

ATTACHMENT 11
USFWS IPaC

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Virginia



Local office

Virginia Ecological Services Field Office

☎ (804) 693-6694

📅 (804) 693-9032

6669 Short Lane

Gloucester, VA 23061-4410

<http://www.fws.gov/northeast/virginiafield/>

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species¹ and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries²).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information.
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME

STATUS

Indiana Bat *Myotis sodalis* Endangered
 There is **final** critical habitat for this species. Your location is outside the critical habitat.
<https://ecos.fws.gov/ecp/species/5949>

Northern Long-eared Bat *Myotis septentrionalis* Threatened
 No critical habitat has been designated for this species.
<https://ecos.fws.gov/ecp/species/9045>

Fishes

NAME	STATUS
Roanoke Logperch <i>Percina rex</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1134	Endangered

Flowering Plants

NAME	STATUS
Northeastern Bulrush <i>Scirpus ancistrochaetus</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/6715	Endangered
Smooth Coneflower <i>Echinacea laevigata</i> No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/3473	Endangered

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

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

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

1. The [Migratory Birds Treaty Act](#) of 1918.

2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

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

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

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

NAME

BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)

Bald Eagle *Haliaeetus leucocephalus*

Breeds Sep 1 to Aug 31

This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.

<https://ecos.fws.gov/ecp/species/1626>

<p>Black-billed Cuckoo <i>Coccyzus erythrophthalmus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9399</p>	Breeds May 15 to Oct 10
<p>Black-capped Chickadee <i>Poecile atricapillus praticus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA</p>	Breeds Apr 10 to Jul 31
<p>Blue-winged Warbler <i>Vermivora pinus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA</p>	Breeds May 1 to Jun 30
<p>Bobolink <i>Dolichonyx oryzivorus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 20 to Jul 31
<p>Canada Warbler <i>Cardellina canadensis</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 20 to Aug 10
<p>Cerulean Warbler <i>Dendroica cerulea</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2974</p>	Breeds Apr 27 to Jul 20
<p>Eastern Whip-poor-will <i>Antrostomus vociferus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds May 1 to Aug 20
<p>Golden Eagle <i>Aquila chrysaetos</i> This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680</p>	Breeds elsewhere
<p>Golden-winged Warbler <i>Vermivora chrysoptera</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/8745</p>	Breeds May 1 to Jul 20
<p>Kentucky Warbler <i>Oporornis formosus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.</p>	Breeds Apr 20 to Aug 20

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

Probability of Presence Summary

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

Probability of Presence (■)

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

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence

across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is $0.25/0.25 = 1$; at week 20 it is $0.05/0.25 = 0.2$.

- The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

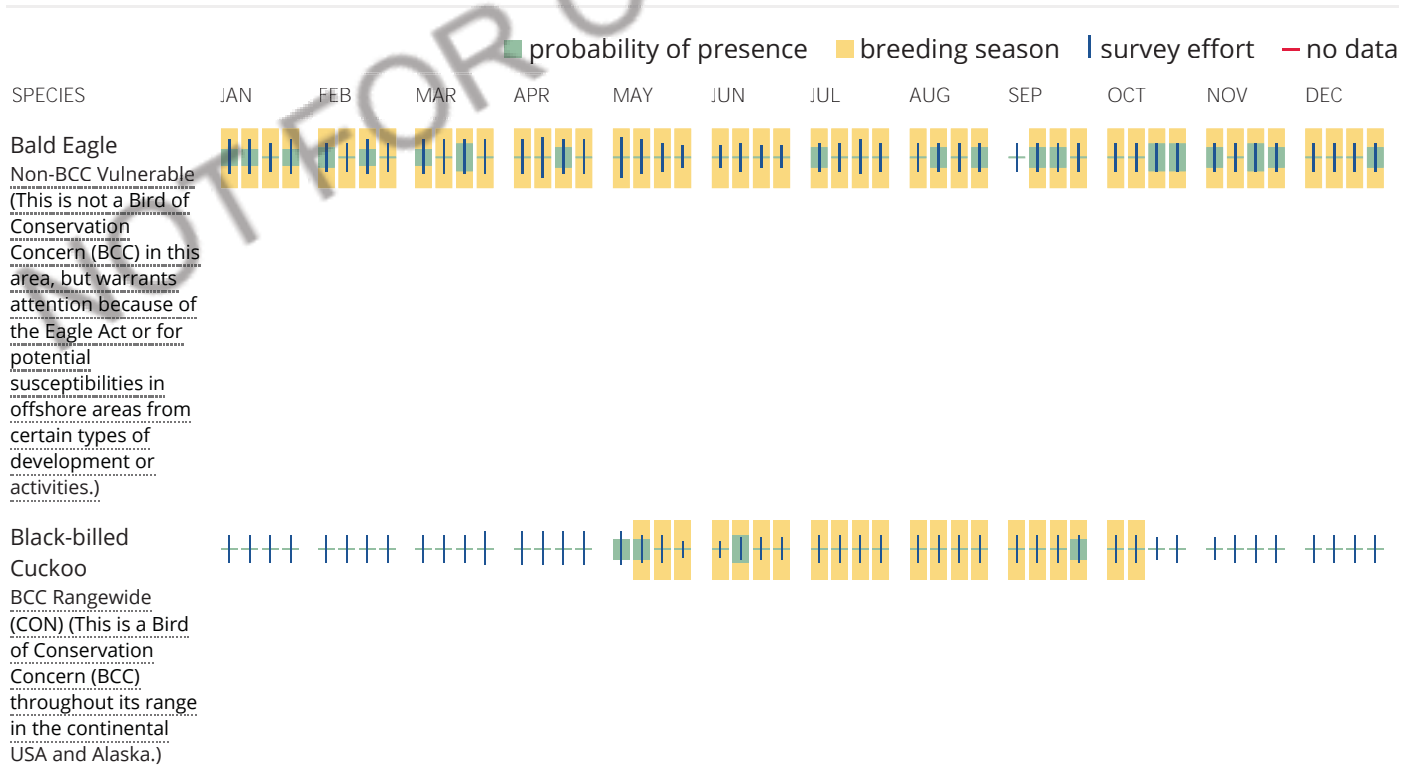
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

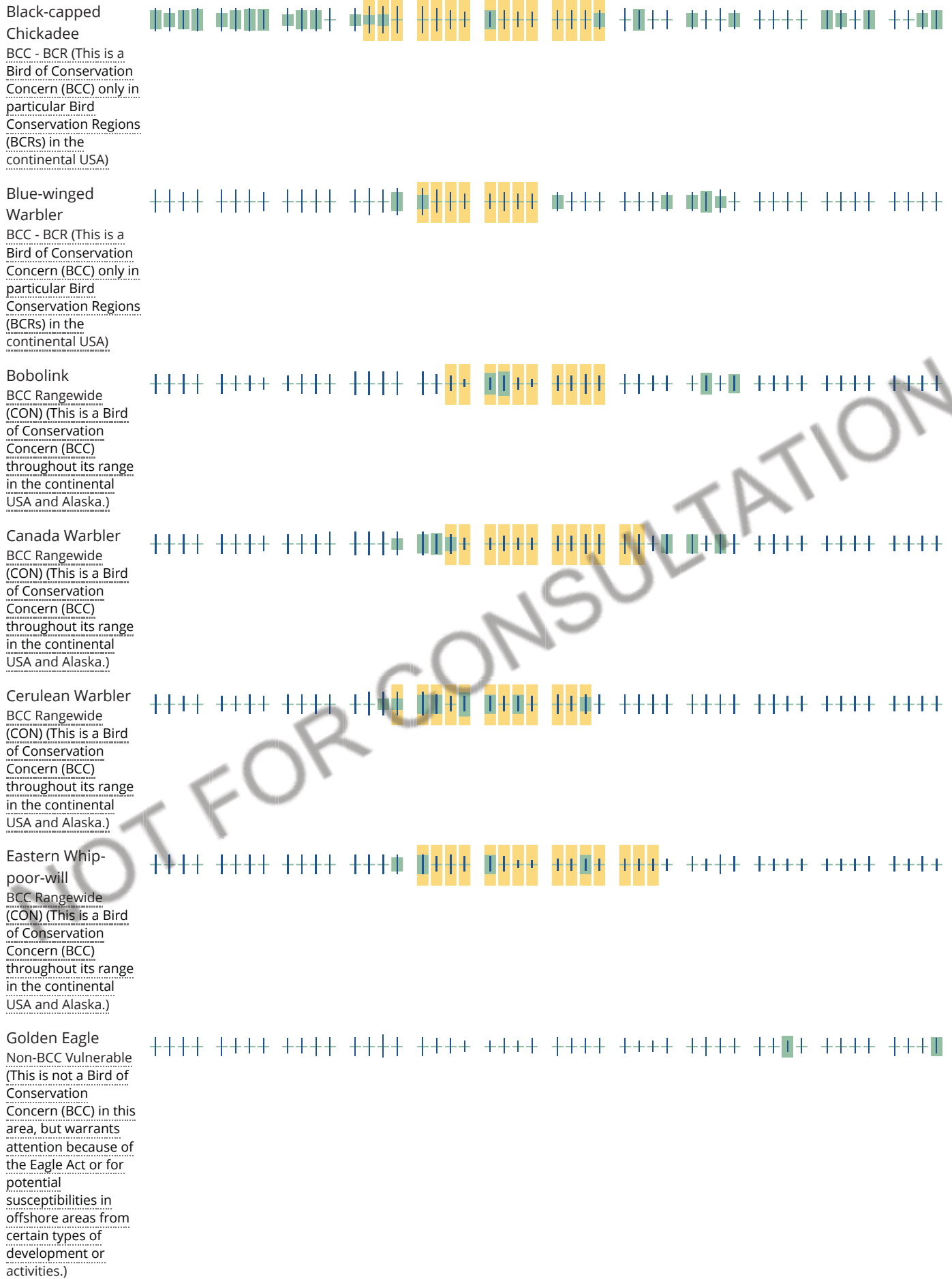
No Data (—)

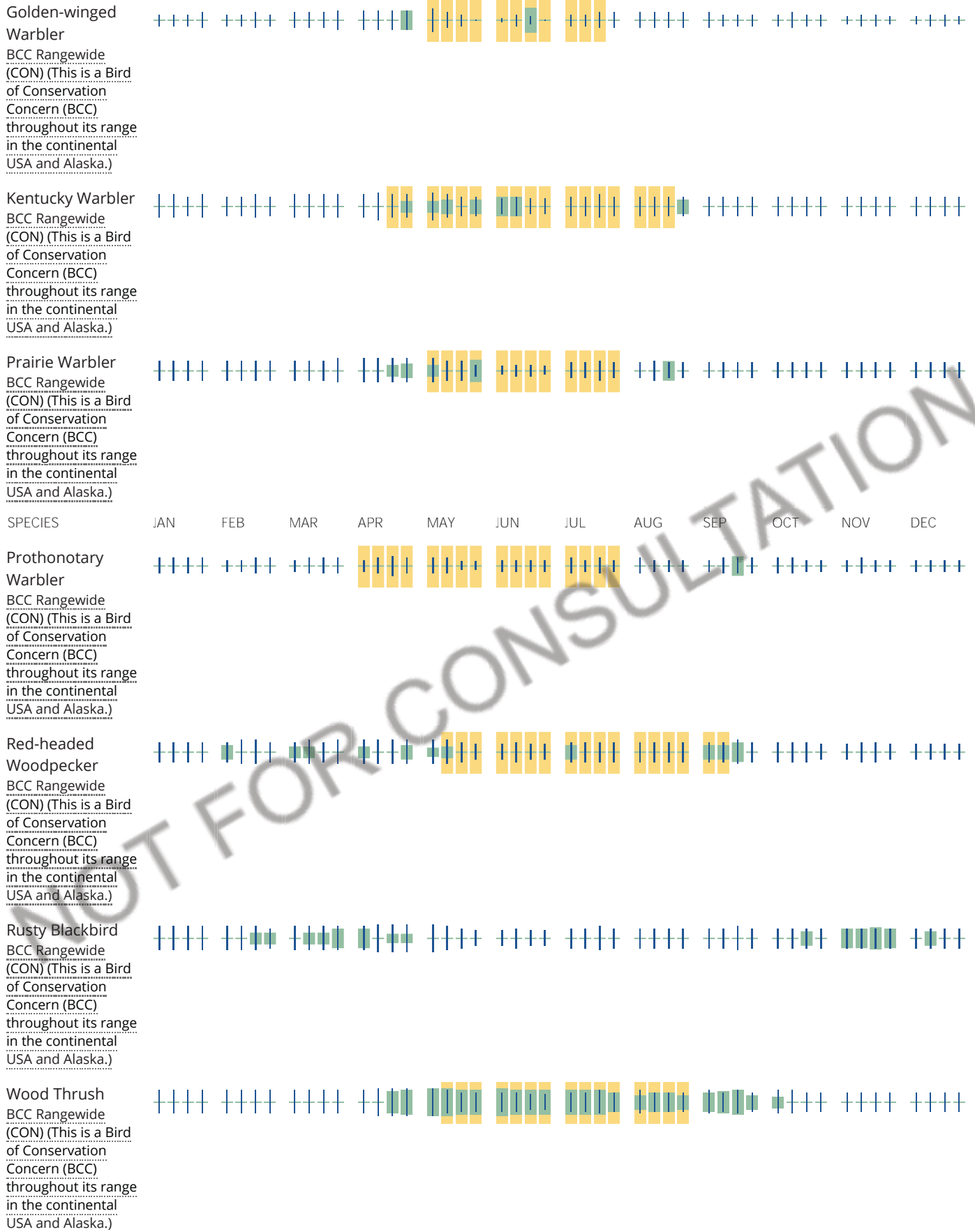
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



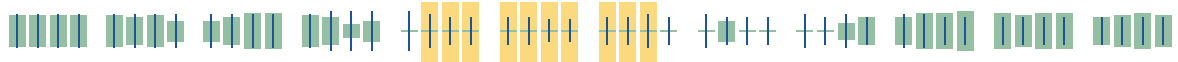




Yellow-bellied

Sapsucker

BCC - BCR (This is a
Bird of Conservation
Concern (BCC) only in
particular Bird
Conservation Regions
(BCRs) in the
continental USA)



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

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

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

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

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

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

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

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

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

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

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

What are the levels of concern for migratory birds?

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

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

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

Details about birds that are potentially affected by offshore projects

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

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

What if I have eagles on my list?

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

Proper Interpretation and Use of Your Migratory Bird Report

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

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

Wetlands in the National Wetlands Inventory

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

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

WETLAND INFORMATION IS NOT AVAILABLE AT THIS TIME

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the [NWI map](#) to view wetlands at this location.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters.

Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

NOT FOR CONSULTATION



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Virginia Ecological Services Field Office
6669 Short Lane
Gloucester, VA 23061-4410
Phone: (804) 693-6694 Fax: (804) 693-9032
<http://www.fws.gov/northeast/virginiafield/>

In Reply Refer To:

November 06, 2020

Consultation Code: 05E2VA00-2021-SLI-0566

Event Code: 05E2VA00-2021-E-01623

Project Name: ROA - Nordt

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

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). Any activity proposed on National Wildlife Refuge lands must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

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

species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

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

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

Attachment(s):

- Official Species List
 - USFWS National Wildlife Refuges and Fish Hatcheries
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Official Species List

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

This species list is provided by:

Virginia Ecological Services Field Office

6669 Short Lane

Gloucester, VA 23061-4410

(804) 693-6694

Project Summary

Consultation Code: 05E2VA00-2021-SLI-0566

Event Code: 05E2VA00-2021-E-01623

Project Name: ROA - Nordt

Project Type: TRANSPORTATION

Project Description: Nordt Property Acquisition and Future Development

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/place/37.32853154525492N79.96874466676425W>



Counties: Roanoke, VA

Endangered Species Act Species

There is a total of 0 threatened, endangered, or candidate species on this species list.

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

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

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

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

Critical habitats

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

USFWS National Wildlife Refuge Lands And Fish Hatcheries

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS OR FISH HATCHERIES WITHIN YOUR PROJECT AREA.

ATTACHMENT 22

VaFWIS Search Report

VaFWIS Search Report Compiled on 11/10/2020, 5:11:19 PM[Help](#)

Known or likely to occur within a **3 mile radius around point 37,19,44.5 -79,58,08.7**
in **023 Botetourt County, 161 Roanoke County, 770 Roanoke City, VA**

[View Map of Site Location](#)

573 Known or Likely Species ordered by Status Concern for Conservation
(displaying first 31) (31 species with Status* or Tier I** or Tier II**)

BOVA Code	Status*	Tier**	Common Name	Scientific Name
060017	FESE	Ia	Spinymussel, James	Parvaspina collina
010214	FESE	IIa	Logperch, Roanoke	Percina rex
030061	FTSE	Ia	Turtle, bog (= Muhlenberg)	Clemmys muhlenbergii
050022	FTST	Ia	Bat, northern long-eared	Myotis septentrionalis
060029	FTST	IIa	Lance, yellow	Elliptio lanceolata
050020	SE	Ia	Bat, little brown	Myotis lucifugus
050027	SE	Ia	Bat, tri-colored	Perimyotis subflavus
040096	ST	Ia	Falcon, peregrine	Falco peregrinus
040293	ST	Ia	Shrike, loggerhead	Lanius ludovicianus
060173	FPST	Ia	Pigtoe, Atlantic	Fusconaia masoni
100155	ST	Ia	Skipper, Appalachian grizzled	Pyrgus wyandot
010127	ST	IIb	Madtom, orangefin	Noturus gilberti
040292	ST		Shrike, migrant loggerhead	Lanius ludovicianus migrans
030012	CC	IVa	Rattlesnake, timber	Crotalus horridus
010174		Ia	Bass, Roanoke	Ambloplites cavifrons
030040		Ia	Pinesnake, northern	Pituophis melanoleucus melanoleucus
040092		Ia	Eagle, golden	Aquila chrysaetos
040306		Ia	Warbler, golden-winged	Vermivora chrysoptera
050024		Ia	Myotis, eastern small-footed	Myotis leibii
100248		Ia	Fritillary, regal	Speyeria idalia idalia
010346		Ib	Shiner, roughhead	Notropis semperasper
020039		Ic	Salamander, Peaks of Otter	Plethodon hubrichti
040213		Ic	Owl, northern saw-whet	Aegolius acadicus
040052		IIa	Duck, American black	Anas rubripes
040036		IIa	Night-heron, yellow-crowned	Nyctanassa violacea violacea
040181		IIa	Tern, common	Sterna hirundo
040320		IIa	Warbler, cerulean	Setophaga cerulea
040140		IIa	Woodcock, American	Scolopax minor
040203		IIb	Cuckoo, black-billed	Coccyzus erythrophthalmus
040304		IIc	Warbler, Swainson's	Limnithlypis swainsonii
100154		IIc	Butterfly, Persius duskywing	Erynnis persius persius

To view **All 573 species** [View 573](#)

*FE=Federal Endangered; FT=Federal Threatened; SE=State Endangered; ST=State Threatened; FP=Federal Proposed; FC=Federal Candidate; CC=Collection Concern

**I=VA Wildlife Action Plan - Tier I - Critical Conservation Need; II=VA Wildlife Action Plan - Tier II - Very High Conservation Need; III=VA Wildlife Action Plan - Tier III - High Conservation Need; IV=VA Wildlife Action Plan - Tier IV - Moderate Conservation Need
Virginia Wildlife Action Plan Conservation Opportunity Ranking:

a - On the ground management strategies/actions exist and can be feasibly implemented.;

b - On the ground actions or research needs have been identified but cannot feasibly be implemented at this time.;

c - No on the ground actions or research needs have been identified or all identified conservation opportunities have been exhausted.

