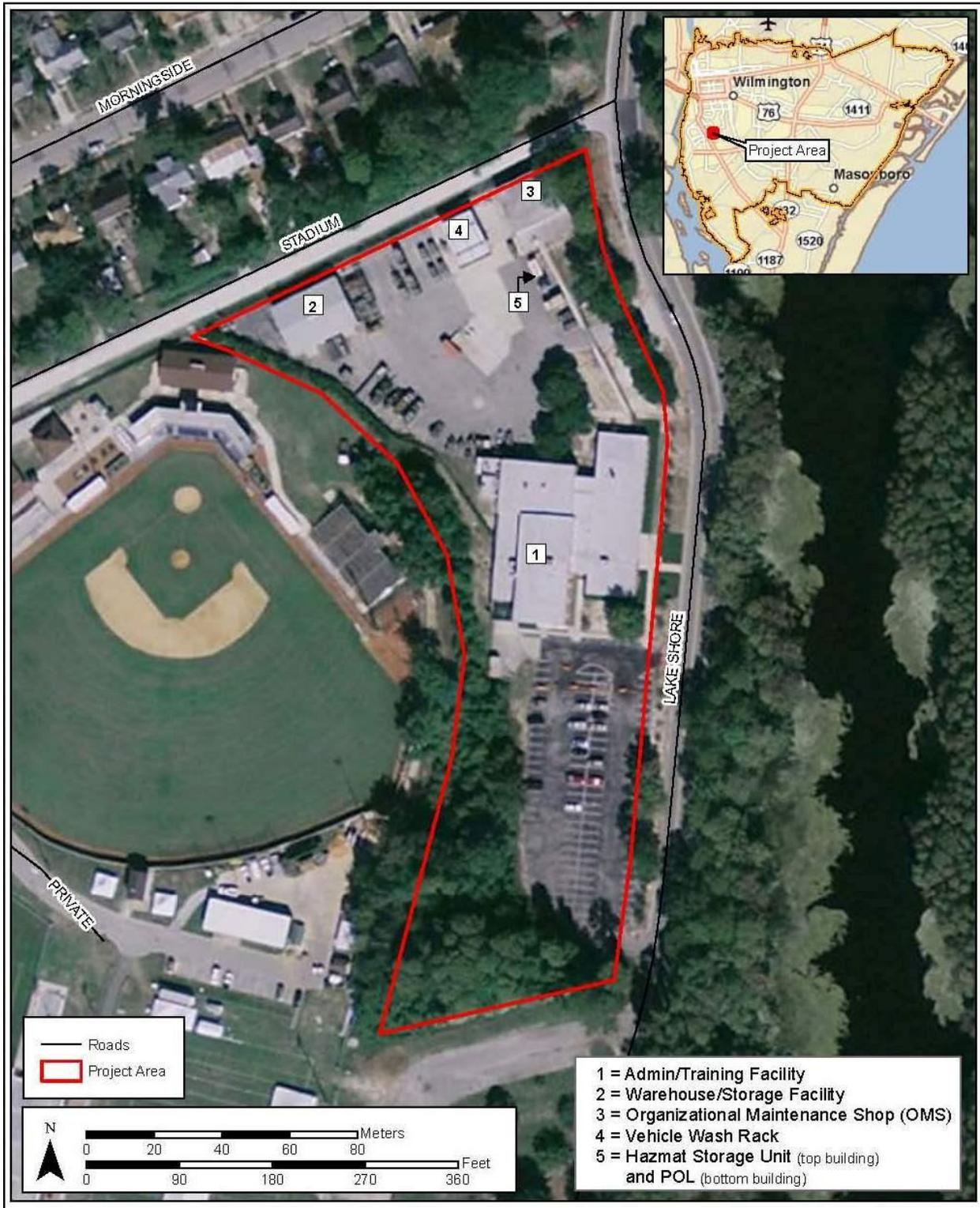
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Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel H. Thomas III", written over a horizontal line.

Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

June 9, 2005

Steven Francis, Chief, Environmental Division
Deputy Chief of Staff
Installation Management
Department of the Army
Headquarters, 81ST Regional Readiness Command
255 West Oxmoor Road
Birmingham, AL 35209-6383

Re: 81ST Regional Readiness Command Facilities, Architectural Survey Findings, United States Army Reserve Centers, Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, and South Carolina, ER 03-3053

Dear Mr. Francis:

Thank you for your letter of April 7, 2005 transmitting the survey report concerning the above project. We appreciate the opportunity to comment on the survey findings and apologize for our delayed response. Our comments are limited to the following US Army Reserve Centers:

◆ NC 001	Nivens	Albemarle
◆ NC 004	Walter Lee Hatch	Asheville
◆ NC 007/100 # 1 AMS # 22		Charlotte
◆ NC 022	Rives	Greensboro
◆ NC 032	Thomas Erwin Allen	Lumberton
◆ NC 040	Uriah G. Lucas	Salisbury
◆ NC 045	Rhodes	Wilmington

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the above referenced properties are not eligible for listing in the National Register of Historic Places. This assessment is based on the survey findings, which indicate that all of the facilities have undergone significant architectural alterations. The facilities thus no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

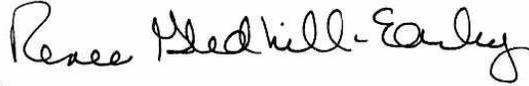
The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.

	Location	Mailing Address	Telephone/Fax
ADMINISTRATION	507 N. Blount Street, Raleigh NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-4763/733-8653
RESTORATION	515 N. Blount Street, Raleigh NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6547/715-4801
SURVEY & PLANNING	515 N. Blount Street, Raleigh, NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6545/715-4801

Enclosure B1: 2005 SHPO Concurrence Letter for Rhodes AFRC.

Thank you for your cooperation and consideration. If you have questions concerning this comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763. In all future communication concerning this project, please cite the above tracking number.

Sincerely,

A handwritten signature in cursive script that reads "Renee Gledhill-Earley".A handwritten signature in cursive script that reads "Peter Sandbeck".

Peter Sandbeck

Enclosure B2: 2005 SHPO Concurrence Letter for Rhodes AFRC.



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

ARRC-SSC-DPW

June 6, 2011

Triangle Native American Society
Tribal Administrator
P.O. Box 26841
Raleigh, NC 27611

Dear Tribal Administrator:

In accordance with 36 Code of Federal Regulations, Part 800 and Army Regulation 200-1, the 81st Regional Support Command (RSC) is writing to inform the Triangle Native American Society of the transfer out of Department of the Army ownership of the Adrian B. Rhodes Armed Forces Reserve Center (AFRC) located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina.

The property consists of an administration/training building, an organizational maintenance shop, an unheated storage building, and one vehicle wash rack situated on 4.26 acres of land. The property is bounded on the south and east by Legion Stadium Sports Complex, to the north by Greenfield Lake and to the west by Woodlawn Subdivision (Enclosure A).

The administration/training building is a two-story, 22,581 square-foot brick building originally built in 1955 and expanded to its current size in 1976. The storage building is an unheated, 3,500 square-foot metal building erected on a concrete slab. The OMS is a 3,696 square-foot single story cinder and brick block building constructed in 1967. The vehicle wash rack is the remaining permanent structure on the property. The wash rack is equipped with an underground oil/water separator. A large portion of the Rhodes AFRC property comprises impervious surface features (i.e. asphalt parking areas, driveways, concrete walkways, and building footprints). A review of available aerial photography shows that the vegetated area located in the southwestern corner of the property has been altered for water drainage and is bordered by a manmade linear drainage ditch. No archaeological testing is recommended due to previous disturbance.

Although the facility is more than 50 years old, a letter from the North Carolina State Historic Preservation Office, dated June 9, 2005, states that the property is not eligible for listing in the National Register of Historic Places (Enclosure B). This determination is based on survey findings, which found that the facility has undergone significant architectural alterations and no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

In accordance with the 2005 Defense Base Closure and Realignment Committee (BRAC) legislation, the 81st RSC is requesting any information as to whether the transfer property is of religious or cultural significance to any Federally Recognized Native American Tribes with ancestral ties to this area of North Carolina.

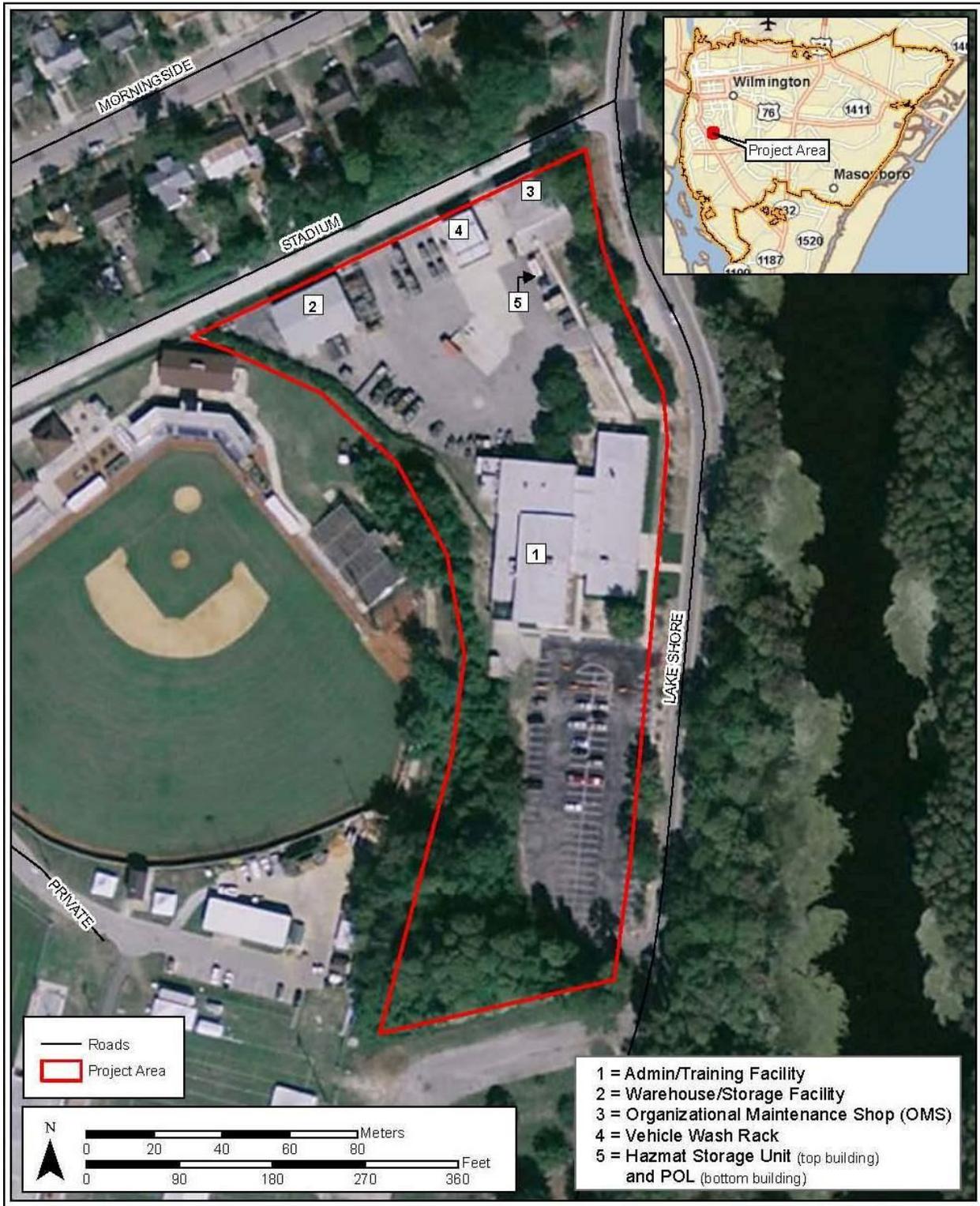
Through this letter, the 81st RSC is seeking consultation with the Triangle Native American Society regarding the proposed property transfer. We request your concurrence and comments on the enclosed determination of eligibility, assessment of effects, and the proposed property transfer, within 30 days of receiving this letter and its supporting materials. If you should have any further questions, please contact Michelle Hook at the 81st RSC via telephone, 803-751-9998, or e-mail, michelle.hook@usar.army.mil. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel H. Thomas III", written over a horizontal line.

Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



- 1 = Admin/Training Facility
- 2 = Warehouse/Storage Facility
- 3 = Organizational Maintenance Shop (OMS)
- 4 = Vehicle Wash Rack
- 5 = Hazmat Storage Unit (top building) and POL (bottom building)

Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

June 9, 2005

Steven Francis, Chief, Environmental Division
Deputy Chief of Staff
Installation Management
Department of the Army
Headquarters, 81ST Regional Readiness Command
255 West Oxmoor Road
Birmingham, AL 35209-6383

Re: 81ST Regional Readiness Command Facilities, Architectural Survey Findings, United States Army Reserve Centers, Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, and South Carolina, ER 03-3053

Dear Mr. Francis:

Thank you for your letter of April 7, 2005 transmitting the survey report concerning the above project. We appreciate the opportunity to comment on the survey findings and apologize for our delayed response. Our comments are limited to the following US Army Reserve Centers:

◆ NC 001	Nivens	Albemarle
◆ NC 004	Walter Lee Hatch	Asheville
◆ NC 007/100 # 1 AMS # 22		Charlotte
◆ NC 022	Rives	Greensboro
◆ NC 032	Thomas Erwin Allen	Lumberton
◆ NC 040	Uriah G. Lucas	Salisbury
◆ NC 045	Rhodes	Wilmington

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the above referenced properties are not eligible for listing in the National Register of Historic Places. This assessment is based on the survey findings, which indicate that all of the facilities have undergone significant architectural alterations. The facilities thus no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

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SURVEY & PLANNING	515 N. Blount Street, Raleigh, NC	4617 Mail Service Center, Raleigh NC 27699-4617	(919)733-6545/715-4801

Enclosure B1: 2005 SHPO Concurrence Letter for Rhodes AFRC.

Thank you for your cooperation and consideration. If you have questions concerning this comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763. In all future communication concerning this project, please cite the above tracking number.

Sincerely,



 Peter Sandbeck

Enclosure B2: 2005 SHPO Concurrence Letter for Rhodes AFRC.



DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

REPLY TO
ATTENTION OF:

ARRC-SSC-DPW

June 6, 2011

Mr. Samuel K. "Ken" Jolly, Chief
Regulatory Division
US Army Corps of Engineers
69 Darlington Avenue
Wilmington, NC 28403

Dear Mr. Jolly:

On May 16, 2005, the Defense Base Closure and Realignment Commission (BRAC Commission) recommended the transformation (closure and/or relocation) of certain actions concerning United States Army Reserve Centers (USARC) in North Carolina. These recommendations were approved by the President on September 23, 2005, and forwarded to Congress. The Congress did not alter any of the BRAC Commission's recommendations, and on November 9, 2005, the recommendations became law. The BRAC Commission recommendations must now be implemented as provided for in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), as amended.

The BRAC Commission recommended the closure of the Adrian B. Rhodes Armed Forces Reserve Center (Rhodes AFRC) and relocation to a new AFRC and Operational Maintenance Shop in Wilmington, North Carolina. To enable implementation of this recommendation, the Army proposes to transfer ownership of the Rhodes AFRC facilities. The recipient of the Rhodes AFRC will be the City of Wilmington Local Redevelopment Authority (LRA). The U.S. Army Corps of Engineers (USACE), Mobile District is in the process of preparing an Environmental Assessment (EA), which will assess the potential environmental impacts of disposal and reuse of the Rhodes AFRC.

Although the 4.26-acre property is largely developed, the National Wetlands Inventory indicates wetlands in the southwestern portion of the property. Vegetation within this area consists of bald cypress (*Taxodium distichum*), swamp tupelo (*Nyssa sylvatica* var. *biflora*), red bay (*Persea borbonia*), Carolina willow (*Salix caroliniana*), various pine species (*Pinus* spp.) and other trees and shrubs. Soils in the area are mapped as Murville fine sand, a hydric soil. This area is connected to Greenfield Lake by a culvert under West Lake Shore Drive and appears to comprise jurisdictional wetlands. Enclosure A is an aerial photograph showing the developed nature of the site and adjacent development. The plan of development does not expand the existing footprint of development and wetland impacts are not proposed for the reuse of the Rhodes AFRC property.

This EA is being prepared in compliance with the National Environmental Policy Act of 1969. The environmental issues analyzed will identify the potential impacts of implementing this property transfer and lead to either a Finding of No Significant Impact or a decision to prepare an Environmental Impact Statement. The Environmental Impact Analysis Process (EIAP) will assist USACE in making an informed decision regarding transfer of the Rhodes AFRC to the City of Wilmington LRA. In support of this process, the 81st RSC is seeking your input in identifying general or specific issues or areas of concern you feel should be addressed in the EIAP.

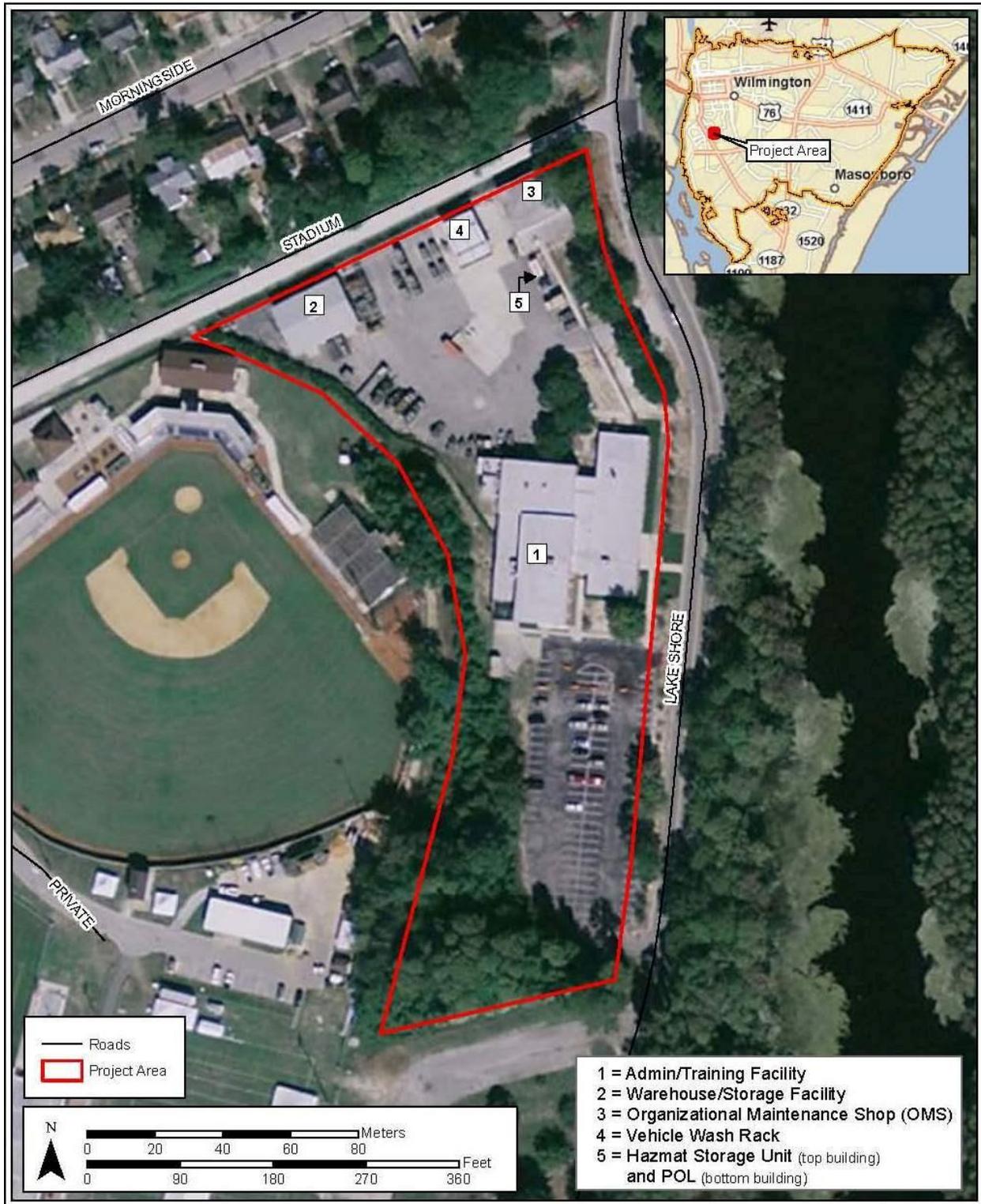
Your prompt attention and cooperation would be greatly appreciated. If you have questions or concerns about this project, please contact Ms. Michelle Hook, Environmental Protection Specialist, 81st Regional Support Command at (803) 751-9998, within thirty (30) days of receipt of this letter. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Daniel H. Thomas III", with a stylized flourish at the end.

Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosure



Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
HEADQUARTERS, 81ST REGIONAL SUPPORT COMMAND
1525 MARION AVENUE
FORT JACKSON, SC 29207-6807

ARRC-SSC-DPW

June 6, 2011

Waccama Siouan Tribe
Tribal Administrator
P.O. Box 69
Bolton, NC 28423

Dear Tribal Administrator:

In accordance with 36 Code of Federal Regulations, Part 800 and Army Regulation 200-1, the 81st Regional Support Command (RSC) is writing to inform the Waccama Siouan Tribe of the transfer out of Department of the Army ownership of the Adrian B. Rhodes Armed Forces Reserve Center (AFRC) located at 2144 West Lake Shore Drive, Wilmington, New Hanover County, North Carolina.

The property consists of an administration/training building, an organizational maintenance shop, an unheated storage building, and one vehicle wash rack situated on 4.26 acres of land. The property is bounded on the south and east by Legion Stadium Sports Complex, to the north by Greenfield Lake and to the west by Woodlawn Subdivision (Enclosure A).

The administration/training building is a two-story, 22,581 square-foot brick building originally built in 1955 and expanded to its current size in 1976. The storage building is an unheated, 3,500 square-foot metal building erected on a concrete slab. The OMS is a 3,696 square-foot single story cinder and brick block building constructed in 1967. The vehicle wash rack is the remaining permanent structure on the property. The wash rack is equipped with an underground oil/water separator. A large portion of the Rhodes AFRC property comprises impervious surface features (i.e. asphalt parking areas, driveways, concrete walkways, and building footprints). A review of available aerial photography shows that the vegetated area located in the southwestern corner of the property has been altered for water drainage and is bordered by a manmade linear drainage ditch. No archaeological testing is recommended due to previous disturbance.

Although the facility is more than 50 years old, a letter from the North Carolina State Historic Preservation Office, dated June 9, 2005, states that the property is not eligible for listing in the National Register of Historic Places (Enclosure B). This determination is based on survey findings, which found that the facility has undergone significant architectural alterations and no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

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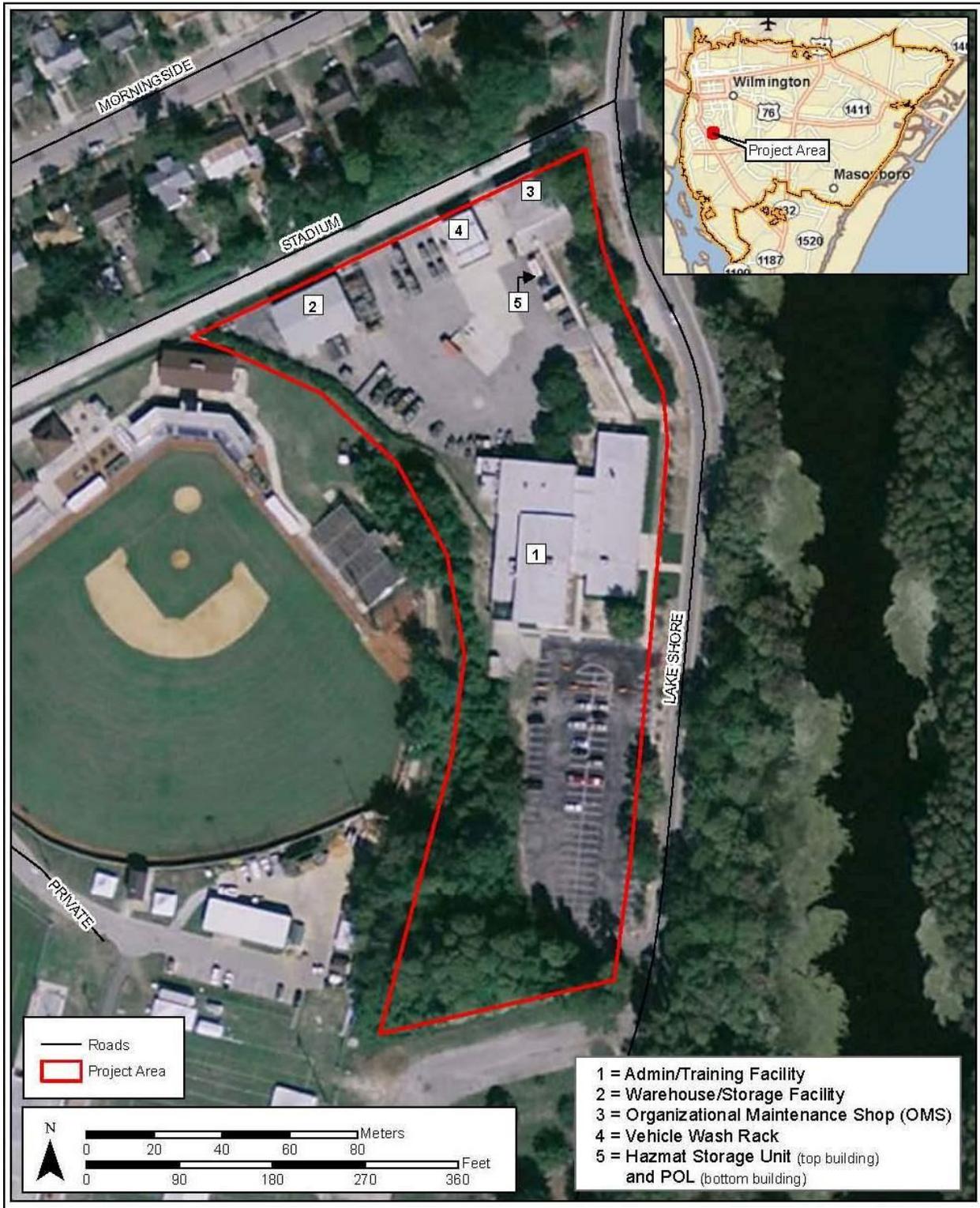
Through this letter, the 81st RSC is seeking consultation with the Waccama Siouan Tribe regarding the proposed property transfer. We request your concurrence and comments on the enclosed determination of eligibility, assessment of effects, and the proposed property transfer, within 30 days of receiving this letter and its supporting materials. If you should have any further questions, please contact Michelle Hook at the 81st RSC via telephone, 803-751-9998, or e-mail, michelle.hook@usar.army.mil. The mailing address is, Attn: Michelle Hook, 81st RSC HQ, 1525 Marion Avenue, Fort Jackson, South Carolina 29207-6807. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. H. Thomas III", written over a horizontal line.

Daniel H. Thomas III
Chief, Environmental Division
81st Regional Support Command

Enclosures



Enclosure A: Aerial view of the Rhodes AFRC property and facilities.



