

**DRAFT  
ENVIRONMENTAL ASSESSMENT  
OF THE  
PROPOSED DEMOLITION OF BUILDING 14 AND CONSTRUCTION  
AND OPERATION OF A FISHER HOUSE  
DEPARTMENT OF VETERANS AFFAIRS CONNECTICUT  
HEALTHCARE SYSTEM  
WEST HAVEN MEDICAL CENTER  
950 CAMPBELL AVENUE  
WEST HAVEN, NEW HAVEN COUNTY, CONNECTICUT**



**Prepared For:**

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**ENVIRONMENTAL ASSESSMENT ABSTRACT**

LEAD AGENCY: VA Connecticut Healthcare System  
COOPERATING AGENCIES: None  
TITLE OF PROPOSED ACTION: Proposed Demolition of Building 14 and Construction and Operation of a Fisher House, VA Connecticut Healthcare System, West Haven Medical Center, West Haven, Connecticut  
AFFECTED JURISDICTION: West Haven, New Haven County, Connecticut  
POINT OF CONTACT: Mr. Vic Verma, P.E., MBA, M.E.; Tel.: (202) 494-2974  
PROPONENTS: VA

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**DOCUMENT DESIGNATION:** Draft Environmental Assessment (Draft EA)

**ABSTRACT:** This Draft Environmental Assessment (EA) evaluates VA’s Proposed Action to accept a gift of funds from the Fisher House Foundation to demolish Building 14, and in its place, to construct a Fisher House in a 0.57-acre area, located at the southern end of Veteran’s Drive, in the southeastern portion of the VA Connecticut Healthcare System, West Haven Medical Center (West Haven VAMC), 950 Campbell Avenue, West Haven, New Haven County, Connecticut. Following construction, the VA would operate and maintain the Fisher House. Fisher Houses provide a “home away from home” in a supportive environment, offering a free place to stay for the veteran or the family of VA patients receiving medical care at the medical center. Currently, there is not a Fisher House at any VA medical center in Connecticut. Construction and operation of the Fisher House would be the first phase of the Proposed Action.

Building 14, a small two-story building currently used as a Learning Recovery Center, was one of 19 structures identified as a contributing resource to the West Haven VAMC historic district in a draft National Register of Historic Places (NRHP) nomination in 2014. The specific mitigation for historical preservation, due to the loss of Building 14, will be developed through continued consultation among the VA, State Historic Preservation Office (SHPO), and the Advisory Council on Historic Preservation (ACHP), and is anticipated to include at a minimum historic preservation of the West Haven VAMC’s ornate entrance gate on Campbell Avenue, which also was identified as a contributing element in the draft NRHP nomination but currently is in poor condition and not operational. The VA anticipates executing a Memorandum of Agreement (MOA) to affirm the selected commitments for mitigation for historic preservation. The mitigation would be performed as part of the second phase of the Proposed Action, occurring only if Building 14 is demolished.

A proposed third phase of the Proposed Action includes construction and operation of an approximately 0.46-acre parking lot (providing approximately 65 spaces) in the northern portion of the West Haven VAMC. This additional parking was proposed to further minimize the less-than-significant adverse impact on decreased parking availability caused by the Fisher House, which would eliminate 24 parking spaces at the southern end of Veteran’s Drive. This proposed northern parking lot would be funded by the West Haven VAMC, at a future date to be determined.

This Draft EA discusses two alternatives: (1) the Proposed Action, which is the preferred alternative, and (2) the No Action alternative, which would maintain the existing conditions at the West Haven VAMC without implementing the Proposed Action. This Draft EA evaluates possible impacts caused by the Proposed Action on environmental resources including: aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat, including threatened and endangered species; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomics; community services; solid and hazardous materials; transportation and parking; utilities; alternative energy sources; and environmental justice.