Anadromous Fish Use Streams

N/A

Impediments to Fish Passage

N/A

Threatened and Endangered Waters (7 Reaches)

[View Map of All Threatened and Endangered Waters](#)

Stream Name	T&E Waters Species						View Map
	Highest TE*	BOVA Code, Status*, Tier**, Common & Scientific Name					
(0194515)	FESE	010214	FESE	Ia	Logperch, Roanoke	Percina rex	Yes
Tinker Creek (0185673)	FESE	010214	FESE	Ia	Logperch, Roanoke	Percina rex	Yes
Tinker Creek (0189851)	FESE	010214	FESE	Ia	Logperch, Roanoke	Percina rex	Yes
Tinker Creek (0190423)	FESE	010214	FESE	Ia	Logperch, Roanoke	Percina rex	Yes
Tinker Creek (0195958)	FESE	010214	FESE	Ia	Logperch, Roanoke	Percina rex	Yes
Tinker Creek (0196006)	FESE	010214	FESE	Ia	Logperch, Roanoke	Percina rex	Yes
Tinker Creek (0198362)	FESE	010214	FESE	Ia	Logperch, Roanoke	Percina rex	Yes

Managed Trout Streams (1 records)

[View Map of All Trout Stream Surveys](#)

Reach ID	Stream Name	Class	Brook Trout	Brown Trout	Rainbow Trout	View Map
05TKR-01	Tinker Creek	Stockable				Yes

Bald Eagle Concentration Areas and Roosts

N/A

Bald Eagle Nests

N/A

Habitat Predicted for Aquatic WAP Tier I & II Species (8 Reaches)

[View Map Combined Reaches from Below of Habitat Predicted for WAP Tier I & II Aquatic Species](#)

Stream Name	Tier Species						View Map
	Highest TE*	BOVA Code, Status*, Tier**, Common & Scientific Name					
Carvin Creek (30101011)	FESE	010174		Ia	Bass, Roanoke	Ambloplites cavifrons	Yes
		010214	FESE	Ia	Logperch, Roanoke	Percina rex	
Carvin Creek (30101012)	FESE	010174		Ia	Bass, Roanoke	Ambloplites cavifrons	Yes
		010214	FESE	Ia	Logperch, Roanoke	Percina rex	
Carvin Creek (30101012)	FESE	010214	FESE	Ia	Logperch, Roanoke	Percina rex	Yes
Peters Creek (30101011)	FESE	010127	ST	Iib	Madtom, orangefin	Noturus gilberti	Yes
		010214	FESE	Ia	Logperch, Roanoke	Percina rex	
Tinker Creek (30101011)	FESE	010127	ST	Iib	Madtom, orangefin	Noturus gilberti	Yes
		010174		Ia	Bass, Roanoke	Ambloplites cavifrons	
		010214	FESE	Ia	Logperch, Roanoke	Percina rex	
Tinker Creek (30101011)	FESE	010174		Ia	Bass, Roanoke	Ambloplites cavifrons	Yes

		010214	FESE	IIa	Logperch, Roanoke	Percina rex	
Tinker Creek (30101012)	FESE	010174		Ia	Bass, Roanoke	Ambloplites cavifrons	Yes
		010214	FESE	IIa	Logperch, Roanoke	Percina rex	
tributary (30101011)	FESE	010174		Ia	Bass, Roanoke	Ambloplites cavifrons	Yes
		010214	FESE	IIa	Logperch, Roanoke	Percina rex	

Habitat Predicted for Terrestrial WAP Tier I & II Species

N/A

Virginia Breeding Bird Atlas Blocks (5 records)

[View Map of All Query Results](#)
[Virginia Breeding Bird Atlas Blocks](#)

BBA ID	Atlas Quadrangle Block Name	Breeding Bird Atlas Species			View Map
		Different Species	Highest TE*	Highest Tier**	
31074	Roanoke, CE	1		II	Yes
31072	Roanoke, NE	1		III	Yes
31071	Roanoke, NW	1		III	Yes
30074	Salem, CE	11		IV	Yes
30072	Salem, NE	21		III	Yes

Public Holdings:

N/A

Summary of BOVA Species Associated with Cities and Counties of the Commonwealth of Virginia:

FIPS Code	City and County Name	Different Species	Highest TE	Highest Tier
023	Botetourt	443	FESE	I
161	Roanoke	451	FESE	I
770	Roanoke City	433	FESE	I

USGS 7.5' Quadrangles:

Salem
 Roanoke

USGS NRCS Watersheds in Virginia:

N/A

USGS National 6th Order Watersheds Summary of Wildlife Action Plan Tier I, II, III, and IV Species:

HU6 Code	USGS 6th Order Hydrologic Unit	Different Species	Highest TE	Highest Tier
RU11	Tinker Creek-Buffalo Creek	68	FESE	I
RU12	Carvin Creek	69	FESE	I
RU13	Tinker Creek-Glade Creek	72	FESE	I
RU14	Roanoke River-Peters Creek	66	FESE	I

Compiled on 11/10/2020, 5:11:20 PM V1061418.0 report=V searchType=R dist= 4828.032 poi= 37,19,44.5 -79,58,08.7

Site Location

37,19,43.0 -79,58,07.6
is the Search Point

Show Position Rings

Yes No
1/8 mile and 1/32 mile at the
Search Point

Show Search Area

Yes No
3 Search distance miles
radius

Search Point is at
map center

Base Map Choices

Color Aerial Photography ▾

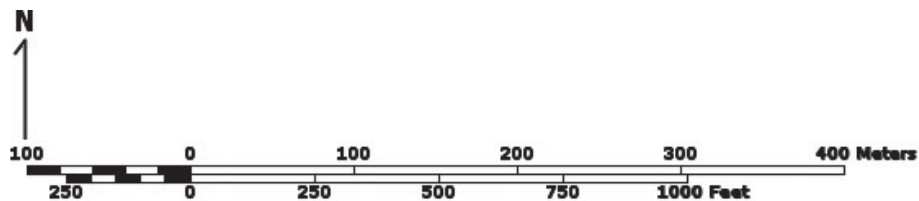
Map Overlay Choices

Current List: Position, Search,
BECAR, BAEANests,
TEWaters, TierII, Habitat,
Trout, Anadromous

Map Overlay Legend

back Refresh Browser Page

Map Click **Pan** **Id** **M** Map Scale **Zoom** **Out** Screen Size **Small** **Size** **Big** **Help**



Point of Search 37,19,43.0 -79,58,07.6
Map Location 37,19,43.0 -79,58,07.6

- Select **Coordinate System**: Degrees,Minutes,Seconds Latitude - Longitude
 Decimal Degrees Latitude - Longitude
 Meters UTM NAD83 East North Zone
 Meters UTM NAD27 East North Zone



Base Map source: Color Aerial Photography 2002 - Virginia Base Mapping Program, Virginia Geographic Information Network

Map projection is UTM Zone 17 NAD 1983 with left 591059 and top 4132126. Pixel size is 1 meter . Coordinates displayed are Degrees, Minutes, Seconds North and West. Map is currently displayed as 600 columns by 600 rows for a total of 360000 pixels. The map display represents 600 meters east to west by 600 meters north to south for a total of 0.3 square kilometers. The map



T & E Waters

-  **Federal**
-  **State**

**Predicted Habitat
WAP Tier I & II**

-  **Aquatic**
-  **Terrestrial**

Trout Waters

-  **Class I - IV**
-  **Class V - VI**

Anadromous Fish Reach

-  **Confirmed**
-  **Potential**

 **Impediment**



**Position Rings
1/8 mile and
1/32 mile at the
Search Point**



**3 mile radius
Search Area**

**Bald Eagle
Concentration Areas
and Roosts**



display represents 1968 feet east to west by 1968 feet north to south for a total of 0.1 square miles.

Topographic maps and Black and white aerial photography for year 1990+ are from the United States Department of the Interior, United States Geological Survey. Color aerial photography aquired 2002 is from Virginia Base Mapping Program, Virginia Geographic Information Network. Shaded topographic maps are from TOPO! ©2006 National Geographic <http://www.national.geographic.com/topo> All other map products are from the Commonwealth of Virginia Department of Game and Inland Fisheries.

map assembled 2020-11-11 14:53:52 (qa/qc March 21, 2016 12:20 - tn=1061603.0 dist=4828.032 Visitor) \$poi=37.3286111 -79.9687778

ATTACHMENT 3

Phase I ESA

(Select Appendices)

& Recommendations

**ECS Mid-Atlantic, LLC***"Setting the Standard for Service"*

Geotechnical • Construction Materials • Environmental • Facilities

July 21, 2021

Danielle Poe
Roanoke Regional Airport Commission
5202 Aviation Drive
Roanoke, Virginia 24012

ECS Project No. 47: 12509

Reference: Phase I Environmental Site Assessment Report, John C Nordt Property, 1420 Coulter Drive NW, Roanoke, Virginia 24012

Dear Ms. Poe:

ECS Mid-Atlantic, LLC (ECS) was contracted by Roanoke Regional Airport Commission to conduct a Phase I ESA in general accordance with ASTM E1527-13, Standard Practice for Environmental Site Assessments, July 21, 2021. Any exceptions, deletions, Historical Data Failures and Other Data Gaps from this practice are described in the Executive Summary and Section 2.3 of the Phase I ESA report.

The findings of the Phase I ESA included the following Recognized Environmental Conditions (RECs):

- The subject property has been utilized as a jewelry manufacturing facility since the 1980's, which has included the use of hazardous chemicals and heavy metals.
- The subject property contains a 4,000 gallon diesel UST that was reportedly installed in 1984 and then updated with new lines and ancillary equipment in 1998 to bring the system up to code. This UST is utilized to store fuel for the facility's back-up generator. More recently, ECS understands that the UST was equipped with a new tank gauge and leak detection system, making it current with new regulations.
 - While no releases have been reported at the subject property, the long term use as a jewelry manufacturer and the long term use of an UST leads to the potential for undocumented or incidental releases, which is considered to be a REC.

Recommendations

Based on the RECs identified by the Phase I ESA of the subject property, ECS offers the following recommendations for additional assessment:

1. ECS recommends completing a Limited Subsurface Sampling Assessment. The subsurface assessment will involve the installation of a minimum of six soil borings using a Geoprobe® direct push sampler and dedicated sampling equipment. Soil borings will be completed in topographically down-gradient locations and around the current UST. If groundwater is encountered, temporary one-inch wells will be installed for the collection of groundwater

7670 Eron Drive, Suite 101, Roanoke, Virginia 24019 • T: 540-362-2000 • F: 540-362-1202 • ecsllimited.com

ECS Florida, LLC • ECS Mid-Atlantic, LLC • ECS Midwest, LLC • ECS Southeast, LLP • ECS Southwest, LLP
ECS Capital Services, PLLC - An Associate of the ECS Group of Companies

samples via a peristaltic pump or dedicated bailers. Borings will be placed in locations biased to where contamination would most likely be found based on the information available at the time. Further, ECS recommends the collection of sub-slab and deep soil gas samples at locations including both the interior and exterior of the facility for a vapor intrusion assessment.

- The estimated cost to complete the services is approximately [REDACTED]. Based on our present schedule we can begin our fieldwork within approximately 2 weeks of receiving written authorization subject to driller availability. ECS anticipates that the field work will take 2 days to complete.

2. ECS recommends that prior to any demolition/renovation activities that an asbestos survey be performed as well as the collection of one Lead Toxicity Characteristic Leaching Procedure (TCLP) sample from the building for lead analysis of the waste stream associated with proposed demolition activities to evaluate if special disposal requirements are needed under US EPA RCRA regulations concerning lead. Further, ECS recommends an Abatement Specification be completed in order to delineate and quantify known and suspect asbestos containing materials in the building and to outline property procedures for the abatement work for the project and outline the contractors' roles and responsibilities in the abatement process.

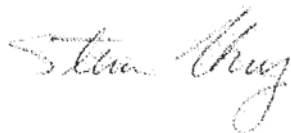
- The estimated cost to complete this additional service is approximately [REDACTED]. [REDACTED] ECS anticipates that the fieldwork and reporting could be completed within two weeks of signed authorization.

3. ECS recommends that prior to any demolition or change of use activities, the AST, UST, specialized equipment including the incinerator/furnace, 55-gallon drums, and any other containers located on the subject property be disposed of and handled properly.

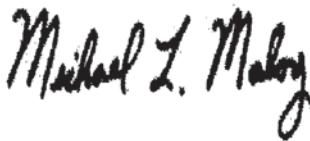
ECS has appreciated the opportunity to assist you with this project. If you have any questions regarding the Phase I ESA report or the information contained in this letter, please contact us at 540-362-2000.

Respectfully submitted,

ECS Mid-Atlantic, LLC



Steven Hay
Project Manager
shay@ecslimited.com
540-362-2000



Michael L. Maloy, CPG
Principal Geologist
mmaloy@ecslimited.com
540-785-6608

PHASE I ENVIRONMENTAL SITE ASSESSMENT



JOHN C NORDT PROPERTY

1420 COULTER DRIVE NW
ROANOKE, VIRGINIA 24012

ECS PROJECT NO. 47:12509

FOR: ROANOKE REGIONAL AIRPORT COMMISSION

JULY 21, 2021





July 21, 2021

Danielle Poe
Roanoke Regional Airport Commission
5202 Aviation Drive
Roanoke, Virginia 24012

ECS Project No. 47: 12509

Reference: Phase I Environmental Site Assessment Report, John C Nordt Property, 1420 Coulter Drive NW, Roanoke, Virginia 24012

Dear Ms. Poe:

ECS Mid-Atlantic, LLC (ECS) is pleased to provide you with the results of our Phase I Environmental Site Assessment (ESA) for the referenced site. ECS services were provided in general accordance with ECS Proposal No. 47:17126-P authorized on June 23, 2021 and generally meet the requirements of ASTM E1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process and EPA Standards and Practices for All Appropriate Inquiries contained in 40 CFR Part 312.

If there are questions regarding this report, or a need for further information, please contact the undersigned.

Sincerely,

ECS Mid-Atlantic, LLC

Steven Hay
Project Manager
shay@ecslimited.com
540-362-2000

Michael L. Maloy, CPG
Principal Geologist
mmaloy@ecslimited.com
540-785-6608

Project Summary

John C Nordt Property
 1420 Coulter Drive NW
 Roanoke, Virginia 24012


Report Section		No Further Action	REC	CREC	HREC	BER	Comment
<u>4.0</u>	User Provided Information	✓					
<u>5.1</u>	Federal ASTM Databases		✓				Manufacturing use of the subject property, since the 1980's is considered to be a REC
<u>5.2</u>	State ASTM Databases		✓				The current onsite UST system is considered to be a REC
<u>5.3</u>	Additional Environmental Record Sources	✓					
<u>6.0</u>	Historical Use Information	✓					
<u>7.0</u>	Site and Area Reconnaissance		✓				Manufacturing use of the subject property, since the 1980's is considered to be a REC
<u>8.0</u>	Additional Services	✓					
<u>9.0</u>	Interviews	✓					

ENVIRONMENTAL PROFESSIONAL STATEMENT

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in § 312.10 of 40 CFR 312. We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.



Steven Hay
Project Manager
July 21, 2021



Michael L. Maloy, CPG
Principal Geologist
July 21, 2021

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1.0 EXECUTIVE SUMMARY

ECS Mid-Atlantic, LLC (ECS) was contracted by Roanoke Regional Airport Commission to perform an ASTM E1527-13, Phase I Environmental Site Assessment (ESA) of the John C Nordt Property located at 1420 Coulter Drive NW in Roanoke, Virginia (i.e. subject property). This Executive Summary is an integral part of the Phase I ESA report. ECS recommends that the report be read in its entirety.

The subject property is identified by the City of Roanoke by parcel identification number as 6630107 and owned by Nordt Properties LLC. The approximate eight-acre subject property is improved with 40,419 square-foot office and manufacturing building and an approximate 5,000 square foot hangar. The subject property is serviced by municipal water and sanitary sewer. The building is heated and cooled with a combination of natural gas and electricity.

Draper Aden Associates previously conducted a Phase I Environmental Site Assessment for the subject property in 2016. The report indicated that the subject property was a jewelry manufacturer, and found several RECs, which are further discussed herein.

The subject property is located in a commercial area of Roanoke, Virginia. The subject property is bound on the north by the Roanoke-Blacksburg Regional Airport, on the east by a Fedex Hanger and Airport Road, on the south by Coulter Drive, followed by an office building, and on the west by commercial properties. ECS did not identify environmental issues at adjoining or nearby properties that are believed to present a recognized environmental condition (REC) at the subject property.

Based on the records search, site reconnaissance and interviews, it appears that the subject property was part of an agricultural tract, with what appears to be a small structure, prior to construction of the current onsite facility, in 1983. Our review of historical information for adjoining or nearby properties identified the area as originally relatively rural and agricultural, that transitioned to a commercial area of Roanoke. Historical records prior to 1890 were not reasonably ascertainable for the subject property.

A regulatory database search report was provided by Environmental Data Resources Inc. (EDR). The database search involves researching a series of Federal, State, Local, and other databases for facilities and properties that are located within specified minimum search distances from the subject property. The report identified the the subject property on several of the researched databases. The EDR report identified several off-site properties within the minimum ASTM search distances. Based on our review of available public records, none of the listings are believed to represent a REC for the subject property, with the exception of those further discussed below.

ASTM E1527-13 defines a "data gap" as: "a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information." Data gaps which would be expected to impact our ability to render a professional opinion concerning the subject property were not identified.



We have performed a Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM E1527-13 of the John C Nordt Property located at 1420 Coulter Drive NW, in Roanoke, Virginia. Exceptions to, or deletions from, this practice are described in Section 2.6 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the property except for the following:

- The subject property has been utilized as a jewelry manufacturing facility since the 1980's, which has included the use of hazardous chemicals and heavy metals.
- The subject property contains a 4,000 gallon diesel UST that was reportedly installed in 1984 and then updated with new lines and ancillary equipment in 1998 to bring the system up to code. This UST is utilized to store fuel for the facility's back-up generator. More recently, ECS understands that the UST was equipped with a new tank gauge and leak detection system, making it current with new regulations.
 - While no releases have been reported at the subject property, the long term use as a jewelry manufacturer and the long term use of an UST leads to the potential for undocumented or incidental releases, which is considered to be a REC.



2.0 INTRODUCTION

2.1 Purpose and Reason for Performing Phase I ESA

The purpose of the ESA was to:

- evaluate the probability of impact to the surface water, groundwater and/or soils within the property boundaries through a review of regulatory information and a reconnaissance of the subject property and vicinity;
- evaluate historical land usage to identify previous conditions that could potentially impact the environmental condition of the subject property;
- conduct all appropriate inquiry as defined by ASTM E1527-13 and 40 CFR Part 312;
- evaluate the potential for on-site and off-site contamination; and,
- provide a professional opinion regarding the potential for environmental impact at the site and a list of Recognized Environmental Conditions (RECs).

The ESA should allow the Users the opportunity to qualify for landowner liability protection under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) provided certain stipulations are met. The landowner liability protections are: an innocent landowner, a contiguous property owner, or a bona fide prospective purchaser. The User must meet the protection stipulations detailed in CERCLA to qualify as well as meet the User Obligations contained within the ASTM E1527- 13 standard.

The reason for conducting this ESA is to perform all appropriate inquiries into the uses and prior ownership of the subject property for a pending real estate transaction.

2.2 Scope of Services

The environmental assessment was conducted in general accordance with ASTM E1527-13 and EPA Standards and Practices for All Appropriate Inquiry (40 CFR §312.10). The environmental assessment was conducted under the supervision or responsible charge of an individual that qualifies as an environmental professional, as defined in 40 CFR §312.10.

ECS was contracted by Roanoke Regional Airport Commission to perform an ASTM E1527-13, Phase I Environmental Site Assessment (ESA) of the John C Nordt Property located at 1420 Coulter Drive NW in Roanoke, Virginia. ECS was not contracted to address non-scope considerations.

2.3 Definitions

ASTM E1527-13 defines a "recognized environmental condition (REC)" as "the presence or likely presence of any hazardous substances or petroleum products in, on or at a property: 1) due to release to the environment, 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat of a future release to the environment." For the purposes of this practice, "migrate" and "migration" refer to the movement of hazardous substances or petroleum products in any form including solid and liquid at the surface or subsurface and vapor in the subsurface.



ASTM E1527-13 defines a "business environmental risk" (BER) as "a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice". ECS also uses the term "Other Environmental Considerations" to discuss BERs and environmental concerns outside of the ASTM E1527-13 requirements (radon, asbestos, lead, wetlands, etc.). Client-imposed limitations and site condition limitations, if encountered, are detailed in Section 2.6 Limiting Conditions/Deviations.

ASTM E1527-13 defines a "*de minimis* condition" as a condition that generally does not represent a threat to human 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. De minimis conditions are not recognized environmental conditions nor controlled recognized environmental conditions.

ASTM E1527-13 defines a "controlled recognized environmental condition (CREC)" as a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example property use restrictions, activity and use limitations, institutional controls, or engineering controls). A condition identified as a controlled recognized environmental condition does not imply that the Environmental Professional has evaluated or confirmed the adequacy, implementation or continued effectiveness of the required control that has been, or is intended to be, implemented.

