ENVIRONMENTAL ASSESSMENT
Lexington Veterans Affairs Medical Center
Proposed Community Living Center
Continuing Care Facilities

Department of Veterans Affairs
Network Contracting Office 9
Leestown Division
2250 Leestown Road
Lexington KY 40511
Project # 596-332
May 2017

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EXECUTIVE SUMMARY

The Department of Veterans Affairs (VA) is proposing to construct a new Community Living Center on the Lexington Veterans Affairs Medical Center Leestown Division campus. The goal for the project is the design of two (2) ‘Green House’ model senior care facilities, approximately 11,000 square feet in size each. The new homes will be designed using the latest resident centered care concepts. Each home will contain ten (10) beds. One home will be used for hospice level care while the other home will be used for long term skilled nursing care. This project will also provide preliminary site development design for the two (2) immediate homes and six (6) future homes and a recreational community center for the Green Homes development.

The VA prepared this EA in accordance with NEPA to analyze the potential environmental effects of the Proposed Action on a range of physical, biological, and human resources. The EA identifies agency consultations that have occurred or are expected to occur prior to implementation of the proposed action. The EA also evaluates the No Action Alternative, under which the Proposed Action would not be implemented. Table ES-1 summarizes the environmental effects of the Proposed Action.
<table>
<thead>
<tr>
<th>Resource</th>
<th>Proposed Action Impacts</th>
<th>Proposed Action Management Measures</th>
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<tbody>
<tr>
<td>Aesthetics</td>
<td>The removal of some mature trees during construction, the natural topology of the site, and the conforming appearance of the proposed buildings will not impact the visual aesthetic of the historic portion of the VAMC campus.</td>
<td>Trees and shrubs will be planted in accordance with the proposed landscaping plan. The area of impact is still screened from the historic campus building by mature trees and natural slopes. There are no residential areas adjacent to this corner of the campus to be impacted by the project.</td>
</tr>
<tr>
<td>Air Quality</td>
<td>Some impact on air quality is anticipated during the construction phase of the project due to dust generated from earthwork, welding fumes, surface coating and construction equipment emissions.</td>
<td>The project specifications require dust abatement provisions. The proposed project and related operations are not anticipated to result in air emissions in excess of applicable criteria. There are no hazardous materials associated with the site or the project. Air emissions from occupying the finished project are not expected to exceed any existing requirements.</td>
</tr>
<tr>
<td>Community Service</td>
<td>Additional impacts during construction to community services are not anticipated because security will be provided by the VA security, potable water from onsite water system and temporary sanitary services (such as portable toilets) will be provided.</td>
<td>As the number of employed people during the normal operations is anticipated to be similar to existing conditions, an additional impact to community services is not anticipated. Based upon the above information, a significant effect to the community service attribute from long-term normal operations is not anticipated.</td>
</tr>
<tr>
<td>Cultural Resources</td>
<td>No archaeological and historical resources are anticipated to be encountered during construction and operation of the CLC.</td>
<td>Minimizing the amount of disturbance to existing features during construction including landscape elements. The cultural resources impacts are addressed Historic Property Review which details actions the VA will take to mitigate the impacts to a level of non-significance.</td>
</tr>
<tr>
<td>Environmental Justice</td>
<td>Construction of the CLC is not anticipated to change minority or disenfranchised population affected environments including air, water, land use or natural resources as the proposed building area currently is owned and operated by the VA.</td>
<td>The VA provides equal access to minorities, encourages the hiring of disabled veterans and disadvantages businesses enterprises. There are no residential areas impacted by the location of this project.</td>
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No impacts would occur
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<tbody>
<tr>
<td>12898 is not anticipated.</td>
<td></td>
<td>No impacts would occur</td>
<td></td>
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<tr>
<td>Floodplains, Wetlands and Coastal Zone</td>
<td>There are no nearby wetlands, floodplains or coastal areas. There is no anticipated significant effect to floodplains, wetlands and coastal zones during construction.</td>
<td>Stormwater during construction will be managed in accordance with BMPs to reduce stormwater impacts. The potential for flooding associated with discharges to the nearby creeks is mitigated by infiltrating stormwater instead of direct discharge.</td>
<td></td>
</tr>
<tr>
<td>Geology and Soils</td>
<td>The CLC buildings are not located within a seismically active portion of the United States.</td>
<td>The proposed buildings will be designed to reduce impacts from earthquakes as required in the International Building Code (IBC) Seismic Standard. Procedures will be put in place to reduce the transport of sediment during inclement weather by preparation of a Stormwater Pollution Prevention Plan.</td>
<td>No impacts would occur</td>
</tr>
<tr>
<td>Hydrology and Water Quality</td>
<td>Sediment generated during rain events within areas of soil intrusive activities associated with grubbing, grading and excavations will be contained and post construction stormwater will be detained for on-site treatment and absorption without impact to historic and natural waterways.</td>
<td>Maintaining adequate stormwater and runoff controls in accordance with construction documents and associated Storm Water Pollution Prevention Plan (SWPPP). On site stormwater retention and treatment prior to absorption and compliance with regulations including best management practices (BMPs) will reduce discharges of contamination to groundwater.</td>
<td>No impacts would occur</td>
</tr>
<tr>
<td>Land Use</td>
<td>The construction land use conditions for the adjoining areas are not anticipated to be affected by the CLC construction as the proposed use is consistent with the current use Therefore, a significant effect is not anticipated.</td>
<td>The proposed action is not anticipated to have adverse effects on the land use in the vicinity of the project including residential, parkland, or commercial properties, as the use is consistent with the current campus use.</td>
<td>No impacts would occur</td>
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### Table ES-1 Summary of Environmental Effects

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<td>Noise</td>
<td>Temporary increase in noise levels is anticipated during construction. There are no residential area near the construction zone. A significant effect is not anticipated for this impact.</td>
<td>The contractor will be required to implement BMPs to reduce noise levels during construction. Occupied project is intended to be a quiet zone area.</td>
<td>No impacts would occur</td>
</tr>
<tr>
<td>Socioeconomics</td>
<td>It is anticipated that socioeconomic impacts from implementation of the proposed CLC building construction will have a short-term positive impact on employment due to hiring of construction personnel and associated ancillary positive impact. It is likely the construction workers will be retained from the existing population surrounding Lexington and therefore additional impacts to public services such as schools, police and fire departments are not anticipated. Based on the above, a significant impact to Socioeconomic Condition during Construction is not anticipated.</td>
<td>The proposed operations within the CLC will retain employment of personnel within the VAMC. As the number of employed people during the normal operations is anticipated to be similar to existing conditions, an additional impact to public resources such as schools, police and fire departments is not anticipated.</td>
<td>No impacts would occur</td>
</tr>
<tr>
<td>Solid and Hazardous Materials</td>
<td>No asbestos or lead based paint will be encountered during construction activities. The facility will contain an emergency generator with an associated diesel aboveground storage tank with built-in double walled containment sealed against water intrusion. A significant effect is not anticipated for this impact.</td>
<td>This is a greenfield construction project so no hazardous materials are believed to be on or near the construction activities. The generator will be specified to have an integral to account for the additional stored diesel and require BMPs to be implemented to reduce the potential for accidental spills contaminating the environment.</td>
<td>No impacts would occur</td>
</tr>
<tr>
<td>Transportation and Parking</td>
<td>The buildings and lots the most frequently utilized on campus and the buildings will remain operational throughout the construction phase and are remote from the construction area. Most visitors drive personal</td>
<td>The normal operation condition includes construction of parking spaces that meets the projected need for residents, staff and visitors. In addition, ADA compliant parking spaces will be located within the vicinity of the buildings. As the services provided in the CLC are consolidated from services currently provided in other buildings within the VAMC complex,</td>
<td>No impacts would occur</td>
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### Table ES-1 Summary of Environmental Effects

