

Appendix C Scoping Summary

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Appendix C – Scoping Summary: Environmental Impact Statement Replacement Robley Rex VA Medical Center Louisville, Kentucky

“Scoping” is the term used in the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR 1501.7) to define the process for determining the scope of issues to address during the environmental analysis of an agency’s proposed action. Scoping also helps identify issues that are neither significant nor relevant to a proposal, or alternatives that are not feasible, thereby eliminating these issues or alternatives from detailed analysis.

This EIS has considered all the scoping comments, whether a comment was made once or multiple times. Questions and issues raised in these scoping comments are addressed throughout this EIS, with analysis focused on a full and fair discussion of significant environmental impacts to inform the VA’s comparison of environmental impacts among the alternatives in support of the Agency’s decision that will be documented in the Record of Decision at the conclusion of the NEPA process.

The scoping process for this EIS was initiated by VA’s publication of a Notice of Intent. The Notice of Intent is the U.S. government’s means of notifying the public and interested parties of an agency’s intention to prepare an EIS for its proposed action. VA published a “Notice of Intent to Prepare an Environmental Impact Statement for a Replacement Robley Rex Veterans Affairs Medical Center, Louisville, Kentucky” in the Federal Register on October 30, 2015. The Notice of Intent is provided as Exhibit C-1.

C.1 Scoping Notice, Media Release, VA Website, and Direct Mail Notification

Scoping notices announcing the EIS, inviting scoping comments, and describing options for submitting scoping comments were published in the Louisville *Courier-Journal* on October 30, October 31, and November 1, 2015; and were posted online on the *Courier-Journal*’s website from October 30 to November 7, 2015. The scoping notices were paid publications in the legal notice section of the newspaper.

VA also prepared a media release announcing the EIS, inviting scoping comments, and describing options for submitting scoping comments. The media release was circulated to 38 representatives of print media, radio, television, and online news sources; forwarded to the Kentucky Department of Veterans Affairs listserv, the Joint Executive Council of Veterans Organizations for the state of Kentucky, the Louisville Metro Council, local and federal elected officials, and the City of Louisville; and posted to the VA Louisville website.

On the VA website for the Louisville Robley Rex VAMC, a page is dedicated to the proposal for a replacement VAMC, at www.louisville.va.gov/newmedicalcenter. When the EIS was announced, VA posted a fact sheet on the EIS, the scoping process, and options for submitting comments.

Postcards were mailed to 301 individuals, organizations, government agencies, and elected officials on October 28, 2015, notifying them of the EIS, the scoping process, and options for submitting scoping comments.

The newspaper notice, media release, fact sheet, and postcard are provided as Exhibits C-2 through C-5.



have been considered and are included where relevant within the Draft EIS.

The VA BHHCS Reconfiguration Draft EIS is available for viewing on the VA BHHCS Web site www.blackhills.va.gov/vablackhillsfuture/ and at the Hot Springs, Rapid City Downtown, Sturgis, Chadron, Alliance, Lied Scottsbluff, and Pierre (Rawlins Municipal) public libraries; as well as in Pine Ridge at the Oglala Lakota College Pine Ridge Center library on the high school campus.

Information related to the EIS process is also available for viewing on the VA BHHCS Web site www.blackhills.va.gov/vablackhillsfuture/.

Meetings

Interested parties are invited to participate in any of six public meetings summarizing the results of the Draft EIS. These meetings will be held in Rapid City, SD; Hot Springs, SD; Pine Ridge, SD; Chadron, NE; Alliance, NE; and Scottsbluff, NE. The dates, times, and locations for these meetings will be published online at www.blackhills.va.gov/vablackhillsfuture/.

At the public meetings, interested parties will also have the opportunity to comment regarding the National Historic Preservation Act Section 106 process, which has been integrated into this NEPA process.

Signing Authority

The Secretary of Veterans Affairs, or designee, approved this document and authorized the undersigned to sign and submit the document to the Office of the Federal Register for publication electronically as an official document of the Department of Veterans Affairs. Robert L. Nabors II, Chief of Staff, Department of Veterans Affairs, approved this document on October 26, 2015, for publication.

Dated: October 27, 2015.

Michael Shores.

Chief Impact Analyst, Office of Regulation Policy & Management, Office of the General Counsel, Department of Veterans Affairs.

[FR Doc. 2015-27684 Filed 10-29-15; 8:45 am]

BILLING CODE 8320-01-P

DEPARTMENT OF VETERANS AFFAIRS

National Research Advisory Council; Notice of Meeting

The Department of Veterans Affairs (VA) gives notice under the Federal Advisory Committee Act, 5 U.S.C., App. 2, that the National Research Advisory Council will hold a meeting on Wednesday, December 9, 2015, at 810 Vermont Ave. NW., Conference Room

730, Washington, DC 20420. The meeting will convene at 9:00 a.m. and end at 4:00 p.m., and is open to the public. Anyone attending must show a valid photo ID to building security and be escorted to the meeting. Please allow 15 minutes before the meeting begins for this process.

The agenda will include a review of the Million Veteran Program and a joint meeting with the Association of American Medical Colleges.

No time will be allocated at this meeting for receiving oral presentations from the public. Members of the public wanting to attend, or needing further information may contact Pauline Cilladi-Rehrer, Designated Federal Officer, ORD (10P9), Department of Veterans Affairs, 810 Vermont Avenue NW., Washington, DC 20420, at (202) 443-5607, or by email at pauline.cilladi-rehrer@va.gov, at least 5 days prior to the meeting date.

Dated: October 27, 2015.

Rebecca Schiller.

Advisory Committee Management Officer.

[FR Doc. 2015-27680 Filed 10-29-15; 8:45 am]

BILLING CODE 8320-01-P

DEPARTMENT OF VETERANS AFFAIRS

Notice of Intent To Prepare an Environmental Impact Statement for a Replacement Robley Rex Veterans Affairs Medical Center, Louisville, Kentucky

AGENCY: Department of Veterans Affairs.

ACTION: Notice of intent.

SUMMARY: Pursuant to the National Environmental Policy Act of 1969 (42 U.S.C. 4321, *et seq.*), VA intends to prepare an Environmental Impact Statement (EIS) for constructing and operating a new campus to replace the existing VA Medical Center, Veterans Benefits Administration office, and three community-based outpatient clinics in Louisville, Kentucky. VA seeks public scoping input on the EIS.

DATES: Interested parties are invited to submit scoping comments for the Replacement Louisville VAMC EIS by Monday, November 30, 2015.

ADDRESSES: Submit scoping comments online through www.Louisville-EIS.com, by email to LouisvilleReplacementHospitalComments@va.gov, or by regular mail to Robley Rex VAMC, Attn: Replacement VAMC Activation Team Office, 800 Zorn Avenue, Louisville, KY 40206.

FOR FURTHER INFORMATION CONTACT: Robley Rex VAMC, Attn: Replacement

VAMC Activation Team Office, 800 Zorn Avenue, Louisville, KY 40206 or by email to LouisvilleReplacementHospitalComments@va.gov.

SUPPLEMENTARY INFORMATION: VA proposes to construct and operate a new 104-bed hospital, which will include diagnostic and treatment facilities, a Veterans Benefits Administration (VBA) regional office, and required site amenities and improvements on a new campus. This proposed project would replace the existing Robley Rex VA Medical Center (VAMC), three community-based outpatient clinics, and the existing VBA regional office with new facilities of sufficient capacity to meet the current and projected future healthcare needs of Veterans in the Louisville service area. The proposed project is needed because the existing Louisville VAMC facilities on Zorn Avenue have reached the end of their serviceable lives. The building conditions and site configuration at the existing 63-year old VAMC are inadequate to effectively and efficiently meet the expanding needs of VA's health care mission and VBA services in the region. Within the Louisville service area, 60,943 Veterans were enrolled to receive care in Fiscal Year 2014. Enrollment is expected to increase to more than 68,000 by FY 2024. During this same time period, outpatient clinic stops are expected to increase from 763,104 to over 963,000. The existing Louisville VAMC facility is insufficient to meet the current and the increasing future needs of VA's health care mission in the region. Therefore, VA conducted studies beginning in 2009 that recommended new facilities be constructed on a new site that would be better suited to meet future needs.

VA has identified two potential action alternatives to be analyzed in detail in this EIS: Construction and operation of a replacement VAMC campus at the "Brownsboro Site" at 4906 Brownsboro Road, Louisville; and construction and operation of a replacement VAMC campus at the "St. Joseph Site," on a parcel located east of I-265 and south of Factory Lane in Louisville. The Brownsboro and St. Joseph Sites were identified through a site selection process conducted by VA in 2011. The Brownsboro Site was acquired by VA in 2012 as the proposed location for the replacement VAMC. In addition to these two action alternatives, the EIS also will evaluate the impacts associated with No Action or "status quo" as required by the National Environmental Policy Act (NEPA) and its implementing regulations. The three community-based outpatient clinics and the existing VBA

Exhibit C-1. Notice of Intent.

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regional office are currently located in leased spaces, for which the leases would not be renewed under either action alternative. VA has tentatively determined that renovating the existing Robley Rex VAMC is not a reasonably foreseeable alternative and would adversely affect VA's ability to provide needed services to Veterans.

Environmental topics that will be addressed in the EIS include aesthetics, air quality, cultural resources and historic properties, geology and soils, hydrology and water quality, wildlife and habitat, noise, land use, floodplains and wetlands, socioeconomic, community services, solid waste and hazardous materials, transportation and traffic, utilities, and environmental justice. Best management practices and mitigation measures that could alleviate any identified environmental effects will be included where relevant.

Two prior environmental assessments (EAs) addressed aspects of VA's proposal. In June 2012, VA completed a *Programmatic EA of the Proposed Site Selection, Construction, and Operation of a Replacement Louisville VA Medical Center*. This analysis concluded with a Finding of No Significant Impact for selecting and acquiring the Brownsboro Site for the replacement Louisville VAMC, with the provision that mitigation measures would be identified in a subsequent site-specific EA to ensure that impacts would not be significant. In December 2014, VA published a *Draft Site-Specific EA: Proposed Replacement VA Medical Center Campus, Louisville, Kentucky*. However, upon further review before publishing a Final Site-Specific EA, VA concluded that an EIS was the appropriate level of NEPA documentation for evaluating the potential for adverse impacts from constructing and operating a replacement campus at the Brownsboro Site. This Notice of Intent initiates the EIS for the replacement Louisville VAMC campus.

Extensive public input was provided by Veterans, elected officials, residents

near the proposed new locations, and other interested members of the public throughout the scoping and public draft reviews for the two EAs. These comments remain in the project record and are being incorporated as identified scoping issues for this EIS.

VA does not intend to hold a public scoping event specific to this EIS, anticipating that any input would largely reiterate issues that have been previously identified. Upon specific request, VA will consider whether an additional in-person scoping event would enhance public involvement in this EIS. The event would be at a Louisville venue at which a project fact sheet would be available in hard copy, posters summarizing the EIS process would be available for viewing, and members of the public could submit written comments using either comment forms or their own written format. There would be no formal presentation by VA or verbal public comment opportunity. The comment form (this form is not a required format for submitting scoping comments), the fact sheet, and the two previous EAs are available online at www.louisville.va.gov/newmedicalcenter/, along with other information related to the EIS process.

The Secretary of Veterans Affairs, or designee, approved this document and authorized the undersigned to sign and submit the document to the Office of the Federal Register for publication electronically as an official document of the Department of Veterans Affairs. Robert L. Nabors II, Chief of Staff, Department of Veterans Affairs, approved this document on October 22, 2015, for publication.

Dated: October 27, 2015.

Michael Shores,

Chief Impact Analyst, Office of Regulation Policy & Management, Office of the General Counsel, Department of Veterans Affairs.

[FR Doc. 2015-27658 Filed 10-29-15; 8:45 am]

BILLING CODE 8320-01-P

DEPARTMENT OF VETERANS AFFAIRS

Commission on Care Meeting

In accordance with the Federal Advisory Committee Act, 5 U.S.C., App. 2, the Commission on Care gives notice that it will meet on Monday, November 16, 2015, and Tuesday, November 17, 2015, at the J.W. Marriott, Jr. ASAE Conference Center, 1575 I St. NW., Washington, DC 20005. The meeting will convene at 8:30 a.m. and end at 12:30 p.m. on both days. The meeting is open to the public.

The purpose of the Commission, as described in section 202 of the Veterans Access, Choice, and Accountability Act of 2014, is to examine the access of Veterans to health care from the Department of Veterans Affairs and strategically examine how best to organize the Veterans Health Administration, locate health care resources, and deliver health care to Veterans during the next 20 years.

On the mornings of November 16 and 17, the Commission will hear from experts who will provide insights on work to be done by the Commission. On the afternoons of November 16 and 17, and the morning of November 18, the Committee will convene closed sessions in accordance with The Government in the Sunshine Act, 5 U.S.C. 552b(c)(2) and (c)(9)(B).

No time will be allocated at this meeting for receiving oral presentations from the public. The public may submit written statements for the Commission's review to Sharon Gilles or John Goodrich, Designated Federal Officers, Commission on Care, at sharon.gilles@va.gov or john.goodrich@va.gov, respectively. Any member of the public wanting to attend may contact Ms. Gilles or Mr. Goodrich.

Dated: October 26, 2015.

Sharon Gilles,

Designated Federal Officer, Commission on Care.

[FR Doc. 2015-27589 Filed 10-29-15; 8:45 am]

BILLING CODE 8320-01-P

Exhibit C-1. Notice of Intent (continued).

THE COURIER-JOURNAL - A GANNETT

STATE OF KENTUCKY

County of Jefferson

**Notice of Intent and Public Scoping:
Environmental Impact Statement (EIS) for Replacement
Robley Rex VA Medical Center (VAMC)**

In accordance with the National Environmental Policy Act (NEPA), the Department of Veterans Affairs (VA) will prepare an EIS for constructing and operating a campus to replace the existing VA Veterans Benefits Administration office, and three community-based outpatient clinics in Louisville, KY. VA has identified two alternative locations for constructing and operating the campus: "Brownsboro Site" and the "St. Joseph Site" and will also evaluate the no action alternative. Additional information on the proposed project and NEPA process to date is available at www.louisville.va.gov/newmedicalcenter/.

VA requests input on potential environmental impacts and suggestions for mitigation. VA does not intend to hold a public scoping event, anticipating that it would largely reiterate previously identified issues. Upon specific request, VA will consider whether an additional in-person scoping event would enhance public involvement. The event would be announced on the VA website and provide a project fact sheet and form for written comments (both available on the website), and would have no formal presentation by VA or verbal public comment opportunity. The extensive public input provided for two related environmental assessments remains in the project record and is being incorporated as scoping input for this EIS. Additional scoping comments may be submitted on or before November 30, 2015, through www.Louisville-EIS.com, by email to LouisvilleReplacementHospitalComments@va.gov, or by registered mail to Robley Rex VAMC, Attn: Replacement VAMC Activation Team Office, 800 Zorn Avenue, Louisville, KY 40206.

Circulation printed and published at 525 West Broadway, Louisville, Kentucky, do solemnly swear that from my own personal knowledge, and reference to the files of said publication, the advertisement of:

Title:	Notice of Intent and Public Scoping	
Run Date(s):	10/30, 10/31, 11/1/2015	NEWSPAPER PRINT
Run Date(s):	10/30/2015 - 11/7/2015	ONLINE

Christine Manning, Inbound Special Services Representative

Signature of person making proof

Subscribed and sworn to before me this 4th day of November 2015

Janice C. Richardson, Notary Public



Exhibit C-2. Newspaper Notice of Scoping.

NOTICE OF INTENT AND PUBLIC SCOPING

Environmental Impact Statement for Replacement Robley Rex Veterans Affairs Medical Center, Louisville, Kentucky

The U.S. Department of Veterans Affairs (VA) proposes to construct and operate a 104-bed hospital, diagnostic and treatment facilities, Veterans Benefits Administration (VBA) regional office, and required site amenities and improvements on a new campus. This proposed project would replace the existing Robley Rex VAMC, three community-based outpatient clinics, and the existing VBA regional office. In accordance with the *National Environmental Policy Act* (NEPA), VA will prepare an environmental impact statement (EIS) for this project.

The proposed project is needed because the existing Louisville VAMC facilities on Zorn Avenue are inadequate to effectively and efficiently meet the expanding needs of VA's healthcare mission and VBA services in the region. VA has identified two potential action alternatives to be analyzed in detail in this EIS: constructing and operating the replacement VAMC campus at the "Brownsboro Site" at 4906 Brownsboro Road, Louisville; and constructing and operating the replacement VAMC campus at the "St. Joseph Site" on a parcel located east of I-265 and south of Factory Lane in Louisville. The EIS will also evaluate the impacts associated with the No Action alternative.

Two prior environmental assessments (EAs) addressed aspects of VA's proposal. Upon further review, VA concluded that an EIS was the appropriate level of NEPA documentation. Extensive public input was provided throughout the scoping and public draft reviews for the two EAs. These comments remain in the project record and are being incorporated as identified scoping issues for this EIS. Additional scoping input may be provided by submitting comments on or before November 30, 2015, online through www.Louisville-EIS.com, by email to LouisvilleReplacementHospitalComments@va.gov, or by regular mail to Robley Rex VAMC, Attn: Replacement VAMC Activation Team Office, 800 Zorn Avenue, Louisville, KY 40206.