ASTM E1527-13 defines a "historical recognized environmental condition (HREC)" as a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted residential use criteria established by a regulatory authority, without subjecting the property to any required controls (for example property use restrictions, activity and use limitations, institutional controls, or engineering controls). Before calling the past release a historical recognized environmental condition, the Environmental Professional must determine whether the past release is a recognized environmental condition at the time the Phase I Environmental Site Assessment is conducted (for example, if there has been a change in the regulatory criteria).

2.4 Limitations

The ESA involved a reconnaissance of the subject property and contiguous properties and a review of regulatory and historical information in general accordance with the ASTM standard and EPA regulation referenced herein. No non-scope considerations or additional issues such as asbestos, radon, wetlands or mold were investigated, unless otherwise described in Section 8.0 of this report.

Note: vapor migration in the subsurface is described in Guide E2600 published by ASTM. ECS has not conducted a Vapor Encroachment Screen in accordance with the E2600 guide.

The conclusions and/or recommendations presented within this report are based upon a level of investigation consistent with the standard of care and skill exercised by members of the same profession currently practicing in the same locality under similar conditions. The intent of this assessment is to identify the potential for recognized environmental conditions in connection with the subject property; however, no environmental site assessment can completely eliminate uncertainty regarding the potential for recognized environmental conditions in connection with the subject property. The findings of this ESA are not intended to serve as an audit for health and safety compliance issues pertaining to improvements or activities at the subject property. ECS is not liable for the discovery or elimination of hazards that may potentially cause damage, accidents or injury.

Observations, conclusions and/or recommendations pertaining to environmental conditions at the subject property are necessarily limited to conditions observed, and or materials reviewed at the time this study was undertaken. It was not the purpose of this study to determine the actual presence, degree or extent of contamination, if any, at this subject property. This could require additional exploratory work, including sampling and laboratory analysis. No warranty, expressed or implied, is made with regard to the conclusions and/or recommendations presented within this report.

This report is provided for the exclusive use of Roanoke Regional Airport Commission. This report is not intended to be used or relied upon in connection with other projects or by other unidentified third parties. The use of this report by any undesignated third party or parties will be at such party's sole risk and ECS disclaims liability for any such third party use or reliance. The use of this report is subject to the same terms, conditions and scope of work reflected in this report and the associated proposal.

2.5 Data Gaps

Data failures (historical data gaps) were identified during the historical research of this subject property. Use of the subject property was generally documented back to 1890. Historical information was missing for various periods. However, due to the apparent historical use, the present use, and the other information that was obtained about the subject property the historical data gaps are not expected to impact our ability to render a professional opinion regarding the subject property.

2.6 Limiting Conditions/Deviations

ASTM E1527-13 requires that the Environmental Professional identify limiting conditions, deletions, and deviations from the ASTM E1527-13 standard, if any, including client-imposed constraints. The following limiting conditions and/or deviations were encountered during the performance of this Phase I ESA:

Areas of dense vegetation covered northern portions of the subject property and may have obscured environmentally significant features and direct observation of the ground surface. In addition, ECS did not view all office spaces or the vault within the subject building; however, this limiting condition is not expected to impact our ability to provide a professional opinion concerning the subject property.

3.0 SUBJECT PROPERTY DESCRIPTION

3.1 Subject Property Location and Legal Description

Site Name	John C Nordt Property
Property Address	1420 Coulter Drive NW
Property City, State	Roanoke, Virginia
Property County	City of Roanoke
Number of Parcels	One
Property ID Number(s)	6630107
Property Size	eight Acres
Property Owner of Record	Nordt Properties LLC
Property Legal Description	According to the City of Roanoke Property: TRACT III BARRENS

3.2 Physical Setting and Hydrogeology

USGS Topographic Map	
Quad Designation	Roanoke, Virginia
Date	2013
Subject Property Settings	
Average Subject Property Elevation (in feet or meters)	Approximately 1,160 feet above mean sea level
General Sloping Direction	Relatively flat
Bodies of Water	None
General Directions of Surface Flow	Curb and gutter to underground conveyances
Presumed Direction of Groundwater Flow	North, Northeast
Geologic Province	Valley and Ridge
Up-gradient Property Direction	South, Southwest

Nearby Properties' Setting	
General Sloping Direction	Relatively flat
Bodies of Water	No notable surface water features mapped or observed within 500 feet of the subject property.
General Directions of Surface Flow	Curb and gutter to underground conveyances
Presumed Direction of Groundwater Flow	Northeast

Regional influences such as changes in soil and geologic conditions, and local topography, may have an impact on groundwater flow. The actual groundwater flow direction cannot be determined without site-specific information obtained through the gauging of groundwater monitoring wells.

3.3 Current Use and Description of the Site

The subject property consists of an approximately eight-acre parcel of land that is currently occupied by John C Nordt, a jewelry manufacturer. Specifically, the facility is a fabricator of specialty metal products with operations that include melting, machining, extruding, drawing, cutting, shaping, mechanical finishing, and electroplating of precious metals. The subject property is improved with a 40,419 square foot office and manufacturing facility, and an approximate 5,000 square foot former hangar, that is primarily utilized for storage. The subject property is located in an area that can generally be described as commercial.

4.0 USER PROVIDED INFORMATION

The ASTM standard includes disclosure and obligations of the User to help the Environmental Professional identify the potential for Recognized Environmental Conditions associated with the subject property. The ASTM E1527-13 User Questionnaire was submitted to and completed by Danielle Poe, representing Roanoke Regional Airport Commission (User of the report). Section 4.0 is based on the completed User Questionnaire. A copy of the completed User Questionnaire is included in Appendix II.

4.1 Title Information

ECS was not provided with title information by the User. If this information is provided following the issuance of this report and information contained therein materially changes the outcome of this report, ECS will issue an addendum to this report.

4.2 Environmental Liens or Activity and Use Limitations

ECS was neither contracted to obtain information on environmental liens or activity and use limitations, nor have we been provided with information on environmental liens or activity and use limitations for our review. It should be noted by the User of this report that if the User does not obtain activity and use limitation information, the User that is seeking to qualify for an innocent landowner, a contiguous property owner, or a bona fide prospective purchaser liability defense may lose these rights to qualify under CERCLA. If the activity use information is provided following issuance of this report and information contained therein materially changes the outcome of this report, ECS will issue an addendum to this report.

4.3 Specialized Knowledge

The User indicated that adjoining properties have been used for airport operations.

4.4 Commonly Known or Reasonably Ascertainable Information

The User indicated that the tenant has been involved in the metals business.

4.5 Valuation Reduction for Environmental Issues

According to the User, the purchase price being paid for the subject property reasonably reflects its fair market value, according to a 2021 appraisal.

4.6 Owner, Property Manager, and Occupant Information

The User indicated that the property is owned by Nordt Properties LLC, and that property is managed by Poe and Cronk real estate.



4.7 Degree of Obviousness

The User stated that they were not aware of obvious indicators that point to the presence or likely presence of contamination at the subject property; however, they have not been able to access the subject property.

5.0 RECORDS REVIEW

A regulatory records search of ASTM standard and supplemental databases was conducted for the subject property and is included in Appendix III. The regulatory search report in the appendix includes additional details about the regulatory databases that were reviewed. The regulatory records search involves searching a series of databases for facilities that are located within a specified distance from the subject property. The ASTM standard specifies an approximate minimum search distance from the subject property for each database. Pursuant to ASTM, the approximate minimum search distance may be reduced for each standard environmental record except for Federal NPL site list, and Federal RCRA TSD list. According to ASTM, government information obtained from nongovernmental sources may be considered current if the source updates the information at least every 90 days or, for information that is updated less frequently than quarterly by the government agency, within 90 days of the date the government agency makes the information available to the public. The following table indicates the standard environmental record sources and the approximate minimum search distances for each record.

Standard Environmental Record Sources	Approximate Minimum Search Distance Per ASTM (miles)	Subject Property	Off-Site Properties
Federal NPL	1.0	No	0
Federal Delisted NPL	0.5	No	0
Federal CERCLIS	0.5	No	0
Federal CERCLIS NFRAP	0.5	No	0
Federal RCRA CORRACTS	1.0	No	0
Federal RCRA non-CORRACTS TSD	0.5	No	0
Federal RCRA Generators	Subject Site and Adjoining Properties	Yes	3
Federal IC/EC	Subject Site Only	No	N/A
Federal ERNS	Subject Site Only	No	N/A
State and Tribal Hazardous Waste Sites (NPL Equivalent)	1.0	No	0
State and Tribal Hazardous Waste Sites (CERCLIS Equivalent)	0.5	No	0
State and Tribal Landfill and/or solid waste disposal sites	0.5	Yes	1



Standard Environmental Record Sources	Approximate Minimum Search Distance Per ASTM (miles)	Subject Property	Off-Site Properties
State and Tribal Leaking Tanks	0.5	No	7
State and Tribal Registered UST and AST	Subject Site and Adjoining Properties	Yes	2
State and Tribal IC/EC	Subject Site Only	No	N/A
State and Tribal Voluntary Cleanup (VCP)	0.5	No	0
State and Tribal Brownfield Sites	0.5	No	0

Based on our knowledge of the subject property and the surrounding area, ECS attempts to verify and interpret this data. While this attempt at verification is made with due diligence, ECS cannot guarantee the accuracy of the record(s) search beyond that of information provided by the regulatory report(s). ECS makes no warranty regarding the accuracy of the database report information included within the regulatory report(s).

The regulatory database search was performed by EDR and is dated June 24, 2021. ECS did not reduce the minimum ASTM search distances stipulated in the standard. The regulatory databases reviewed by ECS included supplemental databases researched by EDR.

5.1 Federal ASTM Databases

5.1.1 Federal RCRIS - Generators

RCRIS identifies facilities that generate hazardous wastes as defined by the RCRA. Very small quantity generators (VSQG) (previously identified as conditionally exempt small quantity generators or CESQGs) generate less than 100 kilograms of hazardous waste, or less than 1 kilogram of acutely hazardous waste, per month. Small quantity generators (SQGs) generate between 100 and 1,000 kilograms of hazardous waste per month. Large quantity generators (LQGs) generate more than 1,000 kilograms of hazardous waste or more than 1 kilogram of acutely hazardous waste per month.

John C. Nordt Co (EPA ID:VAD988202073) - This facility is located at the subject property. The EDR denotes this facility as a Small Quantity Generator (SQG), indicating that the facility generates more than 100 kilograms, but less than 1,000 kilograms of hazardous waste per month, and does not exceed 6,000 kilograms of storage. This facility appears to have received violations related to record keeping, according to the DEQ files reviewed as part of a FOIA request. It appears that the violations had been resolved based on the documents reviewed. Furthermore, this listing denotes that this facility utilized tetrachloroethylene as a degreaser, along with other glycols and oils, which often poses an environmental concern if released into



the environment. Given the long-term historical usage of this facility, there is a potential for undocumented releases to have impacted the subject property, which is considered to be a REC.

BB&T (EPA ID:VAD982701864) - This facility is located at 1410 Coulter Drive NW, an adjoining property to the west. The EDR denotes this facility as a non-generator, indicating the facility no longer stores or generates hazardous waste. No violations are listed in the EDR report. ECS requested files from the DEQ for this facility; however, no files were received prior to issuance of this report. Nonetheless, considering the non-generator status and lack of reported violations, this listing by itself, it not considered to be a REC.

UPS-VARDE (EPA ID:VA0000385211) - This facility is located at 5820 Airport Road NW, and adjoining property to the east. The EDR denotes this facility as a Very Small Quantity Generator (VSQG) indicating that the facility does not store more than 1,000 kg (2,200 lbs) of hazardous waste or 1 kg (2.2 lbs) of acute hazardous waste on site at any time. No violations were indicated with this listing in the EDR report. Furthermore, this facility appeared to have been in compliance during the most recent DEQ inspection in 2018, according to the DEQ files reviewed as part of a FOIA request. Based on the regulated nature of this facility, and the lack of violations, this listing by itself it not considered to be a REC.

Several additional RCRA facilities are identified on the EDR database but were verified to be outside the ASTM search distance of the subject site and adjoining properties. Based on distance and/or topographic position relative to the site, as well as the use of the public water supply, these facilities are not expected to impact the subject property. Additional information pertaining to these listings can be viewed in the regulatory report included in Appendix III.

5.2 State ASTM Databases

5.2.1 Solid Waste Facilities/ Landfill (SWL) List

The SWL is a list of state-permitted solid waste facilities. These facilities may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

John C. Nordt Company Inc. (Permit Number: PBR503) - This facility is located at the subject property. This listing relates to the use of an onsite incinerator, which is designed to burn filters which are utilized during waste water and oil recycling/filtration. Any precious metals are then extracted from the ash from the incinerator. This facility is further discussed in section 5.1.1.

5.2.2 State Leaking Tanks (LTANKS)

The LTANKS database is a list of all reported leaking underground and above ground tanks recorded by the state. Duplicate entries pertaining to LTANKS incidents are discussed in the following LUST section.

5.2.3 Leaking Underground Storage Tank (LUST) List

The LUST list is a record of reported leaking underground storage tank incidents. The LUST list may also identify properties that have had soil and/or groundwater contamination associated with documented releases from aboveground storage tanks, surface spills, and other sources.

The EDR report lists seven LUST facilities within the search radius for the database. These facilities are located greater than 1,000 feet from the subject property. Based on the distance from the subject property, ECS does not consider these listings to be RECs for the subject property. Additional information pertaining to these listings can be viewed in the regulatory report included in Appendix III.

5.2.4 Registered Underground Storage Tank (UST) List

The Registered UST List inventories underground storage tanks registered with the state. This list does not identify USTs that have not been registered or are exempt, such as home heating oil tanks and other unregulated tanks.

John C. Nordt Company (Facility ID: 2003085) - This facility is located at the subject property. The EDR indicates that this facility contains two inactive USTs which were two 10,000-gallon gasoline tanks that have been removed from the ground, and one active 4,000 gallon diesel tank.

According to the DEQ files reviewed the two 10,000 gallon USTs were removed from the ground in November 1998. The tanks were reportedly in good condition during the removal, and two soil samples were collected beneath each tank, which yielded results of total petroleum hydrocarbons gasoline range organics (TPH-GRO) below laboratory detection limits, as documented in a Closure Report in December 1998 by C.B Huggins & Associates, Inc.

The 4,000 gallon diesel UST was reported installed in 1984, and was updated with new lines and ancillary equipment in 1998 to bring the system up to code. This UST is utilized to store fuel for the facility's back-up generator. More recently, ECS understands that the UST was equipped with a new tank gauge and leak detection system, making it current with new regulations. While no releases have been reported, the long term use of the UST leads to the potential for undocumented or incidental releases and is considered to be a REC.

The EDR report lists one additional UST facility within the search radius for the database. This facility is reportedly located greater than 1,000 feet from the subject property. Based on the distance from the subject property, ECS does not consider this listing to be a REC for the subject property. Additional information pertaining to this listing can be viewed in the regulatory report included in Appendix III.

5.2.5 Aboveground Storage Tank (AST) Database

The AST Database is a list of facilities that have registered ASTs with the state regulator.

National Car Rental (Facility ID: 2041747) - This facility is located at 1411 Coulter Drive NW, an adjoining property to the south, and topographically cross-gradient relative to the subject property. According to the EDR, this facility has one active 5,000 gallon gasoline AST, with no reported violations. The AST appears to be approximately 270 feet from the subject property boundary. Considering the distance of the tank relative to the subject property, it is not expected that a release would likely impact the subject property; therefore, this facility is not considered to be a REC.

The EDR report lists one additional AST facility within the search radius for the database. This facility is reportedly located greater than 1,000 feet from the subject property. Based on the distance from the subject property, ECS does not consider this listing to be a REC for the subject property. Additional information pertaining to this listing can be viewed in the regulatory report included in Appendix III.

5.3 Additional Environmental Record Sources

5.3.1 Additional Non-ASTM Federal Databases

5.3.1.1 Superfund Enterprise Management System (SEMS)

SEMS (Superfund Enterprise Management System) tracks hazardous waste sites, potentially hazardous waste sites, and remedial activities performed in support of EPA's Superfund Program across the United States. The list was formerly known as CERCLIS, renamed to SEMS by the EPA in 2015. It contains sites that are either proposed to be or are on the National Priorities List (NPL) as well as sites that are in the screening and assessment phase for possible inclusion on the NPL.

The EDR report lists one SEMS facility within the search radius for the database. This facility is reportedly located greater than 1,000 feet from the subject property. Based on the distance from the subject property, ECS does not consider this listing to be a REC for the subject property. Additional information pertaining to this listing can be viewed in the regulatory report included in Appendix III.

5.3.1.2 Formerly Used Defense Sites (FUDS)

The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

The EDR report lists one FUDS facility within the search radius for the database. This facility is reportedly located greater than 1,000 feet from the subject property. Based on the distance from the subject property, ECS does not consider this listing to be a REC for the subject property. Additional information pertaining to this listing can be viewed in the regulatory report included in Appendix III.

5.3.1.3 Facility Index System (FINDS)

Facility Index System (FINDS) contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), Integrated Compliance Information System (ICIS), 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 Statutes), and PADS (PCB Activity Data System).

The subject property was listed as John C. Nordt Company on the FINDS database. Refer to the RCRA section above for additional information.

5.3.1.4 ECHO

ECHO provides fast, integrated searches of EPA and state data for more than 800,000 regulated facilities. ECHO focuses on inspection, violation, and enforcement data for the Clean Air Act (CAA), Clean Water Act (CWA) and Resource Conservation and Recovery Act (RCRA) and also includes Safe Drinking Water Act (SDWA) and Toxics Release Inventory (TRI) data.

The subject property was listed as John C. Nordt Company on the ECHO database. Refer to the RCRA section above for additional information.

5.3.2 Additional Non-ASTM State Databases

5.3.2.1 Manifest Information (MANIFEST)

The Manifest database contains information pertaining to hazardous waste manifest listings.

ETS Analytical (EPA ID:VAD988200333) - This facility is located at 1401 Municipal Road, approximately 800 feet south of the subject property. This listing is typically related to waste handling and transportation. Considering the distance relative to the subject property, this listing by itself is not considered to be a REC for the subject property.

5.3.3 Other Proprietary Databases

5.3.4 Unmapped (Orphan) Facilities and Sites

One property was identified on the Orphan Summary List. These facilities are considered as unmappable because the facility information in the database is insufficient and does not report accurate facility location. Based on available address and location information, ECS did not identify these facilities within the vicinity of the subject property.

5.4 Regulatory Review Summary

A regulatory database search report was provided by EDR. The database search involves researching a series of Federal, State, Local, and other databases for facilities and properties that are located within specified minimum search distances from the subject property. The report identified the subject property on several of the researched databases. The EDR report identified several off-site properties within the minimum ASTM search distances. Based on our review of available public records, ECS does not consider the off-site listings to be potential sources of soil, groundwater, or vapor impact to the subject property. However, ECS does consider the current and historical use of the subject property as a jewelry manufacturer, and a current onsite UST system to be RECs.