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<td>vehicles onto the campus for patient care or consultations in these buildings and will not be impacted by the construction of this project. Note: Construction-related traffic would be temporary in nature and limited in extent and would not result in long-term increases in traffic volumes in the neighborhood.</td>
<td>additional traffic is not anticipated.</td>
<td></td>
</tr>
<tr>
<td>Utilities</td>
<td>Archaeological resources are not anticipated to be encountered during utility excavation. A significant effect is not anticipated for this impact.</td>
<td>The cultural resources impacts are addressed Historic Property Review which details actions the VA will take to mitigate the impacts to a level of non-significance.</td>
<td>No impacts would occur</td>
</tr>
<tr>
<td>Wildlife and Habitat</td>
<td>The proposed construction activities will be located outside of recommended buffers for species identified in the area. The site has the potential to contain the following endangered species: ☐ The Buffalo Running Clover ☐ The Short’s Bladderwort ☐ The Gray Bat ☐ The Indiana Bat ☐ The Northern Long-eared Bat</td>
<td>The project does not impact any potential bat habitat. The Clover and Bladderwort will need to be surveyed for and if found mitigation steps taken during construction. The campus has adjacent similar meadow areas that would be suitable for transplant. There are no critical habitats in this location, a significant effect to wildlife and habitat attribute during construction is not anticipated for the Gray Bat. The removal of older trees can impact the roosting colonies of the Indiana and Northern Long-eared Bat. These trees need to be surveyed during the breeding months and mitigating action taken.</td>
<td>No impacts would occur</td>
</tr>
</tbody>
</table>
1.0 INTRODUCTION

1.1 Project Background

The Department of Veterans Affairs (VA) is proposing to construct two (2) ‘Green House’ model senior care facilities, approximately 11,000 square feet in size each. The new homes will be designed using the latest resident centered care concepts. Each home will contain ten (10) beds. One home will be used for hospice level care while the other home will be used for long term skilled nursing care. This project will also provide preliminary site development design for two (2) immediate homes and six (6) future homes and a recreational community center for the Green Homes development. Design objectives for the design of this project are as follows.

- Create a resident centered and family friendly atmosphere that is personalizing and welcoming with a sense of being cared for and loved.
- Provide a relaxing atmosphere that balances the preferences for both male and female veterans.
- Providing single resident rooms with attached restrooms will give residents and families enhanced privacy.
- Provide options that allow the resident a sense of control over their environment, i.e. control over lighting, media options and temperature.
- Providing family zones such as the living room, open kitchen, dining room and quiet room will help residents with more presence of family and friends. These spaces provide a sense of community which help strengthen relationships. Variable height kitchen counters will invite residents to sit down and interact with staff as they prepare meals in the open area. Often families and friends need a private, comfortable place and this can be easily accommodated with comfortable and easily arranged furniture in the living room and quiet room.
- Providing extended clearances and mobility equipment will increase staff abilities and will aid in their retention and satisfaction.

This Environmental Assessment (EA) was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code 4321 et seq.), the Council on Environmental Quality (CEQ) Regulations for Implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and 38 CFR Part 26 (Environmental Effects of the Department of Veterans Affairs Actions). This EA has also been prepared in accordance with the VA NEPA.
1.2  Purpose and Need

An increasing number of veterans are approaching an age where care is needed apart from the traditional hospital setting. A Community Living Center program has evolved to provide that care in what used to be called a nursing home in a residential neighborhood setting.

Unlike many nursing homes in the past, a Community Living Center resembles "home" as much as possible. There are activities for Veterans of all ages. There are family friendly places for visiting. Veterans are invited to decorate their rooms. And, pets are allowed to visit or live in the Community Living Center.

Veterans may stay for a brief time or, in rare instances, for the rest of their life. It is a place where Veterans can receive nursing home level of care, which includes help with activities of daily living (e.g., bathing and getting dressed) and skilled nursing and medical care. The mission of a Community Living Center is to restore each Veteran to his or her highest level of well-being. It is also to prevent declines in health and to provide comfort at the end of life.

Community Living Centers provide these services:
- 24-hour skilled nursing care (e.g., help with a wound or IV care)
- Restorative care
- Access to social work services
- Geriatric evaluation and management

Some Community Living Centers also provide these services:
- Mental health recovery care
- Special care for Veterans with dementia or other cognitive deficits
- Respite Care
- Palliative Care and Hospice Care for end of life

Locating the Community Living Center on a remoted corner of the campus at the Lexington Veterans Administration Medical Center allows the community to be in a secure, quiet, neighborhood location with close access to hospital facilities and easy accessibility for family and friend visitation.

1.3  Agency Consultation

The following agencies were consulted as part of this EA.

- United States Department of Agriculture (USDA) Natural Resources Conservation Services - The USDA was consulted with respect to soil survey.
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- Unites States Environmental Protection Agency (USEPA) – The USEPA was consulted with respect to environmental regulations.
- U.S. EPA Region 4 - NEPA Office
- United States Department of the Interior – National Park Service/ Historic American Building Survey – The National Register of Historic Places was consulted with respect to the Historic features of the Campus Historic District.
- U.S. Department of the Interior, Fish and Wildlife Service
- KY Department for Environmental Protection
- Kentucky Department of Fish and Wildlife Resources, Environmental Section
- Lexington-Fayette Urban County Government, Department of Environmental Quality
- Lexington-Fayette Urban County Government, Division of Planning

2.0 ALTERNATIVES

2.1 Development of Alternatives

The VA considered the following alternatives to meet the needs of the growing aging veterans community: (1) construct new CLC, (2) renovate existing buildings, (3) contract out primary and specialty care to outside providers. Alternatives 2 and 3 were considered but not carried forward for reasons discussed below. Constructing a new CLC was selected as the preferred alternative and will be analyzed in-depth in this EA as the Proposed Action.