North Carolina Department of Cultural Resources
State Historic Preservation Office

Peter B. Sandbeck, Administrator

Michael F. Easley, Governor
Lisbeth C. Evans, Secretary
Jeffrey J. Crow, Deputy Secretary

Office of Archives and History
Division of Historical Resources
David Brook, Director

June 9, 2005

Steven Francis, Chief, Environmental Division
Deputy Chief of Staff
Installation Management
Department of the Army
Headquarters, 81ST Regional Readiness Command
255 West Oxmoor Road
Birmingham, AL 35209-6383

Re: 81ST Regional Readiness Command Facilities, Architectural Survey Findings, United States Army Reserve Centers, Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, and South Carolina, ER 03-3053

Dear Mr. Francis:

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◆ NC 001	Nivens	Albemarle
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◆ NC 007/100 # 1 AMS # 22		Charlotte
◆ NC 022	Rives	Greensboro
◆ NC 032	Thomas Erwin Allen	Lumberton
◆ NC 040	Uriah G. Lucas	Salisbury
◆ NC 045	Rhodes	Wilmington

For the purpose of compliance with Section 106 of the National Historic Preservation Act, we concur that the above referenced properties are not eligible for listing in the National Register of Historic Places. This assessment is based on the survey findings, which indicate that all of the facilities have undergone significant architectural alterations. The facilities thus no longer convey their period of significance, nor do they exhibit any elements of exceptional significance related to the Cold War Era.

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Enclosure B1: 2005 SHPO Concurrence Letter for Rhodes AFRC.

Thank you for your cooperation and consideration. If you have questions concerning this comment, please contact Renee Gledhill-Earley, environmental review coordinator, at 919/733-4763. In all future communication concerning this project, please cite the above tracking number.

Sincerely,

A handwritten signature in cursive script that reads "Renee Gledhill-Earley".A handwritten signature in cursive script that reads "Peter Sandbeck".

Peter Sandbeck

Enclosure B2: 2005 SHPO Concurrence Letter for Rhodes AFRC.

APPENDIX C
LRA PLAN AND APPROVAL





City Manager's Office
102 North Third Street
PO Box 1810
Wilmington, NC 28402-1810

910 341-7810
910 341-5839 fax
wilmingtonnc.gov
Dial 711 TTY/Voice



July 7, 2010

Mr. Michael Wilson
Office of Economic Adjustment
Office of the Secretary of Defense
Suite 200
400 Army Navy Drive
Arlington, VA 2202-4704

Dear Michael,

Please find enclosed a copy of the Amendment to the Adrian B. Rhodes Armed Forces Reserve Center Redevelopment Plan, as approved by the Local Redevelopment Authority on July 6, 2010. The Wilmington City Council adopted the Amendment by unanimous vote at last night's meeting.

This submission represents a milestone for both the City of Wilmington and our proposed partners, the Lakeside Partnership (LP). We are pleased that we have reached agreement on the terms under which the Rhodes AFRC will be transferred to LP for use as a facility to serve the region's homeless population. While we fully understand that our submission is subject to be modified in order to comply with requirements of both the Department of Defense and the Department of Housing and Urban Development, we are proud to have finally gotten to this point in the process.

Please review the document and let us know what revisions may be necessary. We stand ready to make those revisions in hopes that we can come to closure of how the transfer will occur as we begin to concentrate on how we will manage the transition.

We look forward to hearing from you in the near future.

Sincerely,

Anthony N. Caudle
Deputy City Manager

cc: Lakeside Partnership

AMENDMENT TO THE ADRIAN B. RHODES ARMED FORCES RESERVE CENTER REDEVELOPMENT PLAN

Adrian B Rhodes AFRC, 2144 W Lake Shore Dr



September 28, 2006
V:/Projects/code_enf/AdrianBRhodesAFRC.mxd



Adopted by
CITY OF WILMINGTON LOCAL REDEVELOPMENT AUTHORITY
July 6, 2010

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Addendum to Adrian B. Rhodes Armed Forces Reserve Center Redevelopment Plan

As Adopted by the City of Wilmington Local Redevelopment Authority

on

July 6, 2010

Purpose

The purpose of this addendum is to address shortcomings identified in the Redevelopment Plan submitted by the City of Wilmington Local Redevelopment Authority (LRA) to the United States Department of Defense (DOD) in November of 2007. The United States Department of Housing and Urban Development (HUD) took exception to the original Plan submission under the provision of the Base Closure Community Redevelopment and Homeless Assistance Act of 1994, as amended and its implementing regulations as found in 24 CFR Part 586. As a result of those noted exceptions, further discussions/correspondence with both DOD and HUD representatives, as well as negotiations with the consortium providing the lone submission for use of the Rhodes property for the provision of homeless services, the City of Wilmington LRA has re-evaluated its prior determination and hereby submits this addendum for review and consideration.

As an addendum to the initial submission, this document seeks to build on the information provided in the Redevelopment Plan; consequently, at certain points in the Addendum, we have made reference to previously submitted material choosing not to duplicate that material within the text of this submission

Balance Review

During its review, HUD will ask several questions regarding:

- Outreach to homeless assistance providers. Was adequate information and assistance given to the community of local homeless assistance providers to participate in the development of the application? Did they have adequate time and help in responding to the solicitation for Notice of Interest (NOI)?
- Impact. Does the overall reuse plan consider the economic impacts of homeless assistance activities proposed in the application?
- Need. Does the reuse plan consider the size and nature of the local homeless population and the availability of necessary service and facilities for Continuum of Care?

- Consistency. Is the reuse plan consistent with the Consolidated Plan or other planning documents adopted by the community?
- Balance. Does the reuse plan achieve an appropriate balance between the expressed needs of homeless assistance providers and the needs of the communities served by the Local Redevelopment Authority (LRA) for economic development and other development?

Outreach

In the initial submission of the Rhodes Redevelopment Plan, the City of Wilmington LRA outlined an extensive outreach program that included public notification in a newspaper of general circulation in the area as well as individual notices that were mailed to every agency in the area that could be identified as providing services to the homeless.

Impacts

The conversion of the Adrian B. Rhodes AFRC to permanent supportive housing has a negative financial impact to the City of Wilmington of approximately \$70,000 for the removal and land preparation of the property as a shovel ready site. In-kind contributions from the City remain uncalculated. The City has chosen to contribute the demolition costs of the existing buildings on the Rhodes site so as to insure that the facilities constructed on the property are more in keeping with the residential look and feel of neighboring properties. The Cape Fear Public Utilities Authority has indicated that no replacement of water or sewer lines would be necessary to accommodate the proposed re-development of the property as proposed by the Lakeside Partnership Center.

The proposed LPC project calls for permanent supportive housing thus it would be anticipated that no increase in the homeless population would result. The Wilmington Police Department does not anticipate additional need for law enforcement as a result of implementation of the proposed plan. In addition, changes to the area housing values are not expected as the structures placed on the Rhodes property are anticipated to be more in keeping with the residential nature of surrounding area properties.

It is anticipated that the impact of the project on emergency health services, social services, shelters and transitional housing would be lowered with the addition of this permanent support housing as the number of chronically homeless individuals should be reduced with the completion of the project. The need for emergency health services is reduced as the permanent supportive housing is the last step to homeless individuals living on their own. The need

for social services should be decreased as the client earns their way out of supportive housing. There would be no need for shelters and transitional housing as the client would have passed through these stages to be in the permanent supportive housing.

Need

The "Ten Year Plan to End Chronic Homeless and Reduce Homelessness in the Cape Fear Region" (a.k.a., The Ten Year Plan), adopted in January, 2007 edition reported that there were 628 homeless in the Cape Fear Region. The latest count as of January 28, 2009 (Exhibit B) disclosed that a total homeless was 630 for that same region. Of those 630 homeless individuals, 190 were in the City of Wilmington with 47 of those residing in permanent supportive housing. These numbers are part of the community's total count as reported to the North Carolina Coalition of End Homeless (NCCEH) and to the North Carolina Interagency Council for Coordinating Homeless Programs (NC ICCHP) (Exhibit C).

Of these totals, 34% were classified as chronically homeless (having a disability and living on the streets, in shelter, etc. for one year or four times in three years). With the homeless population there are significant numbers of families and individuals in vacant, condemned, or substandard housing within the Cape Fear Region. These figures do not take into account families that are doubled up without a legal residence of their own. The numbers fail to account for people who are at risk of homelessness due to unemployment, foreclosures, evictions and/or illness.

The January, 2007 report, interestingly enough, disclosed that the homeless population in the Wilmington area is:

- 84% adult
- 16% children
- 59% male
- 40% female
- 51% white
- 33% black
- 6% American Indian

Within this group, 40% were employed and 42% stated that they were from North Carolina.

The Ten Year Plan to End Homelessness noted that:

- shelter beds total 339 (114 family beds)
- transitional beds of 186 (97 family beds)
- permanent units with 96 beds (7 family beds)

From these statistics the plan concludes that there is an unmet housing need of 119 emergency shelter beds, 84 transitional housing beds, and 119 units of permanent supportive housing.

The project proposed by the Lakeside Partnership Center (LPC) to redevelop the Adrian B. Rhodes AFRC property into permanent supportive housing for the homeless, seeks to address the issue of chronic homelessness in and around the City of Wilmington. The Ten Year Plan defines chronically homeless as: "An unaccompanied disabled individual who has been persistently homeless for more than a year or who has been homeless for four or more episodes over a period of three years" (see Exhibit D).

Consistency

The Ten Year Plan to End Homelessness cites two sets of desired outcomes as key in addressing homelessness. The first set of outcomes is defined as "Prevention, Engagement and Supportive Services". Outcomes in this area address services that can/should be provided in order to assist in the prevention of homelessness before it occurs. The second set of outcomes addresses the provision of shelter for those who have already become homeless. It is in this second set of outcomes that we find the greatest degree of consistency between the proposal offered by the LRA and the measures embraced by the community. The second set of outcomes reads as follows:

2. Housing

- ***Provide permanent housing for homeless individuals and families.***

1. Outcome 2-A:

Provide permanent supportive or permanent housing for 200 chronically homeless individuals, 400 homeless individuals and 70 homeless families.

2. Outcome 2-B:

Modify ordinance and policies to facilitate the creation and preservation of permanent housing for homeless people or those in housing crisis.

Under Goal 2 (Housing) the Plan identifies a strategy to "utilize available properties for the creation of permanent supportive, permanent and/or subsidized housing." Thus the conversion of the Adrian B. Rhodes AFRC BRAC property to permanent supportive housing is consistent with the Ten Year Plan.

Balance

The submission of the Redevelopment Plan Addendum employs a balance determination that is based upon the most recently available city plans pertaining to homelessness; most specifically, the previously referenced Ten Year Plan, as well as the excerpts and provisions of that Plan that are incorporated into City's Consolidated Annual Performance and Evaluation Report (CAPER) for the CDBG and HOME Program.

The provision of this number of proposed permanent supportive units for the chronically homeless population in the greater Wilmington area will have a significant impact on reducing the numbers of chronically homeless that must otherwise find temporary shelter on a nightly basis. Perhaps the greatest impact will be in reducing the number of homeless families as the LPC proposal targets multi-unit dwellings in sufficient number that it could have a significant impact on the currently estimated 70 homeless families in the area.

While the economic reuse of the Adrian B. Rhodes AFRC to permanent supportive housing will have an immediate negative impact to the City of Wilmington of approximately \$70,000, replacement of the existing institutional type structures with new residential type structures will have a greater positive impact to the surrounding residential area. The Lakeside Partnership Center project plans to include the construction of permanent supportive housing in the following configuration:

- Two, single-story duplexes (three bedrooms per living unit) of permanent supportive housing for families with children;
- Two, double-story quadraplexes (one bedroom per living unit) of permanent supportive housing for individuals, including one unit for live-in support staff;
- Three, double-story quadraplexes (two with one bedroom per living unit and one with two bedrooms per living unit) for individuals, including one unit for live-in support staff; and,
- One, single-story building to be used as shared office space, common space (kitchen, group meeting space, etc.) laundry facilities, and storage.

This combination of structures will assimilate the property to the surrounding residential neighborhood.

The benefit of the LPC proposal in comparison to the minimal public cost is significant given the fact that the proposal will bring the community one step closer to achieving important goals with regard to ending homelessness in the region. The LRA, therefore, with this addendum, recommends the approval and acceptance of both this report and the LBA, by the City of Wilmington, DOD, and HUD.

Exhibit

A

Deficiency Letter dated

March 12, 2008



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

MAR 12 2008

Mr. Sterling Cheatham
City Manager
City of Wilmington
1030 North Third Street
Wilmington, NC 28402

Re: Adrian B. Rhodes Armed Forces Reserve Center (AFRC) Redevelopment Plan

Dear Mr. Cheatham:

This letter is to inform you of the Department of Housing and Urban Development's preliminary determination that the May 23, 2007, *Adrian B. Rhodes Armed Forces Reserve Center Redevelopment Plan* (Plan), with undated Addendum to the Redevelopment Plan (Addendum) which was received by HUD on November 26, 2007, submitted by the City of Wilmington (City) in its capacity as the Local Redevelopment Authority (LRA), fails to meet the requirements of the Base Closure Community Redevelopment and Homeless Assistance Act of 1994 as amended (the Act), and its implementing regulations found at 24 CFR Part 586. Pursuant to section 586.35(d) of the regulations, you have ninety (90) days from receipt of this letter within which to submit to HUD and the Department of Defense a revised application that addresses the determinations contained in this letter.

We have found deficiencies in your application, most significantly in the balance determination. Section 2905(b)(7)(H)(i)(III) of the Act and 24 CFR 586.35(b)(4) require the Plan to balance in an appropriate manner a portion or all of the needs of the communities in the vicinity of the installation for economic redevelopment and other development with the needs of the homeless in such communities. The LRA did not make the balance determination in accordance with the requirements of the Act. Second, the LRA used criteria unrelated to the Act and regulations and inconsistent reasoning when evaluating Lakeside Partnership Center's (LPC's) Notice of Interest (NOI). Third, the application does not discuss the economic impact of the proposed homeless assistance as required by the Act and regulation.

Determining balance requires analysis of the economic condition of the community, the loss to the community caused by the closing of the military installation and the community's need for economic redevelopment, economic development, and other development. The LRA must balance those needs against the needs of the homeless in the community, as expressed by the NOIs it received. While some information on the economic condition of Wilmington (rising housing prices and low wages) was provided at page 2 of the Homeless Assistance Submission (HAS), it did not include the number of jobs lost as a result of the Reserve Center closing or whether the proposed use would create any jobs, nor did it establish a case for why the community's need for a recreation center with programs for girls and seniors outweighs the homeless assistance needs expressed by

LPC. Rather, the LRA's balance determination disregarded the needs of the homeless **as expressed in the NOIs**, concluding instead that the programs for girls and seniors could be considered homeless prevention.

The LRA relied on a rather simplistic interpretation of balance, using the relative number of potential users to justify a park use over a homeless assistance project. The LRA said it "felt the need to balance the needs of 598 homeless individuals and family members versus the 91,347 overall population of the City of Wilmington." See Addendum, page 3. Instead, the LRA should have provided data to establish the need for seniors and girls programs. It should have showed HUD why Wilmington needs another park. It should have explained how it determined that there are 598 homeless individuals in Wilmington and should have analyzed their needs and how, and if, they would be met through the NOIs. In the Addendum at page 5, the LRA cites the City of Wilmington's CDBG and HOME Annual Action Plan for FY 2006-2007 as establishing goals to end homelessness, and asserts that because those goals did not consider the Rhodes AFRC property, and because the goals are already established and the City is working on them "...the LRA looked at the Rhodes property to be used for the general population of 91,347 in lieu of the homeless population, for which goals to end homelessness were in place." We simply do not accept this reasoning in lieu of the balance determination prescribed by the statute and regulations. Nothing precludes the use of surplus military property for homeless assistance if the community has recently established goals to end homelessness or allocated homeless assistance funding. In fact, we view BRAC properties as a means to achieve those goals.

HUD tried to help the LRA make a balance determination in accordance with the statute and regulations. In many communications the requirements of the Act were explained. Yet, on November 26, 2007, the LRA submitted the Addendum to the Plan and the decision methodology remained essentially the same as in the initial submission.

Not only did the LRA not make the balance determination required by the Act, the LRA used criteria unrelated to the Act and its implementing regulations and inconsistent reasoning when evaluating LPC's NOI. The LRA also seized upon perceived defects in the NOI as a reason for rejection. In the Addendum at page 3, the LRA stated that the LPC's proposal failed to demonstrate how the project would assist with decreasing the homeless population or providing additional units at the time the facility actually became available in 2011. However, HUD notes that when opened LPC's proposal will provide a net immediate increase of 13 units of permanent supportive housing, thus decreasing the unmet need for permanent housing by 13 units. At page 13 of the Addendum the LRA cites leaving the future of the homeless in Wilmington to the pending completion of the *10 Year Plan to End Chronic Homelessness* as a rationale for rejecting the NOI, but then goes on to say that the 10 Year Plan itself recommends use of the Rhodes facility for homeless assistance.

Additionally, we have concerns about the treatment of LPC's NOI. In the Addendum at page 3, missing information was cited as part of the reason for rejection, yet there is no evidence that the LRA contacted LPC to ask for the missing information. In fact, HUD received a joint letter dated June 19, 2007, from the North Carolina Coalition to End Homelessness and the North Carolina Housing Coalition alleging that the LRA barely communicated with the LPC.

As to the third deficiency, the LRA analyzed the economic impact of the homeless assistance proposal on the homeless assistance providers instead of on the communities in the vicinity of the installation. At page 2 of the Addendum, the LRA focused on the potential loss of The Good Shepherd Ministries' existing transitional housing units. The LRA concluded that since

the Rhodes AFRC would not become available until 2011, transferring the property would not meet the immediate needs of the homeless. We agree that the Rhodes closure will not be immediately available, but the economic impact that should be considered is the impact of the homeless assistance proposal on the public services, including available social services, police, fire protection and infrastructure in the community. See 24 CFR 586.35(b)(2).

To clear the deficiencies in your application, please submit, within 90 days from receipt of this letter, three complete sets of the following:

1. A revised application that includes:
 - a. A new balance determination addressing all the factors discussed above and required by the Act and regulations. This is one last chance for the LRA to explain its decisions to HUD, using the criteria prescribed in the statute and regulations. Otherwise, based on the information received, HUD will have to issue a final determination that the Plan does not appropriately balance the needs of the community for economic redevelopment and other development with the needs of the homeless.
 - b. A narrative description of the economic impact of the proposed homeless assistance on the Wilmington community; and
 - c. A narrative evidencing LRA compliance with 2 below, any revisions to the Plan resulting from the reconsideration required by 2 below, and any legally binding agreements resulting from the reconsideration.
2. Reconsider LPC's NOI. Contact LPC to obtain the information the LRA thought was lacking in the initial NOI. Evaluate their NOI using the criteria established by the Act and regulations.

Please submit the requested documentation to Ms. Linda Charest, BRAC Coordinator, at the U.S. Department of Housing and Urban Development, 451 7th Street S.W., Room 7266, Washington, DC 20410, as well as to Mr. Bryant Monroe, Program Manager, Office of Economic Adjustment, 400 Army-Navy Drive, Suite 200, Arlington, VA 22202. If you have any questions about this letter, you may contact Ms. Charest at 202-402-2595. We look forward to working with you to resolve these matters.

Sincerely,


Mark Johnston
Deputy Assistant Secretary
for Special Needs

cc:

Mr. David Reed, DASA, I&H
Mr. Patrick O'Brien, Dir, OEA

Exhibit

B

North Carolina

Point in time

Homeless Count

January 28, 2009 – NC Point-in-Time Count Reporting Form

Community:	Southeastern Center MH/DD/SA		
Counties covered in this report:	Brunswick, New Hanover and Pender Counties		
Contact:	Catrechia McCoy Bowman	Date Reporting:	February 12, 2009
Email:	bowmanc@secmh.org	Phone:	(910)-332-6848

		A	B	C	D	E
		Sheltered		Unsheltered	TOTAL (column A+B+C)	Permanent Supportive Housing
		Emergency	Transitional			
Households with Dependent Children						
1	# of Men	7	13	11	31	1
2	# of Women	18	81	23	122	1
3	# of Children	40	60	34	134	1
4	Total <i>Persons</i> in Households with Dependent Children (Rows 1+2+3)	65	154	68	287	3
5	Total <i>Number of Households</i> with Dependent Children	20	102	28	150	1
Households without Dependent Children (includes singles, couples without children, unaccompanied youth)						
6	# of Men	99	67	68	234	21
7	# of Women	41	42	26	109	26
8	Total <i>Persons</i> in Households without Dependent Children (Rows 6 +7)	140	109	94	343	47
9	Total <i>Number of Households</i> without Dependent Children	134	96	87	317	47
10	TOTAL HOMELESS PEOPLE (Row 4 + Row 8)	205	263	162	630	50
11	TOTAL HOMELESS ADULTS (Rows 1 + 2 + 8)	165	203	128	496	49
SUBPOPULATIONS For Row 13 – 18, please note <i>how many people from Row 11</i> are definitely members of the named subpopulation						
12	<i>Chronic Homeless</i> (have a disability AND have been homeless for at least 1 year, or have had 4 episodes in 3 years)	73	N/A	45	118	N/A
13	Seriously Mentally Ill (diagnosable by a mental health professional, adults only)	69	15	20	104	0
14	Diagnosable Substance Use Disorder (adults only)	54	43	12	109	0
15	Veterans (adults only)	12	25	24	61	0
16	Persons with HIV/AIDS (adults only)	1	1	0	2	0
17	Victims of Domestic Violence (adults only)	15	23	16	54	0
18	Unaccompanied youth (under 18)	0	6	3	9	0
Of all homeless adults, how many do you know were discharged from the following systems within 30 days prior to becoming homeless:						
19	Criminal Justice System (jails, prisons)	10	17	48	75	0
20	Behavioral Health System (mental health hospitals or substance abuse treatment programs)	8	14	3	25	9
21	Health Care System (hospitals)	9	5	7	21	18

Return To:
 North Carolina Coalition to End Homelessness
 Fax: (888) 742-3465 Email: data@ncceh.org
 Questions? (919) 755-4393

The following report is based on data entered into the Carolina Homeless Information Network (CHIN), a homeless management information system (HMIS), by certified users of participating agencies and programs. The report has been checked and is an accurate representation of data entered into the HMIS.

CHIN recognizes that this report may not include all of an agency's reportable data. Common reasons for a reporting discrepancy may include one or more of the following:

- Incomplete or missing data-Agencies may not have entered all of their reportable data into the system for the reporting period.
- Missing program information-Agencies or programs that do not use the CHIN HMIS are not represented by this report.
- Client refusals to participate in an HMIS- A small percentage of clients choose not to participate in HMIS. In this situation, agencies are required to keep the client's information in a separate file. Agencies are responsible for reporting non-CHIN statistics.

This report is classified for COMMUNITY use. The report does not include any information that may be used to identify specific individuals. Program HMIS activity may be indicated by r

CHIN encourages any recipient of this report to contact identified agencies and programs dire

Additional Notes are included in the first table of the report.

Exhibit

C

North Carolina

Point in time

Homeless County Count

January 28, 2009 - NC Point-in-Time Count Reporting Form
 This form should be used to report your community's total count to NCCEH & the NC ICCHP

Community: 0 NC-506 Wilm/Brunswick/NH/Pender(42)

Counties covered in this report:

Contact:

Date Reporting

Email:

Phone:

	A Sheltered	B Emergency Transitional	C Unsheltered	D TOTAL (column A+B+C)	E Permanent Supportive Housing
Households with Dependent Children					
1 # of Men	4	1			0
2 # of Women	7	5			0
3 # of Children	13	9			0
4 Total Persons in Households with Dependent Children (Rows 1+2+3)	25	15			0
5 Total Number of Households with Dependent Children	8	5			
Households without Dependent Children (includes singles, couples without children, unaccompanied youth)					
6 # of Men	74	19			19
7 # of Women	34	16			28
8 Total Persons in Households without Dependent Children (Rows 6+7)	117	35			47
9 Total Number of Households without Dependent Children	7	35			46
10 TOTAL HOMELESS PEOPLE (Row 4 + Row 8)	140	50		190	47
11 TOTAL HOMELESS ADULTS (Rows 1+2+8)	119	41			47
SUBPOPULATIONS					
For rows 12-18, please note how many people from ROW 11 are definitely members of the named subpopulation					
12 Chronic Homeless (have a disability AND have been homeless for at least 1 year, or have had 4 episodes in 3 years)	54				
13 Seriously Mentally Ill (diagnosable by a mental health professional)	9	11			37
14 Diagnosable Substance Use Disorder	5	18			1
15 Veterans	15	8			2
16 Persons with HIV/AIDS	1	0			0
17 Victims of Domestic Violence	6	3			4
18 Unaccompanied youth	0	0			0
Of all homeless adults, how many do you know were discharged from the following systems within 30 days prior to becoming homeless					
19 Criminal justice System (jails, prisons)	0	0			0

20 Behavioral Health Systems (mental health hospitals or substance abuse treatment programs)	3	0	0
21 Health Care System (hospitals)	1	0	0

Return To:

North Carolina Coalition to End Homelessness

Fax: (888) 742-3465 Email: data@ncceh.org

Questions? (919) 755-4393

NOTE: If a client is checked into more than 1 bed or shelter the totals on this sheet will be higher than on the PIT. A client can be in more than 1 bed if a user forgets to check the client out of a bed when they leave.

	Emergency Shelter	Permanent Supportive	Transitional Shelter	Sum:
ARC-Cottonwoods(1194)		12		12
BFA-Haven Housing II(1861)		2		2
BFA-Haven Housing II(1180)		3		3
CH-Horizons Housing(458)		1		1
GSM-4th Quarter Transitional Living Apts(1088)			19	19
GSM-Overnight Shelter(1089)	84			84
GSM-Sgt Eugene Ashley Memorial Ctr(1087)			6	6
SA-Wilmington Emergency Shelter(698)	43			43
WHFD-Driftwood(1961)		14		14
WHFD-Hopewood Homes(855)		15		15
WIHN-APR Program(459)	13			13
WIHN-Langdon House(1718)			11	11
Wilmington Dream Center(517)			14	14
Sum:	140	47	50	237

NOTE 1: If agencies or programs did not record a shelter stay in the HMIS for the reporting period they will not show up in this report.

NOTE 2: If household members were not checked in together they will be counted as single individuals.

Service Provider	Gender(894)	Client Uid	Type of Household	Service Shelter Bedlist Type	Start Date	End Date
ARC-Cottonwoods(1194)	Female	111612	Without Children	Permanent Supportive	1/9/2008	
	Female	120308	Without Children	Permanent Supportive	10/2/2007	
	Female	121869	Without Children	Permanent Supportive	7/13/2007	
	Female	122479	Without Children	Permanent Supportive	2/11/2008	
	Female	123110	Without Children	Permanent Supportive	10/25/2007	
	Female	124441	Without Children	Permanent Supportive	12/1/2008	
	Female	127425	Without Children	Permanent Supportive	5/19/2008	
	Female	136317	Without Children	Permanent Supportive	9/29/2008	
	Male	115383	Without Children	Permanent Supportive	4/25/2007	
	Male	115389	Without Children	Permanent Supportive	10/24/2007	
	Male	119479	Without Children	Permanent Supportive	10/2/2007	
	Male	130093	Without Children	Permanent Supportive	3/19/2008	
ARC-Cottonwoods(1194)	Count:	12				

NOTE 1: If agencies or programs did not record a shelter stay in the HMIS for the reporting period they will not show up in this report.

NOTE 2: If household members were not checked in together they will be counted as single individuals.

Service Provider	Gender(894)	Client Uid	Type of Household	Service Shelter Bedlist Type	Start Date	End Date
BFA-Haven Housing I(1861)	Female	140277	Without Children	Permanent Supportive	12/6/2006	
	Female	140280	Without Children	Permanent Supportive	3/9/2007	
BFA-Haven Housing I(1861)	Count:	2				

NOTE 1: If agencies or programs did not record a shelter stay in the HMIS for the reporting period they will not show up in this report.

