FINDING OF NO SIGNIFICANT IMPACT (FONSI)
DEPARTMENT OF VETERANS AFFAIRS
PROPOSED VA MEDICAL CENTER
LOUISVILLE, JEFFERSON COUNTY, KENTUCKY

Introduction

A Final Programmatic Environmental Assessment (PEA), included herein by reference, was prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Department of Veterans Affairs' (VA's) Proposed Action to select and acquire a site for the construction and operation of a minimum of 800,000 gross square feet replacement VA Medical Center (VAMC), including required parking, access, and other required site amenities and improvements, in Louisville, Jefferson County, Kentucky. Preparation of the PEA is required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 *et seq.*), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and 38 CFR Part 26 (*Environmental Effects of the Department of Veterans Affairs Actions*).

Once a site is selected and acquired through this programmatic NEPA process, VA will prepare a subsequent, site-specific, "tiered" EA (Site-specific EA or SEA) to more precisely analyze and evaluate the potential effects of the construction and operation of the proposed VAMC. At this latter point in time, design information will be available upon which to conduct this future environmental effects analysis. VA will incorporate the mitigation, avoidance, and management measures identified in the Final PEA into that future design process and tiered NEPA analysis to minimize potential environmental effects.

The *purpose* of the Proposed Action is to provide a replacement, full-service (inpatient and outpatient) hospital (i.e., VAMC) of sufficient capacity to service the current and projected future healthcare needs of US Veterans requiring services from the Louisville VAMC catchment area, primarily in western Kentucky and southern Indiana. VA has sized this required site and facility to accommodate an anticipated 65,000 or more patients per year.

The Proposed Action is *needed* to replace the existing Louisville VA medical facilities that have reached the end of their serviceable lives. The conditions at the existing facilities, as well as the configuration of the existing facilities, are inadequate to effectively and efficiently meet the needs of VA's healthcare mission in the region. Currently, VA provides inpatient and outpatient medical services to Veterans at the existing VAMC in Louisville and four outpatient clinics in the Louisville area. Under current conditions, VA does not have sufficient capacity to provide adequate regional healthcare services to meet the current and future needs of US Veterans. The current hospital and clinics are operating at maximum capacity with limited opportunity for expansion to meet these needs and the Veterans population is estimated to increase more than 65,000 in the next 10 years. In addition, parking at the existing VAMC is insufficient. The insufficient facilities challenge VA's ability to safely, economically, and consistently provide high-quality, integrated healthcare services to the region's Veterans.

1. Description of the Proposed Action and Alternatives

Proposed Action

VA's Proposed Action is to select and acquire a site for the construction and operation of a minimum of 800,000 gross square feet, replacement VAMC, including required parking (approximately 2,400 parking spaces), access, and other required site amenities and improvements, within an approximate 15-mile radius of the existing University of Louisville Healthcare Center, in Louisville, Jefferson County, Kentucky.

VA established the size of the facility and land area required for this Proposed Action based on the number of US Veterans within the Louisville VAMC "catchment area" currently requiring healthcare services, and those Veterans forecast to require such services in the Louisville area over the life of the proposed facility. The Louisville VAMC provides services to a population of 166,000 Veterans in the 35-county region including western Kentucky and southern Indiana. Under the considered alternatives for the Proposed Action, VA would acquire land at one of two Action Alternative Sites for the construction and operation of a new VAMC to replace the existing VAMC. VA's plans for the existing VAMC have not been determined and

will be the subject of a feasibility study and analysis. Existing VAMC operations will continue until the new VAMC is operational in approximately 2018 and then would be transferred to the new facility. At the time operations are transferred to the new VAMC, the existing VAMC will continue to be used by VA for other purposes, will be used by other undefined entities for undefined purposes, or will be decommissioned; however, the level of decommissioning of the existing VAMC is unknown at this time.

Currently, there are no design plans for the proposed replacement VAMC. Following site selection, VA will initiate the design process. At that time, VA will complete a tiered, SEA, in accordance with the above regulations.

Alternatives Considered

VA began developing alternatives for the Proposed Action ranging from reconfiguring the existing (Zorn Avenue) Louisville VAMC site through new construction and/or renovation, to constructing a replacement VAMC at the existing VAMC site or at some new site in the Louisville area (Downtown Site or an undefined greenfield site). In 2009, VA commissioned a feasibility study. That feasibility study concluded that each alternative was feasible, but identified that each alternative presented various challenges or advantages. The feasibility study did not attempt to identify any particular new site, but rather evaluated a generic new site's feasibility compared to reconfiguring the current Zorn Avenue facility.