2.1.1 Alternative 1, (Preferred) Construct new CLC

A new state-of-the-art Community Living Center will be constructed that will house most of the continuing care needs at the medical center. The new CLC will be remote enough from the main hospital buildings to reflect a neighborhood environment yet within the boundary of the Medical Center and close enough to facilitate additional care as needed.

2.1.2 Alternative 2, Renovate

None of the existing buildings on campus have the configuration and access that meet the program requirements. The Historic nature of the existing buildings limits the wheelchair and visitor access required for a Community Living Center and the CLC is intended to be a home like setting not found in existing portions of the campus.

2.1.3 Alternative 3, Contract Out

Contracting out primary and specialty care to outside providers is not a viable option as local availability of providers is limited in this community and would require specific security applications. For these reasons, contracting out all the care envisioned by this program under this alternative is not viable.
2.2 Alternatives Retained for Detailed Analysis

2.2.1 Proposed Action Alternative

Alternative 1, Construct a new CLC, was selected as the preferred alternative and will be analyzed in-depth in this EA as the Proposed Action Alternative. The new CLC buildings will be a series of 8 one story buildings with full handicap access in a remote area of campus readily available to visitors for the patients in a home like, neighborhood setting. The final CLC building design will be reviewed with the Kentucky State Historic Preservation Organization, Lexington-Fayette Urban County Government, Blue Grass Trust and ACHP as required by Section 106 of the National Historic Preservation Act.

Additional ancillary actions associated with constructing the CLC include the following:

- Extension of an existing on campus Fire Suppression Water Line – Installation of an extension to the fire suppression water line that will service the new CLC building is proposed between the CLC building and an existing Campus water line.
- Potable Water Line – Extension of a potable water line to serve the CLC building is proposed from the existing utility lines to the new building.
- Electric Line – Extension of an electrical line to serve the CLC building is proposed from existing utility line location with a new electrical service to the new building.
- Natural Gas Line Installation – Extension of a natural gas line to serve the CLC building is proposed from the existing utility line to the new building.
- Sanitary Sewer Line – Installation of a sanitary sewer line that runs adjacent to the site is proposed to service the new CLC buildings.
- Parking Spaces – Construction of additional paved parking spaces are proposed in the vicinity of the CLC buildings for visitors.

2.2.2 No Action Alternative

Under this alternative, the Proposed Action would not be implemented. The No Action alternative will be analyzed in this EA to provide a baseline from which to compare the Proposed Action alternative. The impacts of the Proposed Action will be contrasted with the current condition and future condition in the absence of the project.
3.0  AFFECTED ENVIRONMENT/ENVIRONMENTAL CONSEQUENCES

A detailed assessment of the effect of the Proposed Action for each environmental attribute is provided below. For each attribute of the proposed action, the existing condition, the anticipated construction condition and the final normal operation condition are discussed when applicable. In addition, the no action alternative is discussed.

3.1  Aesthetics

The VAMC campus and proposed CLC building area is located within the Lexington VA Medical Center, Leestown Division Historic District. The threshold of significance for the aesthetics attribute is not a significant effect as defined in Section 106 of the NHPA.

The removal of some mature trees during construction, the natural topology of the site, and the conforming appearance of the proposed buildings will have limited impact on the visual aesthetic of the historic portion of the VAMC campus. The area of impact is still screened from the historic campus building by mature trees and natural slopes. Note that the VAMC will comply with the Migratory Bird Act Treaty when removing trees. There are no residential areas adjacent to this corner of the campus to be impacted by the project.

3.1.1  Aesthetics No Action Alternative

As no action would occur under this alternative a significant effect to the Historic District would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

3.1.2  Aesthetics Existing Condition Proposed Action

The existing visual setting of the proposed CLC site consists of a historic campus with buildings constructed from the 1930s to the 1950s. The site consists of asphalt paved parking lots, vegetative buried utility corridors, grass lawn with mature trees and a park like setting. No buildings or site features listed in the Historic District Nomination, either contributory or non-contributory are impacted by this project.

3.1.3  Aesthetics Construction Condition Proposed Action

Construction activity associated with the CLC buildings, associated utility upgrade and parking lot improvements is anticipated to be completed over a temporary period of time. Vegetation removed during construction is anticipated to include approximately 20 trees and associated shrubs and grass-covered lands. The removal of mature trees during construction will impact the visual aesthetic of this portion of the VAMC campus, however the landscape plan calls for new tree planting that will mitigate the effect and the site is screened from the historic campus areas.
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3.1.4 Aesthetics Normal Operation Condition Proposed Action
The main buildings on campus are classical revival in style. The ancillary buildings of the campus, including the nearby historic residential complex, reflect some elements of Colonial Revival detailing but to a lesser extent than the main building. They exhibit minimal ornamentation, aside from the symmetrical fenestration, brick exteriors, façade door surrounds, triangular pediments, brick banding, brick quoins, and gable-roof dormers.

The new project utilizes some of these elements without trying to mimic the historic style. The one-story hip-roofed buildings are planned to have a residential aspect with a brick base matching the color of the prevailing campus brick with lap siding above. The fenestration is similar to the adjacent historic residential structures in size and spacing and the roofs have pedimented gables and dormers that allow natural light into the central common area of the houses. The new structures will be screened from the adjacent residential buildings by existing historic vegetation as it is from the main campus buildings. The windows will be double hung sashes resembling the double hung windows in the historic residential buildings.

3.2 Land Use
The proposed use of the land is consistent with the historic function and use of the Medical Center campus. This site has not been built on previously and is using the park like setting as part of the building function for convalescing veterans. The threshold of significance for the land use attribute consists of general conformance with the adjacent uses.

3.2.1 Land Use No Action Alternative
As no action would occur under this alternative a significant effect to the land use would not be anticipated as the current use is consistent with the zoned use of the property. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

3.2.2 Land Use Existing Condition Proposed Action
The existing land use conditions include a green field condition that has been an un-built site since before the VAMC was established. There are no nearby residential areas.

3.2.3 Land Use Construction Condition Proposed Action
The construction land use conditions for the adjoining areas are not anticipated to be affected by the CLC construction as the proposed use is consistent with the current use Therefore, a significant effect is not anticipated.

3.2.4 Land Use Normal Operation Condition Proposed Action
The proposed action is not anticipated to have adverse effects on the land use in the vicinity of the project including residential, parkland, or commercial properties, as the use is consistent with the current campus use.
3.3 Air Quality

Some impact on air quality is anticipated during the construction phase of the project due to dust generated from earthwork, welding fumes, surface coating and construction equipment emissions. The project specifications require dust abatement provisions. The occupied project and related operations are not anticipated to result in air emissions in excess of applicable criteria. There are no hazardous materials associated with the site or the project.

