

## Task 1. Categorical Exclusion Evaluation (CEE)

It is anticipated that GAI will prepare a Categorical Exclusion Evaluation (CEE) for the Capital Connector Project in compliance with the National Environmental Policy Act (NEPA) as described in 23CFR771.117 and 40CFR 1508.4. The environmental analyses for the project will consist of the management, coordination, data collection and technical studies necessary to conform to applicable sections of the Federal Highway Administration (FHWA) guidelines (23CFR771) and FHWA Technical Advisory T6640.8A, FHWA Guidelines on Noise (23CFR772), FHWA Guidelines on Air Quality (23CFR770), and the policies and procedures of the State of West Virginia.

Particular attention will be given to National Register-listed properties, historic architectural resources and districts, community cohesion and the effects of the project on surrounding neighborhoods including environmental justice.

### Project Management, Meetings and Coordination

Normal project administration will be conducted for the estimated 6 months required to complete the CEE, have the City of Charleston and WVDOH complete their review, and incorporate their remarks in the CEE and obtain federal approval.

As part of this task, up to four meetings will be attended: one at the site with resource review agencies, one with the City of Charleston and WVDOH to report on project development, and attendance at two public meetings in Charleston.

### Field View

Field evaluations will be conducted by GAI personnel including a lead environmental specialist, architectural historians and other staff, as required. Documentation will include photographing project area conditions. More details regarding fieldwork conducted by various disciplines appears below.

### CEE Preparation

The following work items will be included in the CEE to the degree required by laws, regulations, and the need observed by field observation. These, as priced in this proposal, include the following:

- Purpose and Need
- Alternative Analysis
- Land Use
- Social
- Population
- Regional and Community Growth

An environmental justice (EJ) analysis will be completed. GAI will review the U.S. census data, American Community Survey 5-year data at both the county and block group level, the Environmental Protection Agency's Environmental Justice Screening and Mapping Tool and other data sources to identify populations of low-income and minorities in the study area. A walkover of the residential areas will also be completed to identify low-income areas and minorities.

Study area data will be compared to the respective countywide data to determine if any portions of the project would qualify as an EJ area based on the thresholds presented in the Council of Environmental Quality's *Guidance under the National Environmental Policy Act* (1997). The analysis will discuss whether the project impacts will have disproportional effects to low income and minority populations and any actions required to minimize, mitigate or avoid impacts to EJ populations.

- Soil Erosion and Sedimentation
- Vegetation, Wildlife, and Wildlife Habitat
- Geology

- Surface Water Hydrology and Water Quality
- Floodplains
- Groundwater Resources
- Energy Conservation
- Parks and Recreation Facilities
- Hazardous and Residual Waste Sites
- Public Facilities and Services
- Community Cohesion
- Displacements
- Air and Noise
- Visual Assessment
- Construction Impacts

### Expanded Studies

The following study subjects will require more detailed analyses and will be specifically priced in the CEE Cost Proposal:

#### **Cultural.**

GAI will conduct background research using the WV Department of Arts, Culture & History (WVDACH) online GIS database and web-viewer. This task will be completed to establish whether previously-recorded cultural resources are located within the Project's Area of Potential Effect, in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended. Specifically, this task will include a review of National Register of Historic Places (NRHP)-listed and eligible properties, historic architectural resources, archaeological sites, and prior cultural resources surveys conducted in the project area and vicinity. In addition, historic-period maps will be examined to determine the presence of potential historic architectural resources and the potential of encountering historic archaeological resources in the project area.

It is anticipated that following the completion of background research, GAI will prepare an initial consultation letter for review and comment by the WVDACH for the project. Although no archaeological fieldwork is proposed at this time, if it is determined that this work is necessary, a supplemental scope will be prepared.

An architectural survey will be performed within the Area of Potential Effect (APE). It is expected that the exact limits of the APE, which will include the project viewshed, will be discussed with the City of Charleston and the WVDOH prior to consulting with the WVDACH. It is anticipated to include aboveground resources fronting Kanawha Boulevard within the Project limits and comprise the completion of West Virginia Historic Property Inventory Forms (HPI) for up to 135 resources consisting of newly-recorded resources and potential updates to existing historic properties/HPIs. Architectural survey work will include the preparation of a Historic Resources Survey and Eligibility Report and a separate Criteria of Effects Report. Should there be a need for any mitigation as a result of effects to historic resources, this work will be conducted as a supplemental task.