NOTE 2: If household members were not checked in together they will be counted as single individuals.

Service Provider	Gender(894)	Client Uid	Type of Household	Service Shelter Bedlist Type	Start Date	End Date
BFA-Haven Housing II(1180)	Female	140357	Without Children	Permanent Supportive	8/12/2008	
	Male	134108	Without Children	Permanent Supportive	8/1/2008	
	Male	140372	Without Children	Permanent Supportive	3/10/2008	
BFA-Haven Housing II(1180)	Count:	3				

NOTE 1: If agencies or programs did not record a shelter stay in the HMIS for the reporting period they will not show up in this report.

NOTE 2: If household members were not checked in together they will be counted as single individuals.

Service Provide Provider	Gender(894)	Client Uid	Type of Household	Service Shelter Bedlist Type	Start Date	End Date
CH-Horizons Housing(458)	Female	147813	Without Children	Permanent Supportive	11/7/2008	
		Count:	1			

NOTE 1: If agencies or programs did not record a shelter stay in the HMIS for the reporting period they will not show up in this report.

NOTE 2: If household members were not checked in together they will be counted as single individuals.

Service Provide Provider	Gender(894)	Client Uid	Type of Household	Service Shelter Bedlist Type	Start Date	End Date
GSM-4th Quarter Transitional Living Apts(Female	Female	112809	Without Children	Transitional Shelter	11/3/2005	
	Female	112811	Without Children	Transitional Shelter	10/28/2005	
	Female	112812	Without Children	Transitional Shelter	10/26/2007	
	Female	112813	Without Children	Transitional Shelter	11/16/2005	
	Female	112816	Without Children	Transitional Shelter	5/24/2006	
	Female	113266	Without Children	Transitional Shelter	1/14/2007	
	Male	112814	Without Children	Transitional Shelter	5/16/2006	
	Male	112815	Without Children	Transitional Shelter	5/16/2006	
	Male	112818	Without Children	Transitional Shelter	5/24/2006	
	Male	112819	Without Children	Transitional Shelter	12/29/2006	
	Male	112820	Without Children	Transitional Shelter	10/12/2005	
	Male	112821	Without Children	Transitional Shelter	12/28/2006	
	Male	112822	Without Children	Transitional Shelter	9/28/2006	
	Male	112825	Without Children	Transitional Shelter	12/22/2006	
	Male	112826	Without Children	Transitional Shelter	7/21/2006	
	Male	112906	Without Children	Transitional Shelter	12/6/2006	
	Male	112959	Without Children	Transitional Shelter	2/26/2007	
	Male	113258	Without Children	Transitional Shelter	4/3/2006	
	Male	113355	Without Children	Transitional Shelter	8/17/2006	
		Count:	19			

4th Quarter Transitional Living Apts(1088)

NOTE 1: If agencies or programs did not record a shelter stay in the HMIS for the reporting period they will not show up in this report.

NOTE 2: If household members were not checked in together they will be counted as single individuals.

Service Provider	Gender(894)	Client Ujd	Type of Household	Service Shelter Bedlist Type	Start Date	End Date
GSM-Overnight Shelter(1089)	Female	104197	Without Children	Emergency Shelter	1/30/2008	
	Female	115350	Without Children	Emergency Shelter	1/30/2008	
	Female	116628	Without Children	Emergency Shelter	1/30/2008	
	Female	118231	Without Children	Emergency Shelter	1/30/2008	
	Female	119516	Without Children	Emergency Shelter	1/30/2008	
	Female	119973	Without Children	Emergency Shelter	1/30/2008	
	Female	122479	Without Children	Emergency Shelter	1/30/2008	
	Female	124441	Without Children	Emergency Shelter	1/30/2008	
	Female	127012	Without Children	Emergency Shelter	1/30/2008	
	Female	129056	Without Children	Emergency Shelter	1/30/2008	
	Female	129075	Without Children	Emergency Shelter	1/30/2008	
	Female	129247	Without Children	Emergency Shelter	1/30/2008	
	Female	129321	Without Children	Emergency Shelter	1/30/2008	
	Female	129371	With Children	Emergency Shelter	1/30/2008	
	Female	129371	Without Children	Emergency Shelter	1/30/2008	
	Female	129410	Without Children	Emergency Shelter	1/30/2008	
	Female	129413	Without Children	Emergency Shelter	1/30/2008	
	Female	129667	Without Children	Emergency Shelter	1/30/2008	
	Female	130831	With Children	Emergency Shelter	1/30/2008	
	Female	130832	With Children	Emergency Shelter	1/30/2008	
	Female	130841	Without Children	Emergency Shelter	1/30/2008	
	Female	130847	With Children	Emergency Shelter	1/30/2008	
	Female	136398	Without Children	Emergency Shelter	1/30/2008	
	Female	140307	Without Children	Emergency Shelter	1/30/2008	
	Male	415	Without Children	Emergency Shelter	1/30/2008	
	Male	10504	Without Children	Emergency Shelter	1/30/2008	
	Male	74120	Without Children	Emergency Shelter	1/30/2008	
	Male	75583	Without Children	Emergency Shelter	1/30/2008	

Male	112821	Without Children	Emergency Shelter	1/30/2008
Male	116591	Without Children	Emergency Shelter	8/25/2008
Male	116626	Without Children	Emergency Shelter	1/30/2008
Male	116721	Without Children	Emergency Shelter	1/30/2008
Male	120089	Without Children	Emergency Shelter	1/30/2008
Male	120188	Without Children	Emergency Shelter	1/30/2008
Male	122392	Without Children	Emergency Shelter	1/30/2008
Male	122798	Without Children	Emergency Shelter	1/30/2008
Male	124959	With Children	Emergency Shelter	1/30/2008
Male	124959	Without Children	Emergency Shelter	1/30/2008
Male	126944	Without Children	Emergency Shelter	8/25/2008
Male	127069	Without Children	Emergency Shelter	1/30/2008
Male	127093	Without Children	Emergency Shelter	1/30/2008
Male	127156	Without Children	Emergency Shelter	1/30/2008
Male	127290	Without Children	Emergency Shelter	8/25/2008
Male	127649	Without Children	Emergency Shelter	1/30/2008
Male	127665	Without Children	Emergency Shelter	1/30/2008
Male	127668	Without Children	Emergency Shelter	8/25/2008
Male	127986	Without Children	Emergency Shelter	1/30/2008
Male	128394	Without Children	Emergency Shelter	1/30/2008
Male	128680	Without Children	Emergency Shelter	1/30/2008
Male	128695	Without Children	Emergency Shelter	1/30/2008
Male	128805	Without Children	Emergency Shelter	8/25/2008
Male	128892	Without Children	Emergency Shelter	1/30/2008
Male	128917	Without Children	Emergency Shelter	1/30/2008
Male	128967	Without Children	Emergency Shelter	1/30/2008
Male	129054	Without Children	Emergency Shelter	8/25/2008
Male	129061	Without Children	Emergency Shelter	1/30/2008
Male	129277	Without Children	Emergency Shelter	1/30/2008
Male	129318	Without Children	Emergency Shelter	1/30/2008
Male	129336	Without Children	Emergency Shelter	1/30/2008

Male	129393	Without Children	Emergency Shelter	8/25/2008
Male	129394	Without Children	Emergency Shelter	8/25/2008
Male	129610	Without Children	Emergency Shelter	1/30/2008
Male	129940	Without Children	Emergency Shelter	1/30/2008
Male	129948	Without Children	Emergency Shelter	1/30/2008
Male	129950	Without Children	Emergency Shelter	1/30/2008
Male	130829	With Children	Emergency Shelter	1/30/2008
Male	130833	With Children	Emergency Shelter	1/30/2008
Male	130835	With Children	Emergency Shelter	1/30/2008
Male	130839	Without Children	Emergency Shelter	1/30/2008
Male	130842	Without Children	Emergency Shelter	1/30/2008
Male	130848	With Children	Emergency Shelter	1/30/2008
Male	140301	Without Children	Emergency Shelter	1/30/2008
Male	140302	Without Children	Emergency Shelter	1/30/2008
Male	140304	Without Children	Emergency Shelter	1/30/2008
Male	140324	Without Children	Emergency Shelter	1/30/2008
Male	141856	Without Children	Emergency Shelter	8/25/2008
Male	144594	Without Children	Emergency Shelter	9/8/2008
	129623	Without Children	Emergency Shelter	1/30/2008
	140299	Without Children	Emergency Shelter	1/30/2008
	140303	Without Children	Emergency Shelter	1/30/2008
	140305	Without Children	Emergency Shelter	1/30/2008
	140306	Without Children	Emergency Shelter	1/30/2008
	140308	Without Children	Emergency Shelter	1/30/2008
	140311	Without Children	Emergency Shelter	1/30/2008
	140323	Without Children	Emergency Shelter	1/30/2008
	140325	Without Children	Emergency Shelter	1/30/2008
			GSM-Overnight Shelter(1089)	Count:
				84

NOTE 1: If agencies or programs did not record a shelter stay in the HIMS for the reporting period they will not show up in this report.

NOTE 2: If household members were not checked in together they will be counted as single individuals.

Service Provider	Gender(824)	Client Uid	Type of Household	Service Shelter Bedlist Type	Start Date	End Date
GSM-Sgt Eugene Ashley Memorial Ctr(1087)	Male	113580	Without Children	Transitional Shelter	3/14/2007	
	Male	113595	Without Children	Transitional Shelter	4/2/2007	
	Male	113727	Without Children	Transitional Shelter	3/29/2007	
	Male	113871	Without Children	Transitional Shelter	2/27/2007	
	Male	113872	Without Children	Transitional Shelter	3/1/2007	
	Male	113920	Without Children	Transitional Shelter	3/28/2007	
3M-Sgt Eugene Ashley Memorial Ctr(1087)	Count:	6				

NOTE 1: If agencies or programs did not record a shelter stay in the HIMS for the reporting period they will not show up in this report

NOTE 2: If household members were not checked in together they will be counted as single individuals.

Service Provider	Gender(894)	Client Uid	Type of Household	Service Shelter Bedlist Type	Start Date	End Date
SA-Wilmington Emergency Shelter(698)	Female	88428	With Children	Emergency Shelter	1/11/2009	
	Female	88428	Without Children	Emergency Shelter	1/11/2009	
	Female	115686	Without Children	Emergency Shelter	1/23/2009	
	Female	116287	Without Children	Emergency Shelter	1/23/2009	
	Female	133338	Without Children	Emergency Shelter	5/12/2008	
	Female	142724	Without Children	Emergency Shelter	9/30/2008	
	Female	144078	Without Children	Emergency Shelter	10/11/2008	
	Female	148111	Without Children	Emergency Shelter	12/1/2008	
	Female	148807	Without Children	Emergency Shelter	12/1/2008	
	Female	149481	Without Children	Emergency Shelter	12/8/2008	
	Female	151430	Without Children	Emergency Shelter	12/30/2008	1/30/2009
	Female	151690	Without Children	Emergency Shelter	1/2/2009	
	Female	153203	Without Children	Emergency Shelter	1/15/2009	
	Female	153419	With Children	Emergency Shelter	1/17/2009	
	Female	153420	With Children	Emergency Shelter	1/17/2009	
	Female	153521	Without Children	Emergency Shelter	1/20/2009	
	Female	154135	Without Children	Emergency Shelter	1/26/2009	1/30/2009
	Male	114745	Without Children	Emergency Shelter	11/11/2008	
	Male	119663	Without Children	Emergency Shelter	8/6/2008	

Male	120577	Without Children	Emergency Shelter	1/20/2009	
Male	125451	Without Children	Emergency Shelter	1/15/2009	
Male	128682	Without Children	Emergency Shelter	1/13/2009	1/31/2009
Male	129229	Without Children	Emergency Shelter	1/6/2009	
Male	131107	With Children	Emergency Shelter	12/22/2008	
Male	134825	Without Children	Emergency Shelter	6/23/2008	
Male	139034	Without Children	Emergency Shelter	8/22/2008	
Male	143399	Without Children	Emergency Shelter	10/6/2008	
Male	147022	Without Children	Emergency Shelter	12/12/2008	1/29/2009
Male	147503	Without Children	Emergency Shelter	11/18/2008	1/30/2009
Male	148294	Without Children	Emergency Shelter	12/1/2008	
Male	149630	Without Children	Emergency Shelter	12/9/2008	
Male	151026	Without Children	Emergency Shelter	12/22/2008	
Male	151437	Without Children	Emergency Shelter	12/30/2008	
Male	151785	Without Children	Emergency Shelter	1/23/2009	
Male	151869	Without Children	Emergency Shelter	1/25/2009	
Male	152334	Without Children	Emergency Shelter	1/9/2009	
Male	152938	Without Children	Emergency Shelter	1/14/2009	1/30/2009
Male	153412	Without Children	Emergency Shelter	1/17/2009	
Male	153434	Without Children	Emergency Shelter	1/20/2009	
Male	154134	Without Children	Emergency Shelter	1/26/2009	1/31/2009
Male	154143	Without Children	Emergency Shelter	1/26/2009	1/31/2009
Male	154322	Without Children	Emergency Shelter	1/27/2009	
Male	154444	Without Children	Emergency Shelter	1/27/2009	1/31/2009
Male	154516	Without Children	Emergency Shelter	1/28/2009	
		Count			
		43			
SA-Wilmington Emergency Shelter(698)					

NOTE 1: If agencies or programs did not record a shelter stay in the HIMS for the reporting period they will not show up in this report.

NOTE 2: If household members were not checked in together they will be counted as single individuals.

Service Provider	Gender(894)	Client Uid	Type of Household	Service Shelter Bedlist Type	Start Date	End Date
WHFD-Driftwood(1961)	Female	111885	Without Children	Permanent Supportive	12/1/2008	

Female	111891	Without Children	Permanent Supportive	12/1/2008
Female	111894	Without Children	Permanent Supportive	12/1/2008
Female	111897	Without Children	Permanent Supportive	12/1/2008
Female	111898	Without Children	Permanent Supportive	12/1/2008
Female	142268	Without Children	Permanent Supportive	12/1/2008
Female	147789	Without Children	Permanent Supportive	12/1/2008
Male	111884	Without Children	Permanent Supportive	12/1/2008
Male	111888	Without Children	Permanent Supportive	12/1/2008
Male	111889	Without Children	Permanent Supportive	12/1/2008
Male	111890	Without Children	Permanent Supportive	12/1/2008
Male	111892	Without Children	Permanent Supportive	12/1/2008
Male	111895	Without Children	Permanent Supportive	12/1/2008
Male	113733	Without Children	Permanent Supportive	12/1/2008

Count: 14

WHFD-Driftwood(1961)

NOTE 1: If agencies or programs did not record a shelter stay in the HMIS for the reporting period they will not show up in this report.

NOTE 2: If household members were not checked in together they will be counted as single individuals.

Service Provider	Gender(894)	Client Id	Type of Household	Service/Shelter Bedlist Type	Start Date	End Date
WHFD-Hopewood Homes(855)	Female	109704	Without Children	Permanent Supportive	12/4/2006	
	Female	109707	Without Children	Permanent Supportive	12/4/2006	
	Female	109726	Without Children	Permanent Supportive	1/25/2007	
	Female	111692	Without Children	Permanent Supportive	1/25/2007	
	Female	111698	Without Children	Permanent Supportive	1/25/2007	
	Female	111699	Without Children	Permanent Supportive	1/25/2007	
	Female	131649	Without Children	Permanent Supportive	11/1/2007	
	Female	131747	Without Children	Permanent Supportive	9/3/2007	
	Female	131748	Without Children	Permanent Supportive	12/1/2007	
	Male	109705	Without Children	Permanent Supportive	12/4/2006	
	Male	109725	Without Children	Permanent Supportive	3/28/2006	
	Male	109735	Without Children	Permanent Supportive	12/4/2006	
	Male	111683	Without Children	Permanent Supportive	1/25/2007	

Male 111688 Without Children Permanent Supportive 1/25/2007
 Male 111689 Without Children Permanent Supportive 1/25/2007
 WHFD-Hopwood Homes(855) Count: 15

NOTE 1: If agencies or programs did not record a shelter stay in the HMIS for the reporting period they will not show up in this report

NOTE 2: If household members were not checked in together they will be counted as single individuals.

Service Provider	Gender(894)	Client Id	Type of Household	Service Shelter Bedlist Type	Start Date	End Date
WIHN-APR Program(459)	Female	135521	With Children	Emergency Shelter	7/8/2008	
	Female	135523	With Children	Emergency Shelter	7/8/2008	
	Female	135524	With Children	Emergency Shelter	7/8/2008	
	Female	139578	With Children	Emergency Shelter	8/15/2008	
	Female	139607	With Children	Emergency Shelter	8/15/2008	
	Female	139612	With Children	Emergency Shelter	8/15/2008	
	Female	145022	With Children	Emergency Shelter	10/16/2008	
	Female	145029	With Children	Emergency Shelter	10/16/2008	
	Male	135522	With Children	Emergency Shelter	7/8/2008	
	Male	139580	With Children	Emergency Shelter	8/15/2008	
	Male	145025	With Children	Emergency Shelter	10/16/2008	
	Male	145030	With Children	Emergency Shelter	10/16/2008	
	Male	145031	With Children	Emergency Shelter	10/16/2008	
WIHN-APR Program(459)		Count:	13			

NOTE 1: If agencies or programs did not record a shelter stay in the HMIS for the reporting period they will not show up in this report

NOTE 2: If household members were not checked in together they will be counted as single individuals.

Service Provider	Gender(894)	Client Id	Type of Household	Service Shelter Bedlist Type	Start Date	End Date
WIHN-Langdon House(1718)	Female	103106	With Children	Transitional Shelter	7/1/2008	
	Female	103121	With Children	Transitional Shelter	7/1/2008	
	Female	103122	With Children	Transitional Shelter	7/1/2008	
	Female	132177	With Children	Transitional Shelter	8/28/2008	
	Female	135521	With Children	Transitional Shelter	12/10/2008	
	Female	135523	With Children	Transitional Shelter	12/10/2008	

Female	135524	With Children	Transitional Shelter	12/10/2008
Male	132179	With Children	Transitional Shelter	8/28/2008
Male	132180	With Children	Transitional Shelter	8/28/2008
Male	132181	With Children	Transitional Shelter	8/28/2008
Male	135522	With Children	Transitional Shelter	12/10/2008
WfHN-Langdon House(1718)			Count:	11

NOTE 1: If agencies or programs did not record a shelter stay in the HMIS for the reporting period they will not show up in this report.

NOTE 2: If household members were not checked in together they will be counted as single individuals.

Service Provider	Gender(894)	Client Id	Type of Household	Service Shelter Bedlist Type	Start Date	End Date
Wilmington Dream Center(517)	Female	105908	Without Children	Transitional Shelter	1/19/2008	
	Female	113855	Without Children	Transitional Shelter	3/16/2007	
	Female	116470	Without Children	Transitional Shelter	12/3/2008	
	Female	130321	Without Children	Transitional Shelter	12/23/2008	
	Female	132477	With Children	Transitional Shelter	4/25/2008	
	Female	132478	With Children	Transitional Shelter	4/25/2008	
	Female	134173	Without Children	Transitional Shelter	6/10/2008	
	Female	134844	Without Children	Transitional Shelter	6/24/2008	
	Female	147080	With Children	Transitional Shelter	11/14/2008	
	Female	147088	With Children	Transitional Shelter	7/18/2008	
	Female	149080	Without Children	Transitional Shelter	9/23/2008	
	Female	151433	Without Children	Transitional Shelter	1/19/2009	
	Female	153789	Without Children	Transitional Shelter	12/24/2008	
Wilmington Dream Center(517)	Female	154064	Without Children	Transitional Shelter	1/23/2009	
Wilmington Dream Center(517)			Count:	14		
Count:			230			
Count:			230			

Exhibit

D

The Streets is
No Place to Live
10 Year Plan



The Street is No Place to Live

TEN YEAR PLAN TO END CHRONIC HOMELESSNESS
AND REDUCE HOMELESSNESS IN THE CAPE FEAR REGION



capefearhomeless.org



VISION, MISSION, and GUIDING PRINCIPLES

VISION

Within 10 years, every person in the Cape Fear Region will have access to permanent, safe, and affordable housing with the needed resources and support for self-sufficiency and well-being.

MISSION

To end the cycle of homelessness, the Cape Fear Region will provide comprehensive support services and housing opportunities for all residents.

GUIDING PRINCIPLES

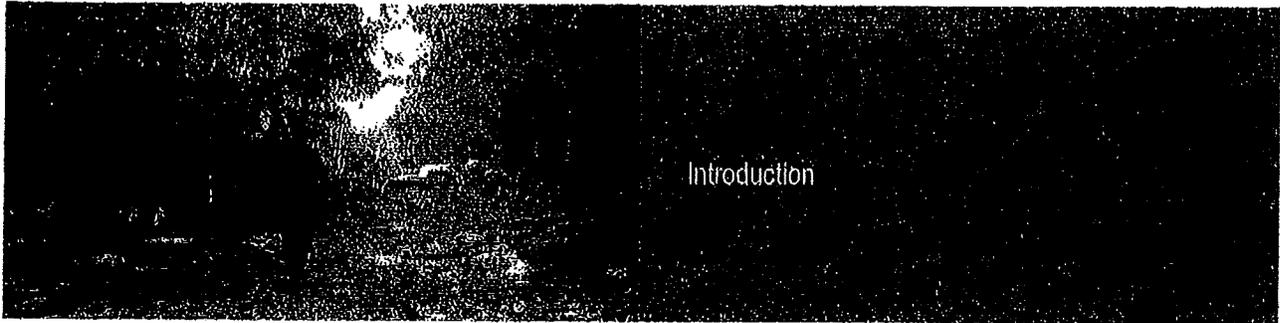
Inclusiveness

Collaborative and coordinated effort

Outcome-driven

Research-based

Maximized resources and minimal duplication



Introduction

Introduction

The United States Interagency Council on Homelessness has issued a challenge to communities across the country to address the problem of homelessness, specifically the chronically homeless. In early Fall 2006, the City of Wilmington and New Hanover County formed a partnership and the Cape Fear Region responded to this challenge by developing the ***Ten Year Plan to End Chronic Homelessness and Reduce Homelessness in the Cape Fear Region (The Ten Year Plan)***. The Ten Year Plan is consistent with and complementary to the federal government's effort to address this issue.

The January 2007 Point-in-Time Count (Appendix A) reveals that approximately 628 homeless people were in the Cape Fear Region and approximately 34% of the people who were homeless were chronically homeless. A Point-In-Time Count establishes a baseline of the Region's homeless population and only captures the number of homeless individuals receiving services in an area on a given day. The chronically homeless consume over 50% of resources including emergency medical services, psychiatric treatment, detox facilities, shelters, law enforcement and correctional facilities, according to the United States Interagency Council on Homelessness. Chronically homeless is defined as those individuals having a disability and living on the streets or in shelter for one year or having four episodes of homelessness in three years. The economic cost associated with chronically homeless individuals is high.

The Ten Year Plan is a long-range, comprehensive plan to help chronically homeless individuals and non-chronic homeless individuals return to healthy and stable lives in permanent housing. The plan is a culmination of a year-long planning effort by the Cape Fear Region's service providers, government administrators, and representatives from the nonprofit sector, the business sector, educational institutions, civic and professional organizations and homeless individuals. The recommendations featured in the plan are evidenced-based practices drawn from best practices of innovative programs and initiatives across the country.

The Ten Year Plan focuses on two major goals:

Goal 1: Provide prevention and supportive services to prevent persons from becoming homeless and enable those who are homeless to move into and remain in a stable housing situation and maximize their self-sufficiency.

Goal 2: Provide Permanent Housing for Homeless Individuals and Families.

The plan includes the strategies that will increase the Cape Fear Region's housing inventory and build the Region's capacity to provide supportive services.

A new approach, called "Housing First/Housing Plus," is a practical and cost effective solution.

The Ten Year Plan is a long-range, comprehensive plan to help chronically homeless individuals and non-chronic homeless individuals return to healthy and stable lives in permanent housing.

"Housing First/Housing Plus" places people in stable housing as rapidly as possible; housing becomes the first step in moving out of homelessness, not the last. The housing is based on adherence to a lease (payment of rent, upkeep of unit, peaceful and orderly conduct), not compliance with a "service plan." Once in housing, this approach works to link tenants with services and supports to address other needs by developing trusting relationships. For some, transitional services for a limited time are all that is needed; for others, long-term support is necessary.

The plan also features a structural framework and projected budget for the implementation of the recommended strategies.

The goals will be accomplished through a five-prong approach:

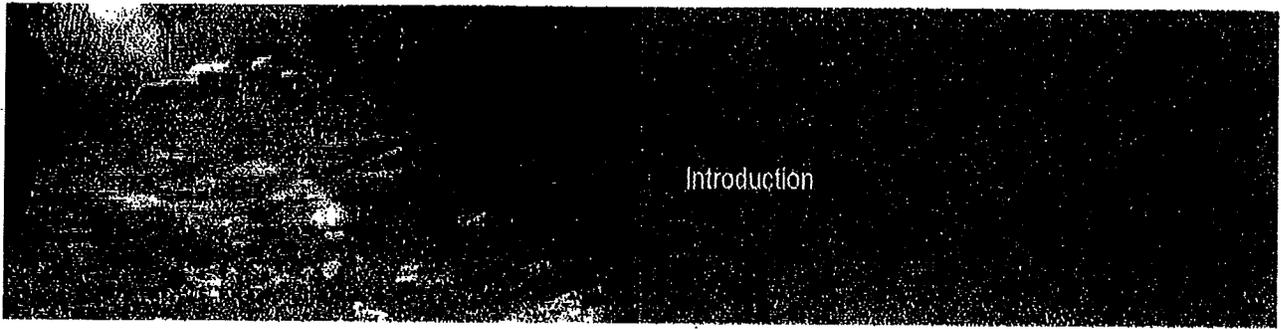
1. Closing the Front Door by preventing homelessness. Strategies involve continuing to prevent homelessness by assuring individuals' access to mainstream resources, increasing financial assistance, reducing referrals and discharges from correctional, health and human service systems to avert homelessness and shelter stays.

2. Opening the Back Door. Strategies include developing permanent supportive housing for chronically homeless individuals and families, expediting enrollment in current benefits programs and increasing financial assistance and supportive services to assist households to exit shelters and obtain housing.

3. Building the Infrastructure. Strategies involve continuing to use local, state and federal funding to increase the supply of affordable housing targeted to low-income households, continuing to expand access to jobs at a living wage, and continuing to expand access to essential supportive services.

4. Managing for Results. This strategy utilizes data to determine the extent and outcomes of public systems and the homeless services system and their interaction with homeless persons.

5. Building a Results Framework. The Implementation Plan establishes a process by which data will be collected and analyzed to determine progress toward the stated outcomes. These outcomes are measurable markers of the achievements of the plan.



Introduction

The Ten Year Plan seeks to end chronic homelessness and reduce homelessness over the next decade by reinvesting and redirecting resources in a coordinated, sustained effort that addresses the underlying causes of homelessness.

This effort will:

- Reduce the number of individuals who become homeless;
- Increase the number of homeless individuals placed into permanent housing;
- Decrease the length and disruption of homeless episodes;
- Provide community based services and supports that prevent homelessness before it happens and diminishes opportunities for homelessness to recur.

The Ten Year Plan explains how the Cape Fear Region will address the complex and perplexing issue of homelessness. This plan: 1) increases the Region's odds of success, 2) helps focus limited resources on outcomes our community says are important, 3) lowers the Region's investment on means or strategies that do not work, and 4) justifies funding for specified results. **The Ten Year Plan** will help those who are homeless and at the same time make the Cape Fear Region a more pleasant and inviting place to work, live and visit.