3.3.1 Air Quality No Action Alternative

As no action would occur under this alternative a significant effect to the air quality would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

3.3.2 Air Quality Existing Condition

The EPA Region 4 has not currently designated Lexington Kentucky a Maintenance Area for particulate matter. The Fayette County area has not been designated a non-attainment area.

3.3.3 Air Quality Construction Condition

Some impact on air quality is anticipated during the construction phase of the project due to dust generated from earthwork, welding fumes, surface coating and construction equipment emissions. The proposed project and related operations are not anticipated to result in air emissions in excess of the NAAQS.

In accordance with the General Conformity Rule under the Clean Air Act, federal actions must comply with the national ambient air quality standards. Specifically, a federal agency must demonstrate that an action approves permits or supports the SIP. However, there are three exceptions to the General Conformity Rule including (1) Actions covered by the transportation conformity rule, (2) actions with associated emissions below specified de minimis levels, and (3) other actions with are either exempt or presumed to conform. As the facility is anticipated to generate less than 100 tons per year of PM10 particulate matter, the action is considered de minimis and therefore exempt from the General Conformity Rule.

The project specification will detail dust and associated construction particulate mitigation measures required during construction of the proposed CLC building. The use of ozone depleting substances (ODS) will be mitigated in the project specification. Based on the above, a significant effect to air quality during construction is not anticipated.

3.3.4 Air Quality Normal Operation Condition

Impacts to air quality in excess of NAAQS primary standards air emissions are not anticipated during normal operations including particulate, ozone and carbon monoxide emissions from patients, staff and visitors vehicles to the CLC facility. Based on the above, a significant effect during normal operation is not anticipated. The existing source air permit will be modified
to incorporate all additional emissions emitting equipment.

3.4 Cultural Resources

The threshold of significance for the cultural resources attribute is not a significant effect as defined in Section 106 of the National Historic Preservation Act of 1996. Unknown and subsequent discoveries during construction can be mitigated through consultation.

3.4.1 Cultural Resources No Action Alternative

As no action would occur under this alternative a significant effect to cultural resources would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

3.4.2 Cultural Resources Existing Condition

The Lexington Veterans Administration (VA) Hospital, currently known as the Veterans Affairs Medical Center, Leestown Division, Lexington, Kentucky, is located at 2250 Leestown Road. Located within a campus setting, the hospital is found on the southwest side of Leestown Road approximately 2.7 miles northwest of downtown Lexington, the seat of government in Fayette County.

The original and ongoing mission of the facility has been to provide health care to veterans of the United States. The hospital was opened in 1931 as a general medical and surgical hospital and was converted to a neuropsychiatric hospital in 1934. The surviving campus preserves the characteristics of both property sub-types of Second Generation Veterans Hospitals. The nearly rectangular property boundary contains 135 acres with sixty-four resources. Thirty-three resources are considered contributing resources with the majority of these classified as buildings. Contributing resources include those that retain integrity and were utilized and/or constructed by the hospital during the historic district's period of significance (1930–1950). The majority of the noncontributing resources are smaller maintenance, utility, or service buildings constructed after 1950. Most of the larger buildings constructed after the period of significance are located in the maintenance/utility area of the campus and include the boiler plant, the utility shops building, the chiller building, and the oil storage tanks. The campus is composed of a monumental main building, patient ward/treatment buildings, a recreation building, kitchen/dining hall/boiler house/garage building, residential quarters, and maintenance/utility buildings. These buildings are loosely grouped by original function into three clusters that may not be totally distinct from one another. The campus setting of the facility consists of mature vegetation, undulating topography, curvilinear and linear landscape elements, and buildings exhibiting Colonial Revival and Classical Revival architectural style ornamentation creating a cohesive architectural campus. Later buildings dating to the second half of the twentieth century were constructed in modern, utilitarian designs.

3.4.3 Cultural Resources Construction Condition

Impacts to cultural resources, including archaeological and historical resources during construction of the CLC are not anticipated due to the projected area of potential impact being
planned to avoid any historical building or artifact listed in the Historic District description.

3.4.4 Cultural Resources Normal Operation Condition

Impacts to cultural resources during normal operations of the CLC, including maintenance activities, are not anticipated to impact the historic district or any artifact on the campus.

3.5 Geology and Soils

Excerpted from the Consulting Services Incorporated “Report Of Geotechnical Exploration”, July 16, 2016  CSI # LX160156

The site is located in the Inner Bluegrass region of the Blue Grass Physiographic Region of Kentucky. This area consists of gently rolling topography and rich, fertile soils. Published topographic mapping by the United States Geological Survey (USGS) indicates the elevations in the site vicinity range from 900 feet to 920 feet.

3.5.1 Geology and Soil No Action Alternative

As no action would occur under this alternative a significant effect would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

3.5.2 Geology and Soils Existing Condition

A review of the USGS Geologic Map of the Lexington West Quadrangle, (dated 1967), indicates that the project site is underlain by Middle Ordovician aged rock deposits; specifically, the Grier Limestone Member of the Lexington Limestone Formation. The Brannon Limestone Member is also mapped nearby the project site. As mapped, the Grier Limestone Member consists of limestone. The limestone is described as very light-gray to dark gray, medium and coarse grained, with shale partings separating some beds.

The Grier Limestone Member has an elevated karst risk. For this geology, karst activity is usually present near “fingers” of this member. The geologic dip in the area of the project site is less than 1 percent to the southwest. There are no faults mapped within one mile of the project site.

As with most of the geology of this portion of Kentucky, Karst (sinkholes, weathered bedrock, caverns, erratic bedrock, etc.) is associated with the site geology. Several closed depressions were mapped near the project site. The Karst Potential Map published by the Kentucky Geological Survey (KGS) indicates that the project site is located in an area with high Karst potential.
According to the USDA Soil Survey of Fayette County (NRCS website), the soils underlying the project site vicinity consists of the following series:

- MuB—Mercer silt loam, 2 to 6 percent slopes
- MpC2—McAfee silty clay loam, 6 to 12 percent slopes

The following are issues listed as characteristics of these series, which could be of interest to the project:

- The Mercer silt loam (MuB) is listed as being moderately well drained while the McAfee silty clay loam (MpC2) is listed as being well drained.
- Depth to restrictive feature (i.e. - lithic bedrock) for the soil series MuB is listed as 76 centimeters while the depth to restrictive feature for MpC2 is listed as 71 inches.
- Depth to water table for the soil series MuB is listed as 66 centimeters while the depth to water table for MpC2 is greater than 200 centimeters.
- The soil series MuB is listed as being very limited to the construction of dwellings without basements. Particular issues affecting construction include shrink-swale potential, depth to hard bedrock, slope, and flooding. The soil series MpC2 is listed as being somewhat limited to the construction of dwellings without basements. The particular issues affecting construction include depth to thick cemented pan, depth to thin cemented pan, and depth to saturated zone.
- These soil series are generally listed as being very limited to the construction of shallow excavations. Particular issues affecting construction include depth to bedrock, too clayey, dusty, slope, unstable excavation walls, depth to cemented pan, and depth to saturated zone.
- Both of the soil series are generally listed as being very limited to the construction of local roads and streets. Particular issues affecting construction include low strength, shrink-swell, depth to bedrock, soluble bedrock, slope, depth to thick cemented pan, depth to thin cemented pan, and depth to saturated zone.