VA does not intend to hold a public scoping event specific to this EIS, anticipating that any input would largely reiterate issues that have been previously identified. Upon specific request, VA will consider whether an additional in-person scoping event would enhance public involvement in this EIS. The event would be at a Louisville venue at which a project fact sheet would be available in hard copy, posters summarizing the EIS process would be available for viewing, and members of the public could submit written comments using either comment forms or their own written format. There would be no formal presentation by VA or verbal public comment opportunity. The comment form (this form is not a required format for submitting scoping comments), the fact sheet, and the two previous EAs are available online at www.louisville.va.gov/newmedicalcenter/, along with other information related to the EIS process.

For further information, contact: Robley Rex VAMC, Attn: Replacement VAMC Activation Team Office, 800 Zorn Avenue, Louisville, KY 40206 or by email to LouisvilleReplacementHospitalComments@va.gov.

Exhibit C-3. Media Release.



FACT SHEET

Environmental Impact Statement for Replacement Robley Rex VA Medical Center Campus

PUBLIC SCOPING

October 30, 2015, to November 30, 2015



National Environmental Policy Act (NEPA)

- Requires a federal agency to consider the environmental impacts of its proposed project in deciding what action to take.
- Prepare an environmental impact statement (EIS) to determine if the proposed action or alternatives have potential to significantly impact the natural and human (social, economic) environment.
- Identify reasonable measures to avoid or minimize environmental harm.

Scoping Process

- Involve the public with identifying the issues and resources to evaluate in the EIS.
- Receive comments on alternatives, impacts, and mitigation options.
- Use comments in preparing EIS.

Purpose of and Need for Replacement VA Medical Center (VAMC) Campus

- **Purpose:** Provide full-service replacement VA medical center (VAMC) campus and co-located Veterans Benefit Administration (VBA) office to serve current and projected needs of Veterans.
- **Need:** Existing Louisville facilities have reached the end of their serviceable lives. The conditions and configuration at the existing VAMC are inadequate to effectively and efficiently meet the expanding needs of VA's healthcare mission, and upgrading the existing VAMC is not practical given the facility's age and space constraints.

Environmental Impact Statement Content

- Purpose and Need
- Alternatives (tentative)
 - A: Construct and operate replacement VAMC campus at 4906 Brownsboro Road (VA's preferred alternative)
 - B: Construct and operate replacement VAMC campus at St. Joseph site, east of I-265 and south of Factory Lane
 - C: No Action – no replacement VAMC campus, continue services at existing Zorn Avenue location
- Description of Affected Environment – baseline for impact analysis
- Analysis of Impacts – direct, indirect, and cumulative, including updated traffic study
- Summary of Public Involvement and Agency Coordination
- Mitigation Measures

Resources that will be Evaluated for Potential Impacts

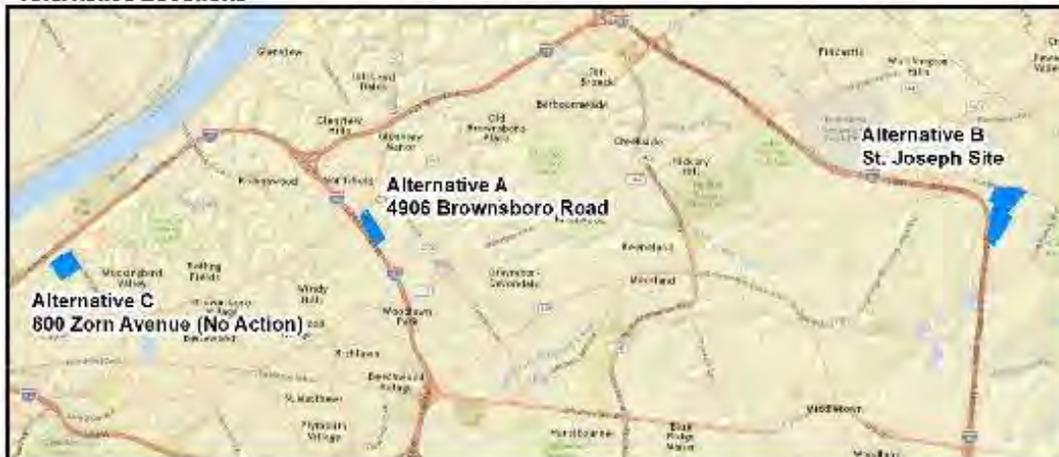
• Aesthetics	• Noise	• Floodplain / wetlands
• Air quality	• Land use	• Hydrology / water quality
• Cultural resources	• Socioeconomics	• Solid waste / hazardous materials
• Geology / soils	• Utilities	• Traffic / transportation
• Wildlife / habitat	• Community services	• Environmental justice

Exhibit C-4. Scoping Fact Sheet.

Schedule

- November 30, 2015 – scoping completed
- February 2016 – Draft EIS available
- March 2016 - public meetings on Draft EIS
- July 2016 – Final EIS available
- August 2016 – Record of Decision published
- 2017 (estimated) - construction begins (subject to budgets / appropriations)
- 2022 (estimated) - new VAMC campus opens (subject to budgets / appropriations)

Alternative Locations



Proposed Site Plan for Replacement VAMC Campus



Site plan is shown at the Alternative A location. A similar layout would be evaluated for Alternative B.

Scoping Comments – Submission Options

Please submit scoping comments by **November 30, 2015** using one of the following methods:

- Online through www.Louisville-EIS.com
- Email to LouisvilleReplacementHospitalComments@va.gov
- Regular mail to Robley Rex VAMC, Attn: Replacement VAMC Activation Team Office, 800 Zorn Avenue, Louisville, KY 40206.

Exhibit C-4. Scoping Fact Sheet (continued).



Notice of Intent and Public Scoping

Environmental Impact Statement

Replacement Robley Rex VA Medical Center, Louisville, KY

In accordance with the National Environmental Policy Act (NEPA), the Department of Veterans Affairs (VA) will prepare an EIS for constructing and operating a campus to replace the existing Robley Rex VAMC, Veterans Benefits Administration office, and three community-based outpatient clinics in Louisville, KY. VA has identified two alternative locations for constructing and operating the campus: the "Brownsboro Site" and the "St. Joseph Site" and will also evaluate the no action alternative. Additional information is available at www.louisville.va.gov/newmedicalcenter/.

VA requests input on potential environmental impacts and suggestions for mitigation. VA does not intend to hold a public scoping event. The extensive public input for two related environmental assessments remains in the project record and is being incorporated as EIS scoping input. Upon specific request, VA will consider whether an additional in-person scoping event would enhance public involvement. The event would be announced on the VA website above, provide a fact sheet and comment form (both available on the website), and would have no formal presentation by VA or verbal public comment opportunity. Scoping comments may be submitted on or before November 30, 2015, through www.Louisville-EIS.com, by email to LouisvilleReplacementHospitalComments@va.gov, or by regular mail to Robley Rex VAMC, Attn: Replacement VAMC Activation Team Office, 800 Zorn Avenue, Louisville, KY 40206.



U.S. Department of Veterans Affairs
Robley Rex VA Medical Center
800 Zorn Avenue
Louisville, KY 40206
www.louisville.va.gov

Name
Address

Exhibit C-5. Scoping Postcard.

C.2 EIS Scoping (October 30 – November 30, 2015) Summary

The public scoping period was open for 31 days from October 30 through November 30, 2015. The scoping process provided sufficient opportunity for stakeholders to express their comments and provide meaningful input to the NEPA process. There were 63 unique comment letters, email, and website comments received; three of these letters/emails were submitted by email as well as through the mail or website. The majority of the comments focused on the details of or preference for an alternative, and the impacts related to traffic.

The 63 comment submissions raised 159 total issues, many of which were raised more than once in multiple letters, or for which a single letter submitted multiple issues within the same category. The 159 comment issues fall into the following categories:

Category	Number of Comment Issues
Alternatives	42
Aesthetics	6
Air quality	5
Geology and soils	2
Hydrology and water quality	3
Wildlife and habitat	1
Noise	1
Land use	11
Socioeconomics and environmental justice	9
Community services	3
Solid waste and hazardous materials	4
Transportation and traffic	47
Utilities	2
General impact analysis	3
NEPA process	4
Agency coordination	1
Public involvement	4
Out of scope	12

The following subsections list the issues raised in the scoping comments. The majority of the comments that follow are in the words of the commenter. Multiple comments conveying the same input are generally provided only once.

C.2.1. Comments on Alternatives

I encourage the VA to locate the future site in a walkable location that is accessible for those using public transit. Locating the campus in a place only accessible via cars does not serve veterans well, as many may not have access to a car.

I believe that the construction should be made at the alternative B or C. Alternative B because it is directly on the highway which links various counties outside of Louisville in a way that those not wanting to drive into Louisville will feel served. Alternative C provides the current veterans with a place they already know how to get to and feel comfortable in the surroundings. Alternative A requires the veterans from outside our city to negotiate the Watterson Expressway which can be heavily congested.

Most new VA construction in the US is associated and near current medical schools which supply the majority of care for veterans.

Various numbers reported in the Courier-Journal report the project at cost of \$600,000,000 with cost overrun of \$300,000,000 and last figures as much as 1.5 Billion. A new parking garage at Zorn Ave would cost 1-2 million.

Not included under your alternatives is the best location: in downtown Louisville adjacent to University Hospital and the Medical Center. Of your three "finalists", leaving the location on Zorn avenue and simply improving current facilities and parking is least disruptive to the environment and the community in general, and most convenient for the population the VA serves. Why disrupt the entire community and go against the explicit wishes of the veterans themselves? It's patently obvious that the VA "preferred site" will wreak havoc on the environment and life quality in general, so why do it? It seems that the VA is asking the community to disprove a bureaucrat's determination, not (as it should be doing) proving that the determination is a sound one in the first place. Nothing offered by the bureaucracy to date has met this hurdle, and yet the process streams right along despite indisputable opposition. Stop it while there's still time.

There is no room at the Brownsboro location. Major construction that close to homes and business would cause major damage, trauma, and expense.

The Brownsboro site is really too small for current and potential future needs of the VA hospital. The plot of land acquired by the VA at Brownsboro Road is very small and I cannot see how that small a parcel on land would be able to accomplish anything the VA is trying to do. The site is already land locked and not an overly large parcel of land. We believe it will outlive its usefulness in a very short time.

If there is no room on the property, will our homes be taken by eminent domain so the facilities can be expanded into the area of our **neighborhood? I don't want to be** forced to move out of my home. If that happens, will property owners be paid the full value of their my property, including money spent on improvements? Will residents be given adequate consideration to find and move to an alternative home?

The 4906 Brownsboro Road site is too small for the size of the medical complex being proposed. An example of the poor long term master planning is the two parking garages that are proposed for 3,000+ vehicles. Typically, on a project of this size between 80 to 100 percent of the parking would be grade (surface) parking. The surface parking has two primary advantages. Initially the surface parking has a lower cost. Parking garages have a construction cost of approximately 10 times the cost of surface parking. The second advantage of surface parking is it then becomes an area for future expansion for buildings/services required of the complex. The parking garages can then be built as needed. This concept was used at two suburban hospitals in the Dupont area that have been in operation for over thirty years, as well as the latest hospitals recently built at the Springhurst and Factory Lane areas. The complex the VA is planning will have a fifty to seventy year life span and will need to be expanded. There will not be an adequate amount of space for this expansion. Please include this as part of the scoping process for the Brownsboro site, the Factory Lane site, and the existing medical complex at Zorn Avenue.

There doesn't seem to be any meaningful attempt to make the new facility environmentally friendly.

Veterans would be much better served with a VA hospital nearer other Medical Care & Doctors (i.e., downtown).

It is a mistake to close the outpatient facilities in the Louisville VAMC Region. Veterans need more outpatient care than inpatient care and the increased driving distance/ congestion will present a significant burden to these patients.

Include all short-listed sites in the EIS. All reasonable alternative sites should be included in the Environmental Impact Statement (EIS), and not just include two sites. That is, all of the sites identified in the PEA should be included as EIS alternatives, such as the Zorn Avenue site, the Downtown site, and any other short-listed sites.

We believe that if the VA is taking a second look at the St. Joseph/Old Henry Road site, then the VA should reconsider all four of the original sites, doing EIS on each of them, and not just two of the original four. How were these two sites chosen and the other two left off the new list? Nothing in this process has been transparent, so we question this latest step in an already convoluted process.

St. Joe site offers proximity to the down town medical centers.

The poor decision to close the three community based outpatient clinics in Louisville. Why do you want to send the Veterans across town?

Compare the alternatives and clearly state and provide substantial analysis verifying the decision why one site is preferred over another and provide detailed analysis to back up that decision. Neither the PEA or the EA provided WHY the Brownsboro location was the chosen site over the alternatives and provide analysis and rationale in support. The PUBLIC deserves this explanation and back-up analysis substantiating the decision!

Louisville, KY is working on a plan to end veteran homelessness called RX: Housing Veterans, finding permanent housing for approximately 360 homeless veterans. The reality of homelessness is such that these men and women

need significant support services, including medical and mental health care, which would be provided by the VA. The other support services would come from agencies such as St. Vincent de Paul, Volunteers of America, the **Coalition for the Homeless, St. John's Center, and the Louisville Metro Housing Authority**, to name a few. All are located downtown, as are the emergency and transitional shelters the veterans use and much of the public housing available to them. Putting the replacement hospital further away from downtown will only increase the difficulty these men and women will face when it comes to accessing care, and will deter many, if not most, of them from visiting their doctors or mental health specialists.

I have not heard a definite statement about whether there will be a helipad for helicopters to be used to bring patients to the facility but hope this possible impact will be considered as well.

The Veterans Administration officials and the master planners have all indicated there is no plan to have a heliport at the 4906 Brownsboro Road medical complex site. I find this difficult to believe since every new or renovated medical complex in the last thirty years has a heliport or immediate access to one. I think this is also a JACO requirement for emergency departments. The fact that the medical complex will be in operation for fifty to seventy years causes me to believe that sooner or later there will be a heliport installed. The reason to deny there will be a heliport is obvious. The noise, air pollution, and expressway traffic disruption would not be a desirable feature for the surrounding neighborhoods. The 3906 Brownsboro Road site is also an area that general/private aviation fly over frequently due to the fact there are crossing expressways that general/private aviation often use as guides. This area is also used as an approach to Bowman Field, one of the local general aviation airports. For this reason I feel this site should not be the preferred site.

VA note regarding these and similar comments: As the commenter notes, VA has no current plans to have a heliport at the proposed replacement VAMC.

If blasting is used to dig down, that may have an adverse risk of damage to the structure of my house and other buildings in the area which would cause expense and may be a risk to the safety of people using the buildings. Will the VA pay for any damage caused by the blasting?

Another impact to consider is that it is proposed that in case of emergencies when the VA needs another means of ingress and egress that they will use a rear exit from the property and go down Carlimar to Westport Road. Carlimar is a residential street in a subdivision. This will create a lot of risk to residents on that street, including children playing in the neighborhood, in addition to traffic, noise and pollution in that neighborhood.

Lack of access to the physicians working at the facility: Most of these physicians, as has been voiced by the medical staff, are housed in the downtown area where they can move between hospitals without a lot of time lost due to transportation. Moving the physicians out to the new location for a few patients makes this cumbersome and a serious waste use of time. The commute time is 30 minutes at least.

Veterans do not want the Brownsboro location and they were insulted at a meeting when they tried to explain that.

Veterans prefer the Zorn Avenue location, with renovations and a parking garage; that is what they are accustomed to.

I am a Vietnam vet who uses the VA satellite services and occasionally the Zorn location and am very pleased with both.

Supposedly the Brownsboro site has been bought – why is VA considering the St. Joseph site?

I would like to see VA break ground on a new facility during my lifetime – is that going to happen? You have done all of your impact studies on the Brownsboro site. Build on that site and stop messing around.

With the excellent medical personnel working in the downtown Medical Center, I wonder why a remote location was even considered. The veterans deserve good access to the medical professionals, expensive machines for testing and treatment, and a much better public transportation network.

From what I understand, the **"Brownsboro" site barely meets the requirements for the new hospital and if this is the case, there will be no opportunity for future growth as the property is surrounded by expressways, main traffic arteries and homes. The only way the Medical Center could grow in the future is for the government to force us out of our homes which would not make a lot of us neighbors happy!**

Such a facility will fail to serve well veterans, who for the most part do not live in this area.

If there was a fix for the traffic flow, I would be willing to reconsider my position.
Oppose Brownsboro Site alternative.
Support St. Joseph Site alternative.
Support keeping facility on Zorn Avenue and adding a parking garage.
Support a downtown location that would centralize services accessible to all.

C.2.2 Comments on Aesthetics

It is difficult to discern without seeing further elevations how facing the rear of the facility toward the Watterson could enhance the desirability of the neighborhood. Additionally, placing a typical VA water tower at the corner of US 22 and the Watterson would be a further distraction.

At the Brownsboro site, the many story buildings and parking garage is really out of character with this residential area.

Appropriate planting of trees.

This facility will operate 24 hours a day, 365 days a year. This will result in lights affecting my subdivision.

Buildings of the height and bulk that are being proposed for the site will be constructed right next to an established lovely subdivision of one and two story homes that have been in the area for over 50 years. This will result in blocking sunlight and air flow to our homes.

A hospital built in this location would completely change the NEIGHBORHOOD! YES it is a largely residential area.

C.2.3 Comments on Air Quality

The addition of the hospital at the Brownsboro site will increase pollution.

Air quality issues need to be addressed in the EIS.