6.0 HISTORICAL USE INFORMATION

6.1 Aerial Photograph Review

ECS reviewed aerial photographs of the subject property and immediately surrounding properties for evidence of former usage which may indicate potential environmental issues. The aerial photographs were obtained from EDR. The aerial photographs reviewed were dated 1956, 1960, 1968, 1972, 1977, 1982, 1988, 1995, 2000, 2006, 2009, 2012, and 2016. Aerial photographs dated prior to 1956 were not available for review from EDR. The ECS review is dependent on the quality and scale of the photographs. The following is a description of relevant information from the aerial photographs:

Year(s)	Subject Property	Adjoining Properties	REC? (yes or no)
1956	A small residential structure may be present on the eastern portion of the subject property, although given the scale and quality of the imagery, specific details cannot be discerned. The remainder of the property appears to be undeveloped agricultural and/or pastoral land.	North - Undeveloped agricultural and/or pastoral land East - Road followed by undeveloped agricultural and/or pastoral land South - Residential-type improvement followed by Undeveloped agricultural and/or pastoral land West - Undeveloped land followed by the airport	No
1960-1977	The subject property appears relatively similar to the previous imagery. The presence of an onsite structure can not yet be discerned, given the quality and scale of the imagery.	North - Airport landing strip East - Road followed by undeveloped agricultural and/or pastoral land South - Residential-type improvement followed by Undeveloped agricultural and/or pastoral land West - Undeveloped land followed by the airport	No
1982	The subject property is improved with a small residential-type structure on the eastern portion of the site, while the remainder of the property is predominantly open grass land.	North - Airport runway East - Forested tract followed by a road (current Airport Road) and open undeveloped land South - Road (current Coulter Drive NW) followed by a commercial-type structure West - Commercial type structure	No

Year(s)	Subject Property	Adjoining Properties	REC? (yes or no)
1988	The subject property now appears to be improved with a large commercial/industrial type structure with an associated asphalt parking lot, and a small outbuilding on the southern half of the site. The northern portion of the site appears to be forested.	Adjoining properties appear relatively similar to the previous imagery.	No
1995	The subject property appears similar to the previous imagery.	North - Airport runway East - Cleared tract followed by Airport Road and commercial developments South - Coulter Drive NW followed by a commercial-type structure West - Commercial type structure	No
2000-2016	The subject property appears similar to the previous imagery and current site conditions.	North - Airport runway East - Commercial-type structures followed by Airport Road and commercial developments South - Coulter Drive NW followed by a commercial-type structure West - Commercial type structure	No

6.2 Sanborn Fire Insurance Map Review

In an effort to identify past uses, ECS utilized EDR to search for historical Sanborn Fire Insurance Maps (Sanborn) for the subject property and surrounding area. Sanborn maps were not available for this area. The absence of such maps generally indicates that the subject property is located in an area where Sanborn maps were not produced because the area was rural or it was not economically feasible. ECS does not expect the lack of Sanborn maps to impact our ability to render a professional opinion concerning the subject property given the amount of historical information obtained from our research, the USGS topographic map, aerial photographs, city directories, and other historical records obtained. A copy of the Unmapped Property report is included within Appendix IV.

6.3 Property Tax Files

Property tax files may include records of past ownership, appraisals, maps, sketches, photos, or other information kept by the local jurisdiction for property tax assessment purposes. According to the City of Roanoke tax assessor online information, the subject property is owned by Nordt Properties LLC. The subject property is listed as an eight-acre parcel with an identification number of 6630107. Additionally, the on-site building is reported as being constructed in 1983 and contains 40,419 square feet of space.

6.4 Recorded Land Title Records

Recorded land title records may include leases, land contracts, and AULs recorded by the local jurisdiction. Land title records may provide only a list of the names of previous owners and may be of limited use; however, they may provide useful information about uses or occupancy of the property when employed in combination with other sources.

ECS was not provided with Land Title Records.

6.5 Historical USGS Topographic Maps

Topographic maps are produced by the United States Geological Survey (USGS) for various time periods. ECS reviewed topographic maps of the subject property and immediately surrounding properties for evidence of former usage which may indicate potential environmental issues. The topographic maps were obtained from EDR and were dated 1890, 1891, 1929, 1933, 1962, 1963, 1968, 1978, 1984, and 2013. Topographic maps dated prior to 1890 were not available for review from EDR. The following is a description of relevant information from the topographic maps:

Year(s)	Subject Property	Adjoining Properties	REC? (yes or no)
1890-1891	The subject property appears to be undeveloped.	Adjoining and nearby properties appear to be undeveloped.	No
1929-1933	A small structure is depicted on the eastern portion of the subject property.	North - Undeveloped land East - Road (current Airport Road) followed by undeveloped land South - Road (Coulter Drive) followed by a small structure West - Undeveloped land	No

Year(s)	Subject Property	Adjoining Properties	REC? (yes or no)
1962-1978	The subject property appears relatively similar to the previous map.	North - Roanoke Municipal Airport East - Airport Road followed by undeveloped land South - Coulter Drive followed by a small structure West - Roanoke Municipal Airport	No
1984	The subject property appears similar to the previous maps; being improved with a small structure along the eastern portion of the site	North - Roanoke Municipal Airport East - Airport Road followed by undeveloped land South - Coulter Drive followed by what appears to be some small (residential-type) and larger (commercial-type) structures West - Several buildings, which appear to be associated with the Roanoke Municipal Airport	No
2013	Generally, structures are not depicted on this topographic map, only roads and other cultural features and landmarks.	Generally, structures are not depicted on this year topographic map, only roads and other cultural features and landmarks.	No

6.6 City Directory Review

One of the ASTM standard historical sources to be reviewed for previous subject property uses is local street directories, commonly known as City Directories. The purpose of the directory review is to identify past occupants of the subject property, adjoining properties, or nearby properties. In some rural areas, street directories information is limited.

ECS reviewed city directories obtained from EDR. The subject property address utilized for the research was 1420 Coulter Drive NW. The directories reviewed were dated 1964, 1969, 1974, 1979, 1984, 1989, 1992, 1995, 2000, 2005, 2010, 2014, and 2017. Directories dated prior to 1964 were not available for review from EDR. A copy of the city directory report is included in Appendix IV. The following is a description of relevant information from the city directories:

Year(s)	Listed Occupants	REC? (yes or no)
Subject Property		
1989-2017	John C Nordt Company, Jewelry Manufacturer	No
Northern Adjoining Properties		
Roanoke-Blacksburg Regional Airport Property		
Eastern Adjoining Properties		
1979-2017	New Life Pentecostal Church (with some other names over the years)	No
Southern Adjoining Properties		
1979-1995	La Maison Du Gourmet	No
2000	Lone Wolf Catering	No
2005	Aircraft Inventory Corp.	No
2014-2017	Branch and Associates	No
Western Adjoining Properties		
1989	First Virginia Bank (Operations Center)	No
2005	First Virginia Bank	No

6.7 Building Department Records

The term building department records means those records of the local government indicating permissions of the local government to construct, alter or demolish improvements on the property.

ECS reviewed the Building Department Records provided by EDR. Permits appear to have consisted of a roof replacement and other general remodeling activities. The other permits for the surrounding area were reported as general construction including; plumbing upgrades and repairs, electrical system upgrades, structure demolitions, and roof replacements. Environmental concerns were not identified in the permits reviewed.

6.8 Zoning/Land Use Records

The term zoning/land use records refers to records of the local government indicating the uses permitted by the government in particular zones within its jurisdictions. ECS reviewed zoning/land use records obtained from the City of Roanoke. The subject property is currently zoned AD; airport development.

6.9 Other Historical Sources

Other credible historical sources may be reviewed to identify past uses of the subject property. These sources may include websites, county or state road maps, historical society documents, or local library information.

FOIA requests were not submitted to the Fire Department or the Health Department due to the additional fees charged by each department and are therefore not considered reasonably ascertainable at the time of this assessment. Given historical information gained from other sources reviewed in this section, this is not considered to be a significant data gap that would affect our ability to render a professional opinion concerning the property's environmental quality.

6.10 Previous Reports

Draper Aden Associates previously conducted a Phase I Environmental Site Assessment for the subject property in 2016. The report indicated that the subject property was a jewelry manufacturer. ECS cannot attest to the accuracy of the information reviewed. The RECs including the following:

- The historical use of the subject property, with continuous storage, use and handling, and disposal of hazardous materials and petroleum products related to manufacturing operations since approximately 1983 as well as former aircraft operations.
- An AEP-owned unused pad-mounted transformer remains on site.
- Current and former commercial/industrial uses of off-site properties, some with LUST cases, located in close proximity and topographically cross-gradient or upgradient with respect to the subject property or potentially cross-gradient or upgradient with respect to groundwater flow.

6.11 Historical Use Summary

According to historical research, the subject property was part of an agricultural tract, with what appears to be a small structure, prior to construction of the current onsite facility, in 1983. Generally, the area has transitioned from a relatively rural and agricultural area to a commercial and industrial area of Roanoke.

No obvious indications of RECs were identified in the historical data review.

7.0 SITE AND AREA RECONNAISSANCE

7.1 Methodology

Steven Hay of ECS conducted the field reconnaissance on July 15, 2021. The weather at the time of the reconnaissance was 90 degrees Fahrenheit and clear. Observations were made from a walking reconnaissance around the perimeter, around the buildings, through the buildings and along several transects across the subject property. Access or visibility limitations, if any, are discussed in Section 2.6. Subject property photographs are included in Appendix V.

7.2 On-Site Features

The subject property is occupied by John C. Nordt, a fabricator of specialty metal products with operations that include melting, machining, extruding, drawing, cutting, shaping, mechanical finishing, and electroplating of precious metals (e.g., gold, silver, and platinum) and may be alloyed with base metals (e.g., copper, nickel, zinc, and ruthenium). The facility operates an incinerator, evaporator, and centrifuge in order to recover precious metals from factory-generated waste. Operations include the use, storage and disposal of hazardous chemicals and petroleum products.

The property includes an approximately 40,419 square foot industrial building and an approximately 5,000 square foot hangar building. The original manufacturing building (constructed in 1983) included approximately 31,250 square feet and an approximate 9,150 square foot addition was added around 1999. The one-story hanger building was constructed in approximately 1983. The building includes office space on the upper level and manufacturing spaces on the lower level. A partial basement exists beneath the factory floor that houses the equipment base supports and other operational equipment. The hangar building is currently used for manufacturing and storage; no aircraft are currently housed or maintained on the property.

The manufacturing area appeared clean and clear of miscellaneous debris. De Minims staining was observed throughout typical of manufacturing operations. Equipment and machinery appeared in good working order with no obvious leakage, damage, or corrosion observed (based on limited observation of overall operations and not a specific observation of all equipment on site).

The remainder of the property consisted of an asphalt parking lot and landscaped areas around the buildings, while a forested area and stormwater detention pond are located on the northern portion of the site.

The table below lists pertinent features of interest that were assessed for the subject property. Relevant information regarding pertinent features is discussed further in this section.

Feature	Yes	No
Underground or aboveground storage tanks	✓	
Strong, pungent or noxious odors		✓
Surface waters		✓
Standing pools of liquid likely containing petroleum or hazardous substances		✓
Drums or containers of petroleum or hazardous substances greater than five-gallons	✓	
Drums or containers of petroleum or hazardous substances less than or equal to five-gallons	✓	
Unidentified opened or damaged containers of hazardous substances or petroleum products		✓
Known or suspect PCB-containing equipment (excluding light ballasts)	✓	
Stains or corrosion to floors, walls or ceilings	✓	
Floor drains and sump pumps	✓	
Pits, ponds or lagoons		✓
Stained soil or pavement		✓
Stressed vegetation		✓
Solid waste mounds or non-natural fill materials		✓
Wastewater discharges into drains, ditches or streams		✓
Groundwater wells including potable, monitoring, dry, irrigation, injections and/or abandoned		✓
Septic systems or cesspools		✓
Elevators		✓
Dry cleaning		✓
Onsite emergency electrical generators	✓	
Specialized industrial equipment (paint booths, bag houses, etc.,) on-site		✓
Hydraulic lifts		✓
Oil-water separators		✓
Compressors on-site	✓	
Grease traps		✓

Underground or aboveground storage tanks

A vent pipe and man-hole cover were observed along the western side of the subject building, which is associated with a 4,000 gallon fiberglass UST utilized for storing diesel fuel for a back-up generator, located within the building.

Vent pipes and terminated lines were observed on either side of the hangar building, in the areas of the removed gasoline tanks.

All three tanks are discussed in greater detail in section 5.2.4. No evidence of a release or overfilling was observed.

In addition, the site contains an ammonia AST.

Drums or containers of petroleum or hazardous substances greater than five-gallons

Several 55-gallon drums are located within the building, located on spill containment pallets. The drums appear to contain used oil, glycols and other chemicals essential to the manufacturing processes. Environmental Options regularly collects waste from the site. Staining was not observed on the drums or the floor surfaces in the vicinity of the drums.

Drums or containers of petroleum or hazardous substances less than or equal to five-gallons

Several containers of chemicals were observed in the subject building. Staining was not observed on the containers or the floor surfaces in the vicinity of the containers.

Known or suspect PCB-containing equipment (excluding light ballasts)

A pad-mounted transformer is located along the western side of the subject building. The transformer is owned and maintained by AEP. Staining, which could be indicative of leakage, was not observed on the transformer or surfaces in the vicinity of the transformer.

Stains or corrosion to floors, walls or ceilings

De Minims staining was observed throughout typical of manufacturing operations

Floor drains and sump pumps

A few floor drains were observed that reportedly lead to a wet recovery system along with drains from sinks, rinse areas, and a floor sump located in the basement. The remaining drains and sinks primarily associated with restrooms and employee areas discharge into the sanitary sewer.

Onsite Emergency Electrical Generators

A diesel powered emergency generator was observed in the basement of the subject building. The diesel fuel is stored in a 4,000-gallon UST referenced above. Staining or petroleum odors were not detected in the vicinity of the diesel generator.

Compressors on-site

Several compressors were associated with the facility. The compressors are located within the subject building. No significant staining was observed in the vicinity of the compressors.

7.3 Adjoining and Nearby Properties

Contiguous and nearby properties were observed during a walking and vehicular reconnaissance of the subject property boundary and public places. The subject property is located in a commercial area of Roanoke, Virginia.

Direction	Description	Relative Gradient	REC
North	The subject property is bound to the north by Roanoke-Blacksburg Regional Airport.	Down-gradient	No
East	The subject property is bound to the east by a Fedex Hangar and Airport Road followed by undeveloped land.	Cross-gradient	No
South	The subject property is bound to the south by Coulter Drive followed by an office building (Branch Builds) and National Rental Car.	Up-gradient	No
West	The subject property is bound to the west by a commercial property	Cross-gradient	No

7.4 Site and Area Reconnaissance Summary

According to our observations of the subject and surrounding properties, the subject property is utilized for jewelry manufacturing. Details pertaining to our on-site and off-site observations are referenced previously. The following RECs were identified during our on-site and off-site reconnaissance:

- The long term historical use of the subject property for jewelry manufacturing leads to the potential for undocumented releases to the environment, which is considered to be a REC.

8.0 ADDITIONAL SERVICES

ASTM guidelines identify non-scope issues, which are beyond the scope of this practice. Non-scope issues have the potential to be business environmental risks. Some of these non-scope issues include; asbestos-containing building materials, radon, lead-based paint, lead in drinking water, wetlands, and mold.

The following non-ASTM considerations were assessed in conjunction with this Phase I ESA:

Asbestos

Based on the age of the building on the property (circa 1983), asbestos-containing materials (ACM) were likely to have been utilized in its construction. ECS conducted a brief visual survey of the property and observed the following potentially suspect ACM: flooring and associated mastics, joint compound, window glazing/caulks, and roofing materials.

This cursory visual survey is not considered to be a complete inspection for ACM. ECS recommends that an asbestos survey be performed by a licensed asbestos inspector prior to conducting demolition or renovation activities that could disturb suspect ACM.

Lead Based Paint

Lead-based paint was banned for residential use in 1978, and many commercial uses were phased out after that year. Based on the age of the building(s) on the property (circa 1983), lead-based paint finishes are not likely to have been utilized in its construction or prior renovation. ECS conducted a brief visual survey of the property did not observe any cracked paint finishes, indicative of lead-based paint.

This cursory visual survey is not considered to be a complete inspection for lead-based paint. ECS recommends that a lead paint survey be performed by a licensed lead inspector prior to conduction demolition or renovation activities that could disturb suspect lead painted surfaces.

Lead in Drinking Water

The subject property is serviced by public water supply.

Buildings constructed prior to the 1980s may have lead pipes and/or lead pipe fittings. Based on the date of construction of the building (1983), it is considered unlikely that the subject property has lead-soldered pipe fittings.

ECS has reviewed the most recent available water quality report produced by Western Virginia Water Authority. According to that report, the site is serviced by the Carvins Cove Reservoir & Treatment Facility. Elevated lead levels were not reported in the samples collected.

Consequently, lead in drinking water is not considered to be a BER for the subject site. Additional site-specific testing would be required to ascertain actual lead in drinking water concentrations.

Visual Mold Inspection



ECS personnel conducted a visual assessment in reasonably accessible areas for visual indications of apparent fungal/mold colonization. Our visual assessment does not imply a guarantee that all possible growth reservoirs of fungal growth/mold were identified since destructive testing was not conducted by ECS. Visual indications of apparent fungal growth (mold) and moisture intrusion were not observed during our assessment.

FEMA Flood Map

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map Panels 51161C0153G and 51161C0154G, dated September 28, 2007, the subject property is located in Flood Hazard Zone X, which is an area of minimal flood hazard. A copy of the FEMA Flood Map is included in Appendix I.

Radon

Radon is a naturally occurring gaseous substance resulting from the radioactive decay of uranium to radium and then to radon. Uranium is a common element found in many geologic formations and substrates, particularly igneous and metamorphic rocks. Radon has a half-life of only 3.8 days and decays to its daughter elements which represent the health hazard commonly associated with radon.

The EPA has established a list that identifies areas of the U.S. with the potential for elevated indoor radon levels. The EPA Map of Radon Zones assigns each county in the U.S. to one of three zones based on radon potential. The EPA Action level for radon is greater than 4 picoCuries per liter (pCi/L). According to information provided on the EPA Map of Radon Zones, City of Roanoke is located in Zone 1, which is predicted to have average screening levels of greater than 4 pCi/L.

Site-specific testing would be needed to assess indoor radon concentrations. No radon testing was conducted during this assessment.

Wetlands and Streams

ECS conducted a review of the U.S. Fish and Wildlife Service National Wetlands Inventory (NWI) Online Map and the USGS Topographic Map (Roanoke, Virginia 2013) to obtain information regarding the subject property.

- The U.S. Fish and Wildlife Service National Wetlands Inventory (NWI) Online Map did not indicate surface waters or wetlands are located on or near the site.
- The USGS Topographic Map did not indicate that surface waters, streams, swamps or ponds are noted on the site.

The subject property consists of eight acres of land developed with a 40,419 square foot building with associated asphalt parking. During our reconnaissance, we observed the subject property for evidence of wetlands, streams, open water/ponds, swamps, etc. During our site visit, ECS did not observe potential wetland/stream features.

Threatened and Endangered Species

Virginia Department of Wildlife Resources:



ECS conducted a search of the VDWR Fish and Wildlife Information Service (FWIS) threatened and endangered species database to evaluate documented occurrences of federally and/or state listed species within a two-mile radius of the project site (see Appendix I). According to FWIS, four species are listed as having been documented within this radius:

- Federal and State-endangered Roanoke Logperch (*Percina rex*) - Confirmed sightings within 2 miles of the site. The Roanoke Logperch inhabits medium-to-large sized warm, clear streams and small rivers of moderate to low gradient. Adults usually occupy riffles, runs, and pools containing sand, gravel, or boulders that are free of silt. Young-of-year congregate in mixed-species schools in shallow habitat underlain by sand and gravel along stream margins.

Based on current site conditions, suitable habitats for this species is not present on the site; therefore, no adverse impacts are expected.

U.S. Fish and Wildlife Service (USFWS):

ECS conducted a review of the USFWS Information for Planning and Consultation (IPaC) database to evaluate the documented occurrences or potential habitat for federally-listed species within the project boundaries. According to the IPaC database, no species are listed as having potential to occur at the project site. Additionally, no critical habitats are listed.

9.0 INTERVIEWS

During the site reconnaissance, Steven Hay interviewed Paul Nordt. Mr. Nordt explained that he has been familiar with the property since 1979, that the manufacturing facility was constructed in 1983, and prior to 1979 the property was part of the Coulter Farm. Mr. Nordt also explained that there have been three USTs onsite, two of which have been removed, while the third tank stores diesel for the back-up generator. Mr. Nordt also stated that there was a Phase I ESA conducted on the subject site in 2016, which has been discussed previously. Finally, Mr. Nordt indicated that he is not aware of 1) environmental concerns associated with the subject property; 2) any pending, past, or threatened administrative litigation or administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the subject property; or 3) any government notices regarding any possible violation of environmental laws or possible liability related to hazardous substances or petroleum products.

10.0 FINDINGS AND CONCLUSIONS

The subject property is identified by the City of Roanoke by parcel identification number as 6630107 and owned by Nordt Properties LLC. The approximate eight-acre subject property is improved with 40,419 square-foot office and manufacturing building and an approximate 5,000 square foot hangar. The subject property is serviced by municipal water and sanitary sewer. The building is heated and cooled with a combination of natural gas and electricity.

Draper Aden Associates previously conducted a Phase I Environmental Site Assessment for the subject property in 2016. The report indicated that the subject property was a jewelry manufacturer, and found several RECs, which are further discussed herein.

The subject property is located in a commercial area of Roanoke, Virginia. The subject property is bound on the north by the Roanoke-Blacksburg Regional Airport, on the east by a Fedex Hanger and Airport Road, on the south by Coulter Drive, followed by an office building, and on the west by commercial properties. ECS did not identify environmental issues at adjoining or nearby properties that are believed to present a recognized environmental condition (REC) at the subject property.