3.5.3 Geology and Soils Construction Condition

In this area of Lexington, Atterberg limits testing was performed on four representative samples. Laboratory testing indicated that 3 out of the 4 tested soil samples were fat clay (CH). The Atterberg limits testing on the representative samples indicated a maximum Plasticity Index (PI) of 36 percent. Soils with a PI above 30 percent can have a tendency to shrink/swale with changes in moisture content. Soils with a PI greater than 50 are generally highly susceptible to volume change. Soils with a PI between these limits have moderate volume change potential. The laboratory test results for soil samples from this site fall in the moderate susceptibility range with a maximum PI of 36 percent.

Shrinking and swelling of foundation and bearing soils are generally not as severe in the central Kentucky area as in other areas because long periods of excessively wet or dry weather do not
normally occur. However, if site grading takes place during the dry summer or fall months, significant drying of the exposed subgrade soils may occur. If these soils resaturate after completion of construction, structural distress may be experienced. Also, moisture content loss typically results in settlement of soil supported building components. Where the soil moisture fluctuates, movement may be ongoing throughout the building’s life, resulting in deterioration and building distress. Strength loss may also affect building components but is more likely to adversely affect parking lots - especially flexible asphalt pavements. Accumulation of water beneath pavement followed by repeated traffic loads, may result in the failure of both pavement and the subgrade materials. Therefore, the volume change potential of the soils should be considered for this project.

Methods to control the adverse effects of these soils include soil modification methods (i.e.- undercut/replace, lime stabilization, etc.), providing efficient drainage around the building and pavements, installation of foundation components at depths below levels where moisture contents are subject to significant fluctuation, and implementing more stringent fill specifications for new fill placement. Please reference the later sections of the soils report for specific details pertaining to these fat clay soils.

Bedrock was encountered in our soil borings ranging in depths from 6.3 feet to 24.7 feet. The deepest auger refusal was encountered at boring B-104 and is located within the southernmost building addition footprint. Please note bedrock was not encountered at borings B-201, B-202, and B-203 (proposed parking lot borings) due to these borings being terminated at approximately 5 feet. Therefore, excavating deeper than about 5 to 7 feet may likely encounter rock. The underlying bedrock consists of primarily limestone with some shale laminations. Typically, limestone is not rippable with a D8 (or larger) dozer with a rip blade. Thus, you should expect that some excavations could require the use of a hoe ram.

The construction plans will contain oil erosion and sediment control Best Management Practices (BMPs), as part of a construction Storm Water Pollution Prevention Plan (SWPPP), to address soil intrusive activities including clearing, grubbing, grading, excavating and temporary stockpiling of site soils. BMPs will also address requirements for proper maintenance of construction equipment, spill response procedures and construction equipment refueling requirements to reduce the potential for discharge of petroleum or other hazardous materials to the environment. Therefore, a significant effect during construction is not anticipated.

As stated earlier, the site is situated in an area prone to Karst development. Levels of risk associated with Karst are difficult to assess, especially with our limited subsurface investigation. So, the Owner must assume that there is always a level of risk of sinkholes or soil dropouts which could cause damage to completed structures or pavements in any limestone Karst area. The use of suitable precautionary measures can reduce this risk.

3.5.4 Geology and Soils Normal Operation Condition

The VAMC campus, including the CLC building normal operations, utilizes BMPs to reduce the potential for subsurface soil discharge of hazardous waste. Routine maintenance activities such as landscaping, irrigation system maintenance and pavement maintenance utilize BMPs to
reduce sediment, oil-grease and other pollutants from being discharged to site soils. Therefore, a significant effect during normal operations is not anticipated.

3.6 Hydrology and Water Quality

The threshold of significance for the Hydrology and Water Quality attribute is not envisioned to include impacts to subsurface groundwater as the groundwater level was not found in borings ranging from 48” to 14’-0”. No natural waterway is located near the site and a sedimentation basin will be designed to receive the site stormwater during construction for on site absorption.

3.6.1 Hydrology and Water Quality No Action Alternative

As no action would occur under this alternative a significant effect would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

3.6.2 Hydrology and Water Quality Existing Condition

The Lexington VA Medical Center, Leestown Division is not located geographically adjacent to major surface water bodies; There exists a historic rock lined drainage culvert in this part of the campus but the design will include provision to intercept any ground or surface water without impacting this historic feature.

3.6.3 Hydrology and Water Quality Construction Condition

During the construction of the proposed CLC, there is the potential for surface water impacts from sediment-laden runoff or from hazardous materials spills (oil, gas, hydraulic fluids). Construction will require that temporary erosion control measures be implemented in accordance with regulations for stormwater prevention. The project is over one acre and will require a general permit, (KPDES) which will require a stormwater pollution prevention plan. The containment and absorption of all the surface and groundwater at this location on the campus is not adjacent to any waterway or natural drainage feature. Construction will include compaction, grading, and re-vegetation as part of permanent erosion control. Regardless of the size of each aspect of the project, erosion protection and minimization of runoff during construction will be included as part of the design and construction of the facility. The project specifications will require BMPs to minimize the potential for surface water impacts from sediment laden runoff or from hazardous materials spills (oil, gas, hydraulic fluids) to include secondary containment systems and implementation of erosion and sediment runoff controls.

3.6.4 Hydrology and Water Quality Normal Operation Condition

The normal operation condition includes long-term stormwater management within the CLC building area using swales and pavement drainage to a storm water detention basin. Required BMPs, maintenance and monitoring will be completed. The size of the planned impervious surface is a small percentage of the area of the campus where the site is located and is surrounded by natural pervious vegetated areas with the paved area run-off directed to the
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detention basin sized to contain the maximum stormwater per Code. Based on the above information, a significant effect during the normal operating condition to hydrology and water quality is not anticipated.

3.7 Wildlife and Habitat

The threshold of significance for the Wildlife and Habitat attribute is the Endangered Species Act (ESA).

3.7.1 Wildlife and habitat No Action Alternative

As no action would occur under this alternative a significant effect would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

3.7.2 Wildlife and Habitat Existing Condition

This area of the campus is a park like setting that has been maintained with periodic mowing and landscape maintenance. The portion of the site impacted by the design is a small portion of the existing habitat in this area. The remainder of the site will remain in the existing condition adjacent to the area of impact.