The Draft EA concludes that the Proposed Action would have no significant adverse impacts, on a short- or long-term basis, directly or indirectly, individually or cumulatively, on the analyzed environment resources, provided that routine management measures and anticipated mitigation for historic preservation specified in this Draft EA are implemented. Therefore, this Draft EA concludes that a Finding of No Significant Impact (FONSI) is appropriate for the Proposed Action, and that an Environmental Impact Statement (EIS) is not required.

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## **EXECUTIVE SUMMARY**

This Draft Environmental Assessment (EA) has been prepared on behalf of the U.S. Department of Veterans Affairs (VA), to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Proposed Action to accept a gift of funds from the Fisher House Foundation to fund the demolition of Building 14, and in its place, construct a Fisher House in a 0.57-acre area in the southeastern portion of the VA Connecticut Healthcare System, West Haven Medical Center (West Haven VAMC), 950 Campbell Avenue, West Haven, New Haven County, Connecticut. Following construction, the VA would operate and maintain the Fisher House. Currently, there are 65 Fisher Houses nationwide, all near military hospitals or VA facilities, but none in Connecticut. The second phase of the Proposed Action includes mitigation for historic preservation due to the loss of Building 14. While the specific mitigation is still being developed, it is anticipated to include at a minimum the historical preservation of the West Haven VAMC's entrance gate and wall, which along with Building 14 are contributing historical resources to the proposed West Haven VAMC historic district. As part of the proposed second phase, a MOA would be executed to document mitigation commitments. A proposed third phase of the Proposed Action includes constructing and operating an approximately 0.46-acre parking lot (65 spaces) in the northern portion of the West Haven VAMC.

Preparation of this Draft EA is required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 *et seq.*), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and 38 CFR Part 26 (*Environmental Effects of the Department of Veterans Affairs Actions*). This Draft EA has also been prepared in accordance with the VA's *NEPA Interim Guidance for Projects* dated September 30, 2010.

The *purpose* of the Proposed Action is to construct and operate a Fisher House, "a home away from home," to provide an on-site no-cost lodging option for the family members and caregivers of Veterans and Active Duty Service members hospitalized at the West Haven VAMC. Fisher Houses provide the opportunity for family members and caregivers to be actively involved in their loved one's treatment plan, supporting positive clinical outcomes, and provides access to medical care for those Veterans that would not be willing to travel for care without support from family.

The Proposed Action is *needed* because this benefit is not currently available at the West Haven VAMC or elsewhere in Connecticut, requiring an estimated 500 families per year to spend thousands of dollars on off-site lodging costs while their family member is hospitalized.

This Draft EA analyzes the Proposed Action and the No Action Alternative. Under the No Action Alternative, the Proposed Action would not be implemented and conditions at the West Haven VAMC would remain as they currently exist. Veterans and their families would continue to lack free on-site lodging within the West Haven VAMC.

Based on the findings of the Draft EA, the Proposed Action would have no significant adverse impact, over a short- or long-term period, directly or indirectly, individually or cumulatively, on the following environmental resources: aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat, including threatened and endangered species; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomics;

community services; solid and hazardous materials; transportation and parking; utilities; alternative energy sources; and environmental justice. This conclusion is based on the VA's commitment to implement routine management measures and commitment to provide mitigation for historic preservation as part of the Proposed Action, thereby ensuring the level of adverse impacts remains at or below less-than-significant levels.

Comments received during the 30-day public review period for this Draft EA will be documented and considered during preparation of the Final EA.

## **1.0 INTRODUCTION**

This Section provides the reader with necessary introductory and background information concerning the Proposed Action for proper analytical context and identifies the purpose of and need for the Proposed Action and the Federal decision to be made.