The Ten Year Plan is a call to action that, when implemented, can radically change the face of homelessness in our community.

When we change direction to ending homelessness, early and comprehensive intervention services at the neighborhood level will prevent homelessness. When we change direction to ending homelessness, no person will be discharged directly from a hospital, foster care, or a jail cell into homelessness.

When we change direction to ending homelessness, the preservation and the increase of affordable housing for those at the lowest income levels will be the priority, not the expansion of the shelter and transitional housing system.

When we change direction to ending homelessness, the role of the shelter system will become one of assessment and triage, not housing and treatment, and staff will provide the assistance necessary to facilitate return to permanent housing as quickly as possible.

When we change direction to ending homelessness, persons who are homeless or near homeless will be a priority population for housing, mental health, substance abuse, and health services provided by the Cape Fear Region.

We must have the courage to change policies, practices, and systems; to redirect resources; develop new and innovative housing and service models; collaborate better with each other; and monitor progress through accountability as we never have before.

Only then can we end homelessness.

"Chronically" homeless is defined as "an unaccompanied, disabled individual who has been persistently homeless for more than a year or who has been homeless for four or more episodes over a period of three years."

The Definition of Homelessness

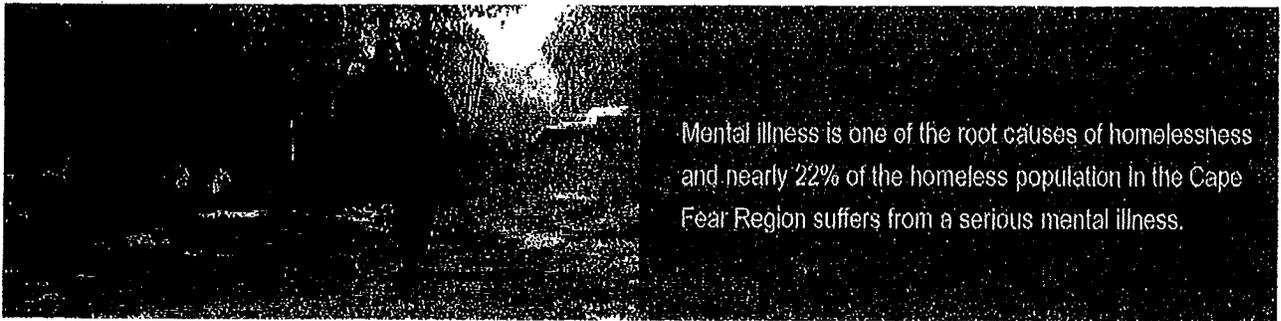
"Chronically" homeless is defined as "an unaccompanied, disabled individual who has been persistently homeless for more than a year or who has been homeless for four or more episodes over a period of three years." Chronically homeless people are highly likely to cycle in and out of housing, the streets, emergency shelters, hospitals, mental health facilities and/or jails for varying periods of time.

A person is considered homeless only when he or she resides in one of the places described below:

- (1) In places not meant for human habitation, such as cars, parks, sidewalks, abandoned buildings (on the street);
- (2) In an emergency shelter;
- (3) In transitional housing for homeless persons who originally came from the streets or emergency shelters;
- (4) In any of the above places but is spending a short time (up to 30 consecutive days) in a hospital or other institution;
- (5) Is being evicted within a week from a private dwelling unit and no subsequent residence has been identified and the person lacks the resources and support networks needed to obtain housing;

- (6) Is being discharged within a week from an institution, such as a mental health or substance abuse treatment facility or a jail/prison, in which the person has been a resident for more than 30 consecutive days and no subsequent residence has been identified and the person lacks the resources and support networks needed to obtain housing; or
- (7) Is fleeing a domestic violence situation and no subsequent residence has been identified and the person lacks the resources and support networks needed to obtain housing.

Some of the root causes of homelessness are unemployment, underemployment, lack of affordable housing, substance abuse/addictions, mental illness, physical disabilities, veterans' post traumatic stress disorder, lack of access to affordable health care and family break-up.



Mental illness is one of the root causes of homelessness and nearly 22% of the homeless population in the Cape Fear Region suffers from a serious mental illness.

Mental Health Reform and Homelessness

Mental illness is one of the root causes of homelessness and nearly 22% of the homeless population in the Cape Fear Region suffers from a serious mental illness. In addition, nearly 30% of North Carolina's total population suffers from a mental health or substance abuse disorder each year; half of these individuals receive no treatment. Mental health reform is underway in North Carolina with the goals of improving access to cost-effective care, choice in treatment, and system accountability. Under the state reform plan, area mental health programs are becoming local management entities (LMEs), separating management and clinical functions, and transitioning clients to other independent or agency-based practice settings. The intent is that many services once provided directly by area programs will be offered by qualified community-based providers contracting with the LMEs. Problems may exist during the transition but eventually many patients once reliant on care at state facilities will be increasingly served by community-based programs. State funded treatment will be targeted to patients with severe mental illnesses and conditions, and less severely ill patients will be able to seek care from primary care providers, human service agencies, and faith communities.

The target population of **The Ten Year Plan** (chronically homeless) is part of the population served by mental health providers. With this in mind, and in order for mental health care providers to serve their homeless clients, local area programs will need to collaborate closely with local community hospitals to assure appropriate services and service linkages are made to those seeking care in emergency departments. In addition, quality patient care will require the development of intensive community support services such as residential programs, psycho-social rehabilitation programs, and client and family outreach services. *Source: Dr. Arthur Costantini, Local Management Entity Area Director, Southeastern Center for MH/DD/SAS, NC Department of Health and Human Services, Division of Mental Health.*

Resolution Endorsing the

10 Year Plan to End Chronic Homelessness and Reduce Homelessness in the Cape Fear Region

WHEREAS, the U.S. Conference of Mayors, the National Association of Counties, and the National League of Cities have passed a resolution supporting 10 Year Plans to End Chronic Homelessness, and

WHEREAS, chronically homeless individuals and families, those with most persistent forms of homelessness, are affected not only by poverty but also by chronic conditions such as mental illness and substance abuse; and

WHEREAS, the abolition of chronic and other forms of homelessness requires collaboration and coordination of resources at all levels of government, together with community institutions, businesses, nonprofits and faith-based organizations, to determine prevention and intervention strategies; and

WHEREAS, city and county governments across the state and nation have begun to develop 10 Year Plans to address, not just chronic homelessness, but all major homeless issues in their community, and

WHEREAS, the discharge of patients back to the community, as part of the State Mental Health Reform, has created an increase of homeless persons throughout the area and has put a greater burden on nonprofits and local government agencies such as Social Services, Health and Law Enforcement; and

WHEREAS, local government, and nonprofit and faith-based organizations are on the front lines of response to homelessness;

WHEREAS, the Steering Committee overseeing the development of the 10 Year Plan to End Chronic Homelessness and Reduce Homelessness in the Cape Fear Region has completed the planning process; and

NOW, THEREFORE, BE IT RESOLVED that the Wilmington City Council approves the 10 Year Plan to End Chronic Homelessness and Reduce Chronic Homelessness in the Cape Fear Region and will work in partnership with regional stakeholders to meet the challenge of implementing this results-oriented 10 Year Plan; and

~~The Wilmington City Council appoint a member of the City Council to serve on a~~
Executive Board to lead the implementation process, with the member having the delegated authority to represent the City Council at Executive Board meetings, and be a conduit between the Executive Board and the City Council, to promote clear and open communication; and

The Wilmington City Council directs the City Manager to appropriate \$90,000 over a two and one half year period to assist with the Administrative Budget for implementation, covering the period January 1, 2008 through June 30, 2010, and appoint a staff person to work with the Community Advisory Committee and staff from other jurisdictions in the Cape Fear Region.

This ____ day of _____.

-Seal-

Mayor

Attest: _____
Clerk to the Board, Secretary

Exhibit

E

Building Site Plan

For

Lakeside Partner Center

Two 2-unit,
single story
buildings
WIHN



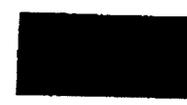
Three 4-unit, two-story
buildings (12 units)
Good Shepherd



Common Building
(one story)

Parking
Lot

Two 4-unit, two-story
buildings (8 units)
WHFD



Exhibit

F

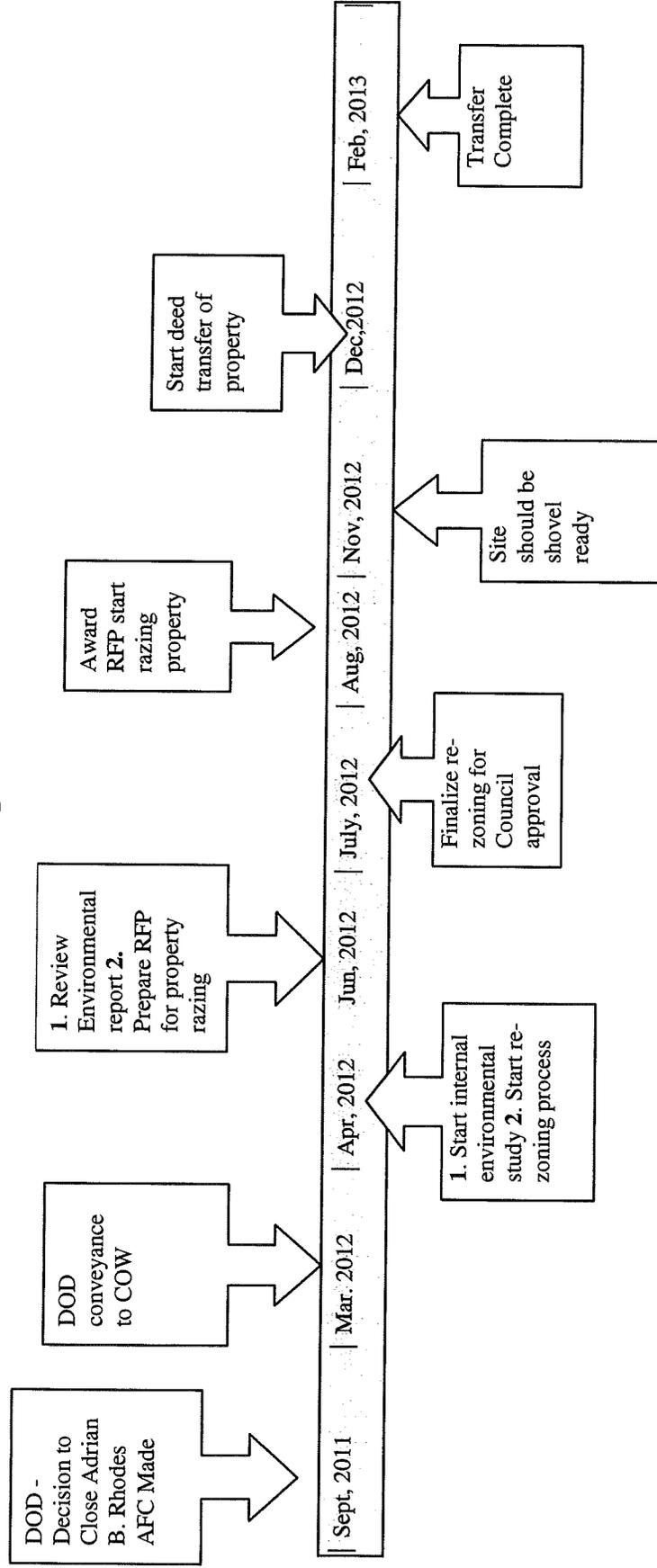
Proposed

Time Line

Of Events

Proposed Timeline For Adrian B. Rhodes AFC

Conveyance**



**Proposed timeline is subject to change/modification pending updated information from the Department of Defense.

Exhibit

G

Proposed

Legal Binding

Agreement

LEGALLY BINDING AGREEMENT FOR REDEVELOPMENT
OF ADRIAN RHODES ARMED FORCES RESERVE CENTER

AGREEMENT made this ___ day of _____, 2010 by the City of Wilmington, a North Carolina municipal corporation (hereinafter “City” or “LRA”), acting as the Local Redevelopment Authority for the former Adrian Rhodes Armed Forces Reserve Center, and Lakeside Partners LLC, a North Carolina non-profit corporation, (hereinafter referred to as “Lakeside Partners”).

WHEREAS, the United States of America (hereinafter “Federal Government”) has determined to close and declare as surplus a certain facility located at 2144 W. Lake Shore Drive, Wilmington, North Carolina consisting of approximately 4.26 acres of land and buildings and commonly referred to as the Adrian Rhodes Armed Forces Reserve Center (hereinafter “Facility” or “Property”) and being more particularly described in Exhibit “A” attached hereto and incorporated herein by reference; and

WHEREAS, the Federal Government has or soon will make the Facility available for civilian reuse pursuant to the Base Closure and Community Redevelopment and Homeless Assistance Act of 1994 (hereinafter “Act”); and

WHEREAS, the Act provides that the local redevelopment authority, that authority or instrumentality established by state or local government and recognized by the Secretary of Defense as the entity responsible for developing the redevelopment plan with respect to the Facility or for directing implementation of the plan, identify interest from homeless providers in the Facility and develop a redevelopment plan for the Surplus Property that balances the economic redevelopment and other development needs of the communities in the vicinity of the Facility with the needs of the homeless in those communities; and

WHEREAS, the City provided notice of the formation of the City of Wilmington as the Local Redevelopment Authority by _____ dated _____ which was recognized by the United States Department of Defense by Notice published in the Federal Register on _____; and

WHEREAS, the LRA developed a Reuse Plan entitled _____ (hereinafter “Initial Plan”), which provided for the redevelopment of the Facility as _____; and

WHEREAS, the LRA’s Plan was approved by the Wilmington City Council on _____ and the application was forwarded to the United States Department of Housing and Urban Development (hereinafter “HUD”) on which review and comment was to occur within 60 days of submission of the Plan pursuant to 24 CFR Part 586, Section 586.35 (a) and (c)(1); and

WHEREAS, the LRA’s Plan was issued a preliminary adverse determination by the United States Department of Housing and Urban Development due to defects in the Plan, specifically the Balance Determination; and

WHEREAS, the LRA conducted a homeless outreach program to fulfill the homeless assistance element. A notice was published in the _____ notifying eligible agencies and homeless providers that Notices of Interest would be accepted for the redevelopment of the Facility; and

WHEREAS, as part of the homeless outreach efforts conducted by the LRA, a workshop was held at the Facility by representatives of the LRA, the Office of Economic Adjustment, and the Department of the Army on _____ to provide a tour of the site and information about the closure process and schedule for receiving proposals from such agencies; and

WHEREAS, the LRA received a proposal from the Lakeside Partners for a homeless assistance program which meets the needs of “homeless people” as defined in 24 CFR Part 586 and 42 USC 11301; and

WHEREAS, the proposal provides for the construction of 24 housing units of permanent supportive rental housing for homeless individuals and families along with office space, common space, laundry facilities and storage; and

WHEREAS, the 10-Year Plan to End Chronic Homelessness and Reduce Homelessness in the Cape Fear Region indicates that there is an urgent need for permanent supportive housing in the area; and

WHEREAS, the Facility is located adjacent to a stable single family neighborhood with affordable housing units and it is important to maintain the integrity of the neighborhood as a single family neighborhood to preserve the affordability of the units and provide a stable environment for the residents of the proposed permanent supportive housing; and

WHEREAS, the Facility is currently zoned R-7 which will permit up to 26 single family dwellings on the property occupied by the Facility, but the property will need to be rezoned to accommodate the mix of housing types included in the proposal; and

WHEREAS, the use of the entire property to provide permanent supportive housing for the homeless is appropriate considering its location; and

WHEREAS, the LRA has submitted a revised Reuse Plan consistent with the Lakeside Partners proposal to HUD for review and comment, a copy of which is attached hereto as Exhibit “B” and incorporated herein by reference (hereinafter “Revised Plan”); and

WHEREAS, the LRA is authorized by G.S. 160A-279 to convey real property to non-profit corporations to carry out a public purpose subject to such covenants and conditions which assure that the property will be put to a public use; and

WHEREAS, this Agreement is entered into to ensure that the Revised Plan submitted by the LRA addresses the needs of the homeless as required by 24 CFR Part 586.

NOW THEREFORE, subject to the terms and conditions of this Agreement, and in consideration of the premises, the respective agreements hereinafter set forth, and other good and valuable considerations, the receipt and adequacy of which are hereby acknowledged, the LRA and the Lakeside Partners agree as follows:

1. Conveyance of Property to Lakeside Partners. The LRA agrees to accept the conveyance of the property from the Federal Government subject to the terms and conditions set forth herein. Upon the conveyance of the property, the LRA shall convey the property and the Lakeside Partners agrees to accept the property subject to the terms and conditions herein. The property shall be used by the Lakeside Partners solely for the purpose of developing permanent supportive housing for the homeless. In particular, the property shall be used for the construction of up to 24 housing units and support facilities described as follows:

- A) Two one-story duplexes (3 bedrooms per unit) of permanent supportive housing for families with children;
- B) Two two-story four-plexes (1 bedroom per unit) of permanent supportive housing for individuals, including one unit for live-in support staff;
- C) Three two-story four-plexes (two with 1 bedroom per unit, one with 2 bedrooms per unit) for individuals, including one unit for live-in support staff; and
- D) A one-story building for shared office space, common space (kitchen, group meeting space, etc.), laundry facilities, and storage.

These eight buildings will be residential in design, and the three one-story buildings will be situated on the perimeter of the property. The two-story buildings will be located toward the interior of the property, providing a very low-impact and attractive profile. The property will be landscaped to further enhance the aesthetic quality of the development, for neighbors and for those using the adjoining facilities (Greenfield Lake Park and the Legion Stadium sports complex). The general location of the one-story and two-story buildings is shown on Exhibit "C" attached hereto and incorporated herein by reference. The LRA understands and agrees that based on the final site plan for the property, the Lakeside Partners may construct less than 24 housing units on the property and the mix of housing types may change; provided any such revised plans will include at least eight units of family housing, and at least four one-story housing units. The location of the two-story units shall not be changed without approval of the LRA. In addition, the final mix of housing types will provide permanent housing for individuals, individuals with disabilities and families with children that shall not be used for temporary or transitional housing.

The LRA understands that the construction of the housing units may be phased by Lakeside Partners based on the availability of funding for the project. The LRA shall cooperate with the Lakeside Partners on the phasing of the project and shall convey the Property to Lakeside Partners as a single tract or multiple tracts depending on the needs of the Lakeside Partners and subject to compliance with local ordinances relating to subdivisions.

The Lakeside Partners shall provide on-site supportive services for the occupants of the housing units including but not limited to case management and counseling consistent with the services described in Exhibit "D" attached hereto and incorporated herein by reference.

2. Conditions to LRA's Acceptance of Conveyance from the Federal Government and Conveyance to Lakeside Partners.

(a) The obligation of the LRA to accept the conveyance of the property from the Federal Government shall be subject to the LRA's determination that the property is suitable for residential purposes as described herein.

(b) The obligations of the LRA to convey the property to the Lakeside Partners shall be subject to the following:

1. The Lakeside Partners shall have submitted a financial plan for the construction of the project and provided evidence to the LRA of a funding commitment for the construction of the initial phase of the units on the property to be conveyed;
2. The Lakeside Partners shall provide to the LRA a phasing plan for the construction of the project showing completion of the project within five (5) years of the date of the conveyance;
3. The Lakeside Partners shall submit a site plan to the City for the development of the project in accordance with the terms of this Agreement; and
4. The Lakeside Partners shall submit a plan to the City for the provision of the supportive services for the project.

3. Conditions to Lakeside Partners' Obligations to Accept Conveyance of the Property. The obligations and liabilities of Lakeside Partners hereunder shall in all respects be conditioned upon the satisfaction of each of the following conditions prior to or simultaneously with the closing, any of which may be waived by written notice from the Lakeside Partners to the LRA.

- a. The conveyance shall be without monetary consideration but shall be subject to the conditions set forth in Paragraph 8 herein.
- b. All buildings, structures, pavement and obstructions shall have been removed from the property so the property is ready for construction of the housing units. The LRA shall complete such work within six (6) months of the conveyance of the property from the Federal Government.
- c. The property shall have been rezoned to permit the construction of the housing units described in Paragraph 1 above.
- d. The LRA shall have provided a survey to the Lakeside Partners, and the survey shall show that there exists no encroachments of buildings on adjacent property onto the property, and no encroachments of any improvements on the property onto adjacent property.

- e. Based on the environmental study completed by the Department of Defense, Lakeside Partners shall be satisfied that there is no environmental contamination on the property that would prevent the use of the property for residential purposes.
- f. A title insurance company acceptable to the Lakeside Partners, shall have issued an Owner's Title Policy Commitment on the property and shall be prepared to issue to Lakeside Partners upon the closing a fee simple Owner's Policy.
- g. All actions, proceedings, instruments and documents required to carry out this contract, or incidental thereto, and all other related matters shall have been approved by counsel for the buyer, whose approval shall not be unreasonably withheld.

4. Cooperation in Planning; Rezoning Application. The LRA and the Lakeside Partners agree to cooperate in defining the conditions and requirements applicable to the development of the site plan for the property. Based on the completion of a site plan to be submitted by Lakeside Partners in compliance with the terms hereof, the City Manager of the LRA shall submit an application to rezone the property to Conditional Use – Multifamily Classification to accommodate the plan.

5. Closing. The closing of the conveyance of the property ("closing") from the LRA to the Lakeside Partners shall be held on a date specified by the Lakeside Partners, which date shall be within sixty (60) days after all buildings, structures and obstructions have been removed from the property as set forth in Section 3b. above. Provided, however, if the phasing plan for the project provides for the subdivision of the property, the conveyance of the various tracts included in the project shall be in accordance with the phasing plan.

6. Title to the Property.

a. Encumbrances. At the Closing, the LRA shall deliver to Lakeside Partners a non-warranty deed conveying to Lakeside Partners a good, indefeasible, fee simple, marketable title to the Property and its appurtenances, said title to be insurable both as to fee and marketability at regular rates by a title insurance company acceptable to the Buyer without exception except as to those matters specifically enumerated in this subparagraph. Said policy shall provide full coverage against mechanics or materialmen's liens, have full survey coverage and shall contain such other special endorsements as Buyer may reasonably require.

The Property and its appurtenances shall be conveyed by the LRA to the Lakeside Partners free and clear of all liens, encumbrances, claims, rights-of-way, easements, leases, restrictions and restrictive covenants except only:

- i. public utility easements, of record in customary form to serve the Property;
- ii. land use regulations and approvals, provided such regulations and approvals do not prohibit or limit the use of the Property for the residential uses described herein.

If, in the opinion of Lakeside Partners' counsel, the LRA's title fails to meet the requirements of this subparagraph, then Lakeside Partners shall have the option of terminating this Agreement.

b. Seller's Affidavit. The LRA shall deliver to Lakeside Partners at Closing the LRA's affidavit setting forth the following: (a) that all work, labor, services and materials furnished to or in connection with the Property have been fully paid for so that no mechanic's, materialmen's or other lien may be properly filed against the Property; (b) that LRA is not the subject of any insolvency or bankruptcy proceeding, nor the subject of any suit or proceeding at law or in equity, or otherwise, the result of which might affect the title to the Property; (c) that the LRA has no knowledge of any violations against the Property, whether filed or threatened, nor of any restrictions against the sale of the Property; and (d) the LRA has no knowledge of any claim or claims made or threatened, the result of which would in any way affect the title to the Property.

7. Closing Costs. LRA shall pay for the preparation of the deed to the Property, and any revenue stamps required to be affixed to the deed in order that the same may be recorded in the New Hanover County Public Registry. Lakeside Partners shall be responsible for the title insurance premium, and the cost of recording the deed and any other instruments to be recorded under the terms of this Agreement with respect to the Property. Except as may otherwise be stated herein, each party shall bear its own expense or expenses, including its own attorneys' fees.

8. Reversion of Title to Property. The LRA's conveyance of the Property to the Lakeside Partners shall be specifically subject to the Lakeside Partners complying with the following covenants and conditions:

a. The Lakeside Partners shall develop and use the Property as permanent supportive housing for the homeless as described in Paragraph 1. The Lakeside Partners shall comply with the approved phasing plan in the construction of the housing, but, in any event, construction shall be completed within five (5) years of the date of the conveyance.

b. The Lakeside Partners shall provide supportive services at the property.

c. The Lakeside Partners shall operate and maintain the Property in compliance with all applicable laws, ordinances, building codes and the City of Wilmington Minimum Housing Code. .

In the case of the breach or violation of any of these covenants and in the event Lakeside Partners fails to cure or institute a cure of the breach or violation within ninety (90) days after written demand by the LRA to the Lakeside Partners so to do or within any further extension thereof that may be granted by the LRA in its sole discretion, then the LRA, at its option, may declare that all estate, conveyed under the Deed relating to the phase that is the subject of the breach or violation shall cease and determine, title and fee simple to the same shall revert to and become re-vested in the LRA or its successors or assigns who shall be entitled to and may of right enter upon and take possession of the Property. The terms of such right of reversion shall

be included in the Deed to the Property. The decision as to when a reversion of the property occurs shall be considered and made by the Wilmington City Council at a regularly scheduled meeting after giving Lakeside Partners thirty (30) days written notice of such meeting.

Any such reversion of title to the LRA shall always be subject to and limited by, and shall not defeat, render invalid, or limit in any way, the lien of any mortgage or deed of trust required for the construction of the project.

If the LRA exercises its rights under this Section 8 and the Property reverts back to the LRA, or if the Agreement is terminated pursuant to Section 6, the LRA shall, take appropriate steps to facilitate the utilization of the Property by other homeless housing providers and to provide the appropriate homeless support services. The term "appropriate steps" shall mean providing reasonable public notice of at least ninety (90) days to homeless service providers in the vicinity of the Property of the types of programs that may qualify as appropriate homeless housing and support services, and negotiating in good faith with homeless providers that respond to said notice. If the LRA is unable to reach agreement with a successor homeless provider or providers following good faith negotiations, the LRA shall have no further obligations hereunder.

9. Performance Reports. The Lakeside Partners shall make an annual performance report to the LRA on compliance with the purposes and conditions of this Agreement. The initial performance report shall be due on January 31 following the year in which the conveyance occurs and annually thereafter.

10. Environmental Renegotiation Clause. In the event that an environmental review of the Facility indicates that the Property is not usable for residential purposes, the LRA shall request the Federal Government to correct the environmental conditions so that the Property may be used in accordance with this Agreement. If the environmental condition can not be corrected so that the property can be used for residential purposes, the LRA and the Lakeside Partners agree to meet and negotiate in good faith for the conveyance of other vacant surplus property owned by the LRA which may be used for the construction of housing in accordance with the Revised Plan.

11. Dispute Resolution. The LRA and the Lakeside Partners shall use their best efforts to resolve any disputes by informal discussions and negotiations between executive officers of the parties. In the event such discussions and negotiations are unsuccessful, the parties may agree to submit the matter to mediation in accordance with the rules for mediation in the North Carolina Superior Court.

12. Survival of Provisions. All the terms, conditions, representations and agreements contained herein shall, as applicable, survive the Closing and the delivery of the deed and other documents for such period of time as shall be deemed necessary to the full performance of this Agreement.

13. Notices. Any notice required or permitted to be given under this Contract shall be in writing and shall be deemed to have been given when deposited in the United States mail, registered or certified mail, postage prepaid, return receipt requested, and addressed as follows:

Local Redevelopment Authority:
Sterling B. Cheatham
City Manager
City of Wilmington
P.O. Box 1810
Wilmington, N.C. 28402

Lakeside Partners:

Either party may, from time to time, by notice as herein provided, designate a different address to which notice to it shall be sent.