VA then published a request for expressions of interest from potential offerors for an acceptable site for the potential development of a new VAMC in April 2010 (VA 2011). The request required that the site must be located within an approximate 15-mile radius of the existing University of Louisville Healthcare Center, in Louisville, Jefferson County, Kentucky. VA's intentions were that the site should be able to accommodate a minimum of 800,000 gross square feet facility and approximately 2,400 parking spaces. Overall, VA required at least 25 acres of developable land to accommodate the required facility.

VA received numerous responses to the request, a number of which met the initial screening criteria. Through a comprehensive screening process, including a visit to each site, VA further narrowed the number of reasonable sites based on a more refined analysis of site-specific aspects, issues, and concerns. These included an analysis of: surrounding land uses; proximity to local hospitals; current zoning; accessibility to transportation, shopping, restaurants, and other features; utility availability; overall site condition; and visible environmental issues/constraints/features. As a result of this more refined screening, VA identified three potential greenfield (mostly undeveloped) sites that appeared to best meet all of the VA's criteria. These sites are referred to in the PEA as the Brownsboro, Fegenbush, and St. Joseph Sites. In addition to the three greenfield sites, VA also identified the Downtown Site and the potential to reconfigure the existing Louisville VAMC site as candidate sites for the replacement VAMC.

In 2011, VA completed an initial environmental screening of these five alternative sites as part of the NEPA process. Through this screening process, potential environmental issues/significant adverse effects were identified for several of the five initially considered sites. Through this screening process, VA determined that only the Brownsboro Site and the St. Joseph Site were reasonable alternatives. The remaining three sites initially considered by VA (i.e., the Fegenbush Site, the Downtown Site, and the Zorn Site) were eliminated from future consideration by VA.

The two Action Alternatives analyzed in depth within the PEA are:

- **Preferred Action Alternative (Brownsboro Site):** Acquire the Brownsboro Site, located southeast of the intersection of Brownsboro Road and I-264, for the construction and operation of a new VAMC. This site includes approximately 36 acres of unimproved, former agricultural land.

- **Alternate Action Alternative (St. Joseph Site):** Acquire the St. Joseph Site, located east of I-265 and south of Factory Lane, for the construction and operation of a new VAMC. This site includes approximately 99 acres of mostly unimproved, agricultural land.

Both of the Action Alternatives effectively provide the sufficient combination of land, location, and proximity to related healthcare facilities in the Louisville area, and meet the purpose of and need for the Proposed Action. The Action Alternatives would provide a site that would ultimately allow VA to construct and operate a VAMC to overcome the deficiencies associated with the current facility.

As required under CEQ Regulations at 40 CFR Part 1502.14, the PEA also considers the No Action Alternative. While the No Action Alternative would not satisfy the purpose of or need for the Proposed Action, this alternative was retained to provide a comparative baseline against which to analyze the effects of the Proposed Action. The No Action Alternative reflects the *status quo*, serves as a benchmark against which the effects of the Proposed Action can be evaluated, and is defined as follows.

- **No Action Alternative**: Do not implement the Proposed Action as identified and continue with operations as currently conducted at the existing Louisville VAMC at the Zorn Avenue location.

2. Environmental Analysis

Based on the analysis contained in the Final PEA, VA concludes there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life associated with implementing either Action Alternative, provided that the mitigation, avoidance, management measures, and Best Management Practices (BMPs) identified in the PEA are implemented. Site-specific impacts would be further evaluated in a subsequent SEA once a site has been selected, acquired, and the proposed VAMC design process has been initiated. The mitigation, avoidance, and management measures identified in the PEA would be incorporated into that future process and analysis.

Preferred Action Alternative (Brownsboro Site)

The Preferred Action Alternative would result in potential impacts to aesthetics, air quality, cultural resources, soils, hydrology and water quality, wildlife and habitat, noise, land use, solid and hazardous materials, transportation and parking, and utilities. With the exception of transportation, all of these potential impacts would be less-than-significant and would be further reduced through careful coordination and implementation of the general BMPs and management measures, and compliance with regulatory requirements.