Air Quality and Sensitive Receptors in the Area: Additional air monitoring studies are needed as Louisville consistently ranks as one of the worst cities for those suffering from asthma. The VA should measure real-time air quality for pollutants associated with vehicular emissions. This quantitative data should be utilized to create a predictive model of air quality impacts due to the increased traffic as a result of the project. Data should come from monitors in close proximity (<0.25 miles) of the site location. The determination of significance of impact should be done with sensitive receptors as the endpoint. The health and environmental impacts of vehicle emissions must be considered.

The exhaust from cars, buses and trucks at a standstill with motors idling for hours daily is an enormous source of air pollution and frustration, with nary a place for a tree to provide any counteraction.

The additional traffic should be analyzed regarding air quality changes to the surrounding area, delays to traffic, both the intermediate surrounding roadways and how it could affect the regional expressway systems, air quality concentration of two parking garages with a total of 3,000 plus cars and any future expansions.

C.2.4 Comments on Geology and Soils

Structural stability: The 4906 Brownsboro Site has two different limestone formations, the Jeffersonville and the Louisville, in a cross bedding condition with an underground spring according to the specific environmental assessment (SEA). This condition can be the cause of subsurface voids (sinkholes). Over the long term (70 plus years of medical complex operation), the could possibly cause structural instability. The cross bedding and

underground spring deterioration can possibly be accelerated due to the 150 geothermal wells (400 feet deep according to the SEA) and the four to five feet deep drilled pockets in the bedrock (hundreds) to anchor and support the various building structural systems. This condition should be analyzed and a cost provided for any possible solutions.

The 4906 Brownsboro Road site has two different layers of limestone, the Louisville and Jeffersonville layers, as indicated in the specific environmental analysis. Both of the limestone formations offgas radon gas. The Jeffersonville limestone has a range of 0.50 to 22.30 with a median of 1.80 pCi/L. The Louisville limestone has a range of 0.70 to 25.00 with a median of 5.40 pCi/L. Both of the limestone formations have a capacity of being greater than the radon value of 4.0 pCi/L, the Environmental Protection Agency (EPA) action level for radon. The Louisville limestone is virtually certain to be in excess of the maximum allowed (see attachment Preventive Medicine report). Radon is a colorless, tasteless, odorless radioactive gas derived from the decomposition of uranium in the soil and rock. After smoking, radon is the second leading cause of lung cancer. The analysis of the St. Joseph site and the 4906 Brownsboro Road site and the existing site at Zorn Avenue should be done for radon off gassing. Any possible solutions and the cost associated should be evaluated and published for review.

VA note regarding this comment: As with any other commercial or residential building, should radon testing reveal a potential to exceed a threshold of 4.0 pCi/L, a radon mitigation would be installed to reduce the radon concentration to a level below the EPA threshold.

C.2.5 Comments on Hydrology and Water Quality

Parking for 3000 cars will require at least 20 acres of land. It would be best not to use conventional concrete or asphalt to make this parking lot. Run off from the parking lot and the heat generate by this size lot would be an environmental hazard for the community. Pervious concrete or porous asphalt would be best.

Residents in our subdivision have drainage problems already. Having all of the facilities constructed on the property adjoining our neighborhood may cause additional drainage issues with resulting expense and safety risk.

Water Resources - Surface and Groundwater Hydrology: Changes in surface hydrology alter the flow of water through the landscape. Construction of impervious surfaces such as parking lots, roads, and buildings increase the volume and rate of runoff, resulting in habitat destruction, increased pollutant loads, and flooding. The Final Programmatic Environmental Assessment from March 2012 found shallow groundwater in at least one boring from the Brownsboro Road site. Additional sampling should be conducted to ensure no significant adverse impact exists that would affect structural integrity.

C.2.6 Comments on Wildlife and Habitat

The ducks, geese and other wildlife who fed on the grain from this land and have nested for a hundred years on this site will be displaced.

C.2.7 Comments on Noise

This facility will operate 24 hours a day, 365 days a year. This will result in noise affecting my subdivision. There will be the noise from ambulances. There has been talk of landscaping to help screen but landscaping is not going to adequately reduce these impacts.

C.2.8 Comments on Land Use

The EAs suggests that a nearly 900,000 square foot hospital and 2 8-story parking garages with 3,000 parking spaces along with a water tower, an administration building, and additional clinics are similar to a mixed use development with residential and retail space. **THEY ARE NOT SIMILAR.** The original proposed hotel in the Midlands development would at maximum have been 100,000 square feet and at least 40 feet lower than the planned hospital. **THIS IS NOT SIMILAR.** The town center would have been developed with the neighboring communities in mind, keeping the fabric of the area intact. There would have been patio homes, condominiums, retail space and walking paths. None of this is in the planned VAMC. The planned hospital **DOES NOT** blend with the residential neighborhoods it borders, and I submit that if a commercial hospital were to be proposed for this site, it would be categorically denied based on the fact that it does not fall into the Planned Development guidelines.

It does not create a development that is **"livable, diverse, and sustainable."** **In fact, the proposed hospital is not livable or diverse.** As far as sustainable, the hospital is supposed to last only 30-40 years before becoming obsolete.

It does not "promote efficient and economic use of the land." In fact, the VA overpaid for the land at the beginning of the project.

It does not "respect and reinforce existing communities, integrating development with existing development to ensure compatibility." In fact, it is **NOTHING** like the surrounding community.

It does not "promote development patterns and land uses which reduce transportation needs and which conserve energy and natural resources." In fact, it will create tremendous traffic issues and cause the state to have to reconfigure a major interchange and widen several state roads in order to try to reduce traffic congestion at the cost of millions of taxpayer dollars. It also can only be reached by a vehicle, which does **NOT** conserve energy or natural resources.

It does not "lower development and building costs by permitting smaller networks of utilities and streets and the use of shared facilities." In fact, the utilities will have to build electrical substations and rebuild water and sewage lines in order to accommodate the proposed hospital.

It does not **"protect and enhance natural resources."** In fact, it destroys prime farmland.

It does not "promote the development of land that is consistent with the applicable form district." In fact, it is nothing like the form district Town Center, which this land is currently designated. It will not have living space, retail space, or office space open to the public.

It does not "encourage a variety of compatible architectural styles, building forms, and building relationships within a planned development." In fact, there will be nothing at all compatible to the surrounding structures, nor will any of the buildings look anything like the buildings of a Planned Development.

It does not "preserve the historic development patterns of existing neighborhoods." In fact, there are **NO** buildings or parking garages of this size anywhere near the planned hospital.

The area is residential and has no multi-story non-residential buildings. The proposed project would profoundly change the longstanding character of the area and Eastern Jefferson county.

C.2.9 Comments on Socioeconomics and Environmental Justice

As a neighbor, I would welcome a nicely designed suitably situated VA Hospital on this site if it enhanced property values while keeping traffic flow at a bearable level.

Environmental Justice and Socioeconomics impact analyses have been severely glossed over previously in the PEA and in the Draft Site-Specific EA, resulting in a very misleading "no impacts" conclusion by the VA:

- My previous comments on the PEA and on the Site-Specific EA continue to be inaccurately summarized and grossly minimized in the EA documents.

- In order to understand important Environmental Justice and Socioeconomics issues with this project, there is a long-overdue need to provide demographics showing where Veterans to be served by the new VAMC are living now and where they will be living in the future. The probable answer is in the West End / Downtown area, in the Southwest area, and in the South End area where all the Military Recruiting Stations are located in Jefferson County . . . and not anywhere near Brownsboro Road, where no Military Recruiting Stations are located in the vicinity.
- The previous military draft has provided an existing broad geographic dispersion of Veterans, but the all-voluntary military is primarily being recruited elsewhere in the County, with far less military recruiting in the East End than in other parts of the County. That is, it is not fair for minority and low-income areas of the County to furnish most of our soldiers, and then have all of the Federal investment and development occur in the upper-income part of the County. The unfairness of these demographics has not been addressed to date in the PEA or in the Draft Site-Specific EA.

VA note regarding the two comments above and similar ones that follow: As stated in Section 1.1, the Louisville VAMC serves Veterans from a 35-county area in western Kentucky and southern Indiana. It does not serve any one Louisville area or neighborhood.

- These demographics should have been provided in the PEA and in the Draft EA, but were not provided even after being requested. Federal law (NEPA) requires that Environmental Justice and Socioeconomics be adequately and fairly addressed

The minority and low-income areas of the community are supplying essentially all of the people / investment needed for our military, but are receiving very little if any of the economic benefits and jobs associated with a major new healthcare facility and the other facilities to be located nearby.

Effectively address the socio-economic impact to the locale neighborhood and surrounding community. The EA **relied upon conclusions drawn in the PEA concluding "No Significant Impact" without analyzing the project** site specific location(s) demographics. Using the City demographics when analyzing socioeconomic impact instead of demographics specific to the direct surrounding (population density, etc.) to analyze the socioeconomic, noise, air quality impact is inadequate and flawed. City demographics is boiler plate and could be used in any construction project providing no relevance. This observation and issue was brought up with the PEA but never addressed.

I am concerned about the impact of the proposed VA development on the value of my home. My husband and I have lived here for over 17 years and had planned to live here for many more years. Before the site was picked, we spent quite a bit of our savings to remodel our home. At that time, the values of property in this neighborhood had been increasing, especially for the ones that had been updated. Values had been coming back and increasing even after the recession. However, I have been watching the sale prices of homes in this neighborhood, and from that and anecdotal information from people about not even looking at homes in this neighborhood because of the potential problems from the hospital, homes seem to be selling for lower prices since the announcement was made to select the Brownsboro Road site for the VA hospital. This is having an adverse impact on property owners in the **area. I don't want to move from my home but if this project continues, the conditions may become unbearable. I also don't want to lose money selling my home. I have not seen anything about mitigating this impact or compensating property owners for the adverse impacts on the value of our property and our quality of life.**

Having a hospital facility of this magnitude here is likely to cause a change in the nature of the businesses in the area. Right now, we have neighborhood shopping centers, with groceries, drug stores, and other businesses that provide goods and services for the residents in the area. What impact will the proposed VA facilities have on this? Will other medical-related businesses come into this area like has happened around the hospitals in the Breckenridge Lane and Dupont Square area? There is limited space for additional businesses so will these come in and replace existing businesses?

C.2.10 Comments on Community Services

The proposed VA facilities will also have an impact on the emergency services in the area if they are required to provide service to these new facilities. Who will bear that cost? That will create additional risk to other people in the area if the emergency services are being used at the VA and are not available when other people need them.

When families and visitors come in from out of town, where will they stay? There are NO hotels in the Brownsboro Road/Watterson Expressway interchange area. There used to be one that still shows up on hotel search sites sometimes but it closed several years ago and was replaced with a small shopping center. It looks like the closest hotel is located on Zorn Avenue near the existing VA hospital site.

Public Safety: The EIS should include an evaluation of the potential impacts of the project on public safety. The evaluation should include an assessment of the direct, indirect, short-term, long-term, and cumulative effects that the project will have on the Suburban Fire Departments that each site would work with. Unlike Metro Louisville Fire Department, the suburban fire departments of Middletown and Lyndon are not funded as part of the Metro **Louisville's annual budget. They receive the bulk of their revenue from property value assessments;** that is, for every \$100 of property value they receive \$0.10. If either of these site locations were developed residentially or commercially the fire departments would receive funding based on the value of the development; however, when the site is developed as a federal project the fire departments will receive no funding. They will be required to provide services that are not within their budgetary means. How will having to provide these new services affect not only the proposed hospital but the community as a whole? The unique nature of this project will necessitate significant training in areas ranging from large-scale evacuation and mass casualty incidents, to terrorist threats and industrial emergencies as well as a full time inspector for the fire prevention office.

C.2.11 Comments on Solid Waste and Hazardous Materials

Hazardous waste in a hospital does not belong in a neighborhood setting.

Even bigger concern is the solid and hazardous waste that would be transported thru these residential areas.

Some officials trying to justify a new site have said the current VA site cannot be used for the replacement hospital because it is contaminated by Agent Orange. Martin Traxler, Director of the Robley Rex VAMC, says that is absolutely not true. So if the current site is just as large as the proposed site, why not rebuild or improve on the existing site?

Note from VA: As acknowledged by the commenter, VA has previously responded to this question. VA has no knowledge of any Agent Orange contamination at the Zorn Avenue campus.

C.2.12 Comments on Transportation and Traffic

It is hard for me to believe that anyone of sound mind who has driven in this area of town feels that this is the best site for the new hospital. The traffic is difficult to navigate at all times of day even with the new exit coming off 264, traffic backs up onto the highway which is dangerous for us who live in the area not to mention for a vet trying to find his or her way through a congested area. Building this hospital in an area easier for our vets to navigate would be one way to tell them how much they are appreciated for their service to us all.

The statement that traffic will be unaffected due to the improvements at the US42 – Watterson interchange which will render the traffic impact virtually unchanged is incorrect. Currently the traffic during rush hours and discharges from the 4 neighborhood schools cause the traffic on Old Brownsboro to predictably backup to the light at Herr lane and further. This was omitted from the traffic study although it was apparent in the live simulation at the public hearing for the US42 - Watterson Expressway Exchange Improvement public meeting. The queue of backed up vehicles, as I have described, was unchanged by the Improvement Proposal(s). Since the VA hospital must blend into this backed up stream of traffic to get to the US42 Watterson interchange, the Impact Study, in regards to traffic being unaffected, is incomplete and misleading.

A new VA hospital at Brownsboro Road will create a great traffic problem as now there are great traffic problems. With 3000- 5000 cars per day added we will have gridlock and after the building is in place there will be no way to correct it. Again the VA Administration will be blamed for poor planning.

The traffic congestion will make access to the Brownsboro site difficult, as the KY Transportation cabinet in the traffic survey has shown, traffic at peak times going from 3000 cars per peak to 15,000 cars.

As a neighbor, I would welcome a nicely designed suitably situated VA Hospital on this site if it enhanced property values while keeping traffic flow at a bearable level.

Our subdivision exit is direct into the intersection of Highways 22 and 42. Current when traffic is heavy during the hours 11:30am to 1:00pm and 3:30pm to 6:00pm we have trouble exiting because people tend to block the intersection. The early traffic can be as many as 20 school buses. By adding the employees from the VA facility we feel the traffic would become impossible if any of we senior citizens in Northfield should have an emergency.

Increased traffic at the Brownsboro Site will be a nightmare & issue: 3000 to 5000 or more additional cars in & out per day, 2100 of which are employees alone). 22/42/Watterson is, right now, a nightmare for traffic. This facility will only massively compound huge traffic problems at Brownsboro Rd / 22/42/ Watterson & at many neighboring streets. The exhaust fume issues alone from all the long traffic backups and huge number of extra cars can only be problematic. Rush hours and school hours will be much more problematic than they already are.

The huge disruptions to the area during many years of construction will be massively **problematic.... plus resulting highway and expressway construction "improvements" which** will never really fully cope with the traffic volumes. And all of this will seriously erode what has been for years a primarily residential area.

Due to the proposed Brownsboro site having limited access from only one two lane road, hwy. 22' there will be increased vehicle traffic and resulting pollution. Since the construction of the slip ramp exiting I 264 the traffic in the area has already heavily increased in the last two years. As a resident of Crossgate we see this increase every day trying to enter and exit our subdivision. The resulting exhaust pollution from vehicles stuck in gridlock will be a hazard. This traffic gridlock will and already impacts hwy. 42, hwy. 22, and I 264.

Please perform an in-depth traffic impact study focusing on peak travel times to the facilities for workers, patients, etc., and on the AM and PM peak periods. Specifically look at future build and no build options and the impacts on adjacent transportation facilities including KY 22, US 42, I-264 including the interchange. Measures should include LOS, delay, V/C ratios, etc. Also examine how transit, ride sharing and other transportation demand management practices can become part of the overall operating plans at the chosen site.

Conduct detailed traffic studies at each location.

The Brownsboro Road location is a disaster in traffic. At rush hour it is backed up in every direction.

Traffic around the Brownsboro area is already a concern and continues to grow yearly. The addition of the hospital at this site will cause further congestion and traffic delays, and make it difficult for ambulances to access the hospital in a timely fashion, which could result in loss of life.

We really don't need the extra traffic on Brownsboro Road and 264. The area is already inundated with traffic at all hours. We have many businesses and 3 schools in the immediate area and adding more traffic would bring everything to gridlock. Every year more and more traffic is brought in.

It will take 400 full time 24/7 employees at the at the hospital, not to mention the outpatient staff members, consulting physicians, patients and family members going to the VAMC. Adding to the congestion and resulting in poor air quality in an already congested area.

Traffic will be significantly impacted by this development and will contribute to the overall degradation of the air quality of the surrounding areas. We submit that a new traffic study should be completed as part of the EIS. The last traffic study is now two years old, and traffic has increased significantly since then. The EIS also needs to factor in the traffic that will result from the closing of the CBOCs Section 3.13.3 Environmental Consequences, page 63 indicates a 39% and 31% increase (> 20%) in traffic at KY 22 & I264 VA entrance and a 9% and 13% increase at KY 22 & US 42 during the morning and evening peak hours, respectively. The weighted average morning and evening peak ADT increase is 30% and 24%, respectively (> 20%). FONSI are FLAWED. Comments and questions are as follows:

- (a) Detailed assumptions for current and projected VA ADT (employees, visitors, patients (inpatient & outpatient), deliveries, volunteers, etc.) used in the analysis is not provided.