14. Independent Contractor. It is mutually agreed that Lakeside Partners is an independent contractor and not an agent of the LRA, and as such the Lakeside Partners shall not be entitled to any LRA employment benefits, such as, but not limited to, vacation, sick leave, insurance, workmen's compensation, or pension and retirement benefits.

15. Conflict of Interest. No paid employee of the LRA shall have a personal or financial interest, direct or indirect, as a contracting party or otherwise, in the performance of this agreement.

16. Non-Waiver of Rights. It is agreed that the LRA's failure to insist upon the strict performance of any provision of this agreement, or to exercise any right based upon a breach thereof, or the acceptance of any performance during such breach, shall not constitute a waiver of any rights under this agreement.

17. Assignment of Agreement. It is mutually agreed by the parties hereto that this agreement is not transferable by either party without the written consent of the other party to this agreement. It is understood and agreed, however, that the Lakeside Partners may be expanded to include additional non-profit corporations engaged in providing housing for the homeless.

18. Entire Agreement. The agreement constitutes the entire understanding of the parties.

19. Binding Effect. The agreement shall be binding upon the heirs, successors, assigns, agents, officials, employees, independent contractors, and subcontractors of the parties.

20. Continuing Obligation. The parties will make and execute all further instruments and documents required to carry out the purposes and intent of the agreement.

21. Reference. Use of the masculine includes feminine and neuter, singular includes plural; and captions and headings are inserted for convenience of reference and do not define, describe, extend or limit the scope of intent of the agreement.

22. Interpretation. All of the terms and conditions contained herein shall be interpreted in accordance with the laws of the State of North Carolina. In the event of a conflict between the various terms and conditions contained herein or between these terms and other applicable provisions, then the more particular shall prevail over the general and the more stringent or higher standard shall prevail over the less stringent or lower standard.

23. Saving Clause. If any section, subsection, paragraph, sentence, clause, phrase or portion of this agreement is for any reason held invalid, unlawful, or unconstitutional by any court of competent jurisdiction, such portion shall be deemed severable and such holding shall not affect the validity of the remaining portions hereof.

24. Amendments. This agreement shall not be modified or otherwise amended except in writing signed by the parties.

25. Non-Discrimination. Lakeside Partners will take affirmative action not to discriminate against any employee or applicant for employment or otherwise illegally deny any person participation in or the benefits of the program which is the subject of this agreement because of race, creed, color, sex, age, disability or national origin. To the extent applicable, Lakeside Partners will comply with all provisions of Executive Order No. 11246 the Civil Rights Act of 1964, (P.L. 88-352) and 1968 (P.L. 90-284), and all applicable federal, state and local laws, ordinances, rules, regulations, orders, instructions, designations and other directives

promulgated to prohibit discrimination. Violation of this provision, after notice, shall be a material breach of this agreement and may result, at LRA's option, in a termination or suspension of this agreement in whole or in part.

IN WITNESS WHEREOF, the LRA and the Lakeside Partners have caused this Agreement to be executed by their duly authorized officers.

City of Wilmington

By: _____
Bill Saffo, Mayor

ATTEST:

APPROVED AS TO FORM:

City Clerk

City Attorney

Lakeside Partners, LLC

By: _____
President

STATE OF NORTH CAROLINA

COUNTY OF NEW HANOVER

I, the undersigned Notary Public, do hereby certify that Penelope Spicer-Sidbury personally appeared before me, and who being duly sworn, says that she knows the common seal of the City of Wilmington and is acquainted with Bill Saffo, Mayor, of the City of Wilmington, and that Penelope Spicer-Sidbury is Clerk of the City of Wilmington and saw the said Bill Saffo, Mayor, of the City of Wilmington, sign the foregoing instrument, and saw the common seal of said City of Wilmington affixed to said instrument by said Mayor that she, the said Penelope Spicer-Sidbury, Clerk as aforesaid, signed her name in attestation of the due execution of said

instrument in the presence of said Mayor of the City of Wilmington. I certify that Penelope Spicer-Sidbury personally appeared before me this day and I have personal knowledge of the identity of Penelope Spicer-Sidbury.

Witness my hand and notarial seal, this the ____ day of _____, 2010.

My Commission Expires:

Notary Public

Printed Name

STATE OF NORTH CAROLINA

COUNTY OF NEW HANOVER

I, _____, a Notary Public, certify that _____, personally came before me this day and acknowledged that he (she) is President of _____, a non-profit corporation, and that by authority duly given and as the act of the corporation, the foregoing instrument was signed in its name and sealed with its corporate seal.

Witness my hand and official seal, this the ____ day of _____, 2010.

My Commission Expires:

Notary Public

Printed Name



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

February 18, 2011

Mr. Sterling Cheatham
City Manager
City of Wilmington
102 North Third Street
Wilmington, NC 28402-1810

Dear Mr. Cheatham:

I am pleased to inform you of the Department of Housing and Urban Development's final determination that the *Amendment to the Adrian B. Rhodes Armed Forces Reserve Center* (the Plan) dated July 6, 2010, with supplemental information dated November 30, 2010, as adopted by the City of Wilmington City Council on October 5, 2010, complies with the requirements of the Base Closure Community Redevelopment and Homeless Assistance Act of 1994 (the Act), 10 U.S.C. §2687 note, as amended, and its implementing regulations found at 24 CFR Part 586. The City of Wilmington Local Redevelopment Authority (LRA) may now move forward with implementing the reuse plan by pursuing the redevelopment of the facility for homeless assistance use via a no-cost homeless assistance conveyance. The basis for HUD's determination is discussed below.

HUD has determined that the Plan appropriately balances the needs of the City of Wilmington for economic redevelopment and other development with the needs of the homeless in the community. The basis for this determination is the fact that HUD's review of base closure plans is subject to the expressed interest and requests of the representatives of the homeless. The LRA received one Notice of Interest (NOI) from representatives of the homeless. The LRA accommodated the NOI submitted by the Lakeside Partnership Center (now Lakeside Partners of Wilmington, Inc.) a collaborative effort of three organizations: Good Shepherd Ministries, Wilmington Housing Finance and Development, and the Wilmington Interfaith Hospitality Network. Where all NOIs from representatives of the homeless are accommodated and where HUD is satisfied that the outreach and consultation with representatives of the homeless was conducted in the manner dictated by the Act and regulations, HUD will conclude that a base reuse plan balances in an appropriate manner the needs of the community for economic and other development with the needs of the homeless in the community.

During final review of the Plan, HUD identified a potential Fair Housing Act violation in the proposed unit configurations. Specifically, page 5 of the Plan describes unit configurations designating single and multiple bedroom units as being made available only to individuals or families with children, respectively. Such unit designations are in violation of the prohibition against discrimination on the basis of familial status under the Fair Housing Act as set forth in

42 U.S.C. §3106, et seq. and HUD's implementing regulations. HUD is sending a copy of this letter to Lakeside Partners to make them aware of our recommendation that they seek the advice of legal counsel, or contact a fair housing specialist in HUD's Atlanta regional office about their obligations under the Fair Housing Act and adjust their proposed use of base property accordingly.

Congratulations on your success in effectively carrying out the military base reuse planning process. I wish you continued success in implementing the Adrian B. Rhodes AFRC Redevelopment Plan. HUD stands ready to assist you in your efforts. If the Department can provide any further service please contact Mr. Gary Dimmick, Director, Office of Community Planning and Development, U.S. Department of Housing and Urban Development, 1500 Pincroft Road, Greensboro, North Carolina 27407-3810. Mr. Dimmick may also be reached at: (336) 547-4000, ext. 2047 or Gary.A.Dimmick@HUD.gov.

Sincerely,

A handwritten signature in black ink that reads "Mark Johnston". The signature is written in a cursive, flowing style.

Mark Johnston
Deputy Assistant Secretary
for Special Needs

cc:

Mr. Joseph F. Calcara, DASA (I&H)
Mr. Patrick O'Brien, OEA
Mr. Anthony Caudle, LRA
Mr. Douglas A. Small, Jr., Lakeside Partners of Wilmington, Inc.

APPENDIX D
ENVIRONMENTAL CONDITION OF PROPERTY REPORT



FINAL

**ENVIRONMENTAL CONDITION OF
PROPERTY REPORT**

**ADRIAN B. RHODES
ARMED FORCES RESERVE CENTER (NC045)
2144 WEST LAKE SHORE DRIVE
WILMINGTON, NC 28401**

Prepared For:

**U.S. Army Corps of Engineers – Louisville District
Engineering Division – Environmental Engineering Branch
600 Dr. Martin Luther King, Jr. Place
Louisville, Kentucky 40202-2232**

FEBRUARY 2007

CERTIFICATION

All information/documentation provided accurately reflects the environmental condition of the property. This ECP Report is in general accordance with the U.S. Department of Defense (DOD) requirements for completion of an Environmental Condition of Property (ECP) Report.

STEVEN FRANCIS
Chief, Environmental Division
Deputy Chief of Staff
Installation Management
81st Regional Readiness Command

DATE

The undersigned certifies the contents of this report are in general accordance with DoD policies for the completion of an ECP.



LENARD GUNNELL, P.G.
Project Geologist
U.S. Army Corps of Engineers

02/07/07

DATE

EXECUTIVE SUMMARY

Fuller, Mossbarger, Scott and May Engineers, Inc. (FMSM), under contract to the U.S. Army Corps of Engineers (USACE), Louisville District, has prepared this Environmental Condition of Property (ECP) Report for the Adrian B. Rhodes Armed Forces Reserve Center (NC045), hereafter referred to as the "Site" or "AFR Center". The Site is located at 2144 West Lake Shore Drive, Wilmington, North Carolina, and encompasses approximately 4 acres.

This ECP Report was prepared in conformance with primary Department of Defense and Army guidance, the Department of Defense's Base Redevelopment and Realignment Manual, DoD 4165.77-M (BRRM), Army regulations and the American Society for Testing and Materials (ASTM) Designation D 6008-96 (2005), *Standard Practice for Conducting Environmental Baseline Surveys*, as secondary guidance when it was not inconsistent with the primary guidance.

This ECP Report details the history of the property, including the U.S. Army Reserve and any prior tenant uses of the Site and the resulting environmental condition of the property.

The AFR Center facility is situated on approximately 4 acres of land with three permanent buildings: a 22,581 square-foot AFR Center building, a 3,696 square-foot Organizational Maintenance Shop (OMS), and a 3,500 square-foot storage building. The Site is currently occupied by two units: the 650th Transportation Company and the 993rd Transportation Company.

Based on a review of aerial photographs and U.S. Geological Survey (USGS) topographic maps dating back to 1958, the Site has served as an AFR Center since 1958. The AFR Center building and OMS were constructed in 1958.

Areas of environmental concern were reviewed and FMSM found petroleum impacts relating to the environmental condition of the property. Petroleum contamination from a former heating oil underground storage tank (UST) was remediated and a No Further Action (NFA) letter was issued by the North Carolina Department of Environment and Natural Resources (NCDENR).

In accordance with Department of Defense policy defining the classifications (See Deputy Under Secretary of Defense Goodman Memorandum dated 21 October 1996), the Property has been classified as Category 2. This classification does not include categorizing the property based on *de minimis* conditions that generally do not present material risk of harm to the public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.

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LIST OF ACRONYMS

ACM	asbestos-containing material
AFR	Armed Forces Reserve
AR	army regulation
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	CERCLA Information System
CERFA	Community Environmental Response Facilitation Act
CONEX	Container Express
ECP	Environmental Condition of Property
EDR	Environmental Data Resources, Inc.
FEMA	Federal Emergency Management Agency
kg	kilogram
LBP	lead-based paint
LUST	leaking underground storage tank
MEC	munitions and explosives of concern
MEP	military equipment parking
NCCMP	North Carolina Coastal Management Plan
NCDENR	North Carolina Department of Environment and Natural Resources
NPL	National Priorities List
NRHP	National Register of Historic Places
O&M	Operations and Maintenance
OMS	Organizational Maintenance Shop
OWS	oil/water separator
PCBs	polychlorinated biphenyls
pCi/l	picoCuries per liter of air
ppm	parts per million
POL	petroleum, oil, and lubricant
POV	privately-owned vehicle

RCRA	Resource Conservation and Recovery Act
RCRIS	RCRA Information System
RRC	Regional Readiness Command
Site	Armed Forces Reserve Center (NC045)
TSD	treatment, storage, or disposal
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

1.0 INTRODUCTION

FMSM was contracted by the USACE – Louisville District, to prepare an ECP Report for the Adrian B. Rhodes AFR Center (NC045), in response to the Base Realignment and Closure (BRAC) 2005 legislation. The facility is located at 2144 West Lake Shore Drive, Wilmington, NC, hereafter referred to as the “Site” or “AFR Center”. In support of the ECP Report, a visual reconnaissance of the Site was conducted on 2 August 2006. The purpose of the visit was to visually obtain information indicating the environmental condition of property at the Site.

1.1 PURPOSE OF ENVIRONMENTAL CONDITION OF PROPERTY REPORT

The Military Department with real property accountability shall assess, determine and document the environmental condition of all transferable property in an ECP Report. This ECP Report is based on readily available information. Pursuant to the Department of Defense’s policy, set forth in the Base Redevelopment and Realignment Manual (DoD 4165.66-M, March 1, 2006) Section C8.3 (BRRM), the primary purposes of the ECP Report include the following:

- Provide the Army with information it may use to make disposal decisions;
- Provide the public with information relative to the environmental condition of the property;
- Assist in community planning for the reuse of Base Realignment and Closure (BRAC) property;
- Assist Federal agencies during the property screening process;
- Provide information for prospective buyers;
- Assist prospective new owners in meeting the requirements under EPA’s “All Appropriate Inquiry” regulations;
- Provide information about completed remedial and corrective actions at the property;
- Assist in determining appropriate responsibilities, asset valuation, and liabilities

The ECP Report contains the information required to comply with the provisions of 40 Code of Federal Regulations (CFR) Part 373, which require that a notice accompany contracts for the sale of, and deeds entered into, for the transfer of federal property on which any hazardous substance was stored, released or disposed of. The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA),

Section 120(h) stipulates that a notice is required if certain quantities of designated hazardous substances have been stored on the property for one year or more – specifically, quantities exceeding 1,000 kilograms or the reportable quantity, whichever is greater, of the substances specified in 40 CFR 302.4 or one kilogram of acutely hazardous waste as defined in 40 CFR 261.30. A notice is also required if hazardous substances have been disposed of or released on the property in an amount greater than or equal to the reportable quantity. Army Regulation (AR) 200-1 requires that the ECP Report address asbestos, lead-based paint, radon and other substances potentially hazardous to human health.

This ECP Report used the American Society for Testing and materials (ASTM) Designation D 6008-96 (2005), *Standard Practice for Conducting Environmental Baseline Surveys* as a guideline when not inconsistent with the BRRM, CERCLA § 120, Army regulations and other applicable Army guidance.

1.2 SCOPE OF SERVICES

This ECP report covers the AFR Center located at 2144 West Lake Shore Drive, Wilmington, North Carolina. The property is bound by West Lake Shore Drive to the east and Stadium Drive to the north. Site maps are provided in Appendix A. Appendix B provides photographs taken during the August 2006 site visit. Appendix C provides warranty deeds for the property and chain of title information. Historical environmental documents and reports are provided in Appendix D, while Appendix E contains the Environmental Data Resources, Inc. (EDR) reports.

This ECP report classifies the property into one of seven DoD Environmental ECP categories as defined by Deputy Under Secretary of Defense S. Goodman Memorandum, “Clarification of ‘Uncontaminated’ Environmental Condition of Property at BRAC Installations” (21 October 1996). The property classification categories are as follows:

- Category 1 – Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas).
- Category 2 – Areas where only the release or disposal of petroleum products has occurred.
- Category 3 – Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial response.
- Category 4 – Areas where release, disposal, and/or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.

- Category 5 – Areas where release, disposal, and/or migration of hazardous substances has occurred, and removal or remedial actions are under way, but all required remedial actions have not yet been taken.
- Category 6 – Areas where release, disposal, and/or migration of hazardous substances has occurred, but required actions have not yet been implemented.
- Category 7 – Areas that are not evaluated or require additional evaluation.

2.0 SITE LOCATION AND PHYSICAL DESCRIPTION

2.1 SITE LOCATION

The AFR Center is located in the western portion of New Hanover County, North Carolina, within the city limits of Wilmington, North Carolina. The site is located in a primarily residential area, with residential areas to the north and a municipal property to the west and south. Greenfield Lake is located east of the Site. Figure 1 in Appendix A provides a general site location map.

2.2 ASSET INFORMATION

Facility Name and Address: Adrian B. Rhodes, Armed Forces Reserve Center
(NC045)
2144 West Lake Shore Drive
Wilmington, NC 28401

Property Owner: United States Government

Date of Ownership: 11 December 1957

Current Occupant: 650th and 993rd Transportation Companies

Zoning: R7 - Residential

County, State: New Hanover County, North Carolina

USGS Quadrangle(s): Wilmington, North Carolina

Parcel: Tract A-100, Parcel # R06013-018-008-000

Latitude/Longitude: 34.203900 N; 77.935600 W

Legal Description: Copies of the deeds, which include legal descriptions, are provided in Appendix C.

2.3 PHYSICAL DESCRIPTION

The AFR Center is situated on 4.26 acres with three permanent structures: a 22,581 square-foot AFR Center building, a 3,696 square-foot OMS building, and a 3,500 square-foot supply storage building. The unit storage building has a sheet metal exterior and is located in the northwest corner of the Site. The AFR Center building and OMS were constructed in 1958.

The AFR Center building consists of a two story structure with concrete block and brick veneer walls. Photograph 1 in Appendix B provides a front view (facing west) of the exterior of the building. Photograph 2 in Appendix B provides a view of the south end of the building facing north. The interior of the AFR Center building consists of office space, classrooms, kitchen area, storage, arms vaults, and an assembly hall. Photographs 3 through 13 provide interior views of the AFR Center building. Figures 3 and 4 in Appendix A provide layouts of the interior of the AFR Center building.

The OMS is a one-story, concrete block and brick veneer structure. The OMS contains two work bay areas, a storage room, mechanical/equipment rooms and offices. A separate office was added to the south end of the OMS at some time but historical documents do not indicate when this addition was constructed. Overhead metal retractable doors are located on the west wall of the building. Photograph 14 in Appendix B shows the front (west) view of the OMS. Photographs 15 - 18 in Appendix B show the interior of the OMS. Figure 5 in Appendix A provides a layout of the interior of the OMS.

The unit storage building consists of a one-story, rectangular-shaped structure with a concrete slab floor and metal walls and roof. The unit storage building consists of a caged storage area used mainly for field equipment. Photographs 21 and 22 show exterior and interior views of the unit storage building.

A military equipment parking (MEP) area and a privately owned vehicle (POV) parking area are also contained within the Site. The POV parking area is located to the south of the AFR Center building, and the OMS and MEP are situated to the north and northwest. Photographs 2 and 21 in Appendix B provide views of the POV and MEP areas, respectively. Chain-link security fencing topped with barbed wire encloses the MEP area, OMS, unit storage building, and the north section of the property. Approximately three-fourths of the Site is covered by impervious surface features (e.g. asphalt parking areas, driveways, concrete walkways, buildings, etc.). The remaining ground surface is covered by lawn area and a sparse population of deciduous trees. The southwest corner of the property contains dense vegetation and is heavily wooded. Topographically, the Site is flat and exhibits no obvious slope. Figure 2 in Appendix A provides a current plan view layout of the Site. Appendix B provides photographs taken during the August 2006 site visit.

Vehicle washing historically occurred in the wash rack located west of the OMS. A floor drain adjacent to the wash rack carried water to an in-ground OWS located between the wash rack and the OMS.

Approximately fifteen military vehicles, including heavy expanded mobility tactical trucks (HEMTT) and high mobility multipurpose wheeled vehicles (HMMWV or Humvee), were located within the MEP area during the site visit. Several non-permanent metal Container Express (CONEX) units were located in the MEP area and a portable

hazardous materials (HAZMAT) storage unit was located south of the OMS. See Photos 19 - 21 in Appendix B for views of the military vehicles and portable storage units.

2.4 SITE HYDROLOGY AND GEOLOGY

2.4.1 Surface Water Characteristics

Figure 6 in Appendix A provides a portion of the 1993 Wilmington, North Carolina United States Geological Survey (USGS) topographic map, which includes the Site. As shown, the Site is situated at an elevation of approximately 8 feet above mean sea level and is relatively flat.

The Site is situated adjacent to Greenfield Lake which lies to the east. A drainage ditch on the Site flows beneath West Lake Shore Drive and discharges into the lake. The outlet stream from Greenfield Lake eventually discharges into the Cape Fear River, which is located approximately one mile to the west. The Cape Fear River discharges into the Atlantic Ocean.

According to the Federal Emergency Management Agency (FEMA) digital Flood Hazard Area map indicates that the Site lies within the 100-year floodplain. Figure 7 in Appendix A provides a map depicting the 100-year and 500-year floodplain in relation to the Site.

2.4.2 Geology/Hydrogeological Characteristics

The site is situated on the Coastal Plains of North Carolina. The area is underlain by limestone of the Peedee Formation of Cretaceous age and limestone and dolomitic limestone of the Castle Hayne Formation. Significant layers of coastal sediments can be situated over the limestone and dolomitic limestone. Plates 8 and 9 in the 1995 Site Assessment Report indicated that the new surface sediments were composed of layers of poorly graded sand and silty sand. Groundwater was encountered from 7 to 8 feet below the surface and limestone bedrock was encountered approximately 30 feet below the surface.

Groundwater in the Wilmington area primarily occurs in two aquifers – the surficial coastal deposits, and the limestones and sands of the Castle Hayne Formation. The surficial aquifers are generally unconfined aquifers. The coastal sediments deposited on top of the confining bedrock, typically occur at a depth of 20 to 50 feet, and are not used for water supply in the Wilmington area. The Castle Hayne aquifer is the most productive aquifer in the State. It is usually a confined aquifer within the limestone, and is found at a depth of over 90 feet in the Wilmington area.

According to information from the GeoCheck section of the EDR report the specific type of soil at the Site is from the Kureb series. The soil does not meet the requirements of a hydric soil. However, the Kureb series can contain inclusions of Leon sand, which is a hydric soil. There is a potential for wetland features in areas of depression through the Kureb sand.

The surface soils are sandy. These soil types have high infiltration rates, low water holding characteristics, high hydraulic conductivity and are characterized as soils with coarse textures. The profile of the area shows sand from the surface down to a depth of 80 inches.

2.5 SITE UTILITIES

Water Service – The City of Wilmington provides potable water for the Site.

Sanitary Sewer System – The City of Wilmington Waste Water Department provides sewer service to the Site.

Gas & Electric – Piedmont Gas provides natural gas to the Site and Progress Energy provides electric service.

2.6 WATER SUPPLY WELLS & SEPTIC SYSTEMS

Based upon a review of available historical site and agency records and interviews with site personnel, no water supply wells or septic systems have been located at the Site.

A search of Federal and State water well databases identified four USGS monitoring wells located within one mile of the Site, with none of these four wells located within ¼ mile of the Site. The databases did not identify any water supply wells within one mile of the Site.

3.0 SITE HISTORY

3.1 HISTORY OF OWNERSHIP

Appendix C contains a chain of title report completed for the Site. The chain of title report did not identify any leases or environmental liens against the AFR Center property. According to historical documentation, the United States of America purchased the property from the City of Wilmington in 1957.

Available business directories including City, cross-reference, and telephone directories were reviewed, if available, at approximately five-year intervals for the years spanning 1964 through 2006. According to a City Directory provided by EDR and dated 10 July 2006, the address of the AFR Center was first listed in the research source in 1975. Subsequent city directory searches list the Site at 2144 West Lake Shore Drive from 1975 through 2005. A copy of the City Directory is included in Appendix E.

3.2 PAST USES AND OPERATIONS

In 1957, the U.S. Government purchased 4.26 acres for construction of the AFR Center. Construction of the AFR Center building and OMS occurred in 1958. Historical information sources do not indicate the uses of the parcel prior to the purchase by the U.S. Government. The Site has served as a reserve and mobilization center for the U.S. Army Reserve since the U.S. Government purchased the land.

The Site primarily functioned as an administrative, logistical, and educational facility, with limited maintenance of military vehicles and equipment occurring in the OMS building. The Site has been used by reservists for drill activities throughout its history. The facility is currently occupied by the US Army Reserve 650th and 993rd Transportation Companies. In addition US Navy Reserve and Coast Guard use the facility for training. At the time of the site visit, the AFR Center building contained various items, including desks, office furniture, and folding tables.

The OMS has been used to perform limited maintenance activities on military vehicles and equipment. Activities inside the OMS were reportedly limited to preventative maintenance checks, including checking vehicle fluids such as motor oil, water, and antifreeze, and light maintenance activities. Small amounts of cleaning supplies, solvents, paint and other materials were stored in a flammable materials cabinet in the OMS.

Vehicle washing has historically occurred in the wash rack located to the west of the OMS building. The wash rack drains to the OWS and reportedly discharges into the city sanitary sewer. An inspection report is included with the Sites historical documents, which indicates the OWS is functioning properly. Historical documents show that the OWS was serviced in 1997 and 2005.

Historical aerial photographs and topographic maps were a primary source of information on the past use and operations at the Site. Figure 6 and Figures 8 through 13 in Appendix A provide USGS topographical maps from 1970 and 1979 and aerial views of the Site and surrounding areas in 1958, 1983, 1993, and 2005. Greenfield Lake appears to the east of the Site in all historical maps and aerial photographs.

The 1958 aerial photograph (Figure 8, Appendix A) shows the AFR Center building and the OMS present on the Site without additions to the structures. North of the Site are residential buildings and south of the Site is undeveloped with wooded areas. The property west of the site contains a horse track and baseball field.

The 1970 USGS topographical map (Figure 9, Appendix A) shows the Site with two buildings present. The areas to the south and north appear undeveloped. Legion Stadium is noted west of the Site.

The 1979 USGS topographic map (Figure 10, Appendix A) shows the Site and surrounding properties as similar to those shown on the 1970 USGS topographic map.

The 1983 aerial photograph (Figure 11, Appendix A) shows the AFR Center building with its addition complete and the OMS building without any addition. The property to the west contains a baseball stadium and the property to the south is developed with one structure present. The property north of the Site appears similar to the 1958 aerial photograph.

The 1993 and 2005 aerial photographs (Figure 12, in Appendix A) show the Site and surrounding properties similar to the conditions observed during the August 2006 site reconnaissance.

3.3 PAST USE, STORAGE, DISPOSAL, AND RELEASE OF HAZARDOUS SUBSTANCES

3.3.1 Past Use and Storage of Hazardous Substances

Information related to the past use and storage of hazardous substances at the Site was compiled through review of available site records, search of Federal and State environmental databases, and interviews with Army Reserve personnel.

Chemicals formerly used and stored at the Site were associated with vehicle and facility maintenance activities, and janitorial services. Janitorial chemicals and building maintenance-related products were stored in the designated storage area within the janitorial closet located in the AFR Center building. Vehicle maintenance products and small amounts of petroleum, oil, and lubricant (POL) products were also stored within designated areas within the OMS building.

Certain types of chemical products used and stored at the Site would likely have contained CERCLA hazardous substances and would have been stored on a rotational basis in amounts necessary to support the unit through direct support level maintenance. There is no indication that CERCLA hazardous substances were stored at the Site for one year or more in excess of corresponding reportable quantities.