The Preferred Action Alternative could result in significant impacts to transportation (traffic). This is primarily due to the anticipated traffic congestion at the intersection of Brownsboro Road (US 42) and Northfield Drive/Old Brownsboro Road. This intersection currently operates at an unacceptable level of service, meaning that current traffic delays are unacceptable to the motoring public. Additional traffic associated with the proposed VAMC would further increase these delays and could have a significant adverse effect on traffic at this intersection. To mitigate the traffic impact of the proposed VAMC, VA would consult and work with pertinent Federal, State, and local regulatory agencies to achieve roadway improvements at this intersection. Some of these improvements are already planned by the Kentucky Transportation Cabinet (KTC). Possible additional improvements are described in the PEA. VA would specifically analyze and address this issue within the SEA, in consultation with appropriate agencies, when additional design and potential project-generated traffic data are available. That SEA would provide a detailed description of the roadway improvement mitigation required to reduce potential unacceptable traffic impacts within the region of influence (ROI) of the Proposed VAMC.

Alternate Action Alternative (St. Joseph Site)

The Alternate Action Alternative would result in potential impacts to aesthetics, air quality, cultural resources, soils, hydrology and water quality, wildlife and habitat, noise, land use, wetlands, solid and hazardous materials, transportation and parking, and utilities. With the exception of transportation (traffic), hydrology and water quality (Waters of the US), wildlife and habitat, and wetlands, all of these potential impacts would be less-than-significant and would be further reduced through careful coordination and implementation of the general BMPs, management measures, and compliance with regulatory requirements.

The Alternate Action Alternative could result in adverse impacts to jurisdictional wetlands and Waters of the US. Four wetland areas were identified on or adjacent to the St. Joseph Site. In addition, a channelized stream (Floyds Fork Tributary) crosses the northern portion of the Site from west to east. However, VA anticipates that through environmentally sensitive site design and following good engineering practices, these potential impacts would be avoided or maintained at less-than-significant levels. VA anticipates that final VAMC design would maintain a buffer of undisturbed land around the majority of

identified surface water resources. However, in those cases where impacts to wetlands and Water of the US cannot be avoided (e.g., at stream crossings), VA would obtain and comply with all necessary permit(s) from the US Army Corps of Engineers (USACE) and Kentucky Department of Environmental Protection (KDEP) under Sections 401 and 404 of the Clean Water Act, to minimize adverse effects to jurisdictional wetlands and surface water resources prior to construction. The SEA would provide a detailed description of any required avoidance or mitigation necessary to maintain effects at less-than-significant levels.

The Alternate Action Alternative could result in adverse impacts to protected wildlife and habitat. The Site includes areas that could provide foraging and roosting habitat for Indiana Bats (a Federally-listed endangered species). In addition, Running Buffalo Clover (a Federally and State-listed endangered species) was identified in three separate locations off-site along the eastern boundary of the southern portion of the St. Joseph Site. VA anticipates that through environmentally sensitive site design and following good engineering practices, as well as consultation with US Fish and Wildlife Service (USFWS) under Section 7 of the Endangered Species Act (ESA), these potential impacts would be mitigated or managed to less-than-significant levels. Protected wildlife and habitat would be avoided to the extent possible. VA anticipates that final VAMC design would maintain a buffer of undisturbed land around the majority of identified on-site potential Indiana Bat habitat and the off-site Running Buffalo Clover. These measures would be fully developed as part of the subsequent SEA, concurrent with the site design efforts.

The Alternate Action Alternative could also result in significant impacts to transportation (traffic). This is due to the anticipated traffic congestion at the intersections of Old Henry Road with Bush Farm Road/Factory Lane, and LaGrange Road and Factory Lane/Chamberlain Lane. Additional traffic associated with the proposed VAMC could have a significant adverse effect on traffic at these intersections. To mitigate the traffic impact of the Proposed VAMC, VA would consult and work with pertinent Federal, State, and local regulatory agencies to achieve roadway improvements at these intersections. Some of these improvements are already planned by the KTC. Possible additional improvements are described in the PEA. VA would specifically analyze and address this issue within the SEA, in consultation with appropriate agencies, when additional design and potential project-generated traffic data are available. That SEA would provide a detailed description of the roadway improvement mitigation required to reduce potential unacceptable traffic impacts within the ROI of the Proposed VAMC.