**Hazardous Waste.** GAI will perform an environmental desktop due diligence review of the Project in an effort to identify environmental concerns and historical environmental issues. As such, a visual inspection of the Project area will not be completed as part of this scope of work. GAI will research available public data sources to identify potential items of concern. Publicly-available data sources may include the WV Department of Environmental Protection (WVDEP) internet sites, the USEPA Envirofacts and ECHO facility internet sites, and other available online data resources and databases.

In addition, GAI will obtain and review available federal and state environmental database records and other available historic information for the potential sites and immediate surrounding areas from Environmental Data Resources, Inc. (EDR). The Records Review will search the National Priorities List

and the Comprehensive Environmental Response Compensation and Liability Information System Inventory maintained by the USEPA and inventories of known or suspected sites of environmental impairment maintained by state and local regulatory authorities.

GAI will review available historical information, such as aerial photographs, topographic maps, Sanborn® maps, city directory information, and vapor encroachment data (if available) obtained by EDR to determine the historical uses and/or potential environmental issues associated with the Project and surrounding areas.

GAI environmental scientists will incorporate the results of the desktop due diligence into the report that will include the findings from the records and document review. The summary will include a general description of the due diligence process, identification of potential environmental concerns, de minimis conditions (if any), opinions and conclusions, and a reference to supporting documentation.

**Rare, Threatened & Endangered Species.** Initial review of the United States Fish and Wildlife Service's (USFWS's) Information for Planning and Consultation (IPaC) will be conducted to determine a list of federally-listed threatened and endangered species, or critical habitat, which could potentially occur in the vicinity of the Project area. GAI will obtain an Official Species List for the Project to evaluate environmental constraints based on the results. If necessary, additional coordination with USFWS can be provided under a supplemental agreement; however, due to the urban setting no impacts to protected species are anticipated. The Project is not within a known use area and potential tree clearing will be less than 17 acres so no bat surveys are anticipated. No natural resources fieldwork is anticipated at this time. Should this work become necessary, it will be conducted as a supplemental task.

**Air and Noise.** A brief qualitative analysis will be provided for potential air and noise impacts on the Project, which are anticipated to be minimal. Sensitive receptors will be identified along the project corridor for both air and noise.

For air quality, the attainment status of the region the Project is located in will be described for each criteria pollutant (e.g., ozone, carbon monoxide, and particulate matter) as well as potential air quality impacts of the Project airshed. The projects applicability to a general conformity analysis will be determined as well as negative impacts to the Project airshed.

For noise impacts, the type of improvement project will be identified, sensitive receptors will be identified, and a determination as to whether a detailed study will be required will be determined based upon anticipated impacts of the Project to the existing sound environment.

#### **Section 4(f) Resources**

It is assumed that there will be impacts to the property containing the NRHP-Listed Downtown Charleston Historic District as Kanawha Boulevard is currently situated within the boundaries of the district. An assessment will also be made to determine if there will be any impacts to publicly-owned parks in the project area including Magic Island Park, Ruffner Memorial Park and Haddad Riverfront Park. This will be discussed in consultation with the City of Charleston, WVDOH, and the Federal Highway Administration (FHWA). For the purpose of this proposal, given the likely impacts to the NRHP-Listed Downtown Charleston Historic District, we propose to use the WVDOH's de minimis template documenting impacts to this Section 4(f) property. If a Programmatic Section 4(f) Evaluation or an Individual Section 4(f) Report is required, this will be conducted as a supplemental task.

#### **CEE Report**

A CEE report will be prepared in draft form and submitted to the City of Charleston, WVDOH, and review agencies for review and comment; one reiteration addressing remarks will be generated. The CEE will then be submitted with the Final Section 4(f) Evaluation to the City of Charleston, WVDOH and FHWA; one reiteration addressing remarks will be generated. The document will be prepared electronically; no paper copies are anticipated. It is expected that the City of Charleston will distribute the appropriate number of report copies to agencies and interested parties, as necessary.