Used oil, used antifreeze, and POL have been stored in separate containers outside the OMS. Minor amounts (less than 30 gallons total) of cleaners, solvents and paints have been stored inside the HAZMAT unit. The used oil AST capacity is 275 gallons and the used antifreeze AST capacity is approximately 200 gallons. POL is stored in 1-gallon and 5-gallon containers with a total volume less than 100 gallons.

3.3.2 Past Disposal and Release of Hazardous Substances

Information related to past disposal and potential release of hazardous substances at the Site was compiled through review of available site records, search of Federal and State environmental databases, and interviews with Army Reserve personnel. According to Army Reserve personnel and site records, on-site disposal of hazardous materials or wastes has not occurred at the Site.

3.4 PAST PRESENCE OF BULK PETROLEUM STORAGE TANKS

Based upon a review of available site records, a search of Federal and State environmental databases, and interviews with Army Reserve personnel, a total of five USTs have been present at the Site.

A 550-gallon heating oil UST was installed for the OMS in the late 1950s. This tank was replaced by a 1,000-gallon heating oil UST in the 1970s. The 1,000 gallon UST for the OMS was removed in 1993 and no remediation was required.

A 2,000-gallon heating oil UST was installed at the north end of the AFR Center building in the late 1950s. This tank was abandoned in place and a 5,000 gallon heating oil UST was installed in the same location in the late 1970s. A 1,000-gallon heating oil UST was installed at the south end of the AFR Center building when a building addition was completed in the late 1970s. These three USTs were removed in 1993 and no remediation was required for the 1,000-gallon UST and the 5,000-gallon UST.

During the 1993 removal of USTs, a leak was observed in the 2,000 gallon UST. The subsequent site assessments indicated petroleum constituent concentrations in soil and groundwater were above North Carolina action levels. Approximately 500 cubic yards of soil was removed from the Site and the area was backfilled with clean soil. Groundwater monitoring continued after the soil remediation and showed decreasing concentrations of petroleum constituents. An NFA letter was issued by the NCDENR in 2001 indicating the release had been sufficiently remediated.

An OWS is present at the Site. Maintenance was performed on the OWS in 1997 and 2005, indicating that the OWS was functioning properly. Analysis of sludge samples showed that the waste material was non-hazardous and non-regulated waste.

3.5 REVIEW OF PREVIOUS ENVIRONMENTAL REPORTS

A review of site records produced several reports pertaining to the Site. The following subsections provide a brief summary of these reports. Copies of the reports, unless otherwise specified, are provided in Appendix D.

3.5.1 2005 Spill Prevention Control and Countermeasure Plan

The SPCC Plan was prepared by Environmental Enterprise Group in May 2005, to comply with 40 CFR 112, which provides the guidance for development of a plan to prevent and handle hazardous and petroleum releases. The plan includes a general listing of material and petroleum products stored at the Site, actions to be taken in the event of spills or releases, and key personnel who implement the plan.

3.5.2 1995 Site Assessment

A site assessment report was prepared for the Site in 1995. The assessment was conducted to determine the effects of a release from a former heating oil UST. The assessment noted the contamination was limited to the groundwater and soil at the north end of the AFR Center building and the presence of free product was the primary environmental concern. Results from laboratory testing are included with the attached copy of the report. A summary of the UST removal and remediation is included in Section 3.4.

3.5.3 2004 Lead-based Paint Survey Report

A lead-based paint (LBP) survey was completed in March 2004 by Environmental Enterprise Group. The survey was conducted for the AFR Center building and the OMS. LBP was found in the AFR Center building on interior and exterior doors and casings, exterior painted lintels, structural steel components and exterior metal fixtures. The OMS contained LBP in coatings on the exterior door, overhead doors, frames, lintels and structural steel components.

3.5.4 2002 Asbestos Re-inspection Report

A 2002 asbestos survey confirmed that ACM was present in the AFR Center building and the OMS. The survey reports that friable ACM was identified in pipe insulation located in the OMS. The friable ACM was removed and replaced with fiberglass insulation in 2002. Floor tiles which contain non-friable asbestos are present in both the administration building and OMS and were noted to be in good condition.

3.5.5 1995 Oil Water Separator Survey

A survey of the OWS at the Site was performed in 1995. The report indicated that the OWS had accumulated a significant amount of oil and solids. Overall, the OWS was reported to function properly. It is recommended in the report that the OWS be pumped out and cleaned.

3.5.6 1997 Oil Water Separator Cleaning Report

Earth Tech Inc. cleaned the OWS in March 1997. The report indicates the OWS was in good condition and that after cleaning, the OWS functioned freely with no blockages. Testing of sludge from the OWS showed that the sludge was a non-hazardous, non-regulated waste.

3.5.7 1993 UST Survey Report, 1993 UST Closure Report, 2003 UST Memorandum

- The 1993 UST Survey Report documented that there were four active heating oil USTs at the Site in August 1993.
- The 1993 UST Closure Report documented the removal of one 1,000-gallon heating oil UST that was located near the intersection of Stadium Drive and West Lake Shore Drive and served the OMS building. The report indicated that there was no evidence of a release from this UST.
- The 2003 UST Memorandum included this summary for the Site: Records indicate two 1,000-gallon heating oil USTs, one 2,000-gallon heating oil UST and one 5,000-gallon heating oil UST were removed FY93 by Environmental Technology of North America, Inc. The Closure Report indicated contamination had resulted from a leak in the 2,000-gallon UST tank. Remediation was completed and a Soil Cleanup Report dated 30 September 2000 was submitted to the NCDENR requesting a finding of NFA. The NCDENR issued a finding of NFA as documented in a letter dated 6 April 2001. Additional information is presented in Section 3.4.

3.5.8 1996 Underground Storage Tank Corrective Action Plan (CAP)

The CAP details the procedures for the remediation of soil and groundwater at the Site from the leaking UST removed in 1993. Only the 2,000-gallon heating oil UST that had been located near the north end of the AFR Center building had a release of petroleum. Monitoring wells were installed and additional groundwater and soil samples were taken. The report includes site maps of the well locations and diagrams of the monitoring wells.

3.5.9 2000 Soil Cleanup Report, 2001 Soil Cleanup Report NFA Correspondence

The 2000 Soil Cleanup Report documents the remedial activities performed at the Site for the residual contamination remaining from the former UST. Twelve monitoring wells were installed and sampling determined free product was present in one well and the groundwater plume extended 120 feet across the Site, but did not leave the AFR Center property. Nineteen soil borings were drilled and sampling determined that the soil contamination was limited to a depth of 4-6 feet below the ground surface immediately above the water table surface. The majority of the petroleum contaminated soil excavated was located at a depth of 4-7 feet below the ground surface. Approximately 300 cubic yards of clean soil was excavated from the surface and stockpiled, and over 500 cubic yards of contaminated soil were excavated and removed from the Site. Confirmation soil sampling was conducted by USACE personnel and indicated no constituents of concern were detected on the Site. Groundwater monitoring continued after the soil remediation and showed decreasing concentrations of petroleum constituents. NFA status was requested based on these results.

The May and June 2001 correspondence documents the communication between the 81st RSC, the City of Wilmington and the NCDENR for completing requirements for the No Further Action status at the Site.

3.5.10 Additional Site Work and Documents Provided

Additional environmental work was conducted at the Site and additional historical reports provided to FMSM after the date of the site visit. These reports are included in Appendix D.

Soil Sampling Report, November 2006. Soil samples were collected in the vicinity of the OWS in November 2006. The soil samples were analyzed for total petroleum hydrocarbons and the results were all below the laboratory detection limit of approximately 30 mg/kg.

NC Facilities Radon Results Datasheets, 1989-1990. Datasheets for radon testing at South Carolina USAR facilities were provided. A 90-day radon survey was conducted at the Site from December 1989 to March 1990. The radon results were at or below 1.0 pCi/l for all areas sampled at the Site. The USEPA recommended exposure limit for radon is 4.0 pCi/l. These datasheets are not included in Appendix D because the majority of the data are for other sites.

OWS Servicing, August 2005. The OWS was pumped out and the waste water and solids, classified as non-hazardous, were shipped off site for disposal. This report is not included in Appendix D because the majority of the report is disposal data and manifests for the water removed from the OWS.

4.0 ADJACENT PROPERTIES

Figure 13 in Appendix A provides a recent aerial view of the Site and adjacent properties. Table 1 provides a list of adjacent properties with their directional location in regards to the Site. A description of the zoning for the adjacent parcels is also listed in Table 1. Photographs 23 through 28 in Appendix B provide views of adjacent properties and surrounding land use.

TABLE 1 LIST OF ADJACENT PROPERTIES			
Direction From Site	Name/Type of Property	Address	Zoning
North	Residential	Stadium Drive	R-7 Residential
South	Wilmington Fire Department Training Tower	West Lake Shore Drive	GB – General Business
East	Greenfield Lake	West Lake Shore Drive	R-5 - Residential
West	Baseball Stadium	2221 Carolina Beach Road	GB – General Business

Appendix A and Appendix E provide historical aerial photographs, topographic maps, and EDR Reports, which were used to evaluate potential environmental impacts on adjacent properties that may have the potential to impact the environmental condition at the Site. The general land use of the surrounding properties does not indicate a concern regarding environmental impacts to the AFR Center.

5.0 REVIEW OF REGULATORY INFORMATION

A component of the ECP is the review of reasonably obtainable Federal, State, and local government records for the Site and surrounding properties, where there has been a release or likely release of a hazardous substance or petroleum product, and which is likely to cause or contribute to a release or threatened release of hazardous substance or petroleum product on the Federal real property. A regulatory database summary was acquired from EDR on 7 July 2006. The regulatory database summary consolidates standard Federal, State, local, and tribal environmental record sources based on ASTM recommended minimum search distances from the Site. A copy of the complete EDR report is included in Appendix E.

5.1 FEDERAL ENVIRONMENTAL RECORDS

The regulatory information presented in Table 2 was obtained from the EDR Federal regulatory database search report.

Database	Search Distance (miles)	Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	1	Total Plotted
NPL	1.000		0	0	0	0	NR	0
Proposed NPL	1.000		0	0	0	0	NR	0
Delisted NPL	1.000		0	0	0	0	NR	0
NPL Recovery	TP		NR	NR	NR	NR	NR	0
CERCLIS	0.500	X	0	0	0	NR	NR	1
CERC-NFRAP	0.500		0	0	0	NR	NR	0
CORRACTS	0.500		0	0	0	0	NR	0
RCRA TSD	1.000		0	0	0	NR	NR	0
RCRA Lg. Quantity Gen	0.500		0	0	NR	NR	NR	0
RCRA Sm. Quantity Gen	0.250	X	0	0	NR	NR	NR	1
ERNS	TP		NR	NR	NR	NR	NR	0
HMIRS	TP		NR	NR	NR	NR	NR	0
US ENG CONTROLS	0.500		0	0	0	NR	NR	0

**TABLE 2
 FEDERAL DATABASE SEARCH**

Database	Search Distance (miles)	Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	1	Total Plotted
US INST CONTROL	0.500		0	0	0	NR	NR	0
DoD	1.000		0	0	0	0	NR	0
FUDS	1.000		0	0	0	0	NR	0
US Brownfields	0.500		0	0	0	NR	NR	0
CONSENT	1.000		0	0	0	0	NR	0
ROD	1.000		0	0	0	0	NR	0
UMTRA	0.500		0	0	0	NR	NR	0
ODI	0.500		0	0	0	NR	NR	0
TRIS	TP		NR	NR	NR	NR	NR	0
TSCA	TP		NR	NR	NR	NR	NR	0
FTTS	TP		NR	NR	NR	NR	NR	0
SSTS	TP		NR	NR	NR	NR	NR	0
ICIS	TP		NR	NR	NR	NR	NR	0
PADS	TP		NR	NR	NR	NR	NR	0
MLTS	TP		NR	NR	NR	NR	NR	0
MINES	0.250		0	0	NR	NR	NR	0
FINDS	TP	X	NR	NR	NR	NR	NR	1
RAATS	TP		NR	NR	NR	NR	NR	0

TP = Target Property; NR = Not Required

5.1.1 Federal RCRA Small and Large Quantity Generators List Within 1/4 Mile

Conditionally exempt small quantity generators are defined as facilities generating less than 100 kilograms (kg) of hazardous waste, or less than 1 kg of acutely hazardous waste per month. RCRA small quantity generators are defined as facilities generating between 100 kg and 1,000 kg of hazardous waste per month, while a large quantity generator is defined as a facility generating more than 1,000 kg of hazardous waste, or over 1 kg of acutely hazardous waste per month.

The AFR Center is listed in the EDR report as a conditionally exempt RCRA-registered small quantity generator (SQG), with USEPA ID NC0210021929. The Site has no transport, storage and disposal (TSD) activities listed and no previous violations are reported. No documentation was available for RCRA-SQG activities or inventories at the Site.

No other RCRA-registered large or small quantity generators were identified near the Site.

5.1.2 CERCLIS List

The CERCLIS Database is the Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) and contains information on hazardous waste sites, potentially hazardous waste sites and remedial activities across the nation.

The Site is listed on the CERCLIS database and is reported as having undergone a CERCLIS preliminary assessment which was completed on 13 September 2005. The Site was subsequently placed on the CERCLIS No Further Remedial Action Planned list.

5.1.3 Facility Index System/Facility Registry System (FINDS) Site

The FINDS List contains both facility information and "pointers" to other sources that contain more detail. The EDR report includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statute), and PADS (PCB Activity Data System).

According to the EDR report, the AFR Center is on the FINDS list due to being listed as a conditionally exempt RCRA SQG. The FINDS list is a cross-reference for RCRA info, a program that allows RCRA program staff to track the notification, permit, compliance and corrective action activities required under RCRA.

5.2 STATE AND LOCAL ENVIRONMENTAL RECORDS

The regulatory information presented in Table 3 was obtained from the EDR State regulatory database search report. Requests for State environmental records were submitted to the North Carolina Division of Air Quality, Water Quality, and Division of

Waste Management. No additional records were received from the State agencies. Copies of these letters are included in Appendix E.

**TABLE 3
 STATE DATABASE SEARCH**

Database	Search Distance (miles)	Site	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	1	Total Plotted
State Haz. Waste	1.000	X	0	0	0	0	NR	1
NC HSDS	1.000		0	0	0	1	NR	1
IMD	0.500	X	0	0	3	NR	NR	4
State Landfill	0.500		0	0	0	NR	NR	0
OLI	0.500		0	0	0	NR	NR	0
LUST	0.500	X	0	0	4	NR	NR	5
LUST TRUST	0.500		0	0	0	NR	NR	0
UST	0.250		0	0	NR	NR	NR	0
AST	0.250		0	0	NR	NR	NR	0
Inst. Controls	0.500		0	0	0	NR	NR	0
VCP	0.500		0	0	0	NR	NR	0
Dry Cleaners	0.250		0	0	NR	NR	NR	0
Brownfields	0.500		0	0	0	NR	NR	0
NPDES	TP		NR	NR	NR	NR	NR	NR

TP = Target Property; NR = Not Required

5.2.1 State Hazardous Waste Sites Within 1 Mile

The State hazardous waste site records are the States' equivalent to CERCLIS. These sites may or may not already be listed on the Federal CERCLIS list. Priority sites planned for remediation using State funds are identified along with sites where remediation will be paid for by potentially responsible parties.

The EDR report lists the Site as a State Hazardous Waste Site, which is a cross-reference for the RCRA SQG list for North Carolina. The Site is listed as a site requiring no further action.

5.2.2 Incident Management Database Within 1/2 Mile

The Incident Management Database (IMD) contains sites which have groundwater or soil contamination resulting from spills or releases. The Site is listed on the IMD and

three other sites within 1/2 mile are listed on the database. Fast Fare #730, NC Army National Guard Armory, and Fast Fare #723 are located more than 1/4 mile west of the Site and are not believed to be a significant environmental risk.

The AFRC is listed on the IMD for being a LUST site which resulted in groundwater contamination. The IMD incident was closed out on 6 April 2001. The IMD report indicates a heating oil tank is the contaminant source.

5.2.3 State-Registered Leaking UST (LUST) Sites Within 1/2 Mile

According to the EDR report four LUST sites were identified within 1/2 mile of the AFR Center. Table 4 lists the four sites along with their addresses and elevations relative to the Site. The Site is also listed on the LUST database.

TABLE 4 LEAKING UNDERGROUND STORAGE TANK SITES				
Company/Site	Address	Distance and Direction from Site	Status	Elevation Relation to Site
Fast Fare #730	2158 Carolina Beach Road	1/2 - 1/4 mile WSW	Closed Out	Higher
NC Army National Guard Armory	2221 Carolina Beach Road	1/2 - 1/4 mile SW	Closed Out	Higher
Fast Fare #723	2069 Carolina Beach Road	1/2 - 1/4 mile W	Closed Out	Higher
Harry AMOCO	2305 Carolina Beach Road	1/2 - 1/4 mile SSW	Tanks Removed	Higher

No active LUST sites are located within 1/2 mile of the Site, and these sites are not believed to be a significant environmental risk.

The Site is listed as a LUST site due to a leaking heating oil underground storage tank which was removed from the Site in 1993. A no further action status was granted to the Site on 6 April 2001.

5.3 TRIBAL ENVIRONMENTAL RECORDS

The regulatory information presented in Table 5 was obtained from the EDR regulatory database search report.

TABLE 5 TRIBAL DATABASE SEARCH							
Database	Search Distance (miles)	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	1	Total Plotted
Indian Reservation	1.000	0	0	0	0	NR	0
Indian LUST	0.500	0	0	0	NR	NR	0
Indian UST	0.250	0	0	NR	NR	NR	0

NR = Not Required

The database search did not identify any sites within the designated search radius requiring discussion.

5.3.1 Registered Indian Reservations Within 1 Mile

According to the EDR report, no designated Indian Reservations are located within one mile of the AFR Center.

5.4 EDR PROPRIETARY RECORDS

The regulatory information presented in Table 6 was obtained from the EDR's Proprietary Records database search report. Sites identified by this database search are discussed in the following subsections.

TABLE 6 EDR PROPRIETARY RECORDS DATABASE SEARCH							
Database	Search Distance (miles)	<1/8	1/8 – 1/4	1/4 – 1/2	1/2 – 1	1	Total Plotted
Manufactured Gas Plants	1.000	0	0	0	0	NR	0

NR = Not Required

The database search did not identify any sites within the designated search radius requiring discussion.

5.5 UNMAPPED SITES

The EDR database search listed eleven unmapped sites. Unmapped sites are facilities with insufficient address information to enable them to be located and mapped, and they

can only be identified as within the zip code of the Site. None of the unmapped sites were not observed within 1/4 mile of the AFR Center during the reconnaissance drive of the site vicinity and are not believed to be a significant environmental risk.

5.6 SUMMARY OF PROPERTIES EVALUATED TO DETERMINE RISK TO THE SITE

Based on an evaluation of available site information and details concerning the properties listed in the database searches, none of the facilities evaluated are classified as "High Risk". "High Risk" properties are those that exhibit significant environmental conditions that have the probability of adversely affecting the environmental conditions at another site.

6.0 SITE VISIT AND REVIEW OF ENVIRONMENTAL PROPERTY CONDITIONS

Findings documented in the following subsections are based on the 2 August 2006 site visit and area reconnaissance, a review of available site records, and information obtained from U.S. Army Reserve personnel.

6.1 UNDERGROUND/ABOVEGROUND STORAGE TANKS

No USTs were observed at the Site. Four heating oil USTs were removed from the Site in 1993. The site assessments and remediation that followed the removal of the USTs are summarized in Sections 3.4 and 3.5. Two ASTs, one for used oil (275 gallons) and one for used antifreeze (200 gallons), are present on Site outside the OMS. The ASTs were observed to be in good condition.

One in-ground OWS, located west of the OMS, was observed during the August 2006 site visit. Based on historical documents and interviews with reserve personnel, the OWS was serviced in 1997 and 2005 and has no known releases.

6.2 INVENTORY OF CHEMICALS / HAZARDOUS SUBSTANCES

At the time of the site visit, the OMS contained two flammable materials cabinets that contained various paints, lubricants and solvents in containers with volumes of one gallon or less. A POL locker located outside the OMS was reported to be empty, but was locked and its contents were not observed. A portable HAZMAT storage unit is located south of the OMS, but the unit was locked and its contents were not observed. No chemicals or hazardous materials were observed in the storage building in the northwest corner of the property. The AFR Center building had small amounts of cleaning supplies, solvents and paint which were stored in various metal cabinets. The medical and dental exam office (Photos 7 and 8 in Appendix B) did not contain any hazardous substances.

6.3 WASTE DISPOSAL SITES

There were no signs of landfilling or illegal waste disposal activities at the Site during the August 2006 site visit.

6.4 PITS, SUMPS, AND DRYWELLS

The restrooms and kitchen in the AFR Center building contained floor drains. All floor drains in the AFR Center building are connected to the municipal sanitary sewer system.

The vehicle wash rack located west of the OMS has one floor drain connected to an OWS located between the wash rack and the OMS. Site personnel confirmed that the wash rack discharges to the municipal sanitary sewer.

No pits, sumps or drywells were observed during the site reconnaissance.

6.5 ASBESTOS CONTAINING MATERIAL

A 2002 asbestos inspection confirmed that ACM is located in the AFR Center building and the OMS. The survey reports that the only friable material was pipe insulation located in the OMS. The friable ACM was removed and replaced with fiberglass insulation in 2002. Floor tiles, which may contain asbestos, were observed to be in good condition in both the AFR Center building and OMS.

6.6 POLYCHLORINATED BIPHENYL CONTAINING EQUIPMENT

Two pole-mounted transformers were observed on the Site property near the north end of the AFR Center building. Visual observation of the transformers from the ground indicated they are in good condition with no leaks observed. The transformers were not labeled for PCB content. Maintenance and remediation of the transformers would be the responsibility of the utility owner, Progress Energy. No response has been received to date for an information request concerning the transformers.

6.7 LEAD-BASED PAINT

All painted surfaces observed during the site reconnaissance appeared to be in good conditions with no peeling or flaking. A lead-based paint (LBP) survey was completed in March 2004 by Environmental Enterprise Group. The survey was performed on the AFR Center building and the OMS building. LBP was found in the AFR Center building on interior and exterior doors and casings, door and window lintels, interior wood window stools, baseboards, chalkboards and structural steel components. In addition LBP was found in the OMS on window casings, exterior doors and frames, window and door lintels and yellow painted structures.

6.8 RADON

Site-specific radon surveys were conducted in 1989-1990 for the AFR Center. The radon results were at or below 1.0 pCi/l for all areas sampled at the Site. The USEPA recommended exposure limit is 4.0 pCi/l.

6.9 MUNITIONS AND EXPLOSIVES OF CONCERN

No evidence of munitions and explosives of concern, including unexploded ordnance, were found during the site visit.

6.10 RADIOLOGICAL MATERIALS

During the August 2006 site visit and records review process, no indications were found of the current or past use, storage or disposal of radiological commodities at the AFR Center.

7.0 REVIEW OF SPECIAL RESOURCES

7.1 LAND USE

Figure 13 in Appendix A provides a 2005 satellite imagery view of the AFR Center and surrounding properties and depicts current land use. According to the City of Wilmington Zoning browser, the Site is currently zoned R-7 Residential and is located in a residential area. Greenfield Lake is located to the east of the Site.

7.2 COASTAL ZONE MANAGEMENT

The Division of Coastal Management (DCM), within the Department of Environment and Natural Resources, is the lead agency for the North Carolina Coastal Area Management Act (CAMA). According to the DCM webpage, New Hanover County is one of 20 counties covered by CAMA. Based on its location away from the ocean, navigable waters or estuary shoreline, the AFR Center is not located in an area of environmental concern that would require a CAMA permit.

7.3 WETLANDS

The U.S. Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) map shows that wetlands are identified on the Site. The mapped wetland is located on the southwest portion of the site, between the POV parking area and the west property line. In addition, soils at the Site are classified as Kureb sand, which is not hydric soil, but can contain inclusions of Leon sand, which is a hydric soil. There is a potential for wetland formation in areas of depression through the Kureb sand. Based on a review of the NWI map and soils information, it appears that jurisdictional wetlands occur in the wooded southwest portion of the Site. Figure 14 in Appendix A provides an NWI map illustrating wetlands at the southwest end of the Site.

7.4 100-YEAR FLOODPLAIN

A review of the Federal Emergency Management Agency digital Flood Hazard Area map indicates that the Site lies inside the 100-year floodplain. This floodplain is associated with Greenfield Lake, and extends from the western shore of the lake to approximately the west property line of the Site. Figure 7 in Appendix A shows the most recently updated Flood Insurance Rate Map (FIRM) of the Site location.

7.5 NATURAL RESOURCES

According to the United States Fish and Wildlife Service (USFWS), the threatened and endangered species shown in Table 7 are known to occur in New Hanover County, NC. No determination concerning the occurrences of these species or their potential habitat is rendered here.

**TABLE 7
 FEDERALLY THREATENED AND ENDANGERED SPECIES TO KNOWN TO OCCUR IN NEW
 HANOVER COUNTY, NC**

Common Name	Scientific Name	Federal Status
Shortnose sturgeon	<i>Acipenser brevirostrum</i>	Endangered
Red-cockaded woodpecker	<i>Picoides borealis</i>	Endangered
West Indian manatee	<i>Trichechus manatus</i>	Endangered
Cooley's meadowrue	<i>Thalictrum cooleyi</i>	Endangered
Rough-leaved loosestrife	<i>Lysimachia asperulaefolia</i>	Endangered
Seabeach amaranth	<i>Amaranthus pumilus</i>	Threatened
Loggerhead sea turtle	<i>Caretta caretta</i>	Threatened
Green sea turtle	<i>Chelonia mydas</i>	Threatened
Piping plover	<i>Charadrius melodus</i>	Threatened

7.6 CULTURAL RESOURCES

The Site does not appear on the National Register of Historic Places (NRHP). Because the Site is younger than 50 years, it is most likely not eligible for listing in the NRHP. A 2005 architectural survey report concluded that the NC045 facility did not meet any of the criteria for exceptional significance and the report recommended the buildings were not eligible for the National Register of Historic Places.

7.7 OTHER SPECIAL RESOURCES

A review of other special resources was conducted including a search for various federally managed and protected lands within or near the Site. The Site is not within an Officially Designated Wilderness Area according to wilderness.net. It is not within a National Wetlands Management District according to the USFWS. The National Park Service (NPS) does not include the Site on the Wild and Scenic Rivers and Trails lists.

8.0 CONCLUSIONS

FMSM was contracted by the USACE, Louisville District Engineering Division to prepare an ECP report for the Adrian B. Rhodes AFR Center, located at 2144 West Lake Shore Drive, New Hanover County, North Carolina. The Site is currently in use by the 650th and 993rd Transportation Companies. The Site has primarily functioned as an administrative, logistic, and educational facility, with limited vehicle maintenance occurring in the OMS building.

Findings of this ECP report are based on existing environmental information, including visual observations, site records, Federal, State, and local database and file information, related to the storage, release, treatment, or disposal of hazardous substances or petroleum products or derivatives on the property. The following paragraphs present the findings related to the environmental conditions on the property that were evaluated during the ECP report process.