Under either of the Action Alternatives, positive, short-term and long-term effects to the local socioeconomic environment would be anticipated. Notably, a significant long-term positive effect to the health of US Veterans would occur should a site be developed for a new, improved VAMC. In addition, the Proposed Action would have a significant, positive impact to traffic and parking in the area of the existing VAMC. No direct or indirect health or safety risks to children are anticipated.

Under the No Action Alternative, the Proposed Action would not be implemented and no improvements to the current level of VA's regional healthcare services or capability would ultimately occur. No positive effects attributable to the Proposed Action would occur and the VA's ability to provide sufficient, requisite health care services to the region's Veterans would be compromised.

The PEA also examines the potential cumulative effects of implementing each of the considered alternatives. This analysis finds that implementation of either of the Action Alternatives, with implementation of the mitigation, avoidance, and management measures proposed in the PEA, would not result in significant cumulative impacts to onsite or regional natural or cultural resources, and would maintain or enhance the socioeconomic environment of the area through long-term provision of required healthcare services to the region's Veterans. The No Action Alternative would not produce these potential positive socioeconomic gains. No significant cumulative effects are identified.

Mitigation

Preferred Action Alternative (Brownsboro Site)

Mitigation measures would be required for transportation (traffic) impacts if the Brownsboro Site is selected.

Transportation. To mitigate the potentially significant traffic impacts associated with the proposed VAMC, VA would consult and work with pertinent Federal, State (KTC), and local (City of Louisville) regulatory agencies to achieve roadway improvements at the Brownsboro Site. Some of these improvements are already planned by KTC. The SEA would provide a detailed description of the roadway improvement mitigation required to reduce potential unacceptable traffic impacts within the ROI of the proposed VAMC. Possible mitigation options and considerations for the Preferred Action Alternative were described in the PEA.

In addition, VA would implement the following general BMPs and management measures to reduce identified potential site impacts:

- ***Aesthetics.*** Brownsboro Road, along the northern boundary of the Brownsboro Site, has been designated by the City of Louisville as a Scenic Corridor. VA would develop a landscape plan and would plant and maintain vegetation to meet the requirements of the Parkway and Scenic Corridor Development Standards Ordinance, to the extent practical. Comply with, to the extent practical, the Louisville Land Development Code (LDC) Ordinance for Generally Applicable Development Standards.

- ***Air Quality.*** As a result of Jefferson County being located in an 8-Hour Ozone Maintenance Area and a $PM_{2.5}$ Nonattainment Area, a Record of Non-Applicability (RONA) under the Clean Air Act of 1990 is likely to be required. In addition, a Title V operating permit may be required for the proposed boiler equipment, including conducting a full conformity analysis for installing a major pollutant emissions source in a nonattainment area. Control fugitive dust emissions during construction and obtain required air quality emissions construction and operations permits (if necessary based on the final design) from the KDEP Division of Air Quality (DAQ) and the Louisville Air Pollution Control District (APCD) and Metro Public Works and Assets (PWA).

- ***Cultural Resources.*** Consultation with the Kentucky Heritage Council (SHPO) and properly address any unknown cultural resources discoveries during site development.

- ***Geology and Soils.*** Control stormwater, soil erosion and sedimentation impacts during construction by preparing and implementing an Erosion Prevention and Sediment Control (EPSC) Plan and complying with Executive Orders (EOs) 13514 and 11988, the Kentucky Pollution Discharge Elimination System (KPDES) permitting process and to the extent practical, LDC ordinances for stormwater management, erosion prevention and sediment control, waterways, and wetlands. Document impacts to prime and unique farmland in accordance with the Farmland Protection Policy Act (FPPA).

- ***Hydrology and Water Quality.*** Control stormwater, soil erosion and sedimentation impacts during construction by complying with EOs 13514 and 11988, the KPDES permitting process and to the extent practical, LDC ordinances for stormwater management, erosion prevention and sediment control, waterways, and wetlands.

- ***Wildlife and Habitat.*** Avoid impacts to migratory birds and re-vegetate with native species.

- ***Noise.*** Manage construction activities and schedules to minimize noise impacts. Comply with, to the extent practical, LDC Noise Ordinance and Kentucky Administrative Regulations (KAR) Blasting Statute.

- ***Wetland, Floodplains, and Coastal Zone Management.*** Implement BMPs to control construction and operational-related impacts of soil erosion and sedimentation, and provide a proper onsite stormwater management system. Comply with Federal and State regulations regarding waterways, wetlands, and floodplain management.