Based on the records search, site reconnaissance and interviews, it appears that the subject property was part of an agricultural tract, with what appears to be a small structure, prior to construction of the current onsite facility, in 1983. Our review of historical information for adjoining or nearby properties identified the area as originally relatively rural and agricultural, that transitioned to a commercial area of Roanoke. Historical records prior to 1890 were not reasonably ascertainable for the subject property.

A regulatory database search report was provided by EDR. The database search involves researching a series of Federal, State, Local, and other databases for facilities and properties that are located within specified minimum search distances from the subject property. The report identified the the subject property on several of the researched databases. The EDR report identified several off-site properties within the minimum ASTM search distances. Based on our review of available public records, none of the listings are believed to represent a REC for the subject property, with the exception of those further discussed below.

ASTM E1527-13 defines a "data gap" as: "a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information." Data gaps which would be expected to impact our ability to render a professional opinion concerning the subject property were not identified.

We have performed a Phase I Environmental Site Assessment in general conformance with the scope and limitations of ASTM E1527-13 of the John C Nordt Property located at 1420 Coulter Drive NW, in Roanoke, Virginia. Exceptions to, or deletions from, this practice are described in Section 2.6 of this report. This assessment has revealed no evidence of recognized environmental conditions in connection with the property except for the following:

- The subject property has been utilized as a jewelry manufacturing facility since the 1980's, which has included the use of hazardous chemicals and heavy metals.

- The subject property contains a 4,000 gallon diesel UST that was reportedly installed in 1984 and then updated with new lines and ancillary equipment in 1998 to bring the system up to code. This UST is utilized to store fuel for the facility's back-up generator. More recently, ECS understands that the UST was equipped with a new tank gauge and leak detection system, making it current with new regulations.
 - While no releases have been reported at the subject property, the long term use as a jewelry manufacturer and the long term use of an UST leads to the potential for undocumented or incidental releases, which is considered to be a REC.

11.0 REFERENCES

ASTM E1527-13. Standard Practice for Environmental Site Assessment, Phase I Environmental Site Assessment Process.

Environmental Data Resources, Inc., The EDR Aerial Photo Decade Package (years 1956, 1960, 1968, 1972, 1977, 1982, 1988, 1995, 2000, 2006, 2009, 2012, and 2016), dated June 25, 2021.

Environmental Data Resources, Inc., The EDR Radius Map Report, dated June 24, 2021.

Environmental Data Resources, Inc., Certified Sanborn Map Report (unmapped), dated June 24, 2021.

City of Roanoke County GIS website, accessed on June 24, 2021.

USGS Topographic Map, Roanoke, Virginia, dated 2013.

Environmental Data Resources, Inc., EDR City Directory Image Report, dated June 29, 2021.

Environmental Data Resources, Inc., Historical Topo Map Report, dated June 24, 2021.

Appendix I: Figures



Figure 1. Site Location Map

John C Nordt Property
1420 Coulter Drive NW
Roanoke, Virginia 24012



National Flood Hazard Layer FIRMMette



79°58'24"W 37°19'56"N



0 250 500 1,000 1,500 2,000 Feet 1:6,000 79°57'46"W 37°19'28"N
 Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

Legend

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

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, AB99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
OTHER FEATURES		Profile Baseline
		Hydrographic Feature
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped

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

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 7/16/2021 at 2:33 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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



U.S. Fish and Wildlife Service



National Wetlands Inventory

1420 Coulter Drive NW



July 16, 2021

Wetlands

-  Estuarine and Marine Deepwater
-  Estuarine and Marine Wetland

-  Freshwater Emergent Wetland
-  Freshwater Forested/Shrub Wetland
-  Freshwater Pond

-  Lake
-  Other
-  Riverine

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

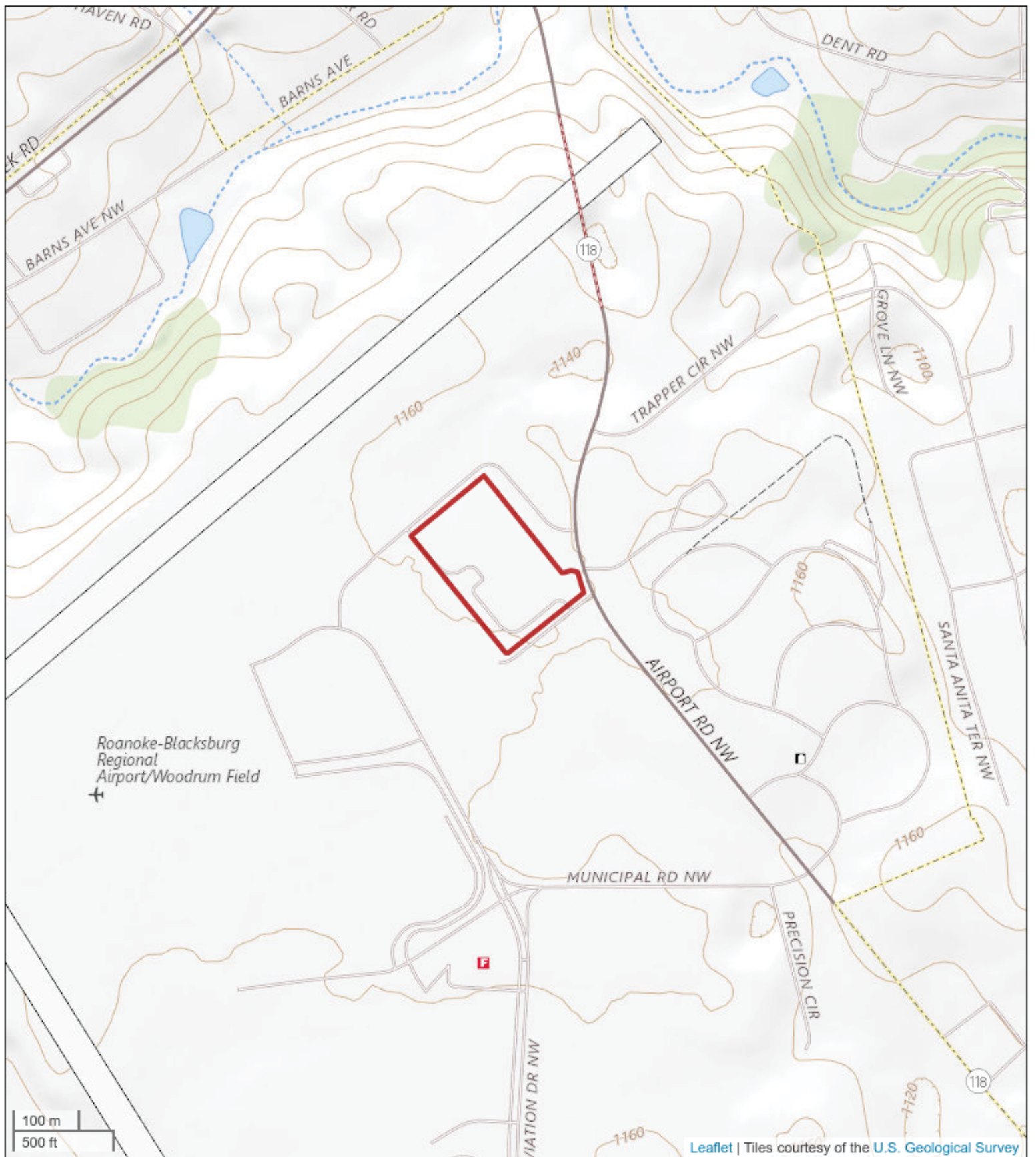


Figure 2. USGS Topographic Map

John C Nordt Property
1420 Coulter Drive NW
Roanoke, Virginia 24012





Figure 3. Aerial Detail Map

John C Nordt Property
1420 Coulter Drive NW
Roanoke, Virginia 24012



Appendix V: Site Photographs



1 - Front of the manufacturing/office building



2 - Manufacturing areas



3 - Manufacturing areas



4 - Metal extraction systems from wastewater



5 - Metal extraction systems



6 - Bulk chemical storage



7 - Chemical storage



8 - Incinerator



9 - Office spaces



10 - Area inside the Hangar



11 - The hangar building



12 - Location of the former pump for the 10,000 gallon UST along the southside of the hangar



13 - Location of the pump for the 10,000 gallon UST on the north side of the hangar



14 - Stormwater detention pond



15 - Northern portion of the property



16 - Ammonia AST



17 - Pad mounted transformer



18 - The 4,000 gallon UST



19 - Adjoining property to the south



20 - Adjoining property to the east



21 - Parking lot on the north side of the hangar



22 - IMG 1626440182598

ATTACHMENT 44

VA DHR Coordination

From: [Stafford, Susan \(FAA\)](#)
To: [Stevens, Laura](#)
Subject: FW: Roanoke-Blacksburg Regional Airport (ROA) Proposed Nordt Property Acquisition (DHR File No. 2020-4865) | e-Mail #03347
Date: Friday, January 15, 2021 10:51:04 AM

FYI

Susan B. Stafford
Environmental Protection Specialist
Beckley Airports Field Office
176 Airport Circle, Rm 101
Beaver, WV 25813
304-252-6216 x 130

From: Adrienne Birge-wilson <Adrienne.Birge-Wilson@dhr.virginia.gov>
Sent: Friday, January 15, 2021 10:30 AM
To: Stafford, Susan (FAA) <Susan.Stafford@faa.gov>
Subject: Roanoke-Blacksburg Regional Airport (ROA) Proposed Nordt Property Acquisition (DHR File No. 2020-4865) | e-Mail #03347

Susan,

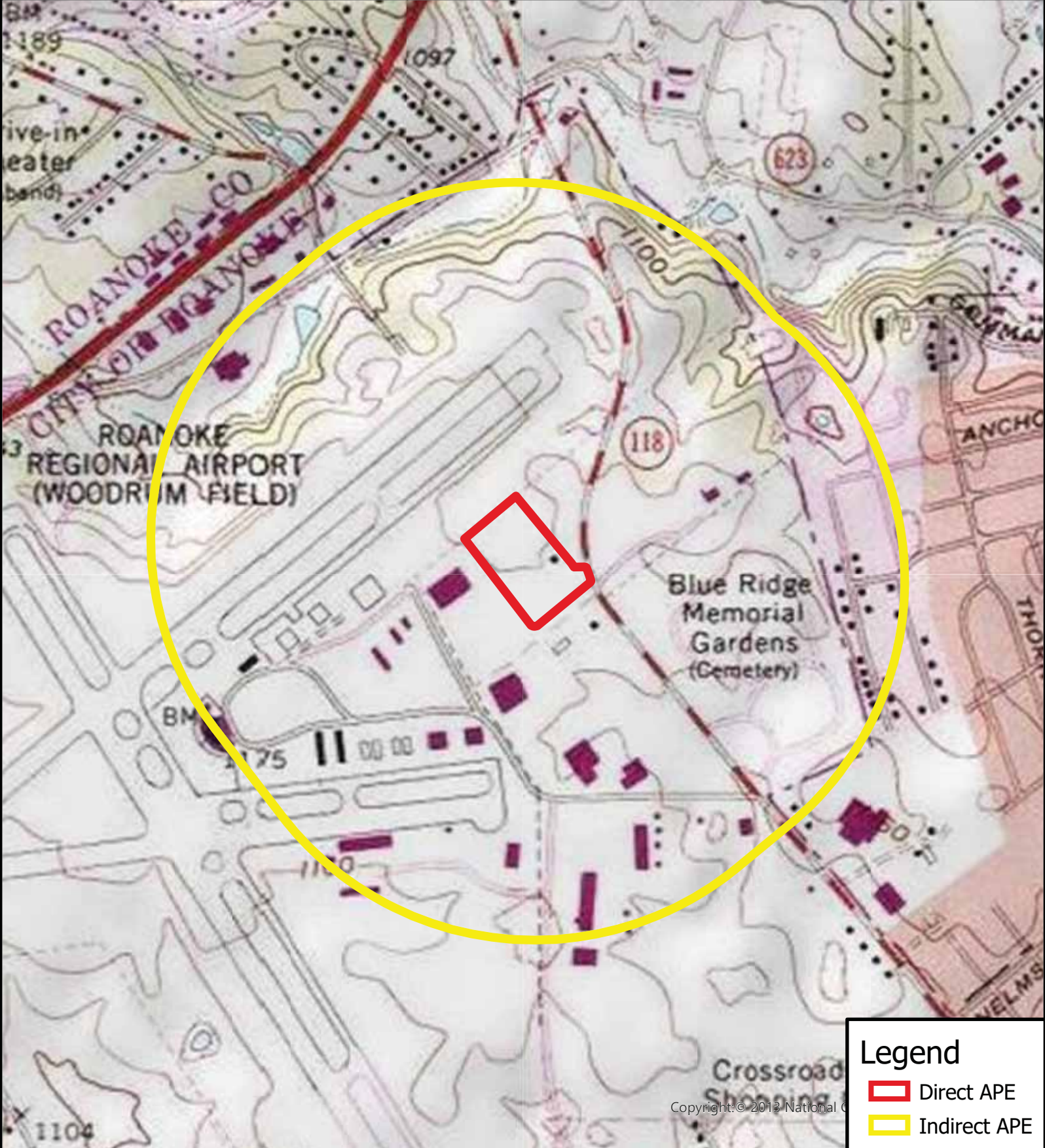
Thank you for requesting comments from the Department of Historic Resources on the referenced project. Based upon the documentation provided, it is our opinion that no historic properties will be affected by the proposed undertaking.

Implementation of the undertaking in accordance with the finding of No Historic Properties Affected as documented fulfills the Federal agency's responsibilities under Section 106 of the National Historic Preservation Act. If for any reason the undertaking is not or cannot be conducted as proposed in the finding, consultation under Section 106 must be reopened.

If you have any questions or if we may provide any further assistance at this time, please do not hesitate to contact me.

Sincerely,

Adrienne Birge-Wilson, Architectural Historian
Office of Review and Compliance
Division of Resource Services and Review
Phone: (804) 482-6092
Adrienne.Birge-Wilson@dhr.virginia.gov



Legend

- Architecture Labels
- Architecture Points
- ☑ Historic Districts
- County Boundaries



Nordt Property Study Area



Feet

0 200 400 600 800
1:9,028 / 1"=752 Feet

Title: Nordt Property Acquisition

Date: 10/29/2020

DISCLAIMER: Records of the Virginia Department of Historic Resources (DHR) have been gathered over many years from a variety of sources and the representation depicted is a cumulative view of field observations over time and may not reflect current ground conditions. The map is for general information purposes and is not intended for engineering, legal or other site-specific uses. Map may contain errors and is provided "as-is". More information is available in the DHR Archives located at DHR's Richmond office.

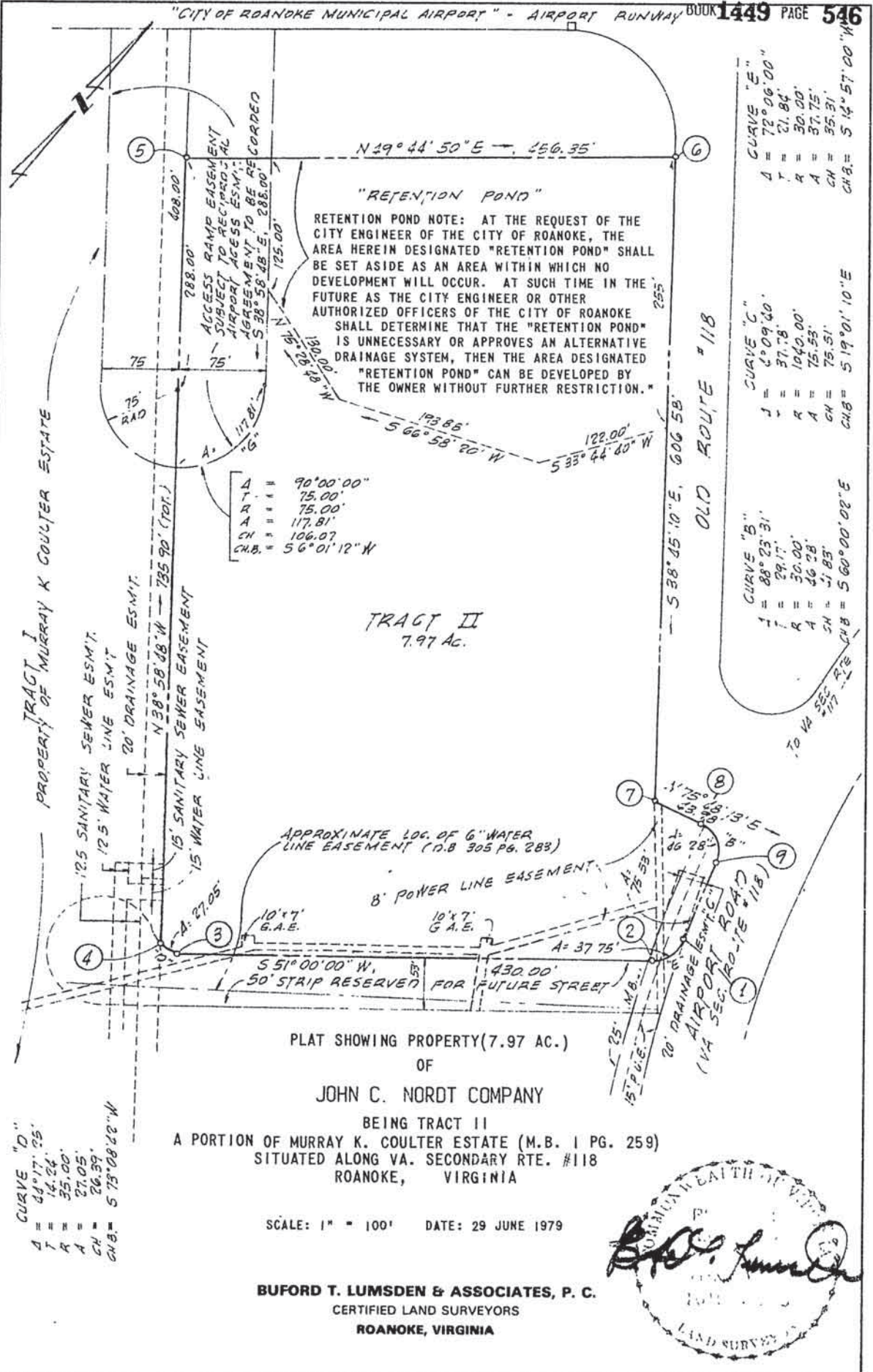
Notice if AE sites: Locations of archaeological sites may be sensitive the National Historic Preservation Act (NHPA), and the Archaeological Resources Protection Act (ARPA) and Code of Virginia §2.2-3705.7 (10). Release of precise locations may threaten archaeological sites and historic resources.

DHR ARCHIVES SEARCH

DHR_ID	SiteNames	EvaluationStatus	Construction Year	Resource Type
128-6037	Building #11, Roanoke Regional Airport (Current)	DHR Staff: Not Eligible	1938	Aviation-Related
128-6038	Building #12, Roanoke Regional Airport (Current)	DHR Staff: Not Eligible	1938	Aviation-Related
128-6034	Former Terminal, Roanoke Regional Airport (Current), Terminal, Woodrum Field (Historic)	DHR Staff: Not Eligible	1951	Aviation-Related
128-6035	Hangar #1, Roanoke Regional Airport (Historic), Hangar #2, Roanoke Regional Airport (Current)	DHR Staff: Not Eligible	1930	Hangar
128-6036	Hangar #2, Roanoke Regional Airport (Historic), Hangar #3, Roanoke Regional Airport (Current)	DHR Staff: Not Eligible	1938	Hangar
128-5440	Waverly (Historic)	null	1860	Single Dwelling

ATTACHMENT 55

**Restrictive Covenant
Coordination**



"RETENTION POND"
 RETENTION POND NOTE: AT THE REQUEST OF THE CITY ENGINEER OF THE CITY OF ROANOKE, THE AREA HEREIN DESIGNATED "RETENTION POND" SHALL BE SET ASIDE AS AN AREA WITHIN WHICH NO DEVELOPMENT WILL OCCUR. AT SUCH TIME IN THE FUTURE AS THE CITY ENGINEER OR OTHER AUTHORIZED OFFICERS OF THE CITY OF ROANOKE SHALL DETERMINE THAT THE "RETENTION POND" IS UNNECESSARY OR APPROVES AN ALTERNATIVE DRAINAGE SYSTEM, THEN THE AREA DESIGNATED "RETENTION POND" CAN BE DEVELOPED BY THE OWNER WITHOUT FURTHER RESTRICTION."