- (b) 753,000 annual outpatient visits are projected annually within 10 years.
- (c) No analysis for year 2023 is presented when the hospital starts operation
- (d) Traffic from the probable closure of the CBOCs at Newburg, DuPont, and Shively is not included in the traffic count.
- (e) The site known as Providence Point is now planning a complex with 519 apartments and thousands of feet of retail space. This traffic is not included in the traffic count.
- (f) KY 22 & I264 VA entrance ADT is reflected now at 21,400. The 2,150 VA employees (1,750 Hospital & 400 Administration Building) alone will increase ADT by 4,300 on the first day of operation, a 20% increase (4,300 / 21,400).
- (g) Rough Estimate of Total Increased ADT at KY22 & I264 VA entrance (from page 63):

Peak ADT = 918 (918 * 1 hour)

Off Peak ADT = 4,255 (185 * 23 hours)

Total ADT = 10,346 (918 + 4,255) * 2

% Increase in ADT = 46% (10,346/21,400) or 43% (10,346/24,300) > 20%

Page 62 states "the proposed action would significantly contribute to the degradation of the LOS at the KY 22 & I-264 intersection, but mitigates it with anticipated KYTC improvements but provides absolutely NO evidence substantiating this conclusion. An EIS should investigate the increase in average daily vehicle traffic volume of at least 20% on access roads to the site or the major roadway network. It will conclude the additional amount of traffic a new VAMC would add will indeed be a SIGNIFICANT IMPACT.

Please locate the VA hospital in a location on better buslines. the bus number 15 is the only bus out there and there's a half hour between trips on weekdays and longer on Sunday. The West end could use a hospital and bus 23 leaves every 15 minutes which would make the hospital here very accessible.

The addition of so many extra vehicles; occupied by older people going to the VA and students from the schools, would make an already terrible situation impossible.

Public transportation service to that location is spotty. How can people get from Downtown where many of the lower cost housing is or from the southwest part of town on public transportation? They might have to take two transfers and 2 1/2 hours to get there. Access to a hospital is paramount.

Since the VA proposed to build a hospital and other administrative facilities on this site, there have already been **adverse impacts. Traffic has gotten worse even before there has been any construction at the site. The "slip ramp"** from the Watterson Expressway to Brownsboro Road that was to enable access to and from the Brownsboro Road property has exacerbated an already dangerous situation. It is much harder to get in and out of our subdivision. I know that some people use the slip ramp even though they are going to US 42. They use it as a **"shortcut"** and this results in traffic on Brownsboro Road that wouldn't have been here. Please note that Brownsboro Road is 3 lanes from its start at US 42 to the intersection at Herr Lane/Lime Kiln Road. There is a large neighborhood shopping center, several small shopping centers, stores, restaurants, a church and a gas station in this section of Brownsboro Road. Most of these have their own access directly onto Brownsboro Road so there are a lot of cars turning in and pulling out of these. At busy times of the day, there are solid lines of traffic and it is hard for me to get in and out of my subdivision to go to work or other destinations. This is before any additional traffic from construction or operation of the proposed hospital. This increases the risk of accidents and injury.

The issue of traffic congestion has been discussed extensively. All of your consultants (OA, Oculus and PJM) and KTC (Palmer) concluded that the traffic congestion can be mitigated with KTC's plans. However the level of service (LOS) can only be improved from obsolete to B in one category and all the rest remain C and D. {see page 99 of June 8, 2012, Final PEA study}. This multi million dollar construction project proposed by KTC is to last 15-20 years. Why are these levels of services acceptable to the VA? Especially in light of the closing of most of the VAMC outpatient facilities and the need for all of the veterans to travel to this new site. I attended the KTC meeting in July, 2014 presented by Palmer. The presenters said that the East End Ohio River Bridge and the increasing population of Oldham Country were not taken into consideration when the I-264, US42, I-71, and KY22 improvements were designed. All the more reason to demand that the LOS be A or B across the board. The

improvements proposed by KTC in 2012 are projected to be complete by 2020. Therefore the roadways will again be obsolete by 2028.

In addition, the traffic light on Brownsboro Road at the end of the slip ramp has already created a traffic hazard between that light and the traffic light at US 42. People trying to get in and out of the restaurants, bank and gas station are crossing lanes of traffic and blocking the other traffic. On the other side of the light, the traffic on Brownsboro Road heading to US 42 is already worse in part because of the traffic island that cuts off one of the lanes that used to turn right at the curve. Now traffic backs up further east on Brownsboro Road because cars have to be in one lane around the curve until there are two lanes. This makes it harder to get in and out of my subdivision.

The studies should consider the adverse impact on traffic on the surrounding roads and existing home and businesses. The proposed facilities will have to be accessed by cars, buses, trucks, ambulances and other emergency vehicles as well as pedestrians. Traffic on surrounding roads is already very heavy. To get to this site, people will be traveling on the Watterson Expressway or I-71, US 42, Brownsboro Road. Other roads that will see increased traffic are US 42 from the west, toward Louisville, or the east, from Prospect. Herr Lane and Lime Kiln Lane will see increased traffic, directly or as people try to find alternatives from the already crowded expressways. In looking at traffic impacts from the proposed VA facilities, it should be considered that a lot of the people coming **to and from the facilities do not live in this immediate area so it will be "new" traffic so it will have an** impact on all of these roads. There is already a lot of traffic in this area, including traffic to and from five nearby schools. Consideration must also be given to the increased traffic that will occur when the East End Bridge is finished. In addition to people traveling on the Watterson and I-71 from other parts of the area to get to or from the Gene Snyder Expressway to access the bridge, I think there will be increased traffic on US 42 and I-71 with all the people who want to cross the East End Bridge but cannot access it from US 42. There will be no entrance or exit from the bridge from US 42. The only access will be from the Snyder. So many people in areas along US 42 east of the Watterson who want to cross that bridge may come in US 42 to the Watterson to I-71 instead of going further out to the Snyder because they would have to head south on the Snyder and then use the cloverleaf at I-71 to get turned around to head north on the Snyder to go back to the bridge. This should be considered in the study of traffic in relation to the proposed VA facilities.

Traffic for the VBA and clinic patients must also be considered.

What if my house catches on fire and the fire trucks cannot get to my house because they cannot get through traffic? What if I need emergency medical care and the ambulance cannot get to my house or cannot get through the traffic to get me to a hospital quickly? The only way in and out of Crossgate is Brownsboro Road. So increased traffic will make it much harder for me to get in and out of my subdivision and will increase the risk of accidents.

Without a doubt, a hospital build in the Brownsboro corridor will severely constrict the already overburdened and area already-identified as a **'FAIL' in congestion by the Kentucky Transportation Cabinet**. The KTC believes that spending a proposed \$9 million and rerouting traffic in this area will only result in a **"D - " rating in traffic flow**.

My main concern is the added congestion of traffic that will be added to an already overly congested area. Congestion in the area: the area has major traffic problems at this point at several times of the day. It may take 20-30 minutes to come up US 42 to get to the facility at several times of the day. Also coming from I-264 from either direction is significant delays.

Access by Veterans: There are very few veterans who will be accessing the facility that live within a 10 mile radius of the facility. Also public transportation is much less in the area making it difficult to reach for many veterans.

I am deeply concerned that an almost impossible traffic congestion area in the Brownsboro Road/Watterson Freeway interchange will get dramatically worse with a hospital in this location.

Since 1988 I have lived near the intersection of Brownsboro Road and I-264, both off Rudy Lane and off Brownsboro Road. Every year the traffic gets worse. It is so bad now that going home traffic results in "parked" cars congested in the right lane of the freeway. I fear being hit by a car coming way too fast with the driver unaware of the snarled traffic ahead. Veterans and their families will be appalled at that dangerous intersection. How will ambulances negotiate with that congestion? The slip ramp off I-264 is a good idea, but it does not solve the problem of too many cars on a two lane freeway. The proposed entrance to the VA Hospital is planned for a very small intersection which will make driving less safe and more irritating for the personnel, and patients of the hospital, not to mention the neighborhood residents.

I wonder how veterans without personal cars will get to the proposed hospital. Public transportation in the Brownsboro area is not optimum, with long waits for buses. A downtown VA hospital would be more centrally located in metro Louisville and would be served by more buses routes.

The biggest concern is the current traffic in this area is about maxed. The congestion in the HWY 42/HWY22 intersection often causes back ups both ways on HWY 42 - for a couple miles in rush hour and in school dismissal hours. I cannot imagine how the road system - both 264 and HWY 22/42 can handle the masses that would be traveling to the hospital. I pity the patients, their families and the employees who would be faced by this obstacle.

Traffic in our area is already impossible at certain times of the day. It can take me 15 or more minutes to get to the gym (which is only a mile or 2 from my home). There are times when we have to sit through three cycles of a single stop light due to traffic. DO NOT ADD TO THIS PROBLEM by putting the VA hospital at the Brownsboro road location.

The building of the new VA hospital at the intersection of KY 22 and the Watterson Expressway will only create more traffic and subsequent congestion in the area. The new East end bridge will eliminate an exit from the Snyder Freeway to US 42 and thus put additional traffic on KY 22 headed West to the new VA facility. There is no way this two lane road can handle this load.

Data from the KY Dept. of Transportation indicates much greater traffic congestion in the area which they currently rate D.

I have suggested to KYTC as part of the traffic study portion of the EIS that the current traffic lights be re-timed in such a way as to mimic the traffic configuration as if the hospital was in operation to give the VA and KYTC a real understanding of the traffic issues for this site. This is such a low cost and low tech way to see the traffic problems in real time. There will be no need for formulas or guesstimates as to how the traffic patterns will look.

The supposed new interchange at the Watterson Expressway and US 42 should be made the catch all solution to the traffic problems. The interchange will not be completed anytime soon. The interchange that will be selected will be the one that is not necessarily the correct one but the most inexpensive one. It will not be the total solution for he ensuring traffic brought on by the hospital.

The traffic that is to be generated by the medical complex will be approximately 11,000 vehicle trips per day. The 4906 Brownsboro Site has approximately 21,000 vehicles that go through the entry intersection to the medical complex site on a daily basis, according to the recent specific environmental assessment. The St. Joseph Site traffic so far has not been determined and/or released to the public. The additional traffic (vehicular trips per day) should be evaluated at the current Robley Rex site, the St. Joseph site, and the 4906 Brownsboro Road site. The additional traffic should be analyzed regarding air quality changes to the surrounding area, delays to traffic, both the intermediate surrounding roadways and how it could affect the regional expressway systems, air quality concentration of two parking garages with a total of 3,000 plus cars and any future expansions.

C.2.13 Comments on Utilities

Solar panels should be place on the roof of the hospital. This is environmentally responsible as well as cutting the expense of operating the hospital. Use the money you save heating and cooling the hospital to provide of veteran services.

Utilities: To date there have been no obvious cost-benefit analyses to indicate site performance from one location to another. It is reasonable to expect that utility infrastructure costs related to the project be considered in order to assure an informed decision. If this is prepared it has not been made readily available to the public. I have no doubt that there are engineering solutions to ensure all utilities are available, but at what cost?

C.2.14 Comments on General Impact Analysis

What you owe me and everybody in the full EIS undertaking is a FRESH evaluation that disregards previous VA actions in the Robley Rex VAMC replacement process. VA's ownership of the Brownsboro Rd site SHOULD NOT be a factor.

Note from VA: VA's ownership of the Brownsboro Site is not a factor in identifying and comparing the environmental impacts of the alternatives evaluated in this EIS.

I hope the new environmental study is honest and above board which I don't feel has been the case previously.

PLEASE examine carefully ALL the impacts in your **environmental study ... impacts during the construction period**, at the time of full utilization, and multiple years afterward.

C.2.15 Comments on NEPA Process

Traffic congestion needs to be addressed in the EIS.

We are very concerned that Labat Environmental, Inc. is conducting the EIS after previously stating prior to the draft EA that they believed the EA would return with a Finding of No Significant Impact. We do not have faith that Labat Environmental, Inc. will have any kind of objective findings regarding this location.

Note from VA: After reviewing the overall NEPA record and the public comments on the draft site-specific EA, Labat and VA agreed that the appropriate level of NEPA documentation for this proposal is this EIS.

We are VERY concerned that the traffic study and/or EIS will be conducted by the same contractor that executed the previous PEA, EA and/or traffic study. There is a valid perception of government-to contractor collusion and contractor favoritism, if not fraud on behalf of the VA to receive results that the VA would deem favorable to continue the build on this congressionally cited-overpaid property.

Note from VA: An EIS (or EA) is not an audit. A federal agency contracts with firms such as TTL and Labat when the agency does not have the staff resources or full range of needed expertise to prepare a NEPA document in-house. The agency is the author of record of a NEPA document.

A full EIS has not been done as required by the National Environment Policy Act. A full EIS will bring to light new facts that have not previously been considered.

C.2.16 Comments on Agency Coordination

There is no input from the following agencies: Louisville Metro Air Pollution Control District, Louisville Economic Development Department, Louisville Inspections, Permits, and Licensing Department, Jefferson County Soil and Water Conservation District, and Louisville Planning and Design Services. Although the report says that comments will be added in the final site-specific EA, we feel that these agencies need to have their comments submitted BEFORE the final EIS so that the community can consider their input on this site. It is a huge disservice to all involved for their comments to not be available for the public.

Note from VA: City and county agencies were notified of VA's intent to prepare an EIS and the opportunity to submit scoping comments; see Section 6.1. They have also been notified of the availability of the Draft EIS for review and comment, and their input will be considered in preparing the Final EIS.

C.2.17 Comments on Public Involvement

I would like to view the information online concerning the 2 proposed VA replacement sites (and the no build scenario), but the link provided on the postcard my agency received doesn't work. Can you please provide me with a way to view these materials?

Note from VA: In response to this comment, VA verified that the published link works.

An in-person public Scoping Meeting should be held to ensure that the active citizens, government officials, and Veterans are up-to-date on the current issues and status of the EIS, and to help identify key overall issues for the EIS.

Note from VA: A single request for an in-person meeting was received. VA determined that the published notices and fact sheets adequately updated the issues and status of the EIS, and therefore a meeting was not held.

EA and EIS comments from the public should be reported correctly in the EIS documentation, rather than the substantially abbreviated and totally incorrect summaries shown in the May 2014 Scoping Report, and in the December 2014 Executive Summary table for Socioeconomics and Environmental Justice.

I have **attended all of the meetings the VA has sponsored regarding the "Brownsboro" site** except the last one and must say they were a waste of time. At the first couple meetings, questions were taken and promises of answers were made by the officials in attendance. To my knowledge no answers were ever received and the meetings which followed were to present the design, etc. It appears the meetings were nothing more than opportunities for **the VA to "check the box" that they** had fulfilled the communication requirements to the affected public and nothing more.

C.2.18 Comments Outside the Scope of the EIS

I am so very ashamed of how vets have been treated medically and this location will only add to their problems. The VA needs to take a hard look at how money has been spent in many cases and this is just one more example of the attitude that this agency seems to have concerning those who have served our country with few rewards.

I would like to encourage the preparers of the EIS to include careful consideration of the future of the existing VA facility on Zorn Ave. in the event it is replaced by a new hospital near the Watterson. The existing VA facility on Zorn is surrounded by residential neighborhoods on several sides. It would be very important that the facility not be simply abandoned but put to some good use compatible with its residential location and protective of the safety of the surrounding population. Will it be reported excess to GSA and repurposed by another agency? Will it be declared surplus and sold to the public? Etc.

VA should sell the 22 & Watterson site and construct this facility on a larger site. Or it should consider using the property in some other way, such as an annex to the Zachary Taylor National Cemetery.

Vets should be able to go to any doctor or hospital they wish and carry a "Vet" insurance card that directly bills to the VA.

It appears that there must have been something underhanded that transpired as the price paid is very **significantly great then the value. Please don't compound the** problem of cost by continuing to stay there. The land should be sold or used as a cemetery.

I also object to the highly inflated purchase price of the land at I-264 and Brownsboro for the hospital. Due diligence and better negotiation should have indicated "This is not the site." Someone should work on recovering the money paid far beyond a reasonable cost.

The VA paid well over \$3 million more than property market value casting a shadow of corruption over the development.

C.3 Input Received During Previous EAs

Throughout the scoping and public draft reviews for the two previous EAs related to this proposal, extensive public input was provided by Veterans, elected officials, residents near the alternative locations, and other interested members of the public. These comments remain in the project record and have been incorporated as identified scoping issues for this EIS.

C.3.1 Comments on Draft Programmatic EA

On the draft programmatic EA, VA received 28 verbal public comments, 109 written comments from individuals, 144 petition signatures/emails, and input from Greater Louisville, Inc., the City of Indian Hills, and Louisville Metro Council. Many of the responders provided similar comments and many provided multiple comments, which were addressed in Appendix D to the final programmatic EA. The issues raised in these comments are listed in Table 6-3, as summarized in that EA.

C.3.1.1 Comments on Traffic and Transportation

Traffic around Brownsboro Site is already bad and will be made worse by the proposed VAMC.

Will Carlimar Lane (south of Brownsboro Site) be affected/used as an access point for the proposed VAMC?

Concern about children in the neighborhood, parked cars along road; don't want people to use it as a cut through to Westport Road.

The Draft PEA indicates that the I-264/Westport Road intersection was opened in April 2011 and that the traffic study was conducted using data obtained from February 2011, prior to the opening of the intersection. This is incorrect; the I-264/Westport Road intersection was opened in April 2010. Was traffic study done correctly?