3.7.3 Wildlife and Habitat Construction Condition

The proposed construction activities will be located outside of recommended buffers for species identified in the area. The site has the potential to contain the following endangered species:

- The Buffalo Running Clover
- The Short’s Bladderwort
- The Gray Bat
- The Indiana Bat
- The Northern Long-eared Bat

The Clover and Bladderwort will need to be surveyed for and if found, mitigation steps taken during construction. There are no critical habitats in this location, a significant effect to wildlife and habitat attribute during construction is not anticipated.

Gray bat: The project does not impact any potential Gray bat habitat. Gray bats are restricted to caves or cave-like habitats that are not impacted by the project. Summer caves are normally located close to rivers or lakes where the bats feed. Gray bats have been known to fly as far as 12 miles from their colony to feed. Gray bats feed primarily on flying insects over rivers and lakes. Aquatic insects, particularly mayflies, make up most of their diet.

_The project may possibly impact potential Indiana bat and Northern Longeared bats habitat by the removal of old trees._

Indiana bats hibernate during winter in caves or, occasionally, in abandoned mines. For hibernation, they require cool, humid caves with stable temperatures, under 50° F but above
freezing. Very few caves within the range of the species have these conditions and none are impacted by this project.

After hibernation, Indiana bats migrate to their summer habitat in wooded areas where they usually roost under loose tree bark on dead or dying trees. During summer, males roost alone or in small groups, while females roost in larger groups of up to 100 bats or more. Indiana bats also forage in or along the edges of forested areas. After migrating to their summer areas, females roost under the peeling bark of dead and dying trees in groups of up to 100 or more. Such groups are called maternity colonies.

The removal of older trees indicated in the construction documents should be surveyed during the summer months for male or maternity colonies and mitigating actions taken. Trees found with bat colonies should be left as long as possible and not affected during summer months. Note that not all the indicated tree removal is required for this phase of construction.

**Northern Longeared bats** During the summer, northern long-eared bats roost singly or in colonies underneath bark, in cavities or in crevices of both live trees and snags (dead trees). Males and non-reproductive females may also roost in cooler places, like caves and mines. Northern long-eared bats seem to be flexible in selecting roosts, choosing roost trees based on suitability to retain bark or provide cavities or crevices.

White-nose Syndrome: No other threat is as severe and immediate as the disease, white-nose syndrome. Due to this threat a Final 4(d) Rule for the Northern Long-eared Bat has been established by the US Fish and Wildlife Service and establishes the determinations applicable to federal action. The WNS zone, as mapped, provides the boundary for the distinction of implementation of this rule. The site is located within Counties/Districts with WNS/Pd Infected Hibernacula according to the map updated January 2, 2018.

Incidental take of northern long-eared bats outside of hibernacula resulting from activities other than tree removal is not prohibited. Incidental take resulting from tree removal is prohibited if it: (1) Occurs within a 0.25 mile (0.4 kilometer) radius of known northern long-eared bat hibernacula; or (2) cuts or destroys known occupied maternity roost trees, or any other trees within a 150-foot (45-meter) radius from the known maternity tree during the pup season (June 1 through July 31). Incidental take of northern long-eared bats as a result of the removal of hazardous trees for the protection of human life and property is also not prohibited.

The removal of older trees indicated in the construction documents should be surveyed during the summer months for male or maternity colonies and mitigating actions taken. Trees found with bat colonies should be left as long as possible and not affected during summer months. Note that not all the indicated tree removal is required for this phase of construction.
3.7.4 **Wildlife and Habitat Normal Operation Condition**

The occupied site has the potential to contain the following endangered species:
- The Buffalo Running Clover
- The Short’s Bladderwort
- The Gray Bat
- The Indiana Bat
- The Northern Long-eared Bat

The Clover and Bladderwort will need to be protected or mitigated with the ongoing field mowing and landscaping maintenance. There are no critical habitats in this location, a significant effect to wildlife and habitat attribute after construction is not anticipated.

The removal of older trees indicated in area after construction should be surveyed during the summer months for male or maternity colonies and mitigating actions taken. Trees found with bat colonies should be left as long as possible and not affected during summer months. Note The requirements of the Environmental Assessment (EA) prepared by the U.S. Fish and Wildlife Service (Service) final rule under section 4(d) of the Endangered Species Act (ESA) for the northern long-eared bat (Myotis septentrionalis) (NLEB) dated December 15, 2015.

### 3.8 Noise

The threshold of significance for the noise attribute is the OSHA noise limit.

#### 3.8.1 Noise No Action Alternative

As no action would occur under this alternative a significant effect would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

#### 3.8.2 Noise Existing Condition

The proposed planning area is considered a relatively quiet environment with no significant noise emitters. Minor sources of noise at the proposed site will include the normal vehicular traffic going through the site and along the adjacent roadways.

#### 3.8.3 Noise Construction Condition

The construction phase of the project is subject to noise limitations specified by project specifications. Increases in noise levels would occur in the immediate vicinity of the proposed project site during the construction phase. However, adherence to appropriate OSHA standards would protect the workforce from excessive noise (29 CFR 1926.52). Noise impacts during construction of the proposed project would be short-term in duration and limited to daytime hours. Since construction related noise impacts are temporary in nature and would not expose people residing or working in the area to severe noise levels, it is anticipated that the impacts to residences, patients and employees would not exceed the OSHA noise
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limit. In addition, no work at night or blasting is anticipated at this time. Based upon the above, a significant effect due to noise is not anticipated.

3.8.4 Noise Normal Operation Condition
The completion of the proposed CLC facility is not anticipated to have significant adverse noise impacts. Since the nature of the project is to provide a residential neighborhood environment the noise levels anticipated will be similar to a residential neighborhood. The additional traffic during the normal operation is not anticipated to exceed that already on adjacent area roadways so increase traffic noise is not anticipated. Based upon the above, a significant noise impact from normal operations is not anticipated.

3.9 Floodplains, Wetlands and Coastal Zone Management

The threshold of significance for this attribute is Kentucky Stormwater Quality Regulations.

3.9.1 Floodplains, Wetlands and Coastal Zone No Action Alternative
As no action would occur under this alternative a significant effect would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

3.9.2 Floodplains, Wetlands and Coastal Zone Management Existing Conditions
The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) database was reviewed for flood zoning designation for the site and the site is located in an area that has not been indicated as a floodplain by FEMA. Based on the topographic and geomorphic position of the site on an elevated hillside, the probability of flooding is considered to be low for the proposed CLC building area.

The Geotechnical Exploration Report did not identify the presence of wetlands within the proposed CLC building area.

The VAMC is not located within a Coastal Zone.