A = 90°00'00"
 T = 75.00'
 R = 75.00'
 A = 117.81'
 CH = 106.07'
 CH.B. = 56°01'12" N

TRACT II
 7.97 AC.

PLAT SHOWING PROPERTY (7.97 AC.)
 OF
 JOHN C. NORDT COMPANY
 BEING TRACT II
 A PORTION OF MURRAY K. COULTER ESTATE (M.B. 1 PG. 259)
 SITUATED ALONG VA. SECONDARY RTE. #118
 ROANOKE, VIRGINIA

SCALE: 1" = 100' DATE: 29 JUNE 1979

BUFORD T. LUMSDEN & ASSOCIATES, P. C.
 CERTIFIED LAND SURVEYORS
 ROANOKE, VIRGINIA



From: Adrian.Gilbert@RoanokeVa.gov
To: [Stevens, Laura](#)
Cc: [David Jeavons](#); Jillian.Papa.Moore@Roanokeva.gov
Subject: Follow-up regarding ROA: Stormwater question
Date: Friday, January 29, 2021 10:35:07 AM

Good Morning Ms. Stevens,

I am responding to your question below on behalf of Jillian Moore. The area indicated as "retention pond" could be considered unnecessary as long as the requirements of State Code section 9VAC25-870-66 Water Quantity are met by any proposed development (provided over 10,000 SF of land is disturbed.) The services of a civil engineer experienced in Virginia stormwater management regulations may be needed in order to determine what may or may not be needed in order to meet these regulations. If it is desired to place any proposed stormwater facilities elsewhere within the parcel, or not at all provided regulations are met, I don't see how that would be a problem. I'm not sure what the circumstances were that generated the need for this language on the plat originally, yet stormwater regulations have changed significantly many times since 1979. Please let me know if you have any more questions.

Adrian Gilbert, CPII
Development Program Administrator
Direct (540) 632-0856

We recommend email as the most reliable form of communication at this time.

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or on clicking links from unknown senders.

Good Afternoon Ms. Moore,

I am following up on Mr. Pugh's earlier email and phone messages I have left for you regarding the attached plat, which identifies a portion of the property as set aside for a retention pond. Roanoke-Blacksburg Regional Airport is looking into the possible purchase of this parcel (location map also attached). I am seeking your input on any requirements associated with future development of this parcel, specifically the retention pond set aside area.

Your assistance is greatly appreciated!

Thank you,

Laura

Laura Stevens, AICP

Parrish and Partners, LLC

803.978.7611 (direct)

803.331.5792 (cell)

LStevens@parrishandpartners.com

ATTACHMENT 66

Sponsor's Assurance

GENERAL WRITTEN ASSURANCES

In accordance with 49 U.S.C. § 47107 (a) (10) of the *1982 Airport Act*, the Airport Sponsor provides assurances that appropriate actions will be taken, to the extent reasonable, to restrict the use of land next to or near Roanoke-Blacksburg Regional Airport to purposes compatible with normal airport operations.


Signature _____ Date 1/22/21

David Jeavons, CPA
Name _____

Interim Executive Director
Title _____

Roanoke Regional Airport Commission
Affiliation _____

(540) 362-1999 x284
Phone Number _____

ATTACHMENT 77

**NEPAssist Environmental
Justice Screen**

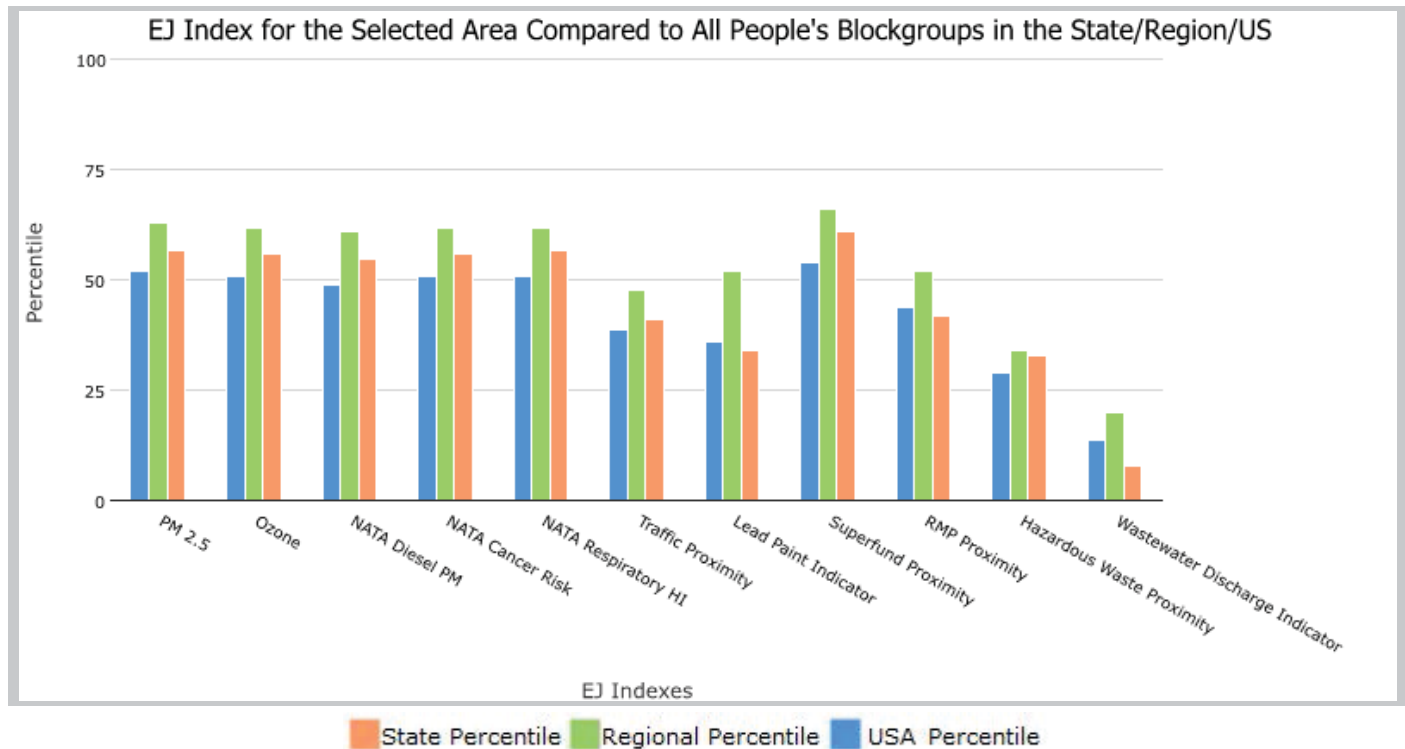
.5 miles Ring around the Area, VIRGINIA, EPA Region 3

Approximate Population: 570

Input Area (sq. miles): 1.04

ROA Nordt Property

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	57	63	52
EJ Index for Ozone	56	62	51
EJ Index for NATA* Diesel PM	55	61	49
EJ Index for NATA* Air Toxics Cancer Risk	56	62	51
EJ Index for NATA* Respiratory Hazard Index	57	62	51
EJ Index for Traffic Proximity and Volume	41	48	39
EJ Index for Lead Paint Indicator	34	52	36
EJ Index for Superfund Proximity	61	66	54
EJ Index for RMP Proximity	42	52	44
EJ Index for Hazardous Waste Proximity	33	34	29
EJ Index for Wastewater Discharge Indicator	8	20	14



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

.5 miles Ring around the Area, VIRGINIA, EPA Region 3

Approximate Population: 570

Input Area (sq. miles): 1.04

ROA Nordt Property



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

EJSCREEN Report (Version 2020)



.5 miles Ring around the Area, VIRGINIA, EPA Region 3

Approximate Population: 570

Input Area (sq. miles): 1.04

ROA Nordt Property

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	7.26	7.87	12	8.63	5	8.55	16
Ozone (ppb)	42.6	42.4	56	43.2	36	42.9	48
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.286	0.425	34	0.477	<50th	0.478	<50th
NATA* Cancer Risk (lifetime risk per million)	29	31	38	31	<50th	32	<50th
NATA* Respiratory Hazard Index	0.37	0.41	27	0.4	<50th	0.44	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	300	570	60	650	55	750	57
Lead Paint Indicator (% Pre-1960 Housing)	0.33	0.21	77	0.36	56	0.28	65
Superfund Proximity (site count/km distance)	0.019	0.11	9	0.15	4	0.13	16
RMP Proximity (facility count/km distance)	0.34	0.38	71	0.62	57	0.74	52
Hazardous Waste Proximity (facility count/km distance)	2.2	1.6	74	2	72	5	67
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.013	3.1	94	34	80	9.4	81
Demographic Indicators							
Demographic Index	31%	32%	56	30%	62	36%	51
People of Color Population	27%	38%	40	33%	55	39%	46
Low Income Population	35%	25%	71	27%	69	33%	60
Linguistically Isolated Population	0%	3%	52	3%	55	4%	45
Population With Less Than High School Education	10%	11%	58	10%	60	13%	54
Population Under 5 years of age	5%	6%	43	6%	46	6%	42
Population over 64 years of age	24%	15%	86	16%	83	15%	86

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

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

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

ATTACHMENT 88

**Waters of the U.S.
Investigation Report**

Nordt Property

Roanoke City, Virginia

WSSI #31085.01

Waters of the U.S. (Including Wetlands) Investigation

November 5, 2020

Prepared for:

Parrish and Partners, LLC
140 Stoneridge Drive, Suite 500
Columbia, SC 29210

Prepared by:



5450 Peters Creek Road, Suite 110
Roanoke, Virginia 24019
Tel: 540-795-6180 Email: contactus@wetlands.com
www.wetlands.com

Waters of the U.S. (Including Wetlands) Investigation

Nordt Property
(±8.0 acres)
WSSI #31085.01

Introduction

Wetland Studies and Solutions, Inc. (WSSI) conducted a waters of the U.S. (including wetlands) investigation on the referenced site to investigate whether or not jurisdictional wetlands or other waters of the U.S. (*i.e.*, streams or ponds) are present. In WSSI's opinion, jurisdictional wetlands and other waters of the U.S. are not present within the project site. The results of WSSI's waters of the U.S. investigation are depicted on the Waters of the U.S. Investigation Sketch (Attachment I) and are summarized below.

Project Area

The site is located adjacent to the Roanoke-Blacksburg Regional Airport between Municipal Road NW and Airport Road NW in Roanoke City, VA. Exhibit 1 is a vicinity map that depicts the approximate boundaries of the site and its general location.

Methodology

This wetland investigation is based on an analysis of available reference documents and a pedestrian investigation. Prior to conducting field work, relevant background information was reviewed including the site topography; the Roanoke, VA 1984 USGS quadrangle (Exhibit 2) and 2019 National Wetlands Inventory (Exhibit 3) maps; City of Roanoke Soils Map data (Exhibit 4); and the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map, Panels 5116C0153G and 5116C0154G (Exhibit 5). The Spring 2002 Natural Color Imagery from Virginia Base Mapping Program (Exhibit 6), and February 2020 Natural Color Imagery from NearMap (Exhibit 7) which serves as a base for Exhibit 8 were examined to investigate whether signatures indicative of wetlands are found on the site.

On October 28, WSSI scientists Stephen Bendele, WPI.T.¹ conducted a pedestrian investigation on the site. The site was systematically searched for jurisdictional wetlands and other waters of the U.S. Potential waters of the U.S. on the site were identified based on a brief examination of the vegetation, soils and hydrology, and their approximate boundaries and locations. A formal wetland delineation, pursuant to the "Corps of Engineers Wetlands Delineation Manual," Technical Report Y-87-1 (1987 Manual) and subsequent guidance and modified by the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Eastern Mountains and Piedmont Region*, Version 2.0 dated April 2012, was not conducted at this time.

Samples of vegetation, soils and hydrology were taken at a representative location to document the absence of waters of the U.S. A Routine Wetland Determination data forms describing the representative plant community, hydrology, and soil characteristics

¹ Wetland Professional In Training, Society of Wetlands Scientists Certification Program, Inc.

is included as Exhibit 9. Photographs of the data point location, representative non-wetland communities, and other existing site conditions are included in Exhibit 10.

Findings

In WSSI's opinion, no jurisdictional wetlands, or other waters of the U.S. (i.e., streams, ponds, etc.) are present on this site. The site consists primarily of maintained turf grass and two commercial buildings with associated impervious parking areas located in the central and southern portions of the site. The northern portion of the site is a forested stand dominated by American elm (*Ulmus americana*), Black Walnuts (*Juglans nigra*), Silver Maples (*Acer saccharinum*), and Sugar Maples (*Acer saccharum*).

Summary

In WSSI's opinion, no jurisdictional wetlands or other waters of the U.S. are located on the Nordt property. Should purchase and development of the site proceed, we recommend submitting this report to the U.S. Army Corps of Engineers (COE) with a request for a jurisdictional determination (PJD) confirming the absence of waters of the U.S.

Limitations

This study is based on examination of the vegetation, soils and hydrology and available reference documents. Field indicators can change with variations in hydrology and other factors. Therefore, our conclusions may vary significantly from future observation by others. This report assesses the potential for wetlands at the site at the time of our review and does not address conditions at a given time in the future.

Our review and report have been prepared in accordance with generally accepted guidelines for the conduct of an investigation for potential wetlands and other waters of the U.S. Conclusions presented herein are based upon our review of available information, the results of our field studies, and/or professional judgement. We make no other warranties, either expressed or implied, and our report is not a recommendation to buy, sell or develop the property.

We offer no opinion and do not purport to opine on the possible application of various building codes, zoning ordinances, other land use or platting regulations, environmental or health laws and other similar statutes, laws, ordinances, code and regulations affecting the possible use and occupancy of the Property for the purpose for which it is being used, except as specifically provided above.

The foregoing opinions are based on applicable laws, ordinances, and regulations in effect as of the date hereof and should not be construed to be an opinion as to the matters set out herein should such laws, ordinances or regulations be modified, repealed or amended.

Any reuse or modification of any of this document (whether hard copies or electronic transmittals) prepared by WSSI without written verification or adaptation by WSSI will be at the sole risk of the individual or entity utilizing said document and such use is without the authorization of WSSI. WSSI shall have no legal liability resulting from any and all claims, damages, losses, and expenses, including attorney's fees arising out of the unauthorized reuse or modification of this document. Client shall indemnify

WSSI from any claims arising out of unauthorized use or modification of the document whether hard copy or electronic.

This report does not constitute a jurisdictional determination of waters of the United States since only an investigation study was undertaken and such determinations must be verified by the U.S. Army Corps of Engineers or the Natural Resources Conservation Service (as applicable), and are subject to review by the U.S. Environmental Protection Agency.

WETLAND STUDIES AND SOLUTIONS, INC.



Stephen Bendele, WPIT²
Environmental Technician

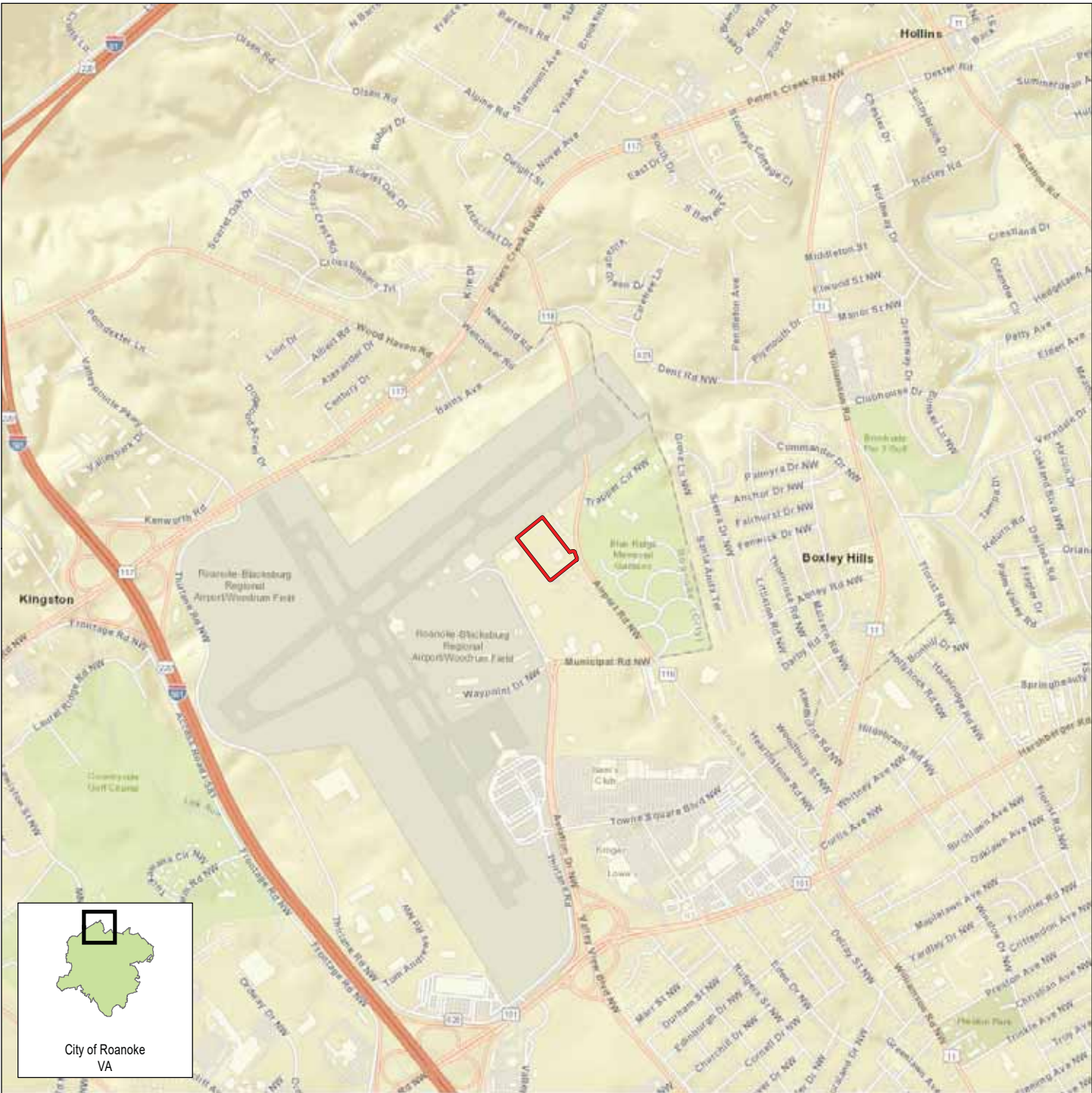


Benjamin N. Rosner, PWS, PWD, CE³
Manager – Environmental Science

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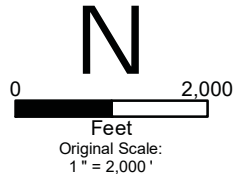
² Wetland Professional in Training, Society of Wetland Scientists Certification Program, Inc.

³ Professional Wetland Scientist #1766, Society of Wetland Scientists Certification Program, Inc.;
Virginia Certified Professional Wetland Delineator #3402-000080; Certified Ecologist,
Ecological Society of America.