Why did VA ignore traffic study findings that suggest major traffic issues?

The traffic impact analysis does not appear to include related support services vehicles such as delivery trucks, in-patient visitors, ambulances, etc.

Did the traffic study account for KTC's planned Right In/Right Out changes to the US 42/Old Brownsboro Road intersection?

There is a conflict of interest – both the site owner and the VA have used the same company for the traffic study.

Does the traffic impact analysis adequately address egress from the proposed VAMC at the Brownsboro Site? It appears that the study focuses on ingress only.

Traffic study does not expand far enough from the Brownsboro Site. It should include the effects on Brownsboro Road west of the Watterson Expressway. It should also be expanded to assess the impacts to the Crossgate community.

VA stated the need for 2,400 parking spaces to be shared by 3,700 cars. With these projections it appears that street parking may occur in the adjacent subdivisions at the Brownsboro Site.

How much will it cost to implement the necessary roadway improvements and who will pay for them?

The PEA notes that the proposed VAMC at the Brownsboro Site could have a significant adverse effect on traffic and that these impacts would be mitigated to less-than-significant levels, but does not adequately analyze the traffic issues and does not adequately discuss how the traffic impacts would be mitigated. The PEA states that **these analyses would be addressed in the SEA. Why would the VA spend millions of dollars of taxpayer's money to purchase the Brownsboro Site without knowing beforehand that significant impacts can be mitigated? VA should conduct additional studies, including an EIS, before taking further action on the Brownsboro Site.**

There is no good public transportation to the Brownsboro Site. Have there been studies on the impact to Veterans who rely on public transportation? Suggestion to consult with TARC to arrange for better public transportation.

Access to the Brownsboro Site would be too limited for a VAMC. The only access would be from the north.

The Brownsboro Site area has an inadequate sidewalk system for the proposed VAMC.

C.3.1.2 Comments on Site Selection

All new VA hospitals are being built in downtown locations. Why not build the VAMC downtown – close to doctors, University facilities?

The Draft PEA omits that former mayor, lieutenant governor, University of Louisville, and Courier-Journal recommend that the VAMC be constructed downtown.

Why did VA ignore Veterans desire to keep the VAMC at Zorn Avenue? Other expressions in favor of keeping the VAMC at Zorn Avenue.

Discuss and compare costs of property acquisition, transportation improvements, etc. for the various options, including staying at Zorn Avenue. Costs associated with the Brownsboro Site are greater than other options. The St. Joseph Site provides 3 times the space for ½ the price of the Brownsboro Site.

Why is VA planning to build the VAMC on a site (Brownsboro Site) that is too small/inadequate for future growth? Will the Brownsboro Site provide adequate space for future Veterans needs 20-50 years from now? What additional expansion would be included in the future? Would the VAMC be expanded onto the surrounding properties in the future through eminent domain?

The Brownsboro Site does not possess adequate hotel, retail, and food outlets.

Was consideration given to buying the Jewish Hospital (near St. Joseph Site)?

Could the former River Road Country Club property (owned by the City of Louisville) be used in addition to the **renovated Zorn Avenue facility to meet VA's needs?**

Could a new parking garage at the Zorn Avenue facility solve the problem?

In past 15 years, how many VAMCs were constructed in similar densely populated neighborhoods? Where are they located?

Veterans and VA staff would be better served if VA would select a site where the VAMC is welcomed, not opposed. VA should consider land already owned by the Federal government.

Why didn't VA look for large vacant tracts of lands and then contact the site owners to see if they were available?

C.3.1.3 Comments on Water Resources

Underground water in Graymoor. Sump pumps run for weeks after a lot of rain. Concerned that hospital at Brownsboro Site will make this worse.

Has drainage been addressed?

C.3.1.4 Comments on Communications

It has not been made clear why the Brownsboro Site is preferable. Drawbacks seem numerous. It does not seem that the process has been conducted with transparency or true concern for the needs of Veterans.

Please provide the pros and cons for each considered site.

Share all comments on the Draft PEA with the public. Include comments from previous meetings which have not been shared. Where and when will public have access to public comments?

Will Veterans' input be shared with the public?

Why did VA not have better contact, communication, and feedback with local neighbors?

Who is the VA informational contact for those who live in the area?

Once a site is selected, what efforts will be made to involve those living in the area to give input regarding binding elements of construction?

Will public have opportunities to meet with VA again to gain info regarding timelines, design, and landscaping plans?

Public meeting concerns – audio problems, format/presentation.

C.3.1.5 Comments on Socioeconomics and Environmental Justice

Veteran users are not geographically dispersed. Recruiting in Jefferson County is in the Southwest, West, and Central, where minority and low income populations are located, not in high-income Northeast Jefferson County where proposed the VAMC would be located. Investments and benefits of the new VAMC should be targeted to existing recruiting centers, closer to low-income and minority populations.

Why doesn't the PEA include an analysis of the local neighborhood and community? Federal Financial Institutions Examination Council data is available that indicates that the residential population around the

Brownsboro Site is much denser than that near the St. Joseph Site. The Brownsboro Road Site is surrounded by 5 Metropolitan Statistical Area (MSA) tracts with a total population estimated from 25,000 to 32,000 and 1-4 family units of 9,000-11,000. The St. Joseph Site includes only 1 MSA tract which includes a population of 7,476 and 1-4 single family units of 2,536. No other large hospital in Louisville backs up into a single-family residential community like what is being proposed. Why would VA choose to construct a massive facility in such a densely populated area which directly borders single family homes while the St. Joseph Site is in a much less populated area with no single family homes bordering the site? The PEA does not adequately address potential significant adverse impacts to the surrounding residential area.

C.3.1.6 Comments on Aesthetics

Build a brick wall, flanked by trees, between the VAMC and the Crossgate community.

Concerned about lighting impacts at the Brownsboro Site.

Concerned about aesthetics impacts at the Brownsboro Site.

Concerned about the loss of green space at the Brownsboro Site.

How can VA accommodate maintaining Old Brownsboro Road as a Scenic Corridor as designated by the City of Louisville?

The Draft PEA states that the Brownsboro Site was rezoned as Planned Development in anticipation of a mixed use development, including a six story hotel and that, as such, a similar sized VAMC likely would not be considered a significant adverse aesthetic impact to the area landowners. This statement is false. The proposed mixed use development included high end residences and was designed to complement the surrounding community. It incorporated greenspace, trees, walking paths, and was to include high end retail shops and restaurants. Although the development included a hotel, which many opposed, it was located on the back and north side of the property along I-264, not in the middle of the site such as the proposed VAMC.

C.3.1.7 Comments on Air Quality

Concerned about pollution and dust from the Brownsboro Site.

C.3.1.8 Comments on Noise

Concerned about noise impacts.

Proposed start time for construction is 7 am, recommend a later start time due to adjacent residents at the Brownsboro Site.

C.3.1.9 Comments on Land Use

There are more schools close to the Brownsboro Site than listed in the PEA. Concerns about impacts to schools. PEA does not account for the dense residential population and retail within 2 miles of the Brownsboro Site. The Brownsboro Site area is mostly residential. The VAMC would be inconsistent (and incompatible) with the surrounding land use. The VAMC would negatively impact property values in the Brownsboro Site area and may increase crime rates.

C.3.1.10 General Comments

Why are adverse effects on neighbors not being considered?
Opposed to the Brownsboro Site for the VAMC.
The Brownsboro Site is the best choice for the VAMC.
The St. Joseph Site is the best choice for the VAMC.
The St. Joseph Site is too isolated for the VAMC.
Opposed to the St. Joseph Site for the VAMC.
The PEA does not provide backup to support the conclusion that the Brownsboro Site and the St. Joseph Site are the only reasonable alternatives; the Fegenbush Site is also reasonable.
The Draft PEA should be amended and an EIS prepared to address the omission of the higher taxpayer cost associated with the Brownsboro Site and the error in the conclusion that the Brownsboro and St. Joseph Sites are the only reasonable sites.
Based on the public meeting, VA seems more concerned about Indiana Bats and Running Buffalo Clover at the St. Joseph Site (than traffic/other issues at the Brownsboro Site).
March 3, 2011 Louisville Downtown Development Corporation letter of support for Downtown Site.
Security issues were not addressed in the PEA. The Brownsboro Site is very accessible from the Watterson Expressway. Does this present a security issue for the proposed VAMC?
Has VA already purchased the Brownsboro Site?
Many doctors donate free time to Veterans at the existing VAMC on Zorn Avenue. Has anyone surveyed them to see if they are willing to travel to the Brownsboro Site?
What will happen to the Zorn Avenue facility if a new VAMC is constructed elsewhere?
If VA is still in the planning stage, how will it be held accountable to promises and assurances it makes?
The process for selecting a site for the VAMC has taken too long. VA needs to make a decision and build the VAMC soon.
The proposed VAMC has been presented as a minimum 800,000 square foot, 110-bed facility. However, it has also been said to be a 1,200,000 square foot facility with up to 250 beds. What is the maximum size? The PEA impact analysis by VA has been minimized using the smaller-sized facility. The actual impacts will be greater.

C.3.2 Scoping Comments and Comments on Draft Site-Specific EA

C.3.2.1 Scoping Comments on Site-Specific EA

Nineteen individuals provided verbal comments at the public scoping meeting and 23 written comment letters were received, and are summarized below.

Purpose and Need

Quality of health care for Veterans should be the major consideration.

Explain how the project site was selected.

Proposed Action
<p>Compare size (square footage) of proposed new facilities to existing facilities.</p> <p>Provide estimated number of patients, visitors, and staff and number of deliveries entering the new VAMC campus.</p> <p>Provide estimated cost to construct and operate a new VAMC.</p> <p>Size of the project site is too small for the planned buildings.</p> <p>Size of the project site limits future expansion.</p> <p>Explain how the project site was selected.</p> <p>Purpose for and use of emergency gate at Carlimar Lane.</p>
Alternatives
<p>Use project site as a cemetery.</p>
Aesthetics
<p>Obstruction of views from adjacent neighborhoods.</p> <p>Visual appearance of buildings.</p> <p>Security lights and illumination of VAMC campus at night.</p>
Air Quality
<p>Effects to local air quality from additional traffic.</p> <p>Dust and pollutants from construction equipment and activities.</p>
Geology and Soils
<p>Potential damage to houses from blasting activities.</p>
Hydrology and Water Quality
<p>Surface drainage from adjacent properties.</p> <p>Stormwater management ponds increasing amount of groundwater infiltration.</p> <p>Stormwater management ponds as a source of mosquito breeding habitat.</p>
Noise
<p>Increased noise levels from additional traffic.</p> <p>Noise from construction and blasting activities.</p> <p>Reduce noise to adjacent properties by installing a concrete security wall (fence).</p>
Land Use
<p>Compatibility with adjacent land uses.</p>
Socioeconomics
<p>Lower property values from changed land use and visual appearance.</p> <p>Maintain property values and security to adjacent properties with concrete security wall (fence).</p> <p>Potential damage to houses from blasting activities.</p>
Community Services
<p>Hinder movement of emergency vehicles through the area with additional traffic.</p> <p>Security of adjacent neighborhoods.</p> <p>Capacity and availability of emergency response services (fire, police).</p>

<p>Transportation and Parking</p> <p>Existing and future traffic congestion in vicinity of Watterson Expressway (I-264) and US 42/KY- 22 (Brownsboro Road).</p> <p>Access to the project site and adjacent businesses and neighborhoods.</p> <p>Availability of public transportation.</p> <p>Adequate parking.</p> <p>Synchronize traffic signals to improve traffic flow.</p> <p>Farther distance for most Veterans to travel.</p> <p>Farther distance for most VAMC staff to travel.</p> <p>Capacity of KYTC-proposed improvements at Watterson Expressway (I-264) and US 42/KY 22 (Brownsboro Road) to adequately handle additional traffic.</p>
<p>Utilities</p> <p>Availability and capacity of water, sewer, gas, and electric services.</p>
<p>Environmental Justice</p> <p>Travel distance for minority Veterans.</p>
<p>Cumulative Impacts</p> <p>Future development (restaurants, hotels, housing) in the area to support out-patients, visitors, and staff.</p>
<p>NEPA Process</p> <p>Finding of No Significant Impact is inappropriate because of estimated traffic volume increases.</p> <p>Prepare an environmental impact statement because traffic is projected to increase by more than 20 percent.</p> <p>Consideration of comments that had been submitted in response to the Programmatic EA.</p>
<p>Outside Scope of NEPA or Proposed Action</p> <p>Select a different location for the new VAMC.</p> <p>The new VAMC should be in close proximity to University of Louisville Medical Center and other regional hospitals to provide specific medical services.</p> <p>Remodel existing VAMC at Zorn Avenue location.</p> <p>Prepare an environmental impact statement because the project site acquisition was more than 10 acres.</p> <p>Hire 4,000 motorists to simulate the traffic conditions anticipated at full operational status of the new VAMC.</p> <p>Acquisition cost of project site.</p> <p>Availability of funding for KYTC to complete interchange improvements.</p>

C.3.2.2 Comments on Draft Site-Specific EA

VA received 125 comment submissions, including verbal comments at public meetings, on the draft site-specific EA, from 97 commenters (several commenters provided multiple submissions). The issues raised in these comments are listed below.

<p>Purpose and Need</p> <p>What is justification in detail and by numbers for moving Zorn VA hospital? Why can't it be renovated? The Zorn site could support this hospital with a major parking garage. Four RFPs were issued for a parking garage at Zorn, including one with a signed contract that was canceled two days later. A decent parking garage and considerable improvements at the Zorn Avenue facility could be completed a lot sooner and with considerable less money than what is proposed for Brownsboro Road.</p> <p>This hospital will have 104 beds, and the current hospital has 110. This property vs. Zorn gains 12 acres, that's all.</p> <p>Is this going to enhance the experience for the veterans: seen on a more timely basis, with more access to top medical services?</p>
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<p>Alternatives</p> <p>What will be the normal working hours for construction of this VA Hospital Medical Complex?</p> <p>If there is blasting during the VA Hospital build, what is the plan to protect the City of Crossgate from home/foundation damage? Will the VA pay for damage to the homes and swimming pools? Will VA survey all buildings that may be impacted in advance of the blasting, so there is baseline of conditions of those buildings?</p> <p>How many parking garages will be built? Above ground or below ground? Location and size of all parking garages and surface lots?</p> <p>How will VA keep patrons from parking in the Crossgate neighborhood, as they do at the Robley Rex campus?</p> <p>How will VA protect the campus from malicious, heinous and terroristic activities and threats? What is VA plan for providing security personnel for its facilities?</p> <p>Can the City of Crossgate expect security protection? How will VA ensure that the residents of Crossgate will be safe from the potential increase in criminal activity, and from construction workers, patients and visitors of the VAMC? Who is accountable for the VA personnel? Will the VA install security cameras for surveillance of key locations involving the Crossgate neighborhood? If a crime is committed in the Crossgate neighborhood and the perpetrator egresses onto the VA campus, who has jurisdiction to apprehend the perpetrator?</p> <p>Where will the 2 required egress routes and 2 required ingresses for the VA campus be located, exactly? Will the Graymoor-Devondale streets be used for emergencies? Where will all vehicle and pedestrian access points in and out of VA property be located? Will the back gate be locked? A proposed emergency exit at the south end of the site connects to roads that cannot support the type of volume of vehicles that might be involved and would meet heavy resistance from existing residents.</p> <p>How big will the power plant be and how will it be fenced off to prevent the children from Crossgate and adjacent neighborhoods from being injured by it?</p> <p>How many TARC and Greyhound bus routes will be added to this area and where will bus shelters be located?</p> <p>How many buildings, with how many floors, will the new VA campus have? What are the proposed dimensions of all proposed buildings/structures?</p> <p>What is the expansion plan of the VA medical complex and does it require additional acreage?</p> <p>Can the hospital, water tower, power station, parking garages, garbage storage containers, and delivery docks be located farther from the Crossgate neighborhood or, for the latter three, not facing the neighborhood?</p> <p>What is the VA's plan for expanding pedestrian sidewalks?</p> <p>What is the proposed location, size, color, lighting, etc. for all proposed signage on buildings and on VA site?</p> <p>What is VA's plan to maintain their purchased property prior to construction? How often will it be mowed?</p> <p>If and when this new hospital is built, all of the area's community based outpatient clinics will close, and the veterans who use them will be forced to travel to the Midlands site or incur more medical cost for those unable to access the Brownsboro location.</p> <p>Clinics should be built in multiple locations instead of expanding a hospital. The idea of one-stop shopping is wrongheaded. Using a nearby clinic is easier.</p> <p>Support proposed action</p> <p>Oppose proposed action at Brownsboro Site. This site should not be selected because the veterans prefer Zorn Avenue and have better transportation access there, it is not near veterans' residences and should be near other medical services, it is not near homeless veterans, the veterans don't want it here, providers will be even less willing to travel there than to Zorn Avenue or may not even be released to travel there in which case the veterans who need to see them would have to travel downtown, there are traffic impacts, it is too small for the proposed development, and due to the demographics of where veterans to be served will be living in the future.</p> <p>Support proposed action at Brownsboro Site.</p> <p>Support No Action alternative to stay at Zorn Avenue.</p> <p>Support remaining at Zorn Avenue with more parking.</p> <p>Support for locating replacement VAMC downtown.</p>
<p>Aesthetics</p> <p>What is the VA's plan on mitigating light noise for this area? Our house directly facing the proposed VA facility will be subject to 24-hour lighting.</p>