### **1.1 West Haven VAMC Background**

The West Haven VAMC is located at 950 Campbell Avenue in West Haven, New Haven County, Connecticut (Figure 1). The West Haven VAMC is part of the VA Connecticut Healthcare System (VACHS), and encompasses an inpatient facility and Ambulatory Care Center at the West Haven VAMC; an Outpatient Care Center in Newington, Connecticut; and six primary care Community Based Outpatient Clinics (CBOCs) in Danbury, New London, Stamford, Waterbury, Willimantic, and Winsted, Connecticut. The VA Connecticut Healthcare System is also affiliated with the Yale University School of Medicine and The University of Connecticut Schools of Medicine and Dentistry, which allow the VA Connecticut Healthcare System to participate in the education and training of more than 675 physicians and dentists each year. Affiliations with more than 150 additional schools allow VA Connecticut to train more than 685 students in allied health disciplines such as nursing, X-ray, pharmacy, physical/occupational therapy, social work, laboratory and nuclear medicine (VA, 2015).

The West Haven VAMC was originally established as the William Wirt Winchester Hospital in 1916 and was designated for the treatment of tuberculosis patients (Woodard & Curran, 2013). Following the end of World War II, the hospital was acquired by VA and gradually transitioned to a general medical care facility. Buildings 1 and 2 (main hospital buildings) were constructed in 1949 and 1952, respectively, and the original hospital buildings were incorporated into the campus.

The West Haven VAMC covers approximately 47 acres. It is improved with 40 buildings, of which 17 buildings are attributed to the original hospital from approximately 1916; 2 buildings are attributed to the post World War II era (1948 to 1958); while the remaining buildings were constructed between 1960 and 2012. The improvements include medical facilities, offices, maintenance and utility structures, storage buildings, and aboveground and underground utilities. Much of the campus is paved, including walkways, roadways, and parking areas with small, isolated pockets of open space and vegetated areas located throughout the campus. The West Haven VAMC intends to construct an approximately 2-acre parking lot with 250 spaces in the northeastern portion of the campus in the near future (VA, 2015).

Of the 40 buildings, 19 are primarily associated with the predecessor tuberculosis hospital, though are currently used for administrative, maintenance, and select patient services. A draft National Register of Historic Places (NRHP) nomination form prepared in 2014 identified these 19 buildings, including Building 14, as contributing resources to the historic district (VA, 2014). Building 14, the location for the proposed Fisher House, is a small two-story building currently used as a Learning Recovery Center where a staff of 10 treat approximately 10-15 patients per day. Building 14 is located at the southern end of Veterans Drive in the southeastern portion of the campus (Figure 2). The West Haven VAMC ornate entrance gate located along Campbell Avenue was also identified as a contributing element to the historic district in the draft NRHP nomination (VA, 2014) (Figure 6). The entrance gate was designed in 1916 by noted landscape architect Beatrice Farrand. Currently, the gate is in poor condition and is not operational (VA, 2014).

Along the West Haven VAMC northern boundary is an undeveloped 0.46-acre area, which is partially wooded and currently utilized for equipment storage (storage containers, construction trailers, etc.) by the West Haven VAMC and construction contractors (Figure 2). This area is the location for the proposed parking lot. Based on historical aerial imagery and topographic maps, this 0.46-acre area did not appear to have been previously developed by the West Haven VAMC (Mabbett, 2016).

Photographs of pertinent site features and relevant existing conditions related to the Proposed Action are presented in the Phase 1 Environmental Site Assessment (Mabbett, 2016) provided in Appendix B.

## **1.2 Fisher House Program Background**

Fisher Houses allow for guests to be at the bedside of their hospitalized loved ones for as long as needed at no charge. Fisher Houses provide the opportunity for family members and caregivers to be actively involved in their loved one's treatment plan, supporting positive clinical outcomes and access to medical care for those Veterans that would not be willing to travel for care without support from family. Families can prepare meals together, do their laundry, relax with a book from the library, watch TV or a DVD, play games, utilize the internet, and visit with other families supporting a sense of normalcy during a very challenging time. Fisher Houses offer a comfortable environment where families can come together to provide support for one another, and establish a peer support network that continues long after the episode of care for the veteran concludes.

