



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

DEC 12 2016

Ms. Judy Williams
Robley Rex VAMC
Replacement VAMC Activation Team Office
800 Zorn Avenue
Louisville, Kentucky 40206

Re: EPA Comments on Draft Environmental Impact Statement on the Replacement Robley Rex VA Medical Center, Louisville, Jefferson County, Kentucky, CEQ No: 20160248;
ERP No: E81042

Dear Ms. Williams:

Pursuant to Section 309 of the Clean Air Act and the National Environmental Policy Act, the U.S. Environmental Protection Agency, Region 4, has reviewed the Department of Veterans Affairs (VA) Draft Environmental Impact Statement (DEIS) for the Proposed Replacement Robley Rex VA Medical Center (VAMC). The DEIS evaluates the environmental consequences of the VA's proposal to construct and operate a new 104-bed hospital, diagnostic and treatment facilities, Veterans Benefits Administration regional office, and other improvements. The proposed facilities will increase the VA's capacity to meet Louisville Veteran's healthcare needs.

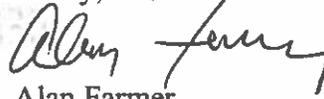
The DEIS examines three alternatives, a No-Action alternative and two Action alternatives sites for the construction of the VAMC. Alternative A and Alternative B involve replacing the existing VAMC Campus and relocating the facility to the 34.9-acre Brownsboro Site or the 99-acre St. Joseph Site. Alternative C, the No-Action Alternative is the continued operation of the existing 47-acre Robley VAMC. The DEIS identifies Alternative A (the Brownsboro Site) as the preferred alternative and Alternative C (No Action) as the environmentally preferred alternative.

This letter provides the EPA's DEIS recommendations on the proposed VAMC construction project. EPA's comments on aesthetic, noise, air, environmental justice, and sustainability measures, and are located in the detailed comments. These comments should be considered in the overall siting and design of the facility, where practicable.

Based on our review of this project, EPA has assigned a rating of EC-1 (Environmental Concerns, Adequate Information) to the DEIS. Consequently, we recommend that every effort should be made to minimize the impacts to surrounding communities and incorporate resource conservation and pollution prevention strategies into the design, siting, and operation of the proposed FCC.

We appreciate the opportunity to provide comments on the DEIS. If there are any questions regarding our comments, you may contact Ntale Kajumba at (404) 562-9620 or kajumba.ntale@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Alan Farmer". The signature is written in a cursive style with a large initial "A" and a long, sweeping tail on the "y".

G. Alan Farmer

Director

Resource Conservation and Restoration Division

Enclosure

EPA Detailed Comments on the DEIS for the Replacement of Robley Rex VMAC

Alternatives

The proposed project examines three alternatives including a No Action Alternative. The two Action Alternatives involve relocating the VAMC to different locations, the Brownsboro Site or the St. Joseph Site. Both the Brownsboro Site and St. Joseph Site increase the VA's capacity to address the healthcare needs of area veterans. The EPA notes that the DEIS identifies the Brownsboro Site (Alternative A) as the VA's preferred alternative. The Brownsboro Site is currently owned by the VA and it is more accessible to the interstate and to a partner hospital. Five alternatives were initially considered during the initial assessment, but the DEIS provides a rationale for the eliminating two of those alternatives from further consideration.

Visual/Aesthetics

The proposed project will noticeably affect the visual character or scenic quality of the existing landscape at both the Brownsboro Site and the St. Joseph Site. According to the DEIS, the buildings will have an adverse visual effect because they will obstruct or detract from a scenic view or will introduce visual elements that are out of scale or character with the surrounding area. The visual impact associated with the Brownsboro and the St. Joseph sites range from major to negligible depending on the observer.

Recommendation: The EPA recommends that the FEIS include commitments to further minimize visual impacts to residents in the vicinity of the proposed facility. Residents have expressed concerns regarding the appearance of the proposed structures, the introduction of buildings and structures that are not in character with the residential area at Brownsboro. Residents have suggested means to further reduce impacts to their viewshed and neighborhoods that should be considered in the FEIS.

Noise and Vibration

Noise and vibration impacts are predicted for the No Action and the proposed Action Alternatives. Background noise levels are also included in the document for each of the alternative sites. The DEIS indicates that noise sensitive land uses exist within the projects vicinity including schools, cemeteries, parks and residential receptors. The primary source of noise and vibration will occur as a result of constructing, then operating the VAMC. According to the DEIS, construction noise will be adverse, short-term and potentially moderate in magnitude. The preferred Brownsboro Site (Alternative A) is a smaller site than St. Joseph Site, therefore the surrounding community may experience more noise and vibration impacts than at St. Josephs.