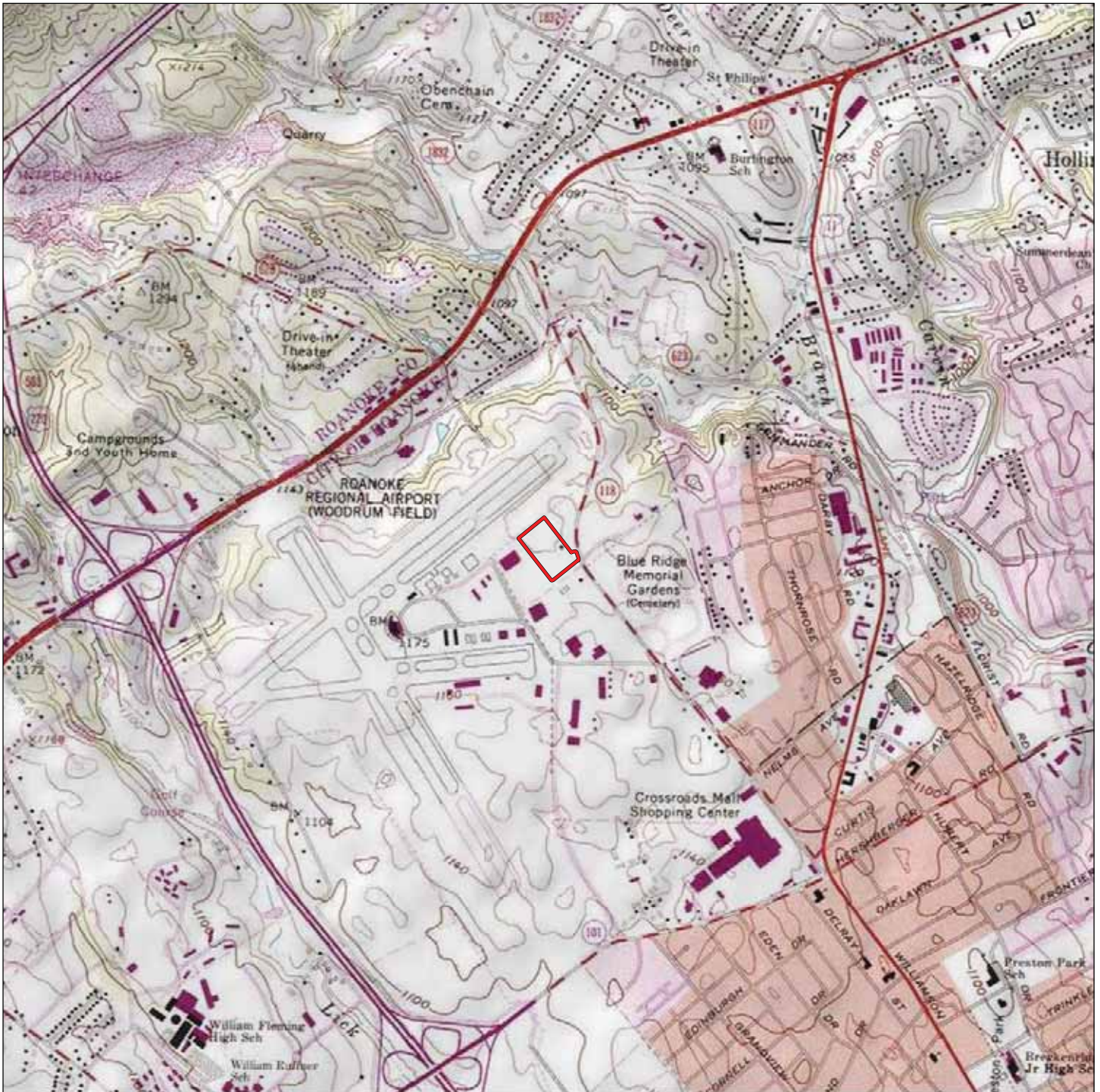


 Site

**Vicinity Map
Nordt Property
WSSI 31085.01**

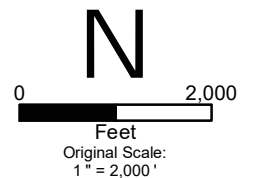


Source: World Street Map - ESRI

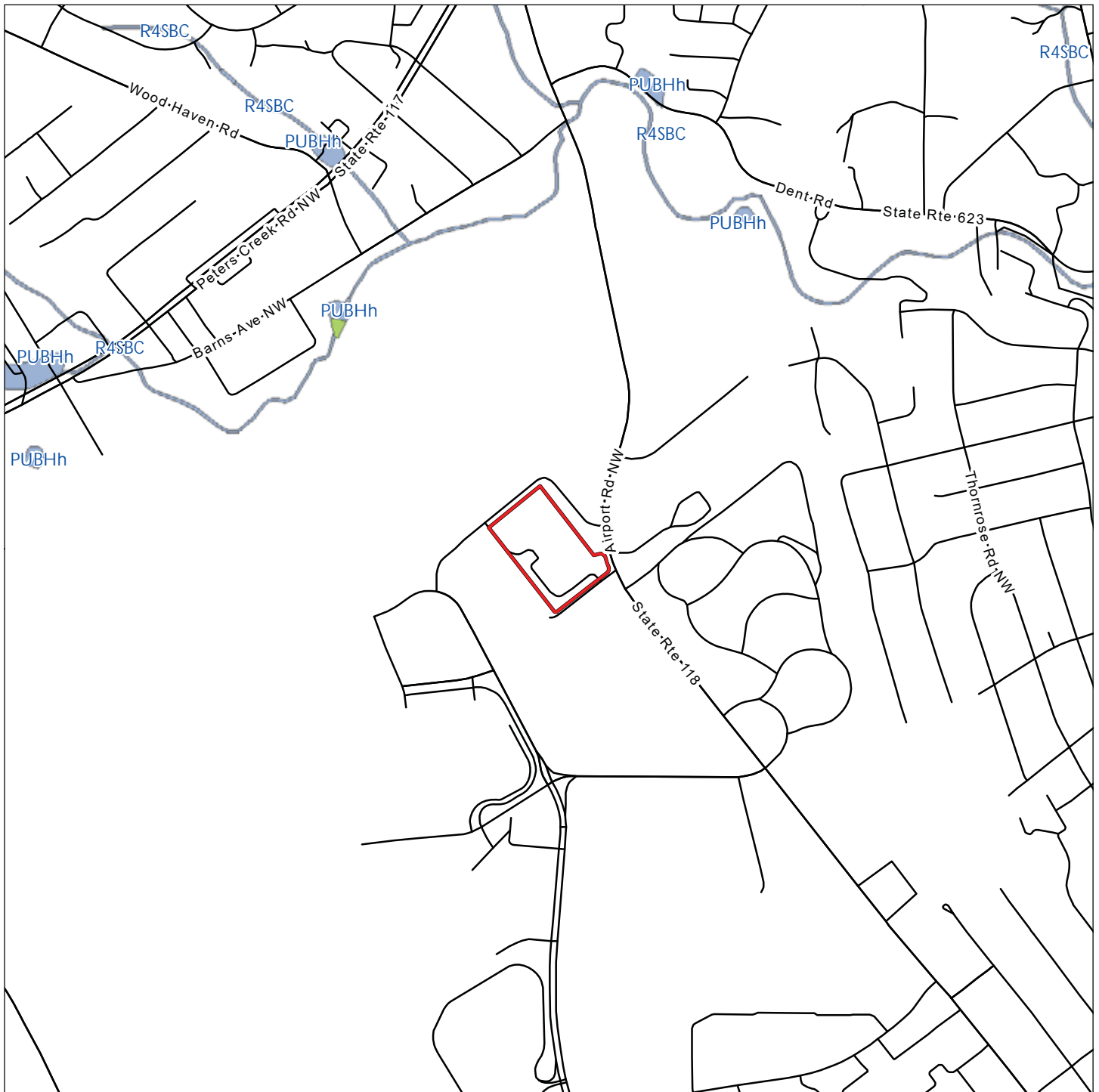


 Site

**USGS 7.5' Quadrangle Map
Nordt Property
WSSI 31085.01**



Roanoke, VA 1984
 Latitude: 37°19'43"N
 Longitude: 79°58'7"W
 Hydrologic Unit Code (HUC): 030101010402
 HUC12 Name: Carvin Creek
 COE Region: Eastern Mountains and Piedmont



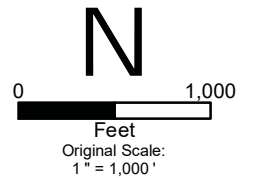
Site

Wetland Type

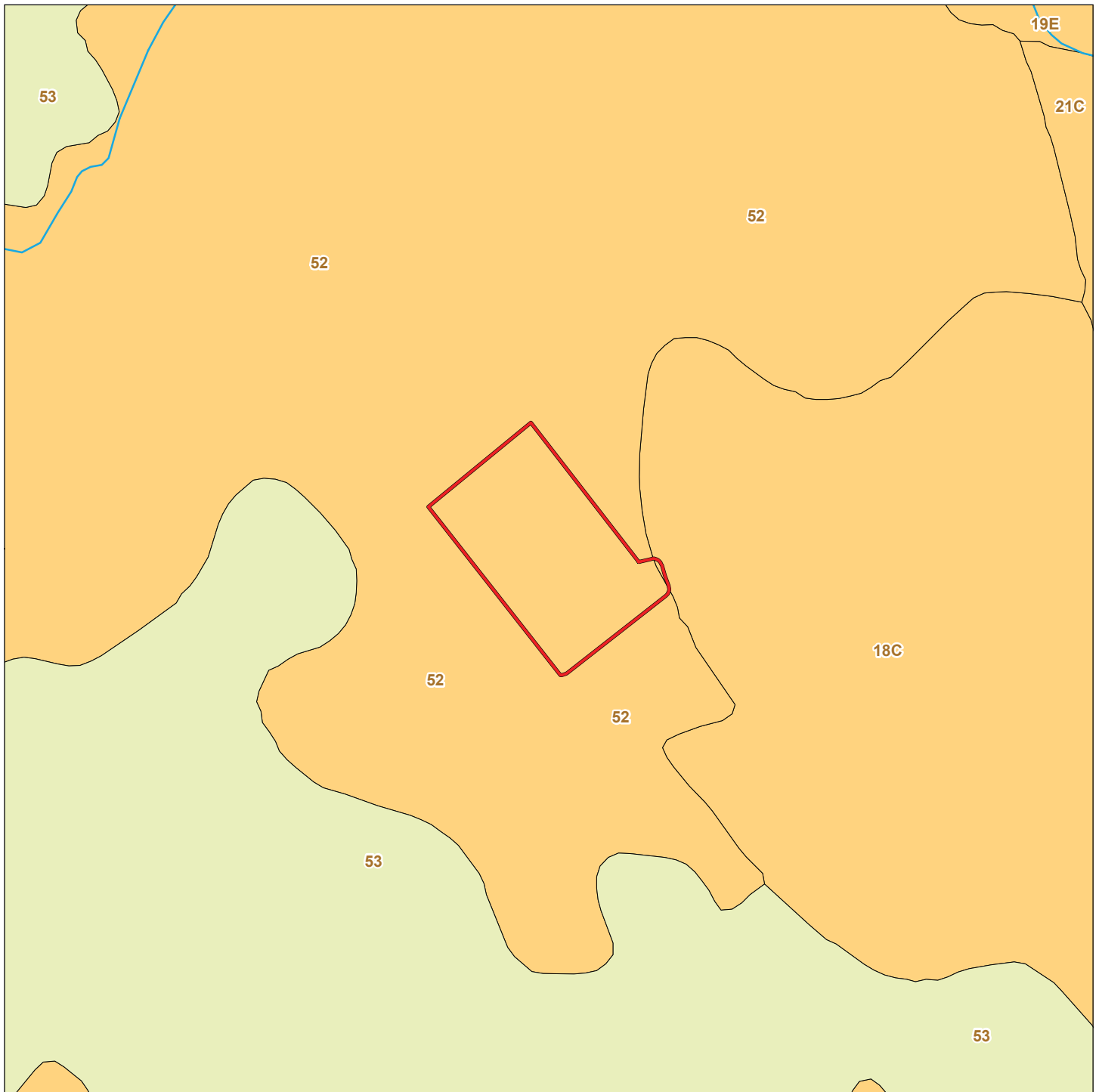
- Open Water
- Freshwater Forested/Shrub Wetland
- Freshwater Emergent Wetland
- Estuarine and Marine Wetland
- Other

Digital National Wetlands Inventory Map

**Nordt Property
WSSI 31085.01**

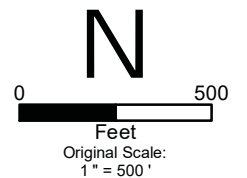


Source: U.S. Fish and Wildlife Service; March 2019



- Site
- Hydric Soil
- Soil with Hydric Inclusion
- Non-Hydric Soil
- Water

**Soils Map
Nordt Property
WSSI 31085.01**



Major Land Resource Area: Southern Appalachian Ridges and Valleys, 128
 Land Resource Region: East and Central Farming and Forest Region, N
 Source: City of Roanoke Digital Data, U.S. Department of Agriculture, 2019

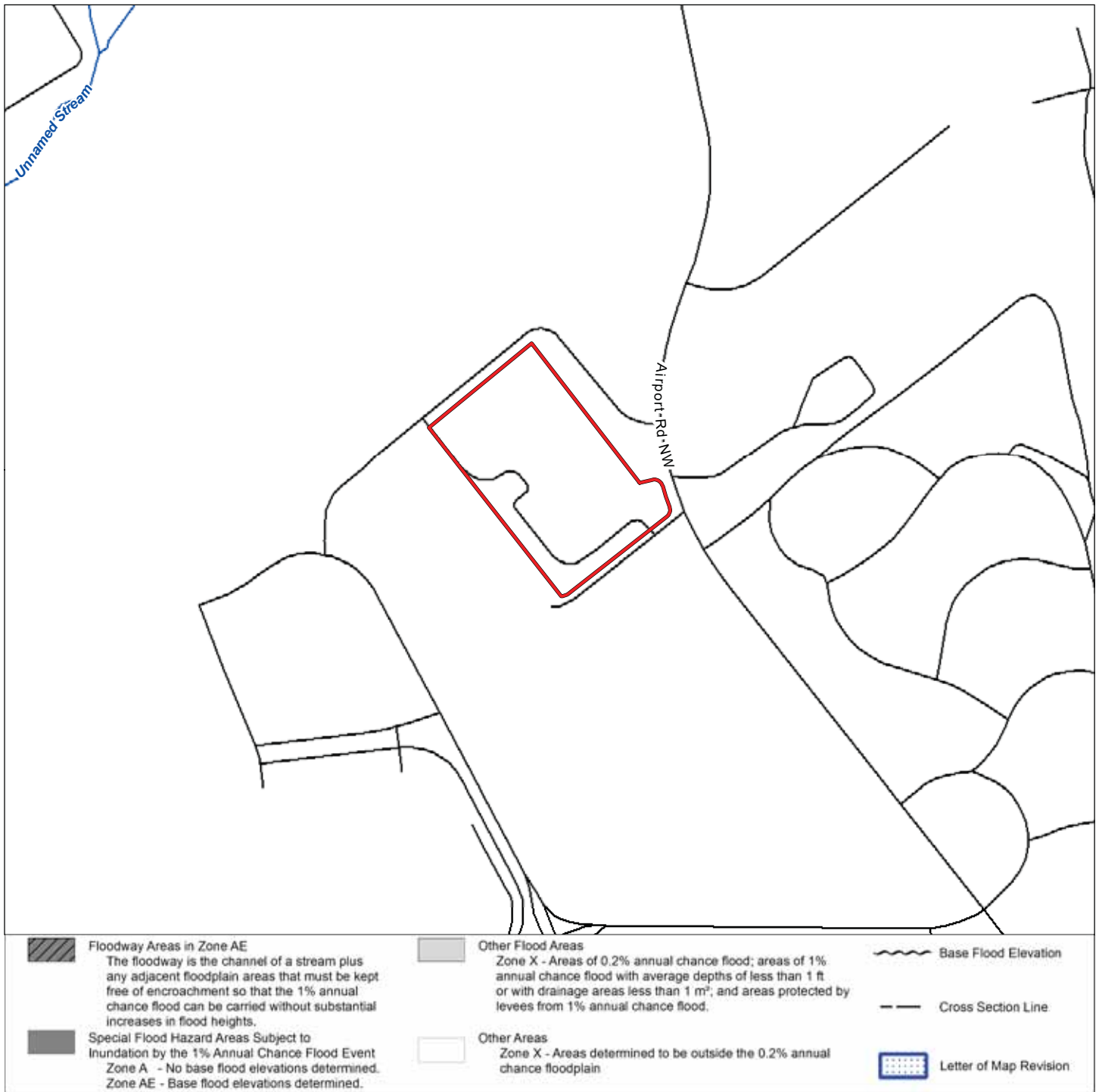
Mapped Soils Report for Nordt Property

Project Number: 31085.01

Applicant / Owner: Parrish and Partners, LLC

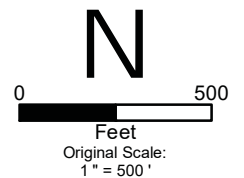
County: Roanoke, VA

Map Symbol	Map Unit Name	Taxonomy	Drainage Class	Hydric National List	Hydric Local List	Hydric Inclusions
52	Udorthents-Urban Land complex	Urban Land	well-drained	NO	NO	NA



 Site

**FEMA Digital Flood Insurance Rate Map
Nordt Property
WSSI 31085.01**

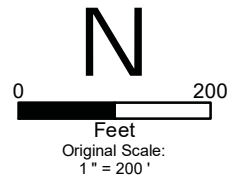


Panel: 51161C0153G, Effective: 09/28/2007
Panel: 51161C0154G, Effective: 09/28/2007



 Site

**Spring 2002 Natural Color Imagery
Nordt Property
WSSI 31085.01**

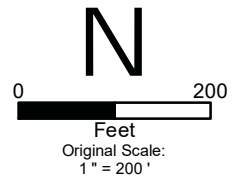


Source: Virginia Base Mapping Program (VBMP)



 Site

**February 2020 Natural Color Imagery
Nordt Property
WSSI 31085.01**



Source: NearMap®






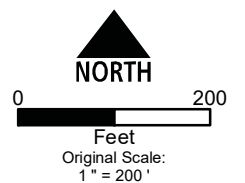
-  Site: ±8.0 acres
-  Photo Location
-  Data Point

Photo Location Map
Nordt Property
WSSI #31085.01

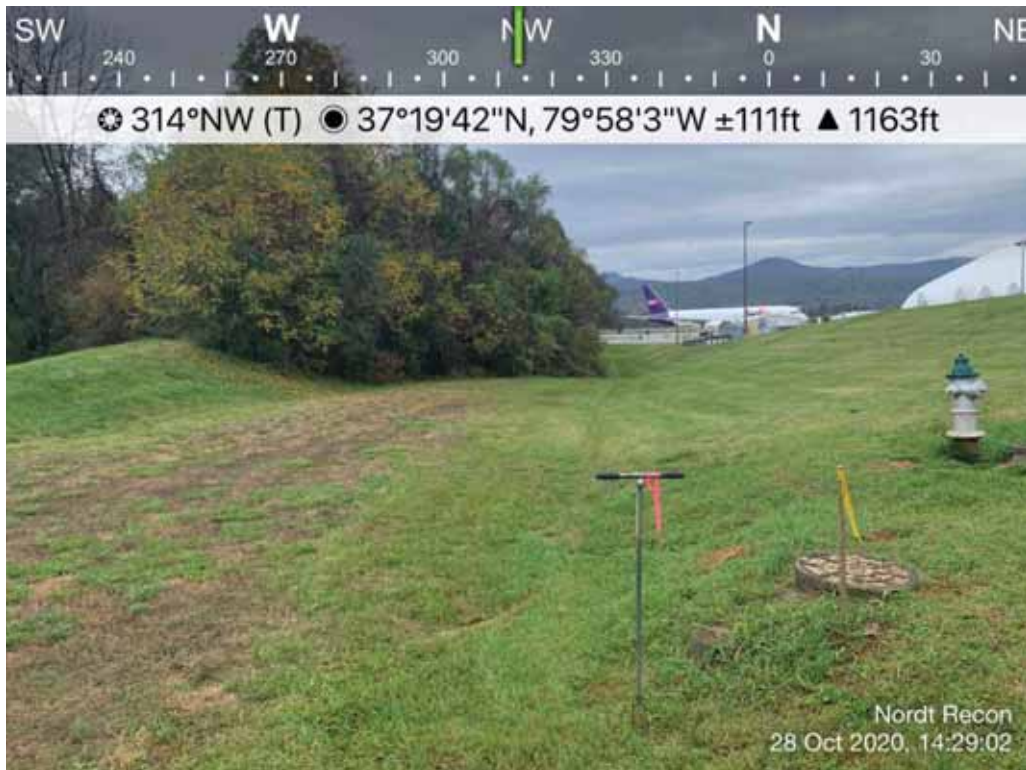


Imagery Source: Nearmap® February, 2020.