- **Asbestos** - A 2002 asbestos re-inspection report confirmed that ACM is located in the AFR Center building and the OMS building. The survey reports that reportedly friable ACM was present as pipe insulation located in the OMS building. The friable ACM was removed and replaced with fiberglass insulation in 2002. Floor tiles, which are assumed ACM, are present in both the AFR Center building and OMS and were observed to be in good condition. The asbestos report indicated the remaining ACM was managed under an O&M Plan; however, this plan was not available for review.
- **Lead-Based Paint (LBP)** - LBP was found in the AFR Center building on interior and exterior doors and casings, exterior painted lintels, structural steel components and exterior metal fixtures. The OMS building contained LBP on the exterior door, overhead doors, frames, lintels and structural steel components.
- **Munitions and Explosives of Concern** - No evidence of munitions and explosives of concern, including unexploded ordnance, were found during the site visit.
- **PCB Transformers** - Two pole-mounted transformers are located on the Site near the north end of the AFR Center building. Visual observation of the transformers from the ground indicated they are in good condition with no leaks observed. The transformers were not labeled for PCB content. Maintenance and remediation of the transformers would be the responsibility of the utility owner, Progress Energy. No response has been received to date for an information request concerning the transformers.
- **Radiological Materials** - No radiological materials were identified at the time of the August 2006 site visit. There is no evidence to suggest that any radiological

commodities were ever improperly managed at the Site, or that any radionuclides were ever released.

- **Radon** – Site-specific radon testing showed average radon levels at the Site were at or below 1.0 pCi/l. The USEPA recommended radon exposure limit is 4.0 pCi/l.
- **Special Resources** - Based on a review of the NWI map and soils information, mapped wetlands are located in the wooded southwest portion of the Site.
- **Surrounding Properties** - Potential environmental sites of concern, located within corresponding ASTM search radius distances from the Site, were evaluated. None of the properties evaluated are considered high risk. “High Risk” properties are those that exhibit environmental conditions that have the probability of adversely affecting the environmental conditions at another site.
- **Use & Storage of CERCLA Hazardous Substances** - Chemicals containing CERCLA hazardous substances would likely have been used and stored at the Site in amounts necessary to support unit-level vehicle and building maintenance activities. However, the quantities stored would not have exceeded corresponding CERCLA threshold planning quantities. There is no evidence that the chemicals used or stored were ever improperly handled, released, or disposed at the Site. Therefore, it is not believed that the past use and storage of hazardous substances have negatively impacted environmental conditions at the Site.
- **USTs/ASTs** - Four USTs were removed from the Site and a no further action letter has been issued by the NCDENR. A used oil AST and a used antifreeze AST are located outside the OMS.
- **Wash Water Discharge** - A vehicle wash facility has been in use at the Site. Residual oil from the vehicle wash rack was collected by the underground OWS located west of the OMS. The OWS discharges to the municipal sanitary sewer system. Historical reports and interviews indicated the OWS has been serviced regularly and functions properly.

In accordance with Department of Defense policy defining the classifications (See Deputy Under Secretary of Defense Goodman Memorandum dated 21 October 1996), the Site has been classified as Category 2, an area where only the release or disposal of petroleum products has occurred. This classification is based on the remediation of contaminated soil associated with a former heating oil UST.

9.0 LIMITATIONS

This ECP Report was prepared to review certain elements of the environmental condition of property related to the storage, release, treatment, or disposal of hazardous substances or petroleum products. It documents efforts to determine or discover the presence or likely presence of a release or threatened release of these materials. Project activities were performed in general conformance with ASTM D6008, consistent with the BRRM, the project prescribed scope of work, and generally accepted practices in the consulting industry. The degree of care and skill is consistent with that generally exercised in the industry under similar conditions.

FMSM has relied on certain information provided by the USACE, USAR, and other parties referenced in the report. This information was assumed to be accurate and complete unless information to the contrary arose during the course of the ECP process. Historic documentation (e.g., information on past environmental practices, environmental records, AFRC operational changes, unit and equipment changes, chemical/substance inventories and storage, current as-built drawings, etc.) and facility personnel knowledge regarding chemicals used or stored on the Site and the quantities stored, was often limited or non-existent. Therefore, statements regarding storage of chemicals or presence of hazardous substances reflect best available data and are not warranted for either completeness or accuracy over the history of the facility.

In preparing this report, FMSM was required to review previous documents from other sources (collectively referred to herein as the Prior Reports). The Prior Reports may present findings regarding the abatement or remediation of known concerns at the time of their preparation or within the limit of the project scope of work. The Prior Reports may include statements or opinions of the original authors of the Prior Reports as to the satisfactory completion of work. FMSM notes that environmental laws and regulations, including abatement or remedial action levels, are periodically reviewed and updated by the various regulatory agencies and may have changed since the respective dates of the Prior Reports.

FMSM has summarized Prior Reports in fulfilling the prescribed scope of work for the project. This summarization may include statements or opinions as to the satisfactory completion of work. These statements or opinions are those of the original report authors. FMSM neither warrants nor certifies the accuracy or completeness of these statements. The summarization of previous documents has not reviewed or updated those conclusions with regards to actions from the time of that document to date, current regulatory agency abatement, or remedial standards. Rather, this summary provides the original author's conclusions at the time the report was prepared. Evaluation of the completeness of previous documents or statements of abatement or remediation is beyond the current scope of service included in this contract.

A limited site reconnaissance was performed to visually identify materials or conditions representing recognized adverse environmental conditions. Identification of hidden conditions, observation of the effects of activities or incidents occurring after completion of the reconnaissance, buried conditions, conditions obscured by dense foliage, conditions beneath buildings, other structures, or covered by building/paving materials, or conditions otherwise obscured, is beyond the scope of this work. The conditions described in this report are valid only for the time that the observations were made. Some conditions may change with time.

The findings and conclusions contained in this report are based in part on the information available at the time of the study. The findings and conclusions should be considered not as scientific certainties, but as probabilities based on professional judgment of the significance of the limited data gathered in the course of the site evaluation, interviews and literature review. If additional or corrected information becomes available, FMSM requests the opportunity to review/modify conclusions, as warranted.

10.0 REFERENCES

PERSONS CONTACTED

- Ms. Michelle Hook, JM Waller Associates, Contractor for 81st Regional Readiness Command, Area 2 Environmental Manager, August 2006
- Sharon Flood, Unit Administrator/Facility Manager, Rhodes AFRC, August 2006

RESOURCES CONSULTED

- Conrad, Stephen C., Geologic Map of North Carolina, 1985, Department of Natural Resources and Community Development, Division of Land Resources, North Carolina Geological Survey.
- Huffman, Rodney L., Groundwater in the Coastal Plain of North Carolina, March 1996, North Carolina Cooperative Extension Service, Water Quality and Water Management.
- Aquifer Characteristics, Division of Water Resources, NCDENR, <http://www.ncwater.org>.
- Aerial Photographs provided by the USGS dated 1958, 1983, 1993, and 2005.
- National Wild and Scenic Rivers, <http://www.nps.gov/rivers/wildriverslist.html>
- USEPA Map of Radon Zones, <http://www.epa.gov/radon/zonemap.html>
- FEMA Flood Hazard Insurance Map, <http://msc.fema.gov/webapp/wcs/stores/servlet/FemaWelcomeView?storeId=10001&catalogId=10001&langId=-1>
- EDR Report - The EDR Report in Attachment C includes a comprehensive list of the Federal, State, Local, Tribal and Proprietary databases that were queried.

AGENCIES CONTACTED

- North Carolina Division of Air Quality
- North Carolina Division of Waste Management
- North Carolina Division of Water Quality
- City of Wilmington, North Carolina

FEDERAL REGULATORY DATABASES

- National Priorities List (NPL), 19 April 2006
- Proposed NPL Sites, 19 April 2006
- Delisted NPL Sites, 19 April 2006
- NPL Recovery, 15 October 1991
- Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS), 1 February 2006
- CERCLIS No Further Remedial Action Planned Sites (NFRAP), 1 February 2006
- Resource Conservation and Recovery Information System (RCRIS) Corrective Action Sites (CORRACTS), 15 March 2006
- Resource Conservation and Recovery Act Information (RCRA), 9 March 2006
- Emergency Response Notification System (ERNS), 31 December 2005
- Hazardous Materials Information Reporting System (HMIRS), 31 December 2005
- Engineering Controls Sites List (US ENG CONTROLS), 21 March 2006
- Institutional Controls Sites List (US INST CONTROLS), 21 March 2006
- Department of Defense Sites (DoD), 31 December 2004
- Formerly Used Defense Sites (FUDS), 5 December 2005
- Listing of Brownfields Sites, 26 April 2006
- Superfund Consent Decrees, 14 December 2004
- Records of Decision (ROD), 13 March 2006
- Uranium Mill Tailings Sites, 4 November 2005
- Potentially Responsible Parties (PRP), 9 March 2006
- Toxic Chemical Release Inventory System (TRIS), 31 December 2003

- Toxic Substances Control Act (TSCA), 31 December 2002
- FIFRA/TSCA Tracking System, 29 March 2006
- FTTS INSP, 31 March 2006
- Section 7 Tracking Systems (SSTS), 31 December 2004
- Integrated Compliance Information System (ICIS), 13 February 2006
- PCB Activity Database System (PADS), 27 December 2005
- Material Licensing Tracking System (MLTS), 12 April 2006
- Mines Master Index File (MINES), 9 February 2006
- Facility Index System/Facility Registry System (FINDS), 27 April 2006
- RCRA Administrative Action Tracking System (RAATS), 17 April 1995
- Biennial Reporting System (BRS), 31 December 2003

STATE AND LOCAL REGULATORY DATABASES

- State Hazardous Waste Sites, 11 April 2006
- Hazardous Substance Disposal Site, 21 June 1995
- Incident Management Database, 4 April 2006
- Solid Waste Facility/Landfills, 27 April 2006
- Old Landfill Inventory (OLI), 3 April 2006
- Leaking Underground Storage Tank Sites (LUST), 2 June 2006
- LUST TRUST, 4 May 2006
- Underground Storage Tank (UST), 12 May 2006
- Aboveground Storage Tanks (AST), 12 April 2004
- Institutional Controls, 11 April 2006
- Voluntary Cleanup Program, 11 April 2006

- Drycleaners, 4 April 2006
- Brownfields, 30 September 2005
- NPDES, 22 May 2006

TRIBAL RECORDS

- Indian Reservation, 31 December 2004
- Indian LUST, 1 January 2006
- Indian UST, 1 January 2006

EDR PROPRIETARY REPORTS

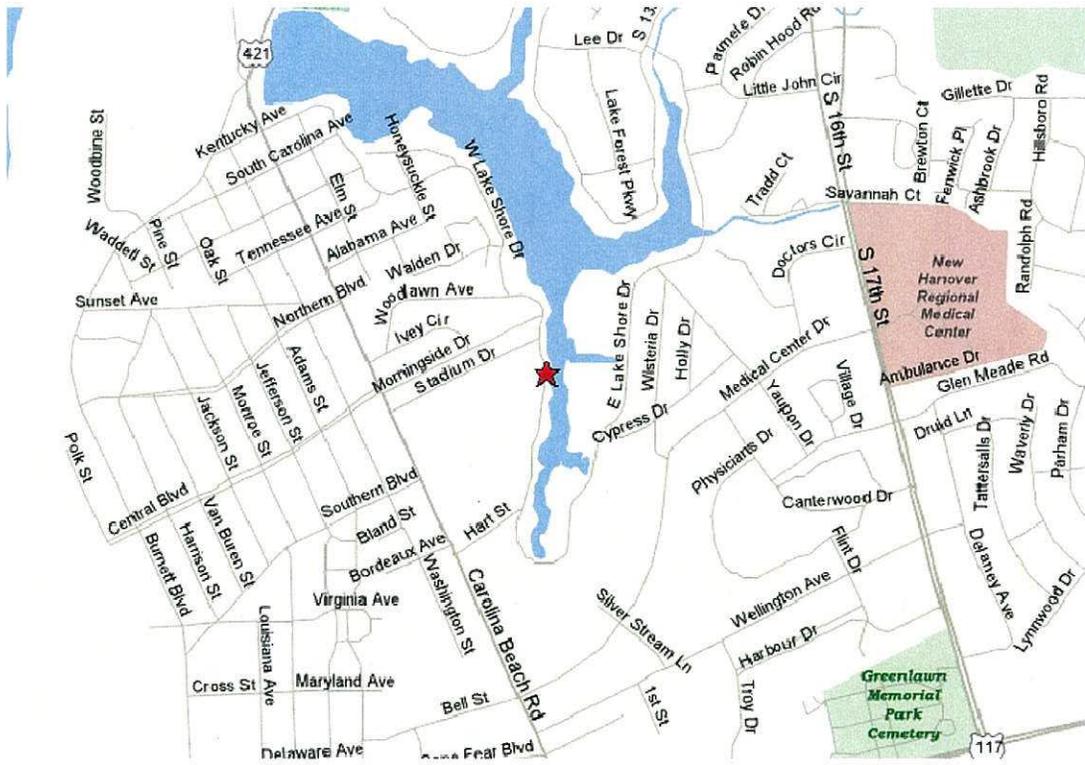
- Manufactured Gas Plants

APPENDIX A

FIGURES



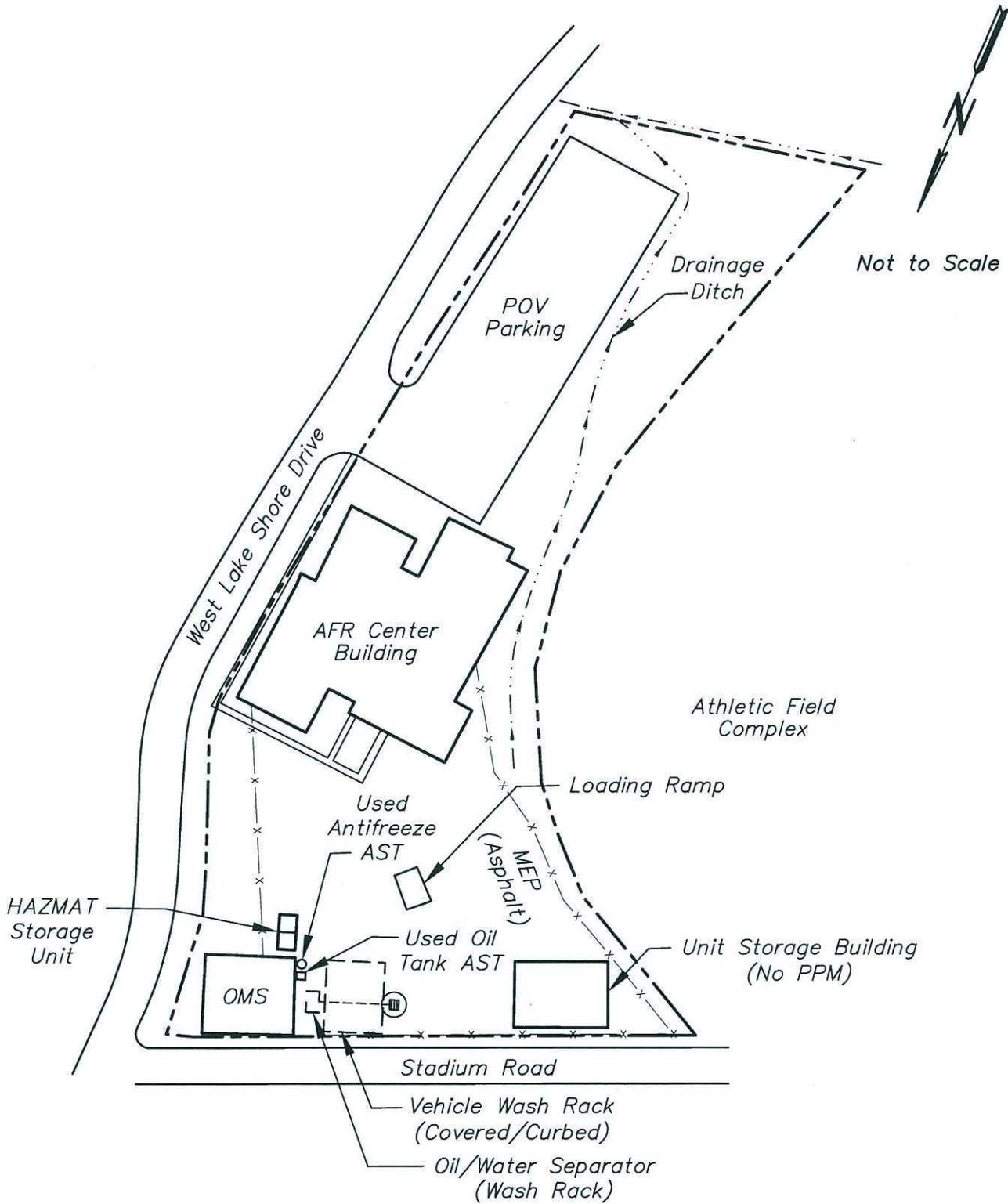

 Not To Scale



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FIGURE 1
GENERAL SITE LOCATION MAP
NC045 ADRIAN B. RHODES AFRC
2144 West Lake Shore Drive
Wilmington, New Hanover County, North Carolina



Adapted from previous SPCC Plan
 (May 2005) prepared by EEG, Inc.
 for US Army Reserve 81st RRC

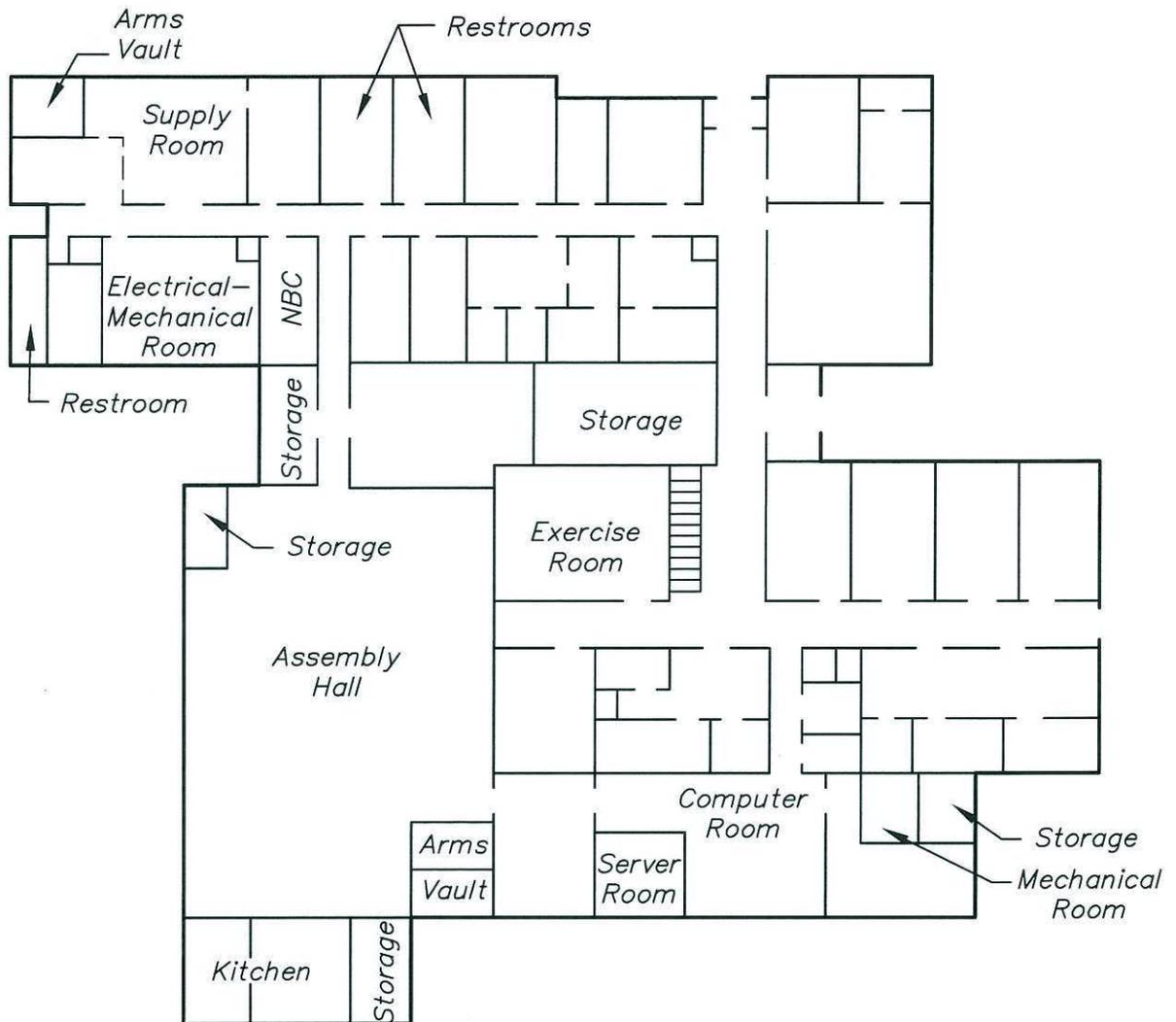
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FIGURE 2
 PLAN VIEW LAYOUT OF SITE
 NC045 ADRIAN B. RHODES AFRC
 2144 West Lakeshore Drive
 Wilmington, New Hanover County, North Carolina



Not to Scale



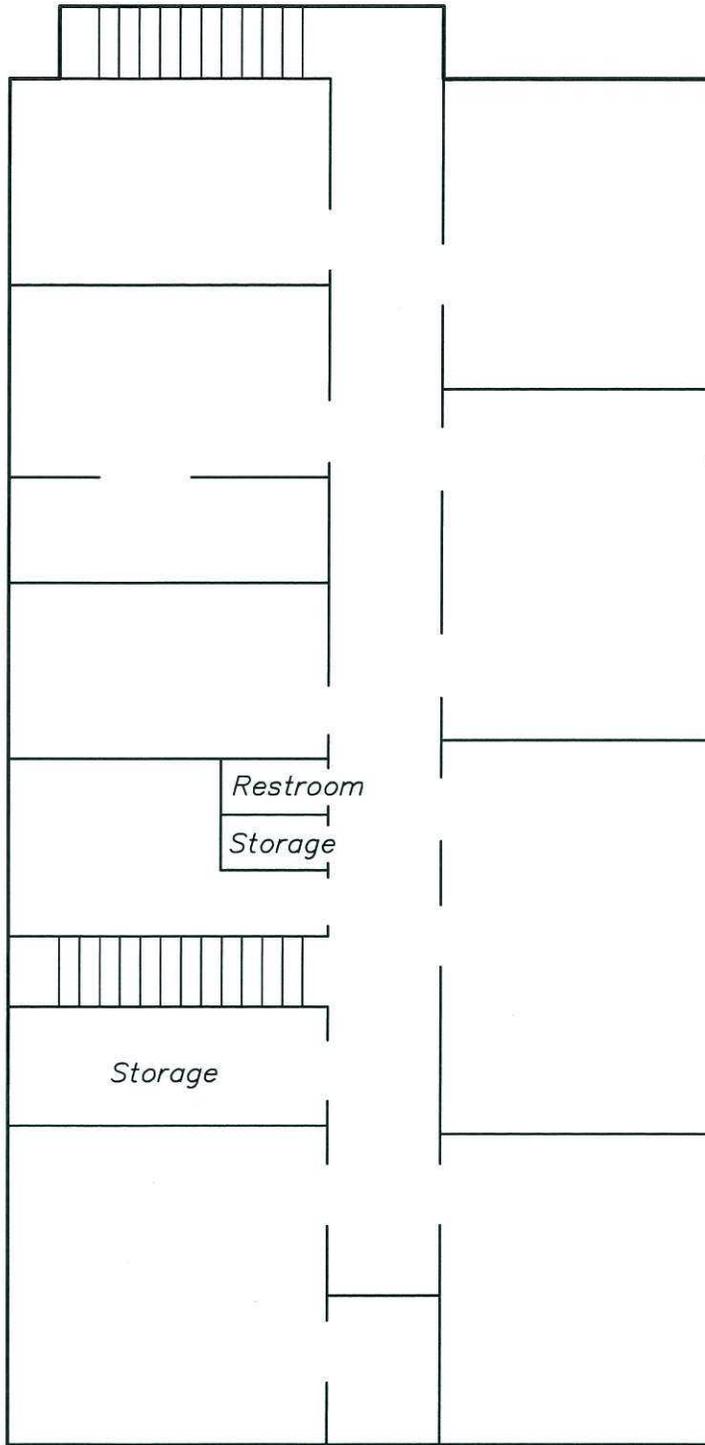
Note:
Unlabeled rooms are offices,
storage or classrooms.