Since 1990, Fisher Houses across the nation have provided services to over 250,000 families who have stayed more than 5.8 million days, saving them a combined \$282 million in hotel and transportation costs. Currently, there are 65 Fisher Houses nationwide, all near military hospitals or VA facilities; however, there are no Fisher Houses in Connecticut.

A requirement of VA Fisher Houses is that they must be located on the medical center grounds or within walking distance of a VA medical facility. Fisher Houses are typically 7,800 to 16,800 square feet and provide eight to 20 bedrooms. Each house is professionally furnished and decorated in the style of the local region. They feature private suites with private baths and common areas, including kitchens, laundry facilities, dining rooms, living rooms, and libraries.

## **1.3 Proposed Action Background**

This section provides a brief background of the Proposed Action. A detailed description of the specific elements in the Proposed Action is provided in Section 3.

Due to the extensive development of medical infrastructure over the past century at the West Haven VAMC, the facility is able to provide in- and out-patient medical services to thousands of veterans annually. However, no free on-site lodging for veterans and their families is available while the veteran receives medical treatment at the West Haven VAMC. Likewise, Connecticut has no Fisher Houses or similar VACHS facilities where this benefit is available.

Accordingly, the VACHS in 2007 identified the West Haven VAMC as a priority site for a Fisher House. Between 2007 and 2016, the VACHS, West Haven VAMC, and the Fisher House Foundation began the scoping process for a Proposed Action to establish a Fisher House at the West Haven VAMC. As the scoping process progressed, the West Haven VAMC subsequently identified a second and third phase for additional work for inclusion under the Proposed Action. The second phase would involve restoring the West Haven VAMC's ornate entrance gate and

wall along Campbell Avenue, but would occur only if and after the Fisher House is constructed. The third phase would involve developing the approximately 0.46-acre northern area into a parking lot with approximately 65 spaces, but would only occur if and after the Fisher House is constructed, and only based on a decision to be made in the future by the West Haven VAMC that the parking lot is needed to alleviate on-site parking shortages and would also be contingent upon funding availability. Together, these three connected phases comprise the Proposed Action.

#### **1.4 Proposed Action Purpose and Need**

The *purpose* of the Proposed Action is to construct and operate a Fisher House, “a home away from home,” in order to provide an on-site no-cost lodging option for the family members and caregivers of Veterans and Active Duty Service members hospitalized at the West Haven VAMC. The Proposed Action is *needed* because this benefit is not currently available at the West Haven VAMC or elsewhere in Connecticut, requiring an estimated 500 families per year to spend thousands of dollars on off-site lodging costs while their family member is hospitalized.

The *purpose* of the second phase is to provide mitigation for historic preservation; it is *needed* due to the proposed loss of Building 14. The specific mitigation will be developed through continued consultation among the VA, SHPO, and ACHP, and is anticipated to include at a minimum historic preservation of the West Haven VAMC’s ornate entrance gate on Campbell Avenue, which also was identified as a contributing element in the draft NRHP nomination but currently is in poor condition and not operational. The VA anticipates executing a MOA to affirm the selected commitments for mitigation for historic preservation. The mitigation would be performed as part of the second phase of the Proposed Action, occurring only if Building 14 is demolished.

The *purpose* of the third phase is to develop in the future the approximately 0.46-acre northern area for an approximately 65-space parking lot in the northern portion of the West Haven VAMC to off-set the net loss of 24 parking spaces caused by constructing the Fisher House. The parking lot would be *needed* to reduce the on-site parking shortage for staff, patients, and visitors at the West Haven VAMC.

Accordingly, the Proposed Action is the preferred action alternative. Under a No Action alternative, none of the three phases of the Proposed Action would be implemented, current conditions at the West Haven VAMC would remain unchanged, and the original purpose and need for free on-site lodging identified above would not be met.

Detailed Proposed Action elements are described in Section 3.5.