3.9.3 Floodplains, Wetlands and Coastal Zone Management Construction Conditions
Stormwater during construction will be managed in accordance with BMPs to reduce stormwater impacts. BMPs installed during construction will require sediment barriers. The potential for flooding associated with discharges to the nearby creeks is mitigated by infiltrating stormwater instead of direct discharge. There are no nearby wetlands, floodplains or coastal areas. Based on the above, a significant effect during construction to floodplains, wetlands and coastal zones is not anticipated.

3.9.4 Floodplains, Wetlands and Coastal Zone Management Normal Operation Conditions
The proposed CLC normal operation condition includes stormwater management BMPs to
address stormwater discharges in accordance with Stormwater Quality regulations. Therefore, an adverse effect during normal operation is not anticipated.

3.10 Socioeconomics

The threshold of significance for the socioeconomic attribute is impact to employment within the vicinity of Lexington and should not generate any increased demand for public resources such as schools, police and fire departments.

3.10.1 Socioeconomics No Action Alternative

As no action would occur under this alternative a significant effect would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

3.10.2 Socioeconomic Existing Condition

Lexington, consolidated with Fayette County and often denoted as Lexington-Fayette, is the second-largest city in Kentucky and the 60th largest in the United States. In the 2016 U.S. Census Estimate, the city's population was 318,449, anchoring a metropolitan area of 506,751 people and a combined statistical area of 723,849 people.

Lexington ranks tenth among US cities in college education rate, with 39.5% of residents having at least a bachelor's degree.

The Leestown Division (LD), located at 2250 Leestown Road, offers inpatient Post-Traumatic Stress Disorder (PTSD) and substance abuse treatment, nursing home care, hospice and respite services, home based primary care, prosthetics and orthotics, geriatrics, optometry, mental health as well as primary care and women's health.

The Veteran population in Lexington's primary service area is estimated at more than 83,000.

3.10.3 Socioeconomic Construction Condition

It is anticipated that socioeconomic impacts from implementation of the proposed CLC building construction will have a short-term positive impact on employment due to hiring of construction personnel and associated ancillary positive impact. It is likely the construction workers will be retained from the existing population surrounding Lexington and therefore additional impacts to public services such as schools, police and fire departments are not anticipated. Based on the above, a significant impact to Socioeconomic Condition during Construction is not anticipated.

3.10.4 Socioeconomic Normal Operation Condition

The proposed operations within the CLC will retain employment of personnel within the VAMC. As the number of employed people during the normal operations is anticipated to be similar to
existing conditions, an additional impact to public resources such as schools, police and fire
departments is not anticipated. Based upon the above information, a significant effect to
socioeconomic attribute from long-term normal operations is not anticipated.

3.11 Community Service

The threshold of significance for the community service attribute is impact to employment within
the vicinity of Lexington. No impact to community service is anticipated.

3.11.1 Community Service No Action Alternative

As no action would occur under this alternative a significant effect would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

3.11.2 Community Service Existing Condition

Potable water and waste water treatment / sanitary sewer connections are currently provided by
the Lexington VA Medical Center, Leestown Division campus distribution system from the local Lexington utility companies. The VAMC currently maintains a security force for security and law enforcement, however, the Lexington Police Department will provide mutual aid if requested.

3.11.3 Community Service Construction Condition

Additional impacts during construction to community services are not anticipated because
security will be provided by the VA security, potable water from onsite water system and
temporary sanitary services (such as portable toilets) will be provided. Impacts to
community services such as schools associated with construction worker dependents is not
anticipated as it is likely construction workers will be retained from the local labor force within the
vicinity of Lexington. Based on the above information, a significant effect to community services
during construction is not anticipated.

3.11.4 Community Service Normal Operation Condition

As the number of employed people during the normal operations is anticipated to be similar to
existing conditions, an additional impact to community services is not anticipated. Based upon
the above information, a significant effect to the community service attribute from long-term
normal operations is not anticipated.

3.12 Solid and Hazardous Materials

The threshold of significance for the solid and hazardous materials attribute is EPA Resource
Conservation and Recovery act (RCRA), EPA Toxic Substance Control Act (TSCA) and EPA
Medical Waste Tracking Act (MWTA) for waste disposal.
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3.12.1 Solid and Hazardous Materials No Action Alternative
As no action would occur under this alternative a significant effect would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

3.12.2 Solid and Hazardous Materials Current Condition
Being a greenfield site no hazardous materials are known to be in the area of impact. The campus may contain buried medical waste from historic operations; however, nothing is indicated in the records or encountered in the borings advanced for the geotechnical investigations.

3.12.3 Solid and Hazardous Material Construction Condition
Hazardous waste is not anticipated to be generated during construction with the exception of routine construction debris, which is anticipated to be disposed at either an offsite municipal landfill approved for the waste stream or construction debris landfill.

Transformers are not anticipated to be encountered during construction. However, if transformers or other potential PCB containing materials are encountered, they should be disposed in accordance with the TSCA.

Buried medical waste encountered during construction will be disposed in accordance with applicable regulations in accordance with the Medical Waste Tracking Act of 1988 (MWTA) at an approved landfill or incinerator.

Emergency Planning and Community Right-to-Know Act (EPCRA) diesel fuel thresholds maybe required depending on the size of the diesel Aboveground Storage Tank (AST) associated with the emergency generator if the total volume of all diesel and gasoline stored within the VAMC complex in ASTs exceeds 10,000-gallons.

The existing Spill Prevention Control and Countermeasure plans will need to be updated to address storage of additional petroleum product in the emergency generator associated with the proposed CLC building.

A significant effect by solid and hazardous materials during construction is not anticipated as these impacts will be mitigated by implementation of EPA and OSHA regulations identified above.

3.12.4 Solid and Hazardous Material Normal Operation Condition
Hazardous waste generated during normal operation would be disposed in accordance with EPA RCRA regulations. Medical waste generated during normal operations would be disposed in accordance with MWTA. Therefore, a significant effect during normal operating condition is not anticipated as wastes generated will be disposed in accordance with applicable EPA
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regulations.

3.13 Transportation and Parking

The threshold of significance for the transportation and parking attribute includes compliance with the Americans with Disability Act (ADA) for parking spaces.

3.13.1 Transportation and Parking No Action Alternative

As no action would occur under this alternative a significant effect would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

3.13.2 Transportation and Parking Existing Conditions

This is a greenfield project, there are no existing parking conditions on this site and the planned parking for patients, visitors and staff will have no effect on the current campus parking.

3.13.3 Transportation and Parking Construction Conditions

The buildings and lots the most frequently utilized on campus and the buildings will remain operational throughout the construction phase and are remote from the construction area. Most visitors drive personal vehicles onto the campus for patient care or consultations in these buildings and will not be impacted by the construction of this project.