<p>At least an 8 to 10 foot BRICK wall on the property adjacent to the Crossgate neighborhood is requested, set back from property line in accordance with agreed plan, and the entire site should be fenced/walled to discourage vehicular and foot traffic through the Crossgate neighborhood.</p> <p>What is the VA's plan for landscape buffering, year-round trees, setbacks, a brick wall set back from property line in accordance with agreed plan with VA commitment to maintain plantings and landscaping on the City's side of the BRICK WALL?</p> <p>Size, height of the structures are out of character for this residential area. The proposed parking structures (two) with a six or eight story design would be a negative impact on the nearby community. It will be an eyesore and not fit in with any current properties. The sunsets I have grown to love will disappear from my perspective.</p> <p>We were told the design would be within the neighborhood aesthetics feeling. The design shown in the EA is far from being residential. There's not a brick to be seen. It's very contemporary. Our homes are very traditional.</p>
<p>Air Quality</p> <p>What is the VA's plan for mitigating dust and debris from lofting into the Crossgate neighborhood?</p> <p>Traffic will contribute to a degradation of air quality in the surrounding areas.</p> <p>Placing a parking garage next to a residential neighborhood would increase pollution; many senior residents have health issues and intolerance to air pollution. The air quality analysis needs to address air quality in and due to the parking garages.</p>
<p>Hydrology and Water Quality</p> <p>Where is the surface water from the VA Hospital Medical Complex going to drain?</p> <p>Will the VA develop its property to help the City of Crossgate mitigate its current water drainage issues?</p> <p>Sinkholes in properties adjacent to the proposed VA site are an existing problem associated with the porous subsurface conditions in the area. Cracks in basement floors and sidewalls are common and associated with hydrostatic pressure from high groundwater levels following prolonged heavy rainfalls and saturated soil conditions that result in groundwater infiltration and basement flooding. The potential results of adding a large building complex with extensive foundation requirements, during the building construction phase that will require anticipated blasting, plus operating conditions once the facility is operational, is unknown but a real concern to area residents. This would apply to drainage issues (both surface runoff and groundwater movement) and impact on existing subsurface structures, where the majority of residential homes have full basements.</p>
<p>Geology and Soils</p> <p>It destroys prime farmland.</p> <p>I can plainly see the sink holes in our entire area. So you blast through the Louisville strata, and the second rock strata, and you're going to have sinking homes. And the VA will just turn their head and say "Oh, well."</p>
<p>Noise</p> <p>Our house directly facing the proposed VA facility will be subject to noise during construction, noise/vibration from operation of utility units and service vehicles, as well as added noise from emergency vehicles and aircraft if helicopter access is proposed, with minimal buffer zone to minimize impact.</p> <p>What is VA's plan for mitigating noise from operations and onsite passenger, commercial, and emergency vehicle traffic? Noise from traffic during operations will not end and there is no mitigation for that.</p> <p>Placing a parking garage next to a residential neighborhood would increase noise.</p>
<p>Land Use</p> <p>Will the VA be bound by the same binding elements previously placed on the Midlands property?</p> <p>Why does the EA conclude the new facility will "GENERALLY" be consistent with the comprehensive plan and existing zoning when it is clearly in contradiction with the PD zoning intent?</p> <p>Mitigations pertaining to zoning lack supporting backup data and analysis to conclude a FONSI.</p> <p>VA building heights are not in compliance with zoning</p> <p>It is in contradiction to intent of the Planned Development (PD) District zoning. It does not promote development of land consistent with the applicable form district, but is nothing like the form district Town Center, which this land is currently designated. Per PD guidelines, there will be nothing compatible to the surrounding structures, none of the buildings will look like a PD, there are no buildings of this size anywhere near the site. The proposed hospital is not livable or diverse and is not sustainable since it is supposed to last only 30-40 years before becoming obsolete. The facility will definitely NOT complement the character of the community or offer a community feel. It does not "promote development patterns and land uses which reduce transportation needs and</p>

<p>which conserve energy and natural resources” but it will create tremendous traffic issues and cause the state to have to reconfigure a major interchange and widen several state roads in order to try to reduce traffic congestion at the cost of millions of taxpayer dollars. It also can only be reached by a vehicle, which does NOT conserve energy or natural resources. t does not “lower development and building costs by permitting smaller networks of utilities and streets and the use of shared facilities,” but the utilities will have to build electrical substations and rebuild water and sewage lines in order to accommodate the proposed hospital.</p> <p>A 900,000 square foot hospital and two eight-story parking garages with a water tower, administration building, and additional clinics are not similar to a mixed-use development with residential and retail space.</p> <p>You said the prior development was a hotel but the prior development was mixed use and complemented the character of the surrounding community.</p> <p>The ratio of people to land is 164 people/1 acre of land. The ratio in our neighborhood is 23 people/ 1 acre of land. Yes, this is a GROSS OVERDEVELOPMENT.</p>
<p>Floodplains and Wetlands</p>
<p>I don’t need a study to see the wetlands visible to the naked eye.</p>
<p>Socioeconomics and Environmental Justice</p> <p>Traditionally, how has a VA hospital affected property taxes or home values? How could the hospital add to property values when the aggregate impact will add undesirable elements to the region? Do you have any studies or proof that property values will go up after the hospital is built?</p> <p>The PEA concluded there would be no environmental justice impacts, but this is a false assumption. The site is not appropriate because military personnel are recruited from minority and low-income areas, not near Brownsboro Road, and therefore should have the federal investment and development occur there and not in the upper-income areas of the county.</p> <p>Do you plan to make payment to those nearby who will be economically harmed? "Socioeconomics. Short-term and long-term beneficial effects to economy. Possible short-term adverse effects to property values." How are we supposed to recoup?</p> <p>This conclusion that there are no significant socioeconomic impacts is based on the PEA, but the PEA does not have one piece of demographic information about the surrounding area. It's only on the state, county, and Louisville level.</p> <p>We have concern for how to eliminate increased pedestrian traffic through our neighborhood or protect homeowners from added exposure to crime or trespassing that likely will result from influx of traffic to the VA facility.</p> <p>The whole Brownsboro corridor should be included in the analysis because the impacts will be that widespread; increase in trade at food outlets will not compensate for the damage done.</p> <p>Mitigations pertaining to socioeconomic and property values lack supporting backup data and analysis to conclude a FONSI.</p>
<p>Community Services</p>
<p>City staffing cuts will impact the fire department’s capability – does VA have a specific fire contingency and how will this plan impact or prioritize fire services of the surrounding neighborhoods?</p> <p>There is no motel near the Brownsboro Road location, but there is one near Zorn Ave. There are no restaurants, offsite medical office facilities, or other nearby existing full service hospitals to supplement VA capabilities.</p>
<p>Solid Waste and Hazardous Materials</p>
<p>According to the Congressman Yarmuth -- we met with him, it was about two months ago, maybe three, and he disclosed that the existing site has a \$25 million cleanup of Agent Orange on it. And we were surprised about that. Well, why didn't they take part of the \$75 million that they've used for buying the site and doing all these plans and clean up the Agent Orange? I mean, isn't that a problem for our veterans up there? Isn't that a problem for the neighbors? So I'm not encouraged by this VA hospital being my new neighbor.</p>
<p>Transportation and Traffic</p>
<p>If this project involves closing the Northfield Drive exit to US 42, then I will oppose it as strongly as I can.</p> <p>None of the stated road improvements are to be seen. Where are your flyovers or ramps to ease all this traffic? What's the environmental impact of those ramps and bridges that are not needed without your hospital?</p> <p>How will construction workers access the site? Who is going to monitor to prevent them from cutting through Graymoor Devondale from Westport Road right into that back site? Where is the offsite construction contractor parking? I do not believe they will comply but will instead park in the neighborhoods.</p>

<p>What is the VA's shift change plan to not contribute to traffic issues in the area?</p> <p>Impacts to traffic are unacceptable. Further analysis of traffic impacts is needed. Mitigations pertaining to traffic lack supporting backup data and analysis to conclude a FONSI. The entire plan is retro, it is automobile-centric, it doesn't speak to any other kinds of access. There is no TARC or pedestrian access, not even a bike rack. To assume that for 30 years it will all be 3,000 automobiles is bad planning. The traffic study doesn't appear to address the issue of access by veterans and employees who rely upon public transportation. How will the homeless veterans get to the hospital?</p>
<p>Utilities</p> <p>Will the power plant be a burden to the current power grid of Crossgate? Will all onsite utilities be underground? How will they impact the City? Existing sanitary sewers most likely are undersized to accept input from the proposed VA facility. Getting hospital-grade utilities installed will be a big mess. The residents on Carlimar Lane will not have a road for their use while the trunk line of the sewers is being installed. Getting hospital-grade utilities installed will be a big pricey. Who will pay for it?</p>
<p>General Comments on Impact Analysis</p> <p>The EA uses the word "temporary or short-term" for construction impacts, but assuming the project is on time and on budget, it will take 6.5 years to complete. This is a long-term impact, not short-term. Six years of noise, dust, vibration is not temporary. The EA uses a "No Action" alternative for impact analysis which is an improper baseline and does not conform to NEPA guidelines. Has closing the clinics been taken into account in the impact analysis? I didn't hear anything related to compliance of vibration, noise, water runoff, the groundwater plan.</p>
<p>NEPA Process</p> <p>An EIS is needed in accordance with VA's own NEPA regulations. Conduct more complete environmental impact studies, considering all relevant facts and impacts, before construction is started. An EIS will address all the items that the VA is dismissing. The website for the proposed VA hospital indicates that the next design phase begins on Jan. 20th. Yet, questions can be submitted on the Draft EA until Feb. 1. This seems to imply that the final decision has already been made. Who are the decisionmakers, where do they get their information, and to whom do they answer? Who answers the questions on the EA? You talked about no action. If I understand you correctly, you said the two choices are build here or no action. I don't understand that there were other sites available and other sites could be chosen.</p>
<p>Agency Coordination</p> <p>What is the compliance plan for ensuring the work is done according to the specified details? We should be entitled to know the compliance plan or the lack thereof on a daily, weekly basis. So that we don't get to the end of this construction project only to find out, "Oh, that guy used the wrong kind of concrete, and he put the drain in the wrong place, and we have residents flooded." Local agencies' comments were not provided in this EA, but these agencies need to have their comments available sooner so the public can consider them before the Final EA. We are also are very concerned that our politicians locally, Representative Yarmuth, Mayor Fischer, Senator McConnell, Senator Rand Paul have not been at least outwardly involved in – in analyzing this for the veterans. If this project goes forward, I hope you will have the courtesy to work with local officials in our area.</p>
<p>Public Involvement</p> <p>Questions sent to VA previously have not been answered. I don't think the VA or the consultants are listening to our legitimate concerns. Request that VA be more open, more transparent, and more detailed in their responses. Questions were not answered at the public meeting.</p>

My previous comments on the PEA and on the Site-Specific EA continue to be inaccurately summarized and grossly minimized in the EA documents.

It is unreasonable to say that we citizens must provide you with data. We are not engineers and cannot conduct our own studies. But our own concerns as citizens are significant and must be considered.

Where can we see the EA with all the details for the analysis summarized in this handout? Has this been published anywhere?

Why are you having a meeting that affects people outside the Watterson at the Clifton Center?

Can the public have access to everything that was said here?

Out of Scope of NEPA Analysis

What will you do with the land if you don't move forward? Consider other non-hospital VA use of Brownsboro Site property such as a national cemetery.

The cost of \$900M is too high. I have not seen anything to justify this expense presented to the general public. Per PD guidelines, it does not promote efficient and economic use of the land because VA overpaid for the land at the beginning of the project.

With so much news of other VA hospitals going over budget, do you know if the \$900M budget for this one is correct? What would happen here if construction is halted like at Denver?

The news on WAVE 3 they said this plan was approved 10 years ago. Where are the open records on that and why are we wasting money doing studies and looking at sites?

How will you guarantee that work goes to the local skilled workforce that plays by the books, including for their subcontractors?

What action can we take to stop this?

Has the money been appropriated to build this VAMC?

How will VA keep the public informed on construction progress and cost? What is the communication plan with local residents once this project starts?

Would VA be interested in purchasing equipment from a particular company?

What information was given to the physicians who said Brownsboro would be an acceptable location? Did they see the traffic in rush hour? How many physicians were surveyed? When? Who were they?

There is no provision for giving homeless veterans a place to live.

All in-scope issues listed in this scoping summary are addressed in this EIS.

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Appendix D

Agency and Tribal Correspondence

- Farmland Conversion Impact Rating for Brownsboro Site, Parts IV and V completed by the Natural Resource Conservation Service, U.S. Department of Agriculture
- Kentucky Department of Fish and Wildlife Resources letter of April 19, 2011: listed species within one mile of the five sites evaluated in the programmatic EA
- U.S. Fish and Wildlife Service letter of May 31, 2011: listed species at five sites evaluated in programmatic EA
- U.S. Fish and Wildlife Service email of June 15, 2011: listed species at Brownsboro Site
- U.S. Fish and Wildlife Service email of December 3, 2015: comments on draft site-specific EA
- Kentucky Energy and Environment Cabinet letter of June 9, 2011: state agency scoping input for programmatic EA
- Louisville Metro Council letter of May 26, 2015: resolution calling for EIS
- Kentucky State Historic Preservation Office letter of April 8, 2015: determination that undertaking at Brownsboro Site will have no adverse effect on historic properties
- VA letters of February 23, 2015, to Delaware Nation, Miami Tribe of Oklahoma, Peoria Tribe, and Eastern Band of Cherokee Indians inviting comments on draft site-specific EA
- Peoria Tribe letter of March 11, 2015: no objection to proposed project at Brownsboro Site
- Delaware Nation email of May 18, 2015: no concerns for construction at Brownsboro Site

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FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)		Date Of Land Evaluation Request August 5, 2014			
Name of Project New Robley Rex VAMC Campus		Federal Agency Involved Dept of Veterans Affairs			
Proposed Land Use Institutional		County and State Jefferson County, Kentucky			
PART II (To be completed by NRCS)		Date Request Received By NRCS Aug 8, 2014		Person Completing Form: David Gehring	
Does the site contain Prime, Unique, Statewide or Local Important Farmland? (If no, the FPPA does not apply - do not complete additional parts of this form)		YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	Average Farm Size 60	
Corn, Soybeans		Farmable Land In Govt. Jurisdiction Acres: 66794 % 27.3		Amount of Farmland As Defined in FPPA Acres: 53420 % 21.8	
		Date Land Evaluation Returned by NRCS Aug. 13, 2014			
PART III (To be completed by Federal Agency)		Alternative Site Rating			
		Site A	Site B	Site C	Site D
A. Total Acres To Be Converted Directly		34.9			
B. Total Acres To Be Converted Indirectly		0			
C. Total Acres In Site		34.9			
PART IV (To be completed by NRCS) Land Evaluation Information					
A. Total Acres Prime And Unique Farmland		34.9			
B. Total Acres Statewide Important or Local Important Farmland		0			
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted		0.07%			
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value		13.6%			
PART V (To be completed by NRCS) Land Evaluation Criterion Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)		88			
PART VI (To be completed by Federal Agency) Site Assessment Criteria (Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)		Maximum Points	Site A	Site B	Site C
1. Area In Non-urban Use		(15)	0		
2. Perimeter In Non-urban Use		(10)	0		
3. Percent Of Site Being Farmed		(20)	0		
4. Protection Provided By State and Local Government		(20)	0		
5. Distance From Urban Built-up Area		(15)	0		
6. Distance To Urban Support Services		(15)	0		
7. Size Of Present Farm Unit Compared To Average		(10)	2		
8. Creation Of Non-farmable Farmland		(10)	10		
9. Availability Of Farm Support Services		(5)	0		
10. On-Farm Investments		(20)	0		
11. Effects Of Conversion On Farm Support Services		(10)	0		
12. Compatibility With Existing Agricultural Use		(10)	0		
TOTAL SITE ASSESSMENT POINTS		160	12	0	0
PART VII (To be completed by Federal Agency)					
Relative Value Of Farmland (From Part V)		100	88	0	0
Total Site Assessment (From Part VI above or local site assessment)		160	12	0	0
TOTAL POINTS (Total of above 2 lines)		260	100	0	0
Site Selected: A		Date Of Selection		Was A Local Site Assessment Used? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/>	
Reason For Selection: Location for the VAMC campus meets the siting criteria for size, current zoning, accessible transportation, available utilities, proximity to local hospitals, and environmental constraints.					
Name of Federal agency representative completing this form: Mary B. Peters				Date: 08/05/2014	



**KENTUCKY DEPARTMENT OF FISH & WILDLIFE RESOURCES
TOURISM, ARTS, AND HERITAGE CABINET**

Steven L. Beshear
Governor

#1 Sportsman's Lane
Frankfort, Kentucky 40601
Phone (502) 564-3400
1-800-858-1549
Fax (502) 564-0506
fw.ky.gov

Marcheta Sparrow
Secretary

Dr. Jonathan W. Gasset
Commissioner

19 April 2011

TTL Associates, Inc.
44265 Plymouth Oak Boulevard
Plymouth, Michigan 48170
ATTN: Paul J. Jackson, Environmental Scientist

RE: Intergovernmental and Interagency Coordination of Environmental Planning for the:
Department of Veterans Affairs (VA)
Proposed VA Medical Center
25 or More Acres on One of Five Potential Sites
Louisville – Jefferson County, Kentucky

Dear Mr. Jackson:

The Kentucky Department of Fish and Wildlife Resources (KDFWR) has received your request for information regarding the subject project. The Kentucky Fish and Wildlife Information System indicates that the following federally and state-listed species are known to occur within one mile, as specified in the request letter, of the project sites:

Brownsboro Site: No listed species, however this site falls within known Indiana bat (*Myotis sodalis*) summer maternity habitat and is considered a sensitive area for this species. These sensitive areas require coordination with the US Fish and Wildlife Service Kentucky Field Office (502-695-0468) prior to construction. This species uses trees (dead, dying, or alive) as summer roosting habitat, with larger trees containing sloughing bark being the most suitable.