Adapted from previous Lead Based Paint
Survey (Mar 2004) prepared by EEG, Inc.
for US Army Reserve 81st RRC

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FIGURE 3
INTERIOR LAYOUT, FIRST FLOOR, AFR CENTER BUILDING
NC045 ADRIAN B. RHODES AFRC
2144 West Lakeshore Drive
Wilmington, New Hanover County, North Carolina



Not To Scale

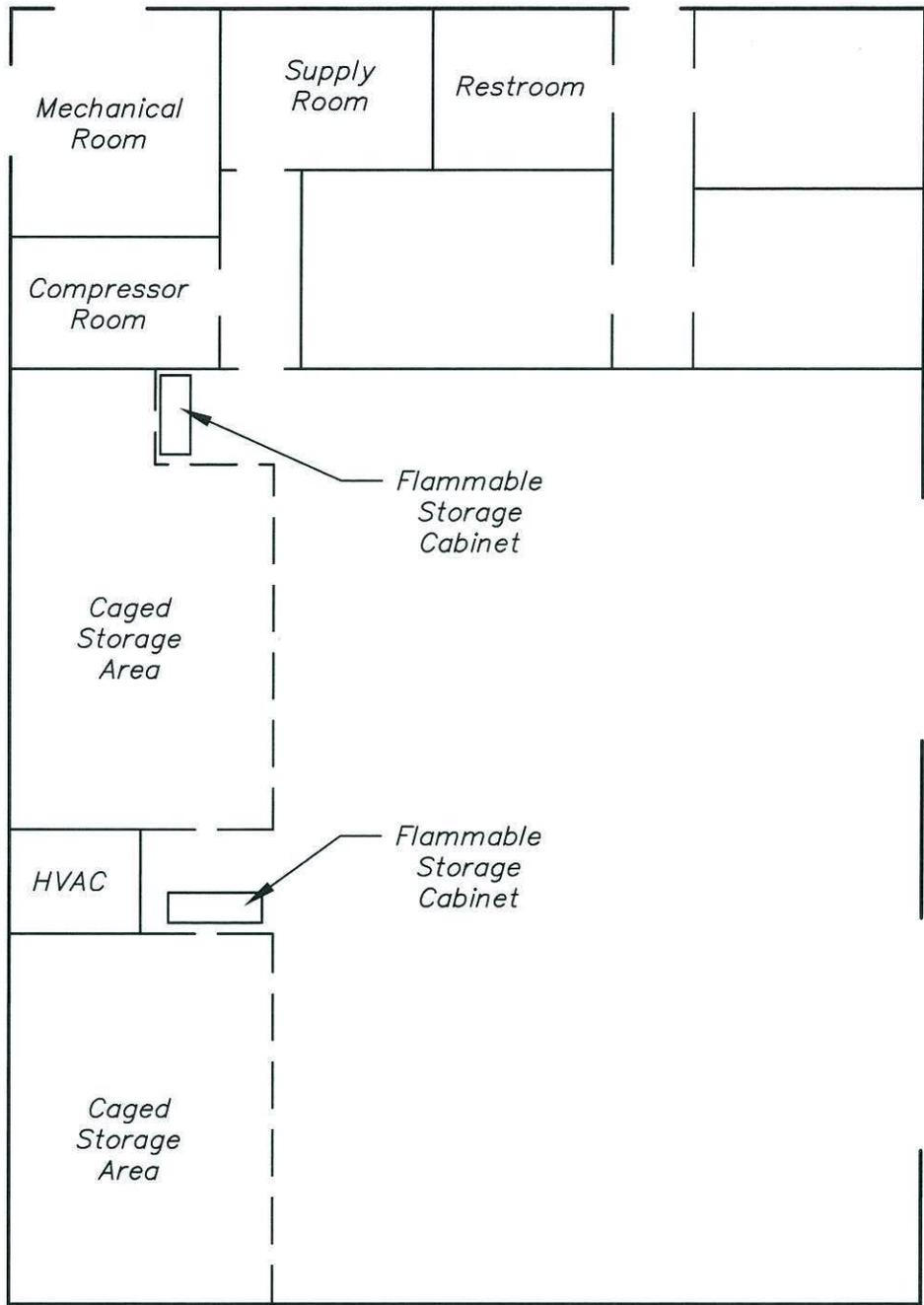
*Note:
Unlabeled rooms are offices,
storage or classrooms.*

*Adapted from previous Lead Based Paint
Survey (Mar 2004) prepared by EEG, Inc.
for US Army Reserve 81st RRC*

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FIGURE 4
INTERIOR LAYOUT, SECOND FLOOR, AFR Center BUILDING
NC045 ADRIAN B. RHODES AFRC
2144 West Lakeshore Drive
Wilmington, New Hanover County, North Carolina



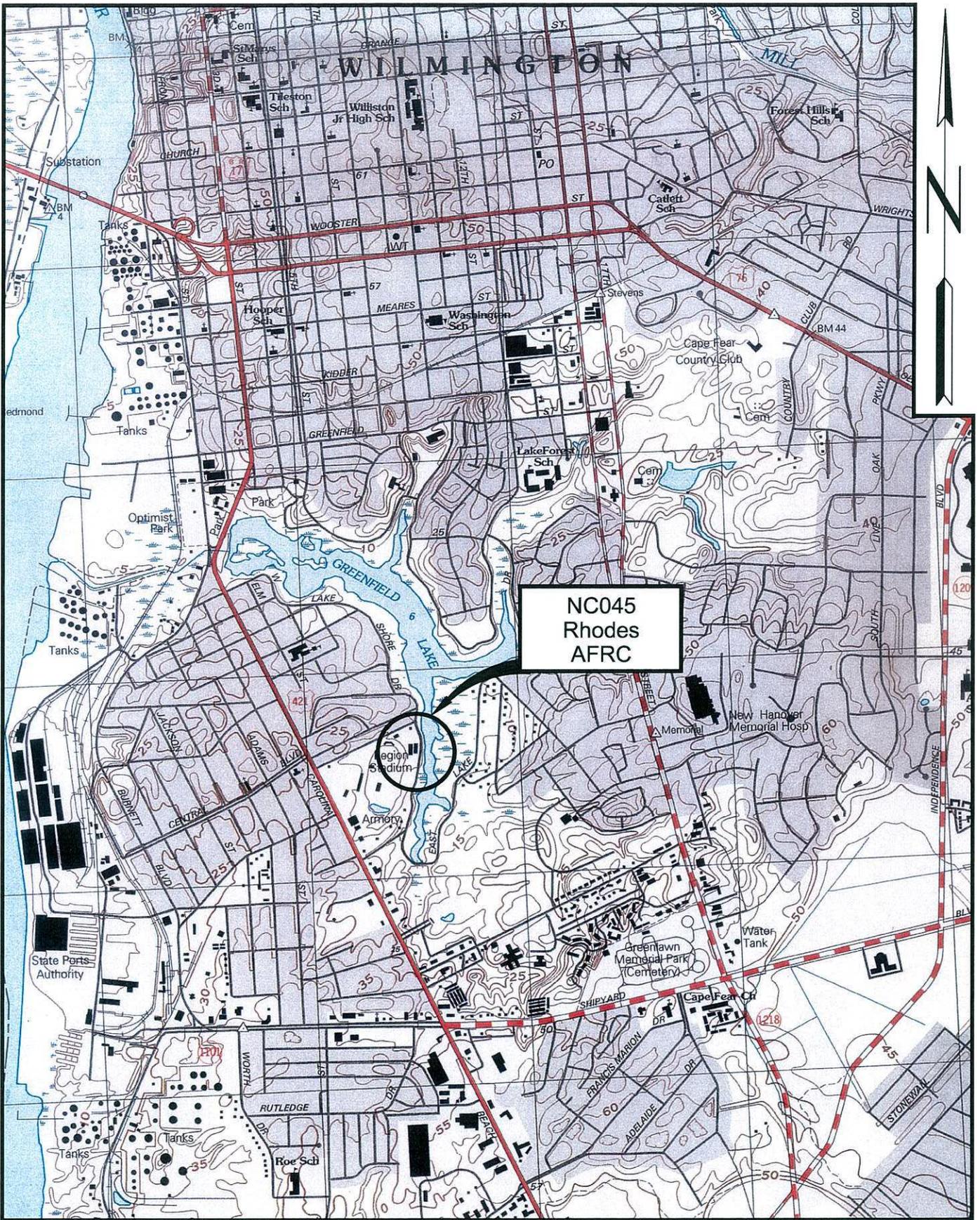
Note:
 Unlabeled rooms are offices,
 storage or classrooms.

Adapted from previous Lead Based Paint
 Survey (Mar 2004) prepared by EEG, Inc.
 for US Army Reserve 81st RRC

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FIGURE 5
 INTERIOR LAYOUT, OMS BUILDING
 NC045 ADRIAN B. RHODES AFRC
 2144 West Lakeshore Drive
 Wilmington, New Hanover County, North Carolina



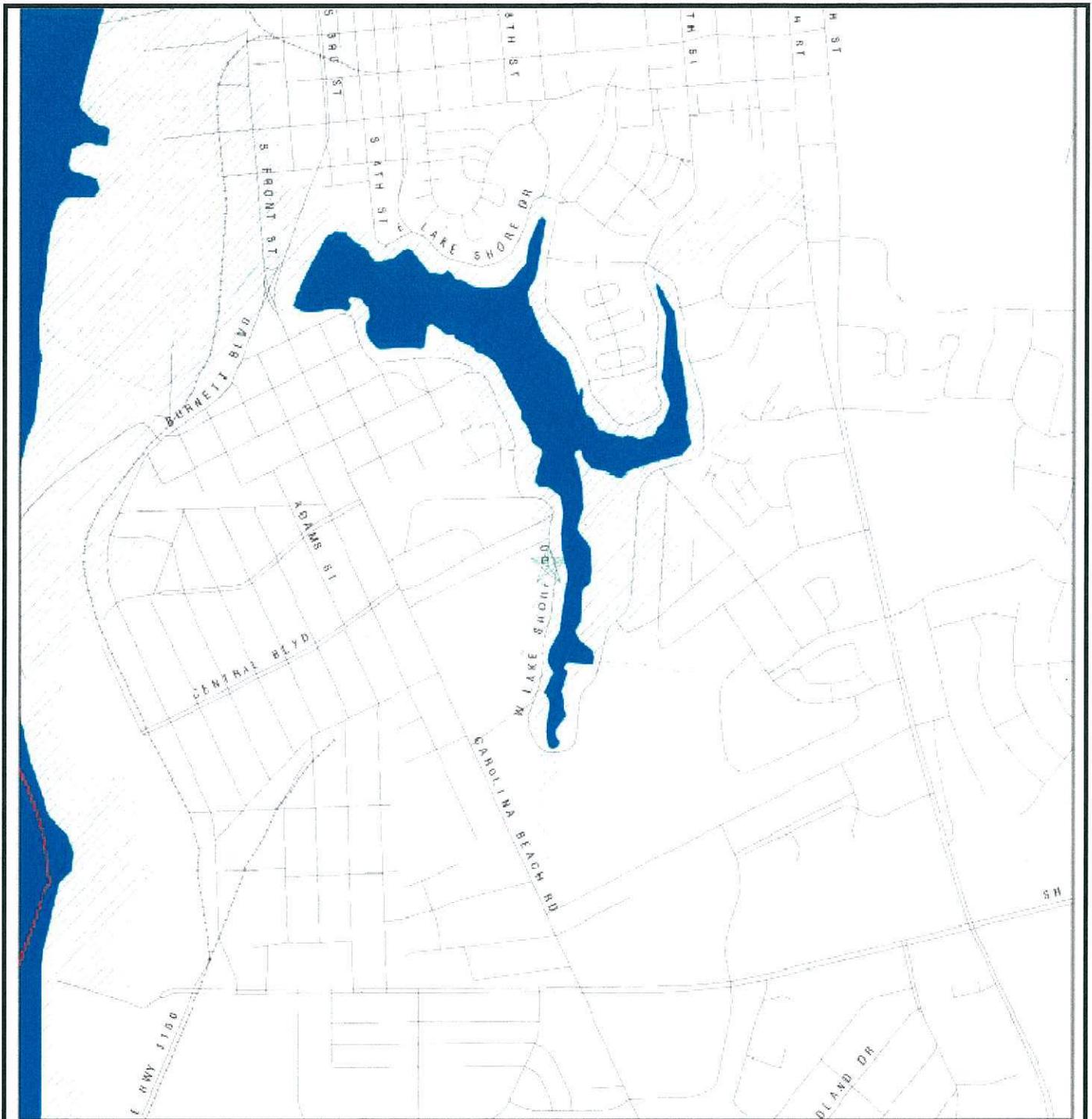
NC045
Rhodes
AFRC

FIGURE 6
1993 USGS TOPOGRAPHIC MAP, WILMINGTON, NORTH CAROLINA
NC045 ADRIAN B. RHODES AFRC
2144 West Lakeshore Drive
Wilmington, New Hanover County, North Carolina



Scale: 1" = 2000'

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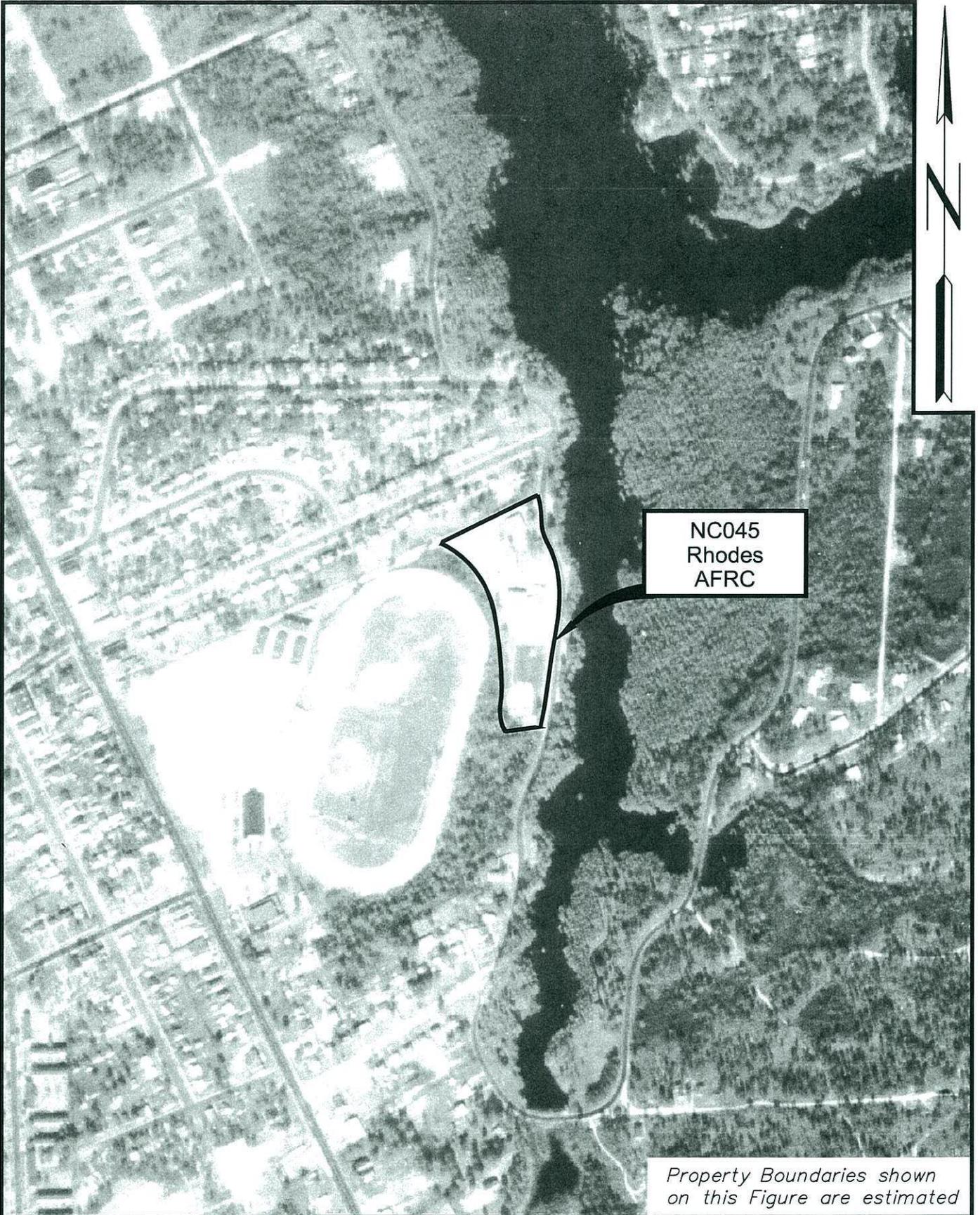


- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- ▲ Manufactured Gas Plants
- National Priority List Sites
- Landfill Sites
- Dept Defense Sites
- Indian Reservations BIA
- ▬ County Boundary
- ▬ Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- National Wetland Inventory
- State Wetlands
- Hazardous Substance Disposal Sites

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FIGURE 7
FLOOD INSURANCE RATE MAP
NC045 ADRIAN B. RHODES AFRC
2144 West Lakeshore Drive
Wilmington, New Hanover County, North Carolina



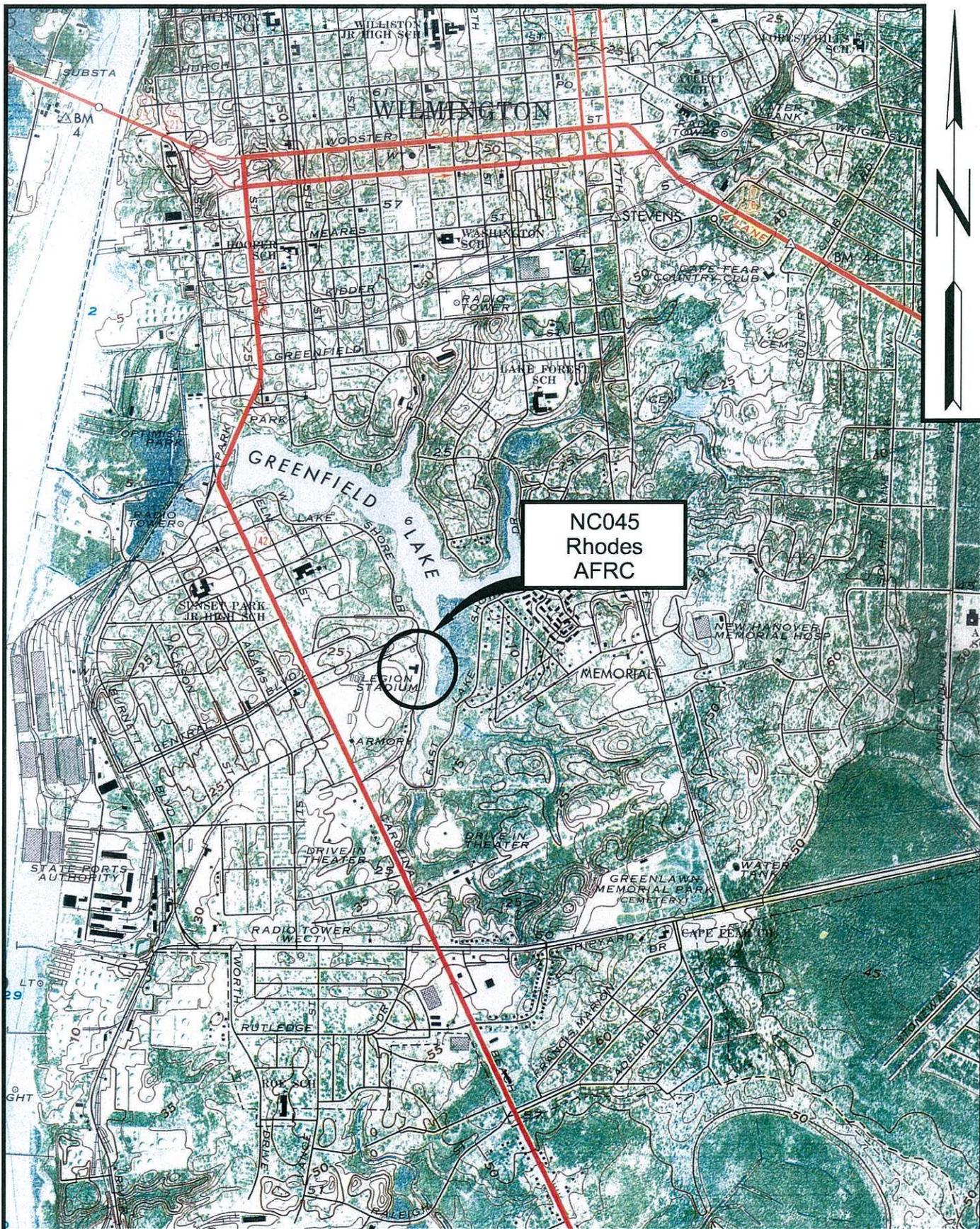
NC045
Rhodes
AFRC

*Property Boundaries shown
on this Figure are estimated*

L:\2006\038\NC045RhodesAerial1958.Dwg



FIGURE 8
1958 AERIAL PHOTOGRAPH
NC045 ADRIAN B. RHODES AFRC
2144 West Lakeshore Drive
Wilmington, New Hanover County, North Carolina



NC045
Rhodes
AFRC

FIGURE 9

1970 USGS TOPOGRAPHIC MAP, WILMINGTON, NORTH CAROLINA

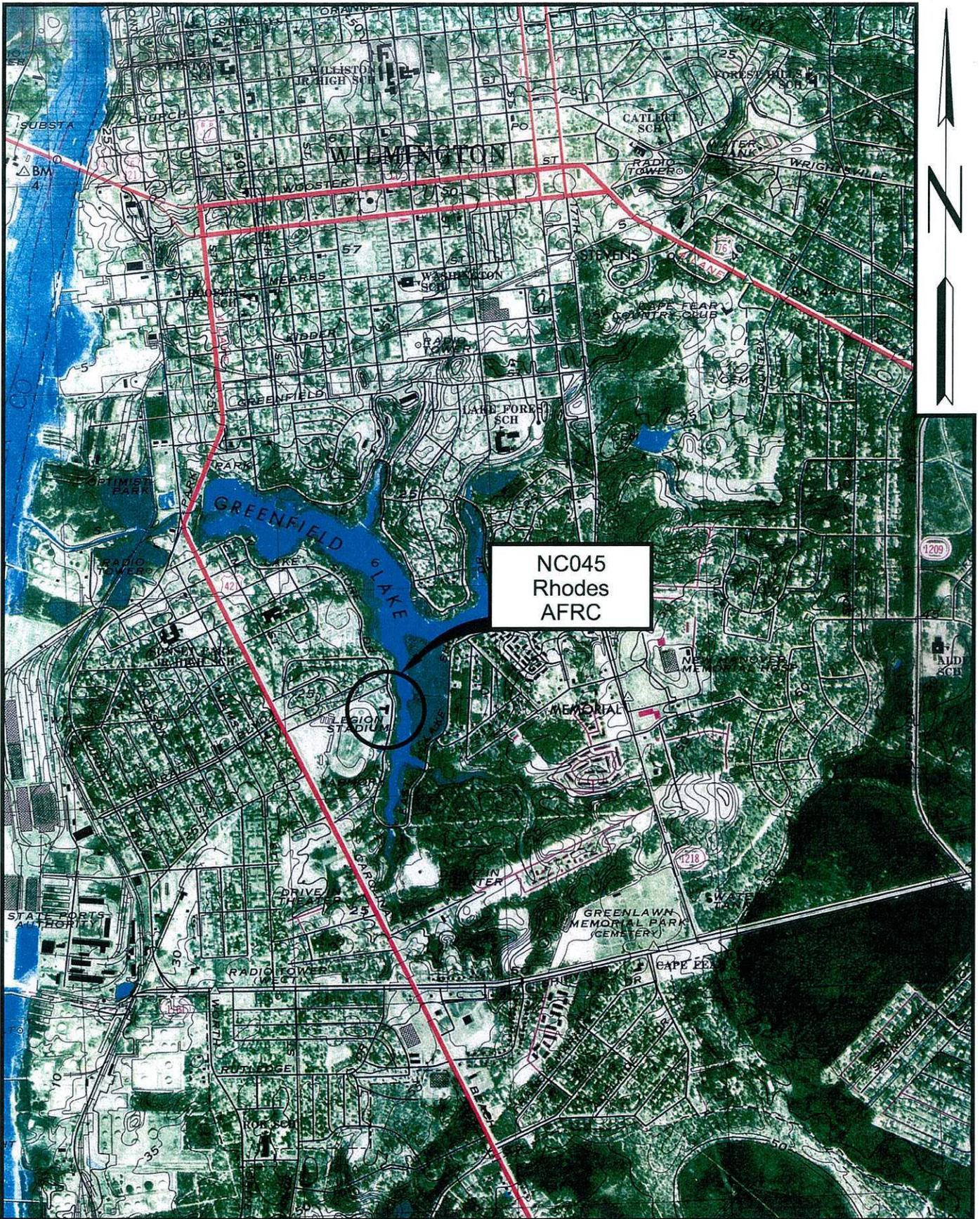
NC045 ADRIAN B. RHODES AFRC

2144 West Lakeshore Drive

Wilmington, New Hanover County, North Carolina



Scale: 1" = 2000'



NC045
Rhodes
AFRC



FIGURE 10
1979 USGS TOPOGRAPHIC MAP, WILMINGTON, NORTH CAROLINA
NC045 ADRIAN B. RHODES AFRC
2144 West Lakeshore Drive
Wilmington, New Hanover County, North Carolina

Scale: 1" = 2000'

L:\2006\038\USGS\NC045\1979.Dwg



NC045
Rhodes
AFRC

*Property Boundaries shown
on this Figure are estimated*

L:\2006\0381\WCO-45RhodesAerial\1983.Dwg



FIGURE 11
1983 AERIAL PHOTOGRAPH
NC045 ADRIAN B. RHODES AFRC
2144 West Lakeshore Drive
Wilmington, New Hanover County, North Carolina



NC045
Rhodes
AFRC

*Property Boundaries shown
on this Figure are estimated*

L:\2006\038\NC045\rhodes\Aerial1993.Dwg



FIGURE 12
1993 AERIAL PHOTOGRAPH
NC045 ADRIAN B. RHODES AFRC
2144 West Lakeshore Drive
Wilmington, New Hanover County, North Carolina



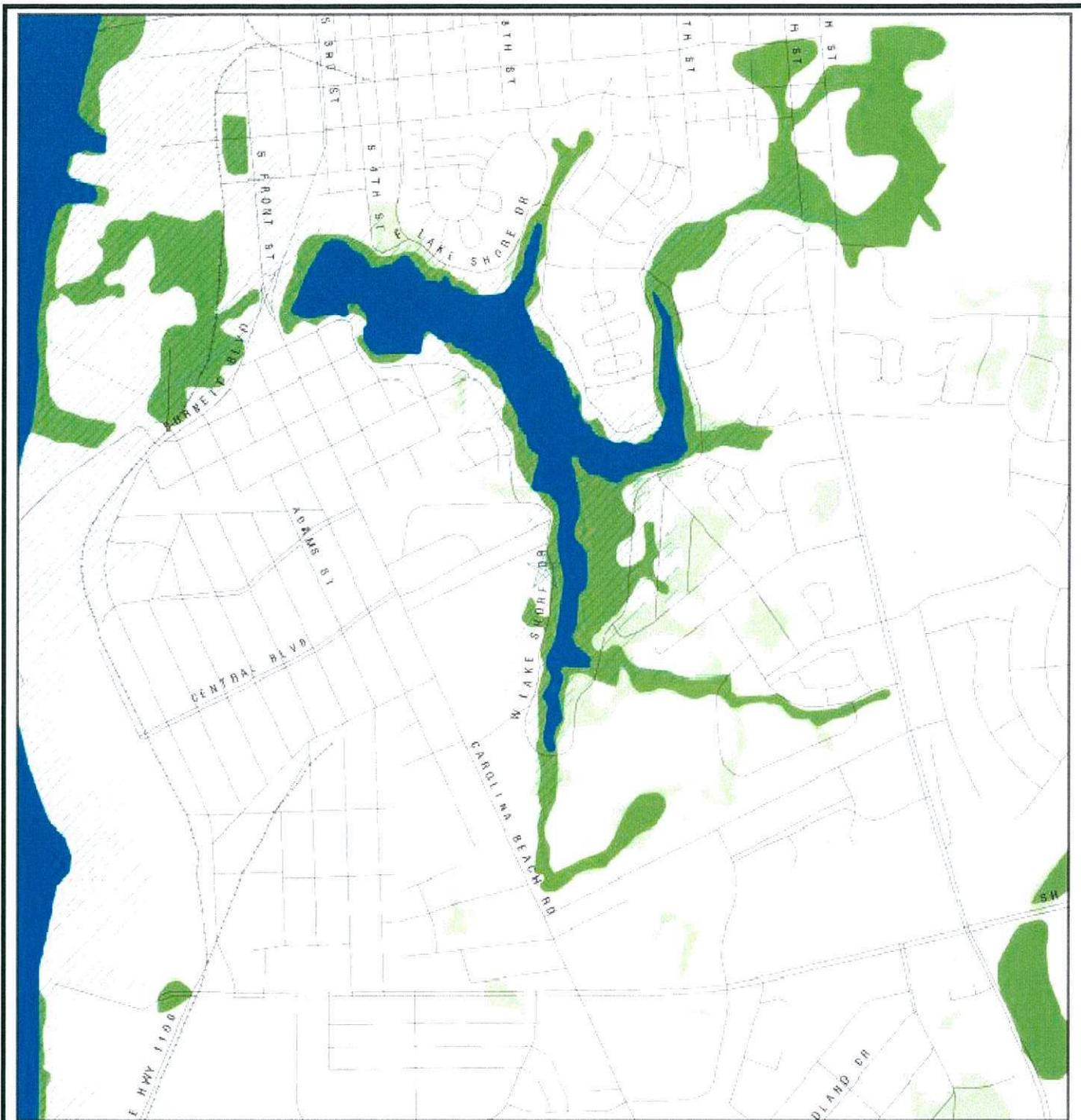
NC045
Rhodes
AFRC

*Property Boundaries shown
on this Figure are estimated*

L:\2006\0381\NC045RhodesAerial\2005.Dwg



FIGURE 13
2005 AERIAL PHOTOGRAPH
NC045 ADRIAN B. RHODES AFRC
2144 West Lakeshore Drive
Wilmington, New Hanover County, North Carolina



★ Target Property

▲ Sites at elevations higher than or equal to the target property

● Sites at elevations lower than the target property

▲ Manufactured Gas Plants

□ National Priority List Sites

□ Landfill Sites

□ Dept. Defense Sites

□ Indian Reservations BIA

▬ County Boundary

▬ Oil & Gas pipelines

▬ 100-year flood zone

▬ 500-year flood zone

■ National Wetland Inventory

■ State Wetlands

□ Hazardous Substance Disposal Sites

I:\2006\038-BRAC_FCPs\NC045\Wetlands\Rhodes-NMI.Dwg



FIGURE 14
 NATIONAL WETLANDS INVENTORY MAP
 NC045 ADRIAN B. RHODES AFRC
 2144 West Lake Shore Drive
 Wilmington, New Hanover County, North Carolina