**EXHIBIT 9
SITE PHOTOGRAPHS
Nordt Property Reconnaissance
WSSI #31085.01**



1. Looking northwest at an area of maintained lawn in the southwestern portion of the site.



2. Looking northwest at an area of maintained lawn in the central portion of the site.

EXHIBIT 9
SITE PHOTOGRAPHS
Nordt Property Reconnaissance
WSSI #31085.01



3. Looking southwest at a forest area in the northwestern portion of the site.



4. Looking northeast at a forested area in the northwestern portion of the site.

EXHIBIT 9
SITE PHOTOGRAPHS
Nordt Property Reconnaissance
WSSI #31085.01



5. Looking northeast at a forested area in the northeastern portion of the project area.



6. Looking east at a forested area in the northeastern portion of the site.

EXHIBIT 9
SITE PHOTOGRAPHS
Nordt Property Reconnaissance
WSSI #31085.01



7. Looking northwest at an area of maintained lawn in the southeastern portion of the site.



8. Looking northeast at an area of maintained lawn in the southeastern portion of the site.

EXHIBIT 9
SITE PHOTOGRAPHS
Nordt Property Reconnaissance
WSSI #31085.01



9. Looking southeast at an area of maintained lawn in the central portion of the site.



10. Looking northwest at data point 1 which characterizes a forested upland in the central portion of the site.

WETLAND DETERMINATION DATA FORM - Eastern Mountains and Piedmont Region

Project/Site: Nordt Property City/County: Roanoke Sampling Date: 10/28/2020
 Applicant/Owner: Parrish and Partners, LLC State: VA Sampling Point: DP-1
 Investigator(s): Stephen Bendele Section, Township, Range: N/A
 Landform (hillslope, terrace, etc.): forest Local relief (concave, convex, none): None Slope (%): 0
 Subregion (LRR or MLRA): MLRA 128 Lat: 37°19'43" Long: 79°58'07" Datum: NAD 83
 Soil Map Unit Name: 52 : Udorthents-Urban Land Complex NWI classification: None

Are climatic / hydrologic conditions on the site typical for this time of year? Yes No (If no, explain in Remarks)
 Are Vegetation , Soil , or Hydrology significantly disturbed? Are "Normal Circumstances" present? Yes No
 Are Vegetation , Soil , or Hydrology naturally problematic? (If needed, explain any answers in Remarks.)

SUMMARY OF FINDINGS - Attach site map showing sampling point locations, transects, important features, etc.

Hydrophytic Vegetation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Is the Sampled Area within a Wetland? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Remarks: None of the three wetland parameters (i.e., wetland hydrology, hydrophytic vegetation, and hydric soils) were satisfied at this data point, which characterizes an forested upland in the central portion of the site.	

HYDROLOGY

Wetland Hydrology Indicators: Primary Indicators (minimum of one is required; check all that apply) <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"><input type="checkbox"/> Surface Water (A1)</td> <td style="width: 50%; border: none;"><input type="checkbox"/> True Aquatic Plants (B14)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> High Water Table (A2)</td> <td style="border: none;"><input type="checkbox"/> Hydrogen Sulfide Odor (C1)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Saturation (A3)</td> <td style="border: none;"><input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Water Marks (B1)</td> <td style="border: none;"><input type="checkbox"/> Presence of Reduced Iron (C4)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Sediment Deposits (B2)</td> <td style="border: none;"><input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Drift Deposits (B3)</td> <td style="border: none;"><input type="checkbox"/> Thin Muck Surface (C7)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Algal Mat or Crust (B4)</td> <td style="border: none;"><input type="checkbox"/> Other (Explain in Remarks)</td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Iron Deposits (B5)</td> <td></td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)</td> <td></td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Water-Stained Leaves (B9)</td> <td></td> </tr> <tr> <td style="border: none;"><input type="checkbox"/> Aquatic Fauna (B13)</td> <td></td> </tr> </table>	<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> True Aquatic Plants (B14)	<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Hydrogen Sulfide Odor (C1)	<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3)	<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Presence of Reduced Iron (C4)	<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)	<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Thin Muck Surface (C7)	<input type="checkbox"/> Algal Mat or Crust (B4)	<input type="checkbox"/> Other (Explain in Remarks)	<input type="checkbox"/> Iron Deposits (B5)		<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)		<input type="checkbox"/> Water-Stained Leaves (B9)		<input type="checkbox"/> Aquatic Fauna (B13)		Secondary Indicators (minimum of two required) <table style="width: 100%; border: none;"> <tr><td style="border: none;"><input type="checkbox"/> Surface Soil Cracks (B6)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Drainage Patterns (B10)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Moss Trim Lines (B16)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Dry-Season Water Table (C2)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Crayfish Burrows (C8)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Stunted or Stressed Plants (D1)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Geomorphic Position (D2)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Shallow Aquitard (D3)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> Microtopographic Relief (D4)</td></tr> <tr><td style="border: none;"><input type="checkbox"/> FAC-Neutral Test (D5)</td></tr> </table>	<input type="checkbox"/> Surface Soil Cracks (B6)	<input type="checkbox"/> Sparsely Vegetated Concave Surface (B8)	<input type="checkbox"/> Drainage Patterns (B10)	<input type="checkbox"/> Moss Trim Lines (B16)	<input type="checkbox"/> Dry-Season Water Table (C2)	<input type="checkbox"/> Crayfish Burrows (C8)	<input type="checkbox"/> Saturation Visible on Aerial Imagery (C9)	<input type="checkbox"/> Stunted or Stressed Plants (D1)	<input type="checkbox"/> Geomorphic Position (D2)	<input type="checkbox"/> Shallow Aquitard (D3)	<input type="checkbox"/> Microtopographic Relief (D4)	<input type="checkbox"/> FAC-Neutral Test (D5)
<input type="checkbox"/> Surface Water (A1)	<input type="checkbox"/> True Aquatic Plants (B14)																																		
<input type="checkbox"/> High Water Table (A2)	<input type="checkbox"/> Hydrogen Sulfide Odor (C1)																																		
<input type="checkbox"/> Saturation (A3)	<input type="checkbox"/> Oxidized Rhizospheres on Living Roots (C3)																																		
<input type="checkbox"/> Water Marks (B1)	<input type="checkbox"/> Presence of Reduced Iron (C4)																																		
<input type="checkbox"/> Sediment Deposits (B2)	<input type="checkbox"/> Recent Iron Reduction in Tilled Soils (C6)																																		
<input type="checkbox"/> Drift Deposits (B3)	<input type="checkbox"/> Thin Muck Surface (C7)																																		
<input type="checkbox"/> Algal Mat or Crust (B4)	<input type="checkbox"/> Other (Explain in Remarks)																																		
<input type="checkbox"/> Iron Deposits (B5)																																			
<input type="checkbox"/> Inundation Visible on Aerial Imagery (B7)																																			
<input type="checkbox"/> Water-Stained Leaves (B9)																																			
<input type="checkbox"/> Aquatic Fauna (B13)																																			
<input type="checkbox"/> Surface Soil Cracks (B6)																																			
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<input type="checkbox"/> Shallow Aquitard (D3)																																			
<input type="checkbox"/> Microtopographic Relief (D4)																																			
<input type="checkbox"/> FAC-Neutral Test (D5)																																			

Field Observations: Surface Water Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): Water Table Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): > 18 Saturation Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Depth (inches): > 18 (includes capillary fringe)	Wetland Hydrology Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
--	---

Describe Recorded Data (stream gauge, monitoring well, aerial photos, previous inspections), if available:

Remarks:

VEGETATION (Four Strata) - Use scientific names of plants.

Sampling Point: DP-1

Tree Stratum (Plot size: <u>30' Radius</u>)	Absolute % Cover	Dominant Species?	Indicator Status
1. <u><i>Pyrus calleryana</i></u>	<u>50</u>	<input checked="" type="checkbox"/>	<u>UPL</u>
2. <u><i>Acer saccharinum</i></u>	<u>40</u>	<input checked="" type="checkbox"/>	<u>FACW</u>
3. <u><i>Acer saccharum</i></u>	<u>30</u>	<input checked="" type="checkbox"/>	<u>FACU</u>
4. <u><i>Juglans nigra</i></u>	<u>5</u>	<input type="checkbox"/>	<u>FACU</u>
5. _____	_____	<input type="checkbox"/>	_____
6. _____	_____	<input type="checkbox"/>	_____
7. _____	_____	<input type="checkbox"/>	_____
8. _____	_____	<input type="checkbox"/>	_____
50% of total cover: <u>62.5</u> 20% of total cover: <u>25</u>	<u>125</u> = Total Cover		
Sapling/Shrub Stratum (Plot size: <u>15' Radius</u>)			
1. _____	_____	<input type="checkbox"/>	_____
2. _____	_____	<input type="checkbox"/>	_____
3. _____	_____	<input type="checkbox"/>	_____
4. _____	_____	<input type="checkbox"/>	_____
5. _____	_____	<input type="checkbox"/>	_____
6. _____	_____	<input type="checkbox"/>	_____
7. _____	_____	<input type="checkbox"/>	_____
8. _____	_____	<input type="checkbox"/>	_____
9. _____	_____	<input type="checkbox"/>	_____
10. _____	_____	<input type="checkbox"/>	_____
50% of total cover: _____ 20% of total cover: _____	_____ = Total Cover		
Herb Stratum (Plot size: <u>5' Radius</u>)			
1. <u><i>Lonicera japonica</i></u>	<u>8</u>	<input checked="" type="checkbox"/>	<u>FACU</u>
2. <u><i>Lonicera maackii</i></u>	<u>4</u>	<input checked="" type="checkbox"/>	<u>UPL</u>
3. <u><i>Ulmus americana</i></u>	<u>1</u>	<input type="checkbox"/>	<u>FACW</u>
4. _____	_____	<input type="checkbox"/>	_____
5. _____	_____	<input type="checkbox"/>	_____
6. _____	_____	<input type="checkbox"/>	_____
7. _____	_____	<input type="checkbox"/>	_____
8. _____	_____	<input type="checkbox"/>	_____
9. _____	_____	<input type="checkbox"/>	_____
10. _____	_____	<input type="checkbox"/>	_____
11. _____	_____	<input type="checkbox"/>	_____
12. _____	_____	<input type="checkbox"/>	_____
50% of total cover: <u>6.5</u> 20% of total cover: <u>2.6</u>	<u>13</u> = Total Cover		
Woody Vine Stratum (Plot size: <u>30' Radius</u>)			
1. <u><i>Vitis sp.</i></u>	<u>10</u>	<input checked="" type="checkbox"/>	<u>NI</u>
2. _____	_____	<input type="checkbox"/>	_____
3. _____	_____	<input type="checkbox"/>	_____
4. _____	_____	<input type="checkbox"/>	_____
5. _____	_____	<input type="checkbox"/>	_____
6. _____	_____	<input type="checkbox"/>	_____
50% of total cover: <u>5</u> 20% of total cover: <u>2</u>	<u>10</u> = Total Cover		

Dominance Test worksheet:

Number of Dominant Species That Are OBL, FACW, or FAC: 1 (A)

Total Number of Dominant Species Across All Strata: 5 (B)

Percent of Dominant Species That Are OBL, FACW, or FAC: 20.0% (A/B)

Prevalence Index worksheet:

Total % Cover of:	Multiply by:
OBL species <u>0</u>	x 1 = <u>0</u>
FACW species <u>41</u>	x 2 = <u>82</u>
FAC species <u>0</u>	x 3 = <u>0</u>
FACU species <u>43</u>	x 4 = <u>172</u>
UPL species <u>54</u>	x 5 = <u>270</u>
Column Totals: <u>138</u> (A)	<u>524</u> (B)
Prevalence Index = B/A = <u>3.80</u>	

- Hydrophytic Vegetation Indicators:**
- 1 - Rapid Test for Hydrophytic Vegetation
 - 2 - Dominance Test is >50%
 - 3 - Prevalence Index is ≤3.0¹
 - 4 - Morphological Adaptations¹ (Provide supporting data in Remarks or on a separate sheet)
 - Problematic Hydrophytic Vegetation¹ (Explain)
- ¹Indicators of hydric soil and wetland hydrology must be present, unless disturbed or problematic.

Definitions of Four Vegetation Strata:

Tree - Woody plants, excluding vines, 3 in. (7.6 cm) or more in diameter at breast height (DBH), regardless of height.

Sapling/Shrub - Woody plants, excluding vines, less than 3 in. DBH and greater than or equal to 3.28 ft (1 m) tall.

Herb - All herbaceous (non-woody) plants, regardless of size, and woody plants less than 3.28 ft tall.

Woody vine - All woody vines greater than 3.28 ft in height.

Hydrophytic Vegetation Present? Yes No

Remarks: (Include photo numbers here or on a separate sheet.)

Nomenclature and indicators from The National Wetland Plant List: 2018 wetland ratings with updates through September 2020; NI species are not used in the Dominance Test Calculation.

SOIL

Sampling Point: DP-1

Profile Description: (Describe to the depth needed to document the indicator or confirm the absence of indicators.)

Depth (Inches)	Matrix		Redox Features				Texture	Remarks
	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²		
0-3	10YR5/4	100					Loam	
3-13	10YR5/4	80	7.5YR4/3	15	C	M	Clay Loam	
			7.5YR4/6	5	C	M		
13-18	7.5YR5/6	90	7.5YR5/3	10	D	M	Clay	

¹Type: C=Concentration, D=Depletion, RM=Reduced Matrix, MS=Masked Sand Grains. ²Location: PL=Pore Lining, M=Matrix

<p>Hydric Soil Indicators:</p> <input type="checkbox"/> Histosol (A1) <input type="checkbox"/> Histic Epipedon (A2) <input type="checkbox"/> Black Histic (A3) <input type="checkbox"/> Hydrogen Sulfide (A4) <input type="checkbox"/> Stratified Layers (A5) <input type="checkbox"/> 2 cm Muck (A10) (LRR N) <input type="checkbox"/> Depleted Below Dark Surface (A11) <input type="checkbox"/> Thick Dark Surface (A12) <input type="checkbox"/> Sandy Mucky Mineral (S1) (LRR N, MLRA 147, 148) <input type="checkbox"/> Sandy Gleyed Matrix (S4) <input type="checkbox"/> Sandy Redox (S5) <input type="checkbox"/> Stripped Matrix (S6)	<input type="checkbox"/> Dark Surface (S7) <input type="checkbox"/> Polyvalue Below Surface (S8) (MLRA 147, 148) <input type="checkbox"/> Thin Dark Surface (S9) (MLRA 147, 148) <input type="checkbox"/> Loamy Gleyed Matrix (F2) <input type="checkbox"/> Depleted Matrix (F3) <input type="checkbox"/> Redox Dark Surface (F6) <input type="checkbox"/> Depleted Dark Surface (F7) <input type="checkbox"/> Redox Depressions (F8) <input type="checkbox"/> Iron Manganese Masses (F12) (LRR N, MLRA 136) <input type="checkbox"/> Umbric Surface (F13) <input type="checkbox"/> Piedmont Floodplain Soils (F19)(MLRA 148) <input type="checkbox"/> Red Parent Material (F21)(MLRA 127, 147)	<p>Indicators for Problematic Hydric Soils³:</p> <input type="checkbox"/> 2 cm Muck (A10) <input type="checkbox"/> Coast Prairie Redox (A16) (MLRA 147, 148) <input type="checkbox"/> Piedmont Floodplain Soils (F19) (MLRA 136, 147) <input type="checkbox"/> Very Shallow Dark Surface (TF12) <input type="checkbox"/> Other (Explain in Remarks)
--	---	---

³Indicators of hydrophytic vegetation and wetland hydrology must be present, unless disturbed or problematic.

<p>Restrictive Layer (if observed):</p> Type: _____ Depth (Inches): _____	<p>Hydric Soil Present? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>
---	---

Remarks:

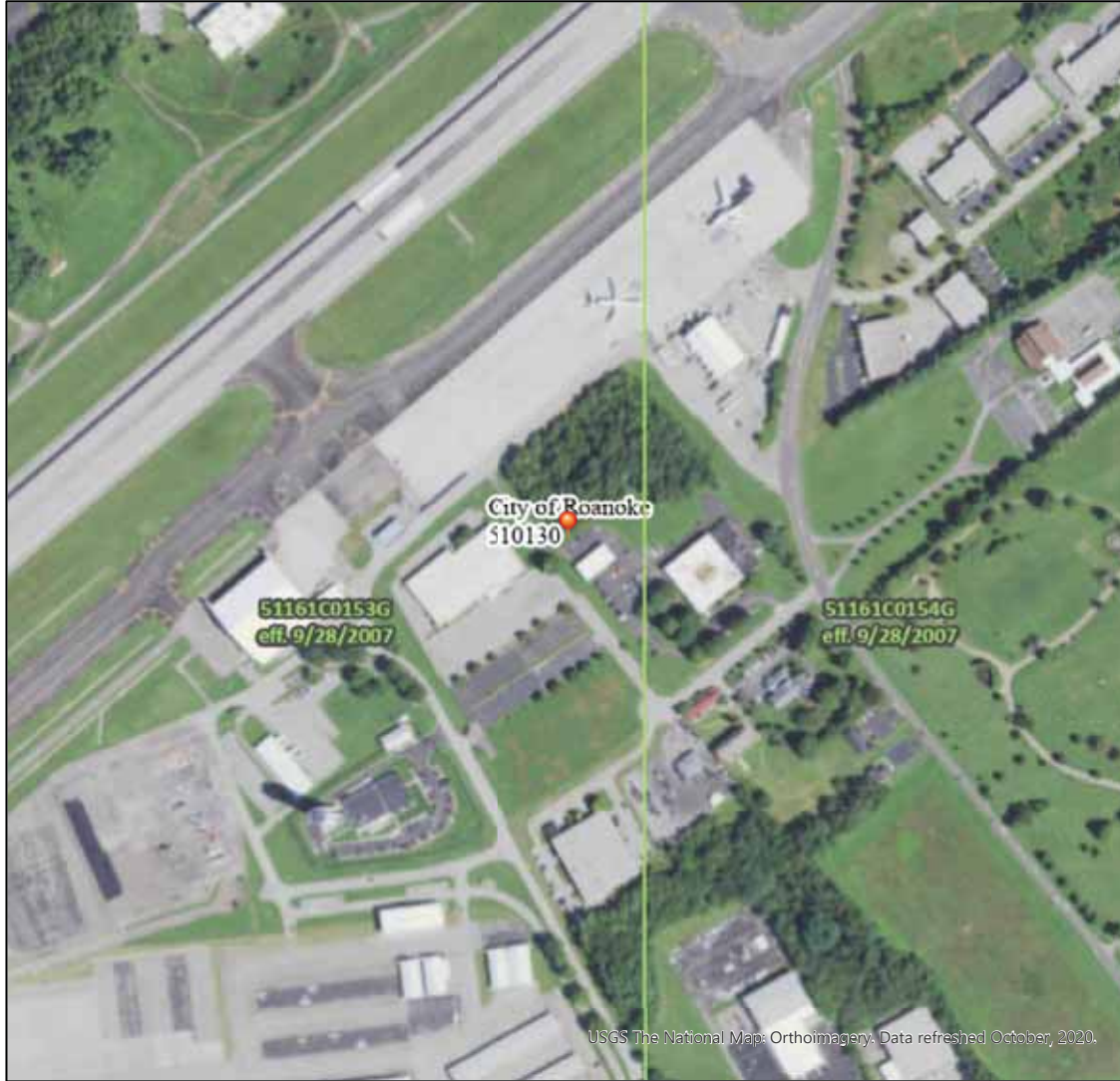
ATTACHMENT 9

FEMA Floodplain Map

National Flood Hazard Layer FIRMette



79°58'29"W 37°19'57"N



USGS The National Map: Orthoimagery. Data refreshed October, 2020.

0 250 500 1,000 1,500 2,000 Feet 1:6,000

79°57'51"W 37°19'28"N

Legend

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

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, AB99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
GENERAL STRUCTURES		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped
		The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 11/3/2020 at 10:23 AM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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

ATTACHMENT 10

Public Involvement

**Draft Short Environmental Assessment Form (SEAF) for the Nordt Property Acquisition at
Roanoke-Blacksburg Regional Airport (ROA)**

The Federal Aviation Administration has completed its review of the revised draft SEAF for the Nordt Property Acquisition at ROA. Please distribute the draft SEAF for public review.

In compliance with CEQ regulation 1506.6, the FAA requires that the draft SEAF be distributed for a thirty (30) day public review, both electronically, and at locations such as the airport administrative offices and local libraries. The draft SEAF must also be distributed to the appropriate federal, state, and local agencies for review and comment.

A NOA for the draft SEAF must be published in a newspaper of general circulation serving the project area. We request that you provide this office with one copy of the proof of publication from the newspaper. If you have any questions or comments, please feel free to contact me via email or at the telephone number below.

Thank you,

Susan B. Stafford
Environmental Protection Specialist
Beckley Airports Field Office
176 Airport Circle, Rm 101
Beaver, WV 25813
304-252-6216 x 130