Fegenbush Site: State-endangered Louisville Crayfish (*Orconectes jeffersoni*) and Bousfield's Amphipod (*Gammarus bousfieldi*). The Fern Creek flows within the boundaries of the project area, and any impacts to this stream must be addressed and permits obtained through the Kentucky Division of Water and the U.S. Army Corps of Engineers.

St. Joseph Site: No listed species, but impacts to streams and wetlands should be addressed if deemed necessary.

Downtown Site: Federally-protected Peregrine Falcon (*Falco peregrinus*), the state-endangered Great Egret (*Ardea alba*), and the state-threatened Kirtland's Snake (*Clonophis kirtlandii*) and Black-crowned Night Heron (*Nycticorax nycticorax*)

Existing (Robley Rex) VAMC Site: Louisville Crayfish, also within sensitive habitat for the Indiana bat.



Please be aware that our database system is a dynamic one that only represents our current knowledge of various species distributions. To minimize indirect impacts to aquatic resources, strict erosion control measures should be developed and implemented prior to construction to minimize siltation into streams and storm water drainage systems located within the project area. Such erosion control measures may include, but are not limited to silt fences, staked straw bales, brush barriers, sediment basins, and diversion ditches. Erosion control measures will need to be installed prior to construction and should be inspected and repaired regularly as needed.

I hope this information is helpful to you, and if you have questions or require additional information, please call me at (502) 564-7109 extension 4453.

Sincerely,



Dan Stoelb
Wildlife Biologist

Cc: Environmental Section File



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Kentucky Ecological Services Field Office
330 West Broadway, Suite 265
Frankfort, Kentucky 40601
(502) 695-0468

May 31, 2011

Mr. Paul Jackson
Environmental Scientist
44265 Plymouth Oaks Boulevard
Plymouth, Michigan 48170

Re: FWS 2011-B-0610; TTL Associates, Inc.. Proposed Department of Veterans Affairs (VA) Medical Center to be located within One of Five Potential Sites in Jefferson County, Kentucky

Dear Mr. Jackson:

The U.S. Fish and Wildlife Service (Service) has reviewed your correspondence of April 15, 2011 regarding the above-referenced project. The Service offers the following comments in accordance with the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*). This is not a concurrence letter. Please read carefully, as further consultation with the Service may be required.

We understand that the VA is in the process of evaluating five potential sites for the construction and operation of a VA Medical Center (VAMC). All of the five sites that are under consideration are located within Jefferson County, Kentucky. The five sites are identified as the Brownsboro Site, Fegenbush Site, St. Joseph Site, Downtown Site, and the Existing (Robley Rex) VAMC Site.

In order to assist you in determining if the proposed project has the potential to impact protected species we have searched our records for occurrences of listed species within the vicinity of the proposed project. Based upon the information provided to us and according to our databases, we believe that the following federally listed species have the potential to occur within the project vicinity.

<u>Common Name</u>	<u>Scientific Name</u>	<u>Federal Status</u>
Indiana bat	<i>Myotis sodalis</i>	endangered
running buffalo clover	<i>Trifolium stoloniferum</i>	endangered
Kentucky glade cress	<i>Leavenworthia exigua</i> var. <i>lacinata</i>	candidate

We must advise you that collection records available to the Service may not be all-inclusive. Our database is a compilation of collection records made available by various individuals and resource agencies. This information is seldom based on comprehensive surveys of all potential habitats and thus does not necessarily provide conclusive evidence that protected species are present or absent at a specific locality.

Downtown Site

Aerial imagery of the Downtown Site indicates that this site does not contain habitat that coincides with the habitat that is required for any of the aforementioned species. Therefore, we believe that if the Downtown Site is the selected location for the proposed VAMC, the proposed project would not likely adversely affect federally listed species.

Indiana bat

Brownsboro Site and Existing Robley Rex Site

The Brownsboro Site and the Existing Robley Rex Site are situated within the home range of a known Indiana bat maternity colony. “Maternity habitat” refers to suitable summer habitat used by juveniles, and reproductive (pregnant, lactating, or post-lactating) females, and is an essential component of the Indiana bat’s lifecycle. Female Indiana bats become pregnant in spring soon after they emerge from their hibernacula, which are usually caves, rockshelters, and mines. The pregnant females migrate to their maternity habitat, forming colonies of up to 100 or more individuals, and roost on “suitable roost trees”. A “suitable roost tree” is any tree (live or dead) with a diameter- at- breast- height (DBH) of 5-inches or greater that exhibits any of the following characteristics: exfoliating bark, crevices or cracks. Trees with a DBH of 5-inches or greater and are not “suitable roost trees”, as previously defined, still serve as foraging habitat for the Indiana bat. Each female in the colony gives birth to one pup per year. The young bats are nursed by the mother, who leaves the roost tree only to forage for food. The young stay with the maternity colony throughout their first summer.

Typically for a project of this nature, the Service would recommend seasonal tree clearing or the completion of a mist net survey before construction activities take place. Mist net surveys provide presence/absence information; however, we already know that the Indiana bats are present and that the project area falls within a maternity colony and a swarming range of a known hibernacula. We do not believe a survey is necessary for the proposed project. Also, seasonal tree clearing could result in indirect and/or cumulative effects to the bats utilizing this maternity colony and overlapping swarming range through changes to the landscape and the removal of potential foraging and roosting habitat while the bats are hibernating, so even seasonal removal of habitat is likely to result in significant or non-discountable effects to the Indiana bat. Due to these concerns, we cannot concur with a determination of not likely to adversely affect for the Indiana bat at this time.

In order to address these concerns and be in compliance with the ESA, we recommend one of the following options:

- 1) The project proponent can further modify the proposed project to eliminate impacts to Indiana bat habitat and thus avoid impacts;

2) The project proponent can request formal section 7 consultation through the lead Federal Action Agency associated with the proposed project; or

3) The project proponent may choose to enter into a Conservation Memorandum of Agreement (MOA) with the Service to account for the incidental take of Indiana bats. By entering into a Conservation MOA with the Service, Cooperators gain flexibility in project timing with regard to the removal of suitable Indiana bat habitat. In exchange for this flexibility, the Cooperator provides recovery-focused conservation benefits to the Indiana bat through the implementation of minimization and mitigation measures that are described in the Indiana Bat Mitigation Guidance for the Commonwealth of Kentucky. For additional information about this option, please notify our office.

Fegenbush Site and St. Joseph Site

The Fegenbush and St. Joseph Sites are situated within potential Indiana bat habitat. The aforementioned recommendations, regarding the Indiana bat, apply to these areas, except that the project proponent could remove trees in these areas in between the dates of October 15th through March 31st without additional mitigation.

Running Buffalo Clover

Existing Robley Rex Site, Fegenbush Site, and St. Joseph Site

Running buffalo clover may occur within the Existing Robley Rex Site, Fegenbush Site, and St. Joseph Sites. This plant species requires periodic, moderate disturbances to reduce competition and maintain open or semi-open habitat conditions. Disturbed areas such as old pastures, moderately grazed fields, road rights-of-way, and power line rights-of-way that are mechanically maintained are known to provide suitable habitat for these species. Additionally, running buffalo clover is known to occur in habitats ranging from stream banks and low mesic (moderately moist) forests to lawns and cemeteries. If the proposed project(s) require alteration of habitat that coincides with the habitat required for this species, an on-site inspection or survey of the area must be conducted to determine if the listed species is present or occurs seasonally. Prior to construction activities including tree clearing, a survey should be done by qualified personnel and be conducted during the appropriate time of day and/or year to ensure confidence in survey results. Please notify this office with the results of any surveys and an analysis of the “effects of the action,” as defined by 50 CFR 402.02 on any listed species including consideration of direct, indirect, and cumulative effects.

A survey for running buffalo clover would not be necessary if sufficient site-specific information was available that showed that: (1) there is no potentially suitable habitat within the project area or its vicinity or (2) the species would not be present within the project area or its vicinity due to site-specific factors.

Kentucky glade cress

Fegenbush Site

Kentucky glade cress may occur within the Fegenbush Site. Kentucky glade cress is federally listed as a candidate species. This rare plant species is only known to occur in Bullitt County and Jefferson County, Kentucky. It grows in small depressions of exposed bedrock that are in

full sun on flat bedded outcrops of limestone in shallow soils of glades, rock outcrops, pastures and lawns. This habitat is sometimes present along ROWs. The Service requests that the VA voluntarily commit to ensuring that the proposed project does not impact potential or identified Kentucky glade cress habitat. The Service believes this measure would significantly contribute to the conservation and restoration of Kentucky glade cress; and, may prevent the species from becoming listed as endangered or threatened.

Kentucky glade cress is a federal candidate species, which means the Service has sufficient information on its biological status and threats to propose Kentucky glade cress as endangered or threatened under the ESA, but for which development of a proposed listing regulation is precluded by other higher priority listing activities. Candidate species receive no statutory protection under the ESA. The Service encourages cooperative conservation efforts for these species because they are, by definition, species that may warrant future protection under the ESA.

Addressing the needs of Kentucky glade cress before the regulatory requirements associated with a listed threatened or endangered species come into play, would allow the VA, landowners, and other entities greater management flexibility to stabilize or restore the species and its habitat for future projects. In addition, as such threats are reduced and populations are increased or stabilized, priority for listing can be shifted to those species in greatest need of the ESA's protective measures. Ideally, sufficient threats can be removed to eliminate the need for listing.

Thank you again for your request. Your concern for the protection of endangered and threatened species is greatly appreciated. If you have any questions regarding the information that we have provided, please contact James Gruhala at (502) 695-0468 extension 116.

Sincerely,

A handwritten signature in blue ink that reads "Virgil Lee Andrews, Jr." with a stylized flourish at the end.

Virgil Lee Andrews, Jr.
Field Supervisor

Stacey Creighton

From: James_Gruhala@fws.gov
Sent: Wednesday, June 15, 2011 6:22 PM
To: Stacey Creighton
Subject: Re: FWS 2011-B-0660; Blue Equity, LLC., Property at 4906 Brownsboro Road, Louisville, Kentucky

Ms. Stacey Creighton
Assistant to the Chairman
Blue Equity, LLC
333 East main Street, Suite 200
Louisville, Kentucky 40201

Dear Ms. Creighton:

Please accept this correspondence and maintain for your records as the U.S. Fish and Wildlife Service's (Service) official response to your June 15, 2011 correspondence, regarding the above-referenced property that is located at 4906 Brownsboro Road, Louisville, Kentucky. It is our understanding that Blue Equity, LLC is currently considering selling or leasing the property for development. The Service offers the following comments in accordance with the Endangered Species Act (ESA) of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

In order to assist you in determining if a proposed project that would occur at the subject property has the potential to impact federally protected species we have searched our records for occurrences of listed species within the vicinity of the proposed project. Based upon the information provided to us and according to our databases, we believe that the federally endangered Indiana bat (*Myotis sodalis*) is the only federally listed species that has the potential to occur within the vicinity of the subject property.

Indiana bat

The subject property is within the home range of a known Indiana bat maternity colony. "Maternity habitat" refers to suitable summer habitat used by juveniles, and reproductive (pregnant, lactating, or post-lactating) females, and is an essential component of the Indiana bat's lifecycle. Female Indiana bats become pregnant in spring soon after they emerge from their hibernacula, which is usually caves, rockshelters, and mines. The pregnant females migrate to their maternity habitat, forming colonies of up to 100 or more individuals, and roost on "suitable roost trees". A "suitable roost tree" is any tree (live or dead) with a diameter-at-breast-height (DBH) of 5-inches or greater that exhibits any of the following characteristics: exfoliating bark, crevices or cracks. Trees with a DBH of 5-inches or greater and are not "suitable roost trees", as previously defined, still serve as foraging habitat for the Indiana bat. Each female in the colony gives birth to one pup per year. The young bats are nursed by the mother, who leaves the roost tree only to forage for food. The young stay with the maternity colony throughout their first summer.

Aerial imagery indicates that the subject property is a perviously cleared field that does not contain "suitable roost trees", as defined above for Indiana bats.. Additionally, the property is adjacent to a highway and surrounded by development. Based on the lack of "suitable roost trees" and due to the property's proximity to urban development, we believe that future development at this property would not likely adversely affect the Indiana bat.

Please contact me if you have need any further assistance. Refer to project number FWS 2011-B-0660.

Sincerely,

James Gruhala
Fish & Wildlife Biologist
U.S. Fish & Wildlife Service
KY Ecological Services Field Office
330 West Broadway, Room 265
Frankfort, KY 40601

(502) 695 0468 ext. 116

From: Allison, Carrie [mailto:carrie_allison@fws.gov]
Sent: Thursday, December 03, 2015 06:10 AM
To: Louisville Replacement Hospital Comments
Subject: [EXTERNAL] FWS 2016-B-0059; Comments on the DRAFT EA

To Whom It May Concern:

The U.S. Fish and Wildlife Service Kentucky Field Office (KFO) has reviewed the draft Environmental Assessment for the Robley Rex Veterans Affairs Medical Center in Louisville, Kentucky. Potential impacts to federally listed species were addressed during technical assistance and informal consultation with our office in 2011 and it was determined that no suitable habitat for threatened or endangered species was present within the project area.

However, since 2011, the Northern long-eared bat (NLEB) has been listed as a federally threatened species. Based on site-specific information, it appears there is no potential winter habitat within the project area. However, the draft EA does mention that there are a few remaining trees within the project area. These trees could be suitable as NLEB maternity roost trees. NLEB roost trees typically contain peeling bark and/or cavities, similar to roost trees used by the Indiana bat, but can be as small as 3" diameter at breast height.

Therefore, before finalizing the EA, we recommend that the potential for NLEB to be using the site be addressed. We have no additional comments or concerns regarding federally listed species and believe that the draft EA adequately addresses the Indiana bat, running buffalo clover, and Kentucky glade cress.

If you have any questions, please contact me at your earliest convenience.

Carrie L. Allison
U.S. Fish and Wildlife Service
330 W. Broadway, Rm. 265
Frankfort, KY 40601
502-695-0468 ext. 103

"Though for emotional or aesthetic reasons we may lament the loss of large charismatic species, such as tigers, rhinos, and pandas, we now know that loss of animals, from the largest elephant to the smallest beetle, will also fundamentally alter the form and function of the ecosystems upon which we all depend." ~ Rodolfo Dirzo



ENERGY AND ENVIRONMENT CABINET

Steven L. Beshear
Governor

DEPARTMENT FOR ENVIRONMENTAL PROTECTION
300 FAIR OAKS LANE
FRANKFORT, KENTUCKY 40601
PHONE (502) 564-2150
FAX (502) 564-4245
www.dep.ky.gov

Leonard K. Peters
Secretary

R. Bruce Scott
Commissioner

June 9, 2011

TTL Associates, Inc.
44265 Plymouth Oaks Boulevard
Plymouth, MI 48170
ATTN: Paul J. Jackson, Environmental Scientist

Re: Intergovernmental and Interagency Coordination of Environmental Planning for Proposed VA Medical Center Louisville-Jefferson County, KY. (SERO 2011-16)

Dear Mr. Jackson,

The Energy and Environment Cabinet serves as the state clearinghouse for review of environmental documents generated pursuant to the National Environmental Policy Act (NEPA). Within the Cabinet, the Commissioner's Office in the Department for Environmental Protection coordinates the review for Kentucky state agencies.

We received your April 15, 2011 letter requesting our input in the NEPA process as you begin the Environmental Assessment development for the new Proposed VA Medical Center. The document was sent to the Division of Water, Division of Waste Management, Division for Air Quality, and State Nature Preserves Commission. The attached comments were provided by the Division for Air Quality, the Division of Waste Management, and Division of Water. The Nature Preserves Commission had no comment.

If you have any questions, please contact me at (502) 564-2150, ext. 112.

Sincerely,

Larry C. Taylor
State Environmental Review Officer

ATTACHMENT

Division of Water Comments

Intergovernmental and Interagency Coordination of Environmental Planning for Proposed VA Medical Center Louisville-Jefferson County, KY

Endorsement:

A request for review of the Jefferson County; Intergovernmental and Interagency Coordination of Environmental Planning for Proposed VA Medical Center Louisville-Jefferson County, KY was received on May 5, 2011. The Division of Water (DOW) completed this review and has provided the following comments.

Compliance & Technical Assistance Branch: No comments

Water Quality Branch: Proposal #4 would be the preferred location for the new hospital because all of the project area is already developed. Proposal #5 would be the second preference. As with any other project, best management practices shall be used to reduce runoff from the project into adjacent surface waters.

Watershed Management: Any construction taking place in the floodplain will require a "Stream Construction Permit" issued by the Division of Water.

Any wells located on any of the properties will need to be properly abandoned by a Kentucky Certified Well Driller. Contractors will need to have a Groundwater Protection Plan if their activities are included in the covered activities from the Groundwater Protection Plan regulation. If an emergency back-up water supply well is to be drilled, a Kentucky Certified Water Well Driller must be used to perform the work.