- ***Solid and Hazardous Materials.*** Implement construction and operational BMPs to minimize effects and to comply with applicable regulations.

- ***Transportation and Parking.*** Manage construction and operation activities. Comply with KTC regulations and the Louisville LDC, to the extent practical.

- ***Utilities.*** Comply with Louisville Water Company (LWC), Metropolitan Sewer District (MSD), and Louisville Gas and Electric (LGE) requirements.

Alternate Action Alternative (St. Joseph Site)

Design avoidance and/or mitigation measures would be required for wetlands and Waters of the US, wildlife and habitat, and traffic impacts if the St. Joseph Site is selected.

Wetlands and Waters of the US. VA would avoid onsite wetlands and surface water resources to the extent possible during the site design process. VA anticipates that final VAMC design would maintain a buffer of undisturbed land around the majority of the identified wetlands and surface water resources. However, in those cases where impacts to wetlands and Water of the US cannot be avoided, VA would obtain and comply with all necessary permit(s) from the USACE and KDEP under Sections 401 and 404 of the Clean Water Act, to minimize adverse effects to jurisdictional wetlands and surface water resources prior to construction.

To minimize potential wetlands and surface water impacts from the implementation of the Alternate Action Alternative, VA would:

- Obtain a jurisdictional determination from the USACE regarding identified wetlands and Waters of the US.
- Develop a site design that avoids interaction with onsite and adjacent wetlands and surface waters.
- Obtain and execute any requirements of necessary permits from the appropriate Federal and State agencies under Sections 401 and 404 of the Clean Water Act.
- Develop a site plan that provides a buffer around jurisdictional wetlands and surface waters in accordance with the City of Louisville and Jefferson County Waterways and Wetlands Protection Ordinance.

Wildlife and Habitat. VA anticipates that through environmentally sensitive site design and following good engineering practices, as well as consultation with USFWS, potential wildlife and habitat impacts would be mitigated or managed to less-than-significant levels. Protected wildlife and habitat would be avoided to the extent possible. VA would implement the following mitigation (if necessary), avoidance, and management measures to reduce potential adverse effects protected wildlife and habitat to acceptable, less-than-significant levels. These measures would be fully developed as part of the subsequent SEA, concurrent with the site design efforts. VA would:

- Submit the Threatened and Endangered Species Habitat Survey and Running Buffalo Clover Survey to the USFWS for review and comment.
- Maintain a buffer of undisturbed land around identified protected wildlife resources, if possible.
- If impacts to the Indiana Bat and Running Buffalo Clover are unavoidable, VA would enter into a Memorandum of Agreement (MOA) with the USFWS to account for the incidental taking of Indiana Bats and Running Buffalo Clover. In addition, VA would conduct seasonal tree clearing (October 15 through March 31) in coordination with the USFWS to minimize impacts to Indiana Bats.

Transportation. To mitigate the potentially significant traffic impacts associated with the proposed VAMC, VA would consult and work with pertinent Federal, State (KTC), and local (City of Louisville) regulatory agencies to achieve roadway improvements at the St. Joseph Site. Some of these improvements are already planned by KTC. The SEA would provide a detailed description of the roadway improvement mitigation required to reduce potential unacceptable traffic impacts within the ROI of the proposed VAMC. Possible mitigation options and considerations for the Alternate Action Alternative were described in the PEA.

In addition, VA would implement the following general BMPs and management measures to reduce identified potential site impacts:

- ***Aesthetics.*** Comply with, to the extent practical, the Louisville LDC Ordinance for Generally Applicable Development Standards.

- ***Air Quality.*** As a result of Jefferson County being located in an 8-Hour Ozone Maintenance Area and a $PM_{2.5}$ Nonattainment Area, a RONA under the Clean Air Act of 1990 is likely to be required. In addition, a Title V operating permit may be required for the proposed boiler equipment, including conducting a full conformity analysis for installing a major pollutant emissions source in a nonattainment area. Control fugitive dust emissions during construction and obtain required air quality emissions construction and operations permits (if necessary based on the final design) from the KDEP DAQ and the Louisville APCD and PWA.

- ***Cultural Resources.*** Consultation with the SHPO and properly address any unknown cultural resources discoveries during site development.