Comment/Recommendation: The EPA appreciates the VA's commitment to providing early information and schedules on construction activities and expected noise levels and duration to relevant stakeholders. Should blasting occur, pre-blast survey's will also be conducted for residents that request one within one-half mile of the site. In addition, a mechanism for reporting construction-related noise concerns should be established considering that the noise levels may approach/exceed the noise abatement criteria and that construction activities such as pile driving and blasting events may occur. The FEIS should estimate the total project construction time (months, years) in order to help assess the general magnitude and/ duration of the potential construction noise impact.

Air Quality

The document assesses existing air quality conditions in terms of the National Ambient Air Quality Standards (NAAQS) for criteria pollutants. The EPA has set National Ambient Air Quality Standards for six principal "criteria" pollutants. These pollutants are particle pollution (often referred to as particulate matter), ground-level ozone, carbon monoxide, sulfur oxides, nitrogen oxides, and lead. The proposed project is located in Louisville, an area which is currently designated by the EPA as nonattainment for particulate matter (PM_{2.5}).

Comment: The EPA notes that the project will be subject to Title 5 and New Source Review permitting which will ensure that the facility meets the Federal Clean Air Act requirements.

Traffic

Traffic volume in the project area would increase as a result of the proposed project. According to the DEIS, the VA Traffic Impact Study indicates that approximately 10,000 vehicles per day will be added to the road due to the VAMC's relocation to the Brownsboro Site or the St. Joseph Site resulting in additional delays and increase travel times. Measures are discussed that would reduce some of the proposed impacts including roadway widenings, intersection improvements, extended bus routes, vehicle sharing and only using exists into neighborhoods during emergencies.

Comments: Given that traffic and transportation is a key issue for residents and the VAMC, the EPA recommends sustained coordination with the local Kentucky Transportation Cabinet, the Transit Authority of River City and other relevant stakeholders to address some of the proposed transportation improvements needed to support the VAMC. Efforts to continue to work with neighboring residents to ensure that traffic from the facility does not intrude onto surrounding neighborhood streets should be a made.

Environmental Justice

The DEIS includes an environmental justice section. The environmental justice analysis is conducted using the 1997 Council for Environmental Quality's (CEQ) Environmental Justice Guidance under the National Environmental Policy Act. The environmental justice analysis includes the use of the *50% Criterion* and the *Meaningfully Greater Criterion* to compare data from the counties in the Louisville VAMC Service Area to the reference population at the State.

Recommendation: Based on our review, the EPA notes that the *Meaningfully Greater Criterion* is used as part of the assessment, but we have concerns regarding how the criterion was applied. The DEIS used a 10% higher threshold, but the manner in which it is calculated can mean that minority or low-income populations may not be appropriately identified. In the DEIS, it appears that 10% threshold is simply added to a reference population (i.e., 10% threshold+16.3% poverty reference population = 26.3% poverty threshold). However, the way the threshold should be used to yield consistent benchmarks involves taking 10% of 16.3% poverty, which is 1.63 and then adding that to 16.3% resulting in a benchmark of 17.93%. The EPA recommends using this mathematical calculation method for the *Meaningfully Greater Criterion* to yield consistent benchmarks that will be 10% higher than the reference population regardless of what the initial percent population value is.

Green Infrastructure and Pollution Prevention

Incorporation and Use of Green Infrastructure Concepts: Green building practices are considered that provide an opportunity to create environmentally-sound and resource-efficient buildings by using an integrated approach to design. Given the severe drought levels facing Lexington, Kentucky <http://www.plantmaps.com/interactive-kentucky-drought-monitor-map.php> and the national energy policy, resource conservation measures that minimize impacts from major federal facilities are important. The DEIS indicates that the exterior of the buildings will be designed to meet the leadership in Energy and Environmental Design Silver certification for healthcare facilities.

Comment: The EPA supports the VA's commitment to ensure that the exterior of the buildings will be designed to meet the Leadership in Energy and Environmental Design Silver certification for healthcare facilities. We also note the provision highlighted in the DEIS from the VA's Strategic Sustainability Performance Plan which includes "approaches for reducing energy use and cost, finding renewable or alternative energy solutions and using recycled and sustainably produced materials."