Enforcement Branch: The Division of Enforcement does not object to the project proposed by the applicant.

Division of Waste Management Comments

Project Number: SERO 2011-6

Comments will be made when the site is selected.

Division for Air Quality Comments

**DAQ Comments: Construction of VA Medical Center in Louisville –
Jefferson County (SERO 2011-16)**

Kentucky Division for Air Quality Regulation **401 KAR 63:010** Fugitive Emissions states that no person shall cause, suffer, or allow any material to be handled, processed, transported, or stored without taking reasonable precaution to prevent particulate matter from becoming airborne. Additional requirements include the covering of open bodied trucks, operating outside the work area transporting materials likely to become airborne, and that no one shall allow earth or other material being transported by truck or earth moving equipment to be deposited onto a paved street or roadway. Please note the Fugitive Emissions Fact Sheet located at <http://air.ky.gov/Pages/OpenBurning.aspx>

Kentucky Division for Air Quality Regulation **401 KAR 63:005** states that open burning is prohibited. Open Burning is defined as the burning of any matter in such a manner that the products of combustion resulting from the burning are emitted directly into the outdoor atmosphere without passing through a stack or chimney. However, open burning may be utilized for the expressed purposes listed on the Open Burning Brochure located at <http://air.ky.gov/Pages/OpenBurning.aspx>

Also, for any proposal that involves the renovation or demolition of an existing structure,

Kentucky Division for Air Quality Regulation **401 KAR 58:025**, Asbestos Standards, apply to this project, and the project must be inspected by a Kentucky Accredited Asbestos Inspector. Asbestos that will be affected by this activity must be removed by a Kentucky accredited contractor before renovation or demolition begins. Written notification must be given on form DEP 7036 to the Louisville Metro Air Pollution Control District at least 10 weekdays prior the start of demolitions, whether or not asbestos has been identified to be present. Please note form DEP 7036 and the Asbestos Fact Sheet located at <http://air.ky.gov/Pages/OpenBurning.aspx>

The Division also suggests an investigation into compliance with applicable local government regulations.



LOUISVILLE METRO COUNCIL
CLERK'S OFFICE

May 26, 2015

Robley Rex VAMC
Attn: Laura Schafsnitz
800 Zorn Avenue
Louisville, KY 40206

Dear Ms. Schafsnitz:

On behalf of the Louisville Metro Council I am forwarding to your attention a copy of Resolution No. 039, Series 2015, which was adopted at a meeting of the Council held on March 26, 2015.

The title of the Resolution reads as follows:

A RESOLUTION SUPPORTING AN ENVIRONMENTAL IMPACT STATEMENT FOR THE NEW LOUISVILLE VETERANS AFFAIRS MEDICAL CENTER

Section I of the Resolution reads:

"The Louisville Metro Council, by this Resolution, is requesting a complete and thorough Environmental Impact Statement which shall include current and projected traffic data by the U.S. Department of Veterans Affairs."

Your attention to this matter is greatly appreciated.

Sincerely,

H. Stephen Ott, CKMC
Clerk of the Louisville Metro Council
601 West Jefferson Street
Louisville, KY 40202

Enclosure: Resolution 039, Series 2015

Cc: Council Members Leet, Johnson, Owen, Blackwell, Aubrey Welch, Peden, Downard, Kramer, Parker, Benson, Denton, Fowler, Engel, Magre, James, Hollander, Green, Shanklin, Woolridge, Bryant Hamilton, Butler, Stuckel, Flood, Yates, Ackerson and President Tandy

www.louisvilleky.gov

601 WEST JEFFERSON STREET • 502.574.3902 • LOUISVILLE, KENTUCKY 40202

RESOLUTION NO. 039, SERIES 2015

A RESOLUTION SUPPORTING AN ENVIRONMENTAL IMPACT STATEMENT FOR THE NEW LOUISVILLE VETERANS AFFAIRS MEDICAL CENTER (AMENDED BY SUBSTITUTION)

Sponsored by: Council Members Leet, Johnson, Owen, Blackwell, Aubrey Welch, Peden, Downard, Kramer, Parker, Benson, Denton, Fowler, Engel, Magre, James, Hollander, Green, Shanklin, Woolridge, Bryant Hamilton, Butler, Stuckel, Flood, Yates, Ackerson and President Tandy

WHEREAS there are approximately 57,000 veterans living in Jefferson County and a total of 366,000 veterans living in the Commonwealth of Kentucky that are served by the regional Robley Rex Veterans Affairs Medical Center, which is currently located on Zorn Avenue; and

WHEREAS, veterans of the United State Armed Forces deserve a world class hospital because many have returned after suffering service-related injuries or with mental health issues; and

WHEREAS, the Louisville Metro Council requests the U.S. Department of Veterans Affairs conduct a full Environmental Impact Statement as required by federal law; and

WHEREAS, the Environmental Impact Statement is a necessity and should include a detailed analysis of current and accurate traffic data to properly estimate the impact of the new Veterans Affairs Medical Center on the surrounding environment; and

WHEREAS, the traffic analysis should be done in a detailed and transparent process using experts with demonstrated expertise in traffic analysis in the Louisville area.

NOW THEREFORE, BE IT RESOLVED BY THE LEGISLATIVE COUNCIL OF THE LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT (THE COUNCIL) AS FOLLOWS:

SECTION I: The Louisville Metro Council, by this Resolution, is requesting a complete and thorough Environmental Impact Statement which shall include current and projected traffic data by the U.S. Department of Veterans Affairs.

SECTION II: This Resolution shall take effect upon its passage and approval.



H. Stephen Ott
Metro Council Clerk



David W. Tandy
President of the Council



Greg Fischer
Mayor

4/13/15

Approval Date

APPROVED AS TO FORM AND LEGALITY

Michael J. O'Connell
Jefferson County Attorney



BY: 



STEVEN L. BESHEAR
GOVERNOR

**TOURISM, ARTS AND HERITAGE CABINET
KENTUCKY HERITAGE COUNCIL**

BOB STEWART
SECRETARY

THE STATE HISTORIC PRESERVATION OFFICE
300 WASHINGTON STREET
FRANKFORT, KENTUCKY 40601
PHONE (502) 564-7005
FAX (502) 564-5820
www.heritage.ky.gov

CRAIG A. POTTS
EXECUTIVE DIRECTOR AND
STATE HISTORIC PRESERVATION OFFICER

April, 8, 2015

Christine M. Modovsky
Labat Environmental, Inc.
1406 Fort Crook Road South, Suite 101
Bellevue, NE 68005

Re: A Cultural Historic Resource Survey for the Proposed Brownsboro Road Veterans Affairs Medical Center in Louisville, Jefferson County, Kentucky

Dear Ms. Modovsky:

The Kentucky Heritage Council, State Historic Preservation Office, has received for review and comment the above referenced cultural historic resource survey for the proposed Brownsboro Road Veterans Affairs Medical Center completed by Cultural Resource Analysts, Inc.

The report authors identified two previously surveyed sites (JF 487 and 394), eight previously undocumented sites (JF 2761-2768), and five previously undocumented neighborhoods (JF 028-032) within the APE. In addition, four NRHP/NHL properties within the larger vicinity of the project were identified at the request of the Louisville Metro Historic Preservation Officer (JF 395, 527, 528, and 593).

We are in agreement with each of the report authors recommendations save one. With additional research, Site 3 (JF 487) may be found to have National Register eligibility. Based on the location of Site 3 in relation to the proposed project however, there will be no potential for effect. It is therefore the determination of this office that the undertaking will have No Adverse Effect on Historic Properties.

Thank you for coordinating with this office. Should you have any questions please feel free to contact me at 502-564-7005.

Sincerely,

Craig A. Potts
Executive Director and
State Historic Preservation Officer



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction and Facilities Management
Washington DC 20420

February 23, 2015

Kerry Holton, President
Delaware Nation, Oklahoma
P.O. Box 825
Anadarko, OK 73005

Dear Mr. Holton:

The United States Department of Veterans Affairs (VA) is providing the enclosed *Draft Site-Specific Environmental Assessment: Proposed Replacement VA Medical Center Campus, Louisville, Kentucky* for the Delaware Nation's review and comment.

This site-specific environmental assessment (EA) identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic effects associated with constructing and operating the proposed new Robley Rex VA Medical Center (VAMC) campus, which would include a regional Veterans Benefits Administration office. The new campus would be located at 4906 Brownsboro Road in Louisville, Jefferson County, Kentucky, southeast of the intersection of the Watterson Expressway (I-264) and Brownsboro Road. A programmatic EA completed in June 2012 concluded there would be no significant impacts from selecting the Brownsboro Road site for the location of this Proposed Action.

Two alternatives are analyzed in this site-specific EA: VA's Proposed Action to construct and operate the replacement campus at 4906 Brownsboro Road, and the No Action Alternative of not constructing and operating a replacement VAMC at the Brownsboro Road site, but continuing operations at the existing Louisville VAMC. VA intends to issue a "Finding of No Significant Impact" following the public review period, providing there are no substantive comments that warrant further evaluation.

Comments may be submitted to LouisvilleReplacementHospitalComments@va.gov or Robley Rex VAMC, Attn: Replacement VAMC Activation Team Office, 800 Zorn Avenue, Louisville, KY 40206. The favor of providing any reply within 30 days is requested.

If you have any questions, please contact me at (224) 610-3817 or George.Odorizzi@va.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "George Odorizzi".

George Odorizzi, PE, CCM
Project Manager

Enclosure: CD with Draft Site-Specific EA



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction and Facilities Management
Washington DC 20420

February 23, 2015

Thomas E. Gamble, Chairperson
Miami Tribe of Oklahoma
P.O. Box 1326
Miami, OK 74355-1326

Dear Mr. Gamble:

The United States Department of Veterans Affairs (VA) is providing the enclosed *Draft Site-Specific Environmental Assessment: Proposed Replacement VA Medical Center Campus, Louisville, Kentucky* for the Miami Tribe of Oklahoma's review and comment.

This site-specific environmental assessment (EA) identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic effects associated with constructing and operating the proposed new Robley Rex VA Medical Center (VAMC) campus, which would include a regional Veterans Benefits Administration office. The new campus would be located at 4906 Brownsboro Road in Louisville, Jefferson County, Kentucky, southeast of the intersection of the Watterson Expressway (I-264) and Brownsboro Road. A programmatic EA completed in June 2012 concluded there would be no significant impacts from selecting the Brownsboro Road site for the location of this Proposed Action.

Two alternatives are analyzed in this site-specific EA: VA's Proposed Action to construct and operate the replacement campus at 4906 Brownsboro Road, and the No Action Alternative of not constructing and operating a replacement VAMC at the Brownsboro Road site, but continuing operations at the existing Louisville VAMC. VA intends to issue a "Finding of No Significant Impact" following the public review period, providing there are no substantive comments that warrant further evaluation.

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If you have any questions, please contact me at (224) 610-3817 or George.Odorizzi@va.gov.

Sincerely,

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George Odorizzi, PE, CCM
Project Manager

Enclosure: CD with Draft Site-Specific EA



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction and Facilities Management
Washington DC 20420

February 23, 2015

John P. Froman , Chief
Peoria Tribe of Indians of Oklahoma
P.O. Box 1527
Miami, OK 74355-1527

Dear Mr. Froman:

The United States Department of Veterans Affairs (VA) is providing the enclosed *Draft Site-Specific Environmental Assessment: Proposed Replacement VA Medical Center Campus, Louisville, Kentucky* for the Peoria Tribe of Indians of Oklahoma's review and comment.

This site-specific environmental assessment (EA) identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic effects associated with constructing and operating the proposed new Robley Rex VA Medical Center (VAMC) campus, which would include a regional Veterans Benefits Administration office. The new campus would be located at 4906 Brownsboro Road in Louisville, Jefferson County, Kentucky, southeast of the intersection of the Watterson Expressway (I-264) and Brownsboro Road. A programmatic EA completed in June 2012 concluded there would be no significant impacts from selecting the Brownsboro Road site for the location of this Proposed Action.

Two alternatives are analyzed in this site-specific EA: VA's Proposed Action to construct and operate the replacement campus at 4906 Brownsboro Road, and the No Action Alternative of not constructing and operating a replacement VAMC at the Brownsboro Road site, but continuing operations at the existing Louisville VAMC. VA intends to issue a "Finding of No Significant Impact" following the public review period, providing there are no substantive comments that warrant further evaluation.

Comments may be submitted to LouisvilleReplacementHospitalComments@va.gov or Robley Rex VAMC, Attn: Replacement VAMC Activation Team Office, 800 Zorn Avenue, Louisville, KY 40206. The favor of providing any reply within 30 days is requested.

If you have any questions, please contact me at (224) 610-3817 or George.Odorizzi@va.gov.

Sincerely,

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George Odorizzi, PE, CCM
Project Manager

Enclosure: CD with Draft Site-Specific EA



DEPARTMENT OF VETERANS AFFAIRS
Office of Construction and Facilities Management
Washington DC 20420

February 23, 2015

Michell Hicks, Principal Chief
Eastern Band of Cherokee Indians
Qualla Boundary, P.O. Box 455
Cherokee, NC 28719

Dear Mr. Hicks:

The United States Department of Veterans Affairs (VA) is providing the enclosed *Draft Site-Specific Environmental Assessment: Proposed Replacement VA Medical Center Campus, Louisville, Kentucky* for the Eastern Band of Cherokee Indian's review and comment.

This site-specific environmental assessment (EA) identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic effects associated with constructing and operating the proposed new Robley Rex VA Medical Center (VAMC) campus, which would include a regional Veterans Benefits Administration office. The new campus would be located at 4906 Brownsboro Road in Louisville, Jefferson County, Kentucky, southeast of the intersection of the Watterson Expressway (I-264) and Brownsboro Road. A programmatic EA completed in June 2012 concluded there would be no significant impacts from selecting the Brownsboro Road site for the location of this Proposed Action.

Two alternatives are analyzed in this site-specific EA: VA's Proposed Action to construct and operate the replacement campus at 4906 Brownsboro Road, and the No Action Alternative of not constructing and operating a replacement VAMC at the Brownsboro Road site, but continuing operations at the existing Louisville VAMC. VA intends to issue a "Finding of No Significant Impact" following the public review period, providing there are no substantive comments that warrant further evaluation.

Comments may be submitted to LouisvilleReplacementHospitalComments@va.gov or Robley Rex VAMC, Attn: Replacement VAMC Activation Team Office, 800 Zorn Avenue, Louisville, KY 40206. The favor of providing any reply within 30 days is requested.

If you have any questions, please contact me at (224) 610-3817 or George.Odorizzi@va.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "George Odorizzi".

George Odorizzi, PE, CCM
Project Manager

Enclosure: CD with Draft Site-Specific EA



PEORIA TRIBE OF INDIANS OF OKLAHOMA

118 S. Eight Tribes Trail (918) 540-2535 FAX (918) 540-2538

P.O. Box 1527

MIAMI, OKLAHOMA 74355

CHIEF
John P. Froman

SECOND CHIEF
Jason Dollarhide

March 11, 2015

George Odorizzi, PE, CCM
Project Manager
Department of Veterans Affairs
Office of Construction and Facilities Management
Washington, DC 20420

Re: Proposed Replacement VA Medical Center Campus, Louisville, Jefferson County, Kentucky

Thank you for providing notice of the referenced project. The Peoria Tribe of Indians of Oklahoma is unaware of any documentation directly linking Indian Religious Sites to the proposed project location. There appear to be no objects of cultural significance or artifacts linked to our tribe located in or near the project location.

The Peoria Tribe of Indians of Oklahoma is unaware of items covered under NAGPRA (Native American Graves Protection and Repatriation Act) to be associated with the proposed project site. These items include: funerary or sacred objects; objects of cultural patrimony; or ancestral human remains.

The Peoria Tribe has no objection at this time to the proposed project. If, however, at any time items are discovered which fall under the protection of NAGPRA, the Peoria Tribe requests immediate notification and consultation. In addition state, local and tribal authorities should be advised as to the findings and construction halted until consultation with all concerned parties has occurred.

Thank you,

Cynthia Stacy
Special Projects Manager/NAGPRA

TREASURER
Aaron Wayne Blalock

SECRETARY
Tonya Mathews

FIRST COUNCILMAN
Carolyn Ritchey

SECOND COUNCILMAN
Craig Harper

THIRD COUNCILMAN
Alan Goforth

From: Nekole Alligood [mailto:NAlligood@delawarenation.com]
Sent: Monday, May 18, 2015 2:24 PM
To: Odorizzi, George (CFM)
Cc: Corey Smith
Subject: [EXTERNAL] EA for proposed replacement of VA Medical Center Campus, Louisville, KY

Good afternoon, Mr. Odorizzi, I would like to apologize for getting in touch with you beyond the 30 day review period; I have fallen behind in my reviews.

A formal letter will be sent, but in the meantime I have reviewed the CD included with your letter and find no concerns for the construction of the proposed new VA facility. Considering its proximity to an already developed area, it seems potential for prehistoric or historic findings are minimal although should it occur, construction must be immediately stopped and the proper state entities notified as well as the tribes with historic oversight for the area.

Best regards,
Nekole Alligood

*Nekole Alligood
Director of Cultural Preservation
Delaware Nation
31064 HWY 281
PO Box 281
Anadarko, OK 73005
Phone: 405-247-2448
Fax: 405-247-8905*