- ***Geology and Soils.*** Control stormwater, soil erosion and sedimentation impacts during construction by preparing and implementing an EPSC Plan and complying with EOs 13514 and 11988, the KPDES permitting process and to the extent practical, LDC ordinances for stormwater management, erosion prevention and sediment control, waterways, and wetlands. Document impacts to prime and unique farmland in accordance with the FPPA.

- ***Hydrology and Water Quality.*** Control stormwater, soil erosion and sedimentation impacts during construction by complying with EOs 13514 and 11988, the KPDES permitting process and to the extent practical, LDC ordinances for stormwater management, erosion prevention and sediment control, waterways, and wetlands.

- ***Wildlife and Habitat.*** Avoid impacts to migratory birds and re-vegetate with native species. Coordinate with the USFWS with regard to threatened and endangered species and sensitive habitats.

- ***Noise.*** Manage construction activities and schedules to minimize noise impacts. Comply with, to the extent practical, LDC Noise Ordinance and KAR Blasting Statute.

- ***Wetland, Floodplains, and Coastal Zone Management.*** Implement BMPs to control construction and operational-related impacts of soil erosion and sedimentation, and provide a proper onsite stormwater management system. Comply with Federal and State regulations regarding waterways, wetlands, and floodplain management.

- ***Solid and Hazardous Materials.*** Implement construction and operational BMPs to minimize effects and to comply with applicable regulations.

- ***Transportations and Parking.*** Manage construction and operation activities. Comply with KTC regulations and the Louisville LDC, to the extent practical.

- ***Utilities.*** Comply with LWC, MSD, and LGE requirements.

3. Regulations

The Proposed Action will not violate the NEPA, the CEQ Regulations, 38 CFR Part 26, or other Federal, State, or local environmental regulations. This will be achieved by implementing the avoidance, mitigation, and management measures summarized above.

4. Commitment to Implementation

VA affirms their commitment to implement the Final PEA and FONSI in accordance with the NEPA, the CEQ Regulations, and 38 CFR Part 26. Implementation is dependent on funding. VA will ensure that adequate funds are requested in future years' budget(s) to achieve the goals and objectives set forth in the Final PEA and FONSI, and to fund the commitments described above.

5. Agency and Public Involvement

VA has consulted with appropriate Federal, State, and local regulatory agencies, and has attempted to consult with federally recognized Native American Tribes identified as having ancestral ties to the Louisville area, including potentially the Action Alternative sites. This consultation is documented in the Final PEA. Concerns expressed by pertinent regulatory agencies and tribes have been addressed in the Final PEA.

In addition, VA published and distributed the Draft PEA for a 30-day public comment period as announced by a Notice of Availability (NOA) published in the Louisville Courier-Journal on March 30, 2012 through April 1, 2012. Review copies were made available for public review at the Louisville Free Public Library – Westport Branch and the existing Louisville VAMC. VA also made a copy available for download via the internet through a link on the Louisville VAMC internet website. In addition, VA held a public meeting on April 18, 2012 at Kammerer Middle School, located near the Brownsboro Site, to discuss the Proposed Action and the Draft PEA, and to accept comments on the Draft PEA. 203 people signed in at the public meeting. VA received:

- 28 verbal public comments from the public meeting.
- 26 written public comments at the public meeting.
- 83 written public comments via email or US Mail.
- 3 written public comments provided by local government or quasi-government agencies.
- 144 people signed a petition and sent emails to VA and Kentucky elected officials requesting that VA select the St. Joseph Site for the proposed VAMC.

Comments received that are relevant to the Proposed Action and Draft PEA were addressed in the Final PEA.

6. Finding of No Significant Impact

After careful review of the Final PEA, VA has concluded that implementation of the Proposed Action at either the Brownsboro Site or the St. Joseph Site would not have a significant impact on the quality of the human or natural environment provided VA implements the mitigation, avoidance and management measures identified in the Final PEA. VA will implement these measures. VA will complete a subsequent, tiered SEA that analyzes the potential environmental effects of the construction and operation of the proposed replacement Louisville VAMC on the selected site. The identified mitigation, avoidance, and management measures will be incorporated and more fully developed in that tiered SEA.

It is the conclusion of VA that, with the implementation of the appropriate mitigation and management measures identified in this PEA and those to come in the Tiered SEA, that the Proposed Action would not have a significant adverse impact on human health or the environment. Therefore preparation of an environmental impact statement is not required.

Robert Neary
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Date: 6-14-12