Note: Construction-related traffic would be temporary in nature and limited in extent, and would not result in long-term increases in traffic volumes in the neighborhood.

3.13.4 Transportation and Parking Normal Operation Conditions

The normal operation condition includes construction of parking spaces that meets the projected need for residents, staff and visitors. In addition, ADA compliant parking spaces will be located within the vicinity of the buildings. As the services provided in the CLC are consolidated from services currently provided in other buildings within the VAMC complex, additional traffic is not anticipated. Therefore a traffic study was not completed. Based on the above information, a significant effect is not anticipated during the normal operation condition.

3.14 Utilities

The threshold of significance for the utilities attribute includes Section 106 of the National Historic Preservation Act of 1996 that will be mitigated through consultation during utility installation construction specification.

3.14.1 Utilities No Action Alternative

As no action would occur under this alternative a significant effect would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed
3.14.2 Utilities Existing Conditions
Campus-wide existing utilities include potable water, electrical power, sanitary sewer, telephone, and data systems.

3.14.3 Utilities Construction Condition
Utility improvements to the campus associated with the CLC project include installation of a fire suppression water line including backflow preventer, natural gas pipeline, and electrical, and enhanced telecommunications (fiber optic line) for the campus. In addition, the CLC building will be connected to existing campus utilities including potable water pipelines and sanitary sewer. As noted above, the proposed stormwater management will utilize retention basins and on-site absorption

Based on the above information, a significant effect during normal operation is not anticipated.

3.14.4 Utilities Normal Operation Conditions
The normal operation condition includes modernized utility distribution (sanitary sewer, potable water and natural gas) which should have a positive impact to employees. The fire suppression is anticipated to include backflow protection, thus reducing the potential for stagnant water flowing into city potable water lines. Additional positive impacts include energy efficient equipment such as chillers, insulated windows and water conserving toilets. Based on the above information, a significant effect to the normal operation condition is not anticipated.

3.15 Environmental Justice
The threshold of significance for environmental justice attribute is Executive Order 12898.

3.15.1 Environmental Justice No Action Alternative
As no action would occur under this alternative a significant effect would not be anticipated. However, the No Action Alternative would not satisfy the purpose and need for the Proposed Action stated above.

3.15.2 Environmental Justice Existing Condition
The VA provides equal access to minorities, encourages the hiring of disabled veterans and disadvantages businesses enterprises. There are no residential areas impacted by the location of this project.

3.15.3 Environmental Justice Construction Condition
Construction of the CLC is not anticipated to change minority or disenfranchised population affected environments including air, water, land use or natural resources as the proposed building area currently is owned and operated by the VA. Therefore, a significant effect as
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defined in Executive Order 12898 is not anticipated.

3.15.4 Environmental Justice Normal Operation Condition
The proposed action is not anticipated to change minority or disenfranchised population affected environments including air, water, land use or natural resources during the normal operations as the proposed building area currently is owned and operated by the VA. Therefore, a significant effect as defined in Executive Order 12898 is not anticipated.

3.16 Potential for Generating Substantial Controversy
Controversy over impacts from construction, removal of existing mature trees within the campus and appearance of the proposed CLC buildings was mitigated by the selection of a remote part of campus not visible from the Historic buildings. Measures including consultation, avoidance of historical resources, replanting trees and modification of the aesthetics of the proposed buildings to address any controversy are underway.

4.0 PUBLIC INVOLVEMENT

The VAMC may complete public outreach meetings to discuss the proposed CLC project, invited public comment, and provide a forum for the public to discuss the proposed project directly with the VA as needed. Prior to each public meeting, a legal notice will be posted on campus.

5.0 MANAGEMENT MEASURES

Compliance with regulations and implementation of BMPs are not considered mitigation but management measures. Management measures to be implemented during the design and construction of this project to reduce potential negative environmental impacts will follow VA standards and current BMPs for all design disciplines and specified to be implemented by the contractors in the construction documents.

6.0 CONCLUSIONS

The analysis performed in this EA concludes that there would be no significant adverse impact, either individually or cumulatively, to the human environment, provided management measures consisting of best management practices and regulatory compliance measures described in this EA are implemented. Therefore, this EA concludes that a Finding of No Significant Impact (FONSI) is appropriate, and that an Environmental Impact Statement (EIS)
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is not required.

7.0 LIST OF PREPARERS

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<th>Name</th>
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</tr>
</tbody>
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8.0 REFERENCES

- National Environmental Policy Act of 1969 (NEPA)
- Executive Order 12898 – Environmental Justice
- Executive Order 13423 - Strengthening Federal Environmental, Energy, and Transportation Management
- Executive Order 13514 – Federal Leadership in Environmental, Energy, and Economic Performance
- Executive Order 11988 – Floodplain Management
- Executive Order 11990 - Protection of Wetlands
- National Historic Preservation Act (NHPA)
- Clean Air Act (CAA)
- Clean Water Act (CWA)
- Coastal Zone Management Act (CZMA)
- Endangered Species Act (ESA)
- Farmland Protection Policy Act (FPPA)
- Resource Conservation and Recovery Act (RCRA) (ongoing operations)
- Noise Control Act (NCA)
- Oil Pollution Act (OPA)
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- Spill Prevention, Control and Countermeasure Plans (SPCC)
- Toxic Substances Control Act (TSCA)
APPENDIX A

List of Environmental Permits / Modifications

The following environmental permits or modifications are anticipated to be required prior to construction of the proposed action.

- **Air Permit** – The existing source air permit will be modified to incorporate additional emissions emitting equipment. The VA / contractor should ensure that future air discharges are in accordance with EPA NESHAP.
- **EPCRA Assessment** – The VA or contractor shall complete an Emergency Planning and Community Right-to-Know Act (EPCRA) diesel fuel thresholds assessment prior to construction. The assessment will detail if the VAMC complex currently or will subsequent to construction meet the requirements of EPCRA including if the total volume of all diesel and gasoline stored within the VAMC complex in ASTs exceeds 10,000-gallons.
- **SHPO - A 106 evaluation** – The VA or designer / contractor shall comply with any stipulations for archeological resource monitoring during soil intrusive activities.
- **Specifications** - Construction requirement to address potential noise and dust should be anticipated in the project specification.
- **SPCC** – The VA should update the existing SPCC plan to address additional petroleum stored at the proposed CLC emergency generator.
- **General Construction Permit (KPDES Permit)**
- **Stormwater Pollution Prevention Plan**
- **LFUCG Sanitary Sewer CAP permit application**
Environmental Assessment
Lexington Veterans Affairs Medical Center, Leestown Division
Proposed Community Living Center | Continuing Care Facilities

APPENDIX B

AERIAL VIEW OF COMMUNITY LIVING CENTER SITE ON VMAC LEESTOWN DIVISION CAMPUS