## 2.0 ENVIRONMENTAL ASSESSMENT PROCESS

### 2.1 Regulatory Requirements

Preparation of this Draft EA is required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 *et seq.*), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), 38 CFR Part 26 (*Environmental Effects of the Department of Veterans Affairs Actions*), Native American Graves Protection and Repatriation Act (NAGPRA), 36 CFR Part 800, Protection of Historic Properties, VA Implementing Regulations, Environmental Effects of VA Actions, Title 38 CFR, Part 26 (51 FR 37182, October 20, 1986), VA Directive 7545 for Cultural Resource Management; and Applicable Federal, State, and local requirements; and Applicable Executive Orders, Federal, State, and local requirements. This Draft EA has also been prepared in accordance with VA *NEPA Interim Guidance for Projects* dated September 30, 2010.

### 2.2 Environmental Impact Methodology

#### 2.2.1 Environmental Assessment

VA, as a Federal agency, is required to incorporate environmental considerations into their decision-making process for the actions they propose to undertake. This is done in accordance with the regulatory requirements identified in Section 2.1.

Ultimately, VA will decide, in part based on the analysis presented in this Draft EA and after having taken potential environmental, cultural, and socioeconomic effects into account, whether it should implement the Proposed Action, and, as appropriate, carry out mitigation and management measures to reduce effects on the environment.

Accordingly, this Draft EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Proposed Action and No Action Alternative.

In this Draft EA, impacts are identified as either significant, less than significant (i.e., common impacts that would not be of the context or intensity to be considered significant under the NEPA or CEQ Regulations), or no impact. As used in this Draft EA, the terms “effects” and “impacts” are synonymous. Where appropriate and clearly discernible, each impact is identified as either adverse or positive.

The CEQ Regulations specify that in determining the significance of effects, consideration must be given to both “*context*” and “*intensity*” (40 CFR 1508.27):

**Context** refers to the significance of an effect to society as a whole (human and national), to an affected region, to affected interests, or to just the locality. In other words, the context measures how far the effect would be “felt.”

**Intensity** refers to the magnitude or severity of the effect, whether it is beneficial or adverse. Intensity refers to the “punch strength” of the effect within the context involved.

In this Draft EA, the significance of potential direct, indirect, and cumulative effects has been determined through a systematic evaluation of each considered alternative in terms of its effects on each individual environmental resource component.

The thresholds of change for the intensity of impacts are defined as follows:

*Beneficial-and-not-significant*: This impact represents an improvement in existing conditions. This impact is beneficial and noticeable. An Environmental Impact Statement (EIS) is not required.

*None-to-negligible*: A potential impact of this severity would be localized and immeasurable at the lowest level of detection. An EIS is not required for this impact.

*Minimal-to-moderate*: Minimal impact is localized and slight but detectable. Moderate is readily apparent and appreciable. Minimal-to-moderate impact would not require specific mitigation measures, other than those dictated by regulatory and permitting requirements. An EIS is not required for this impact.

*Significant-but-mitigated*: A potential impact of this severity would require specific mitigation measures beyond those associated with permit requirements but an EIS is not required for this impact.

*Significant-and-immitigable*: A potential impact of this severity would have to be evaluated in an EIS.

## **2.2.2 Environmental Resources Assessed**

This Draft EA evaluates possible impacts to aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat, including threatened and endangered species; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomics; community services; solid and hazardous materials; transportation and parking; utilities; alternative energy sources; and environmental justice.

Section 5 presents a detailed assessment and analysis of the environmental consequences associated with the Proposed Action and No Action Alternative on each of these environmental resources.

## **2.3 Agency Coordination and Public Involvement**

In accordance with the aforementioned regulatory requirements in Section 2.1, this Draft EA allows for public input into the Federal decision-making process; provides Federal decision-makers with an understanding of potential environmental effects of their decisions, before making these decisions; identifies measures the Federal decision-maker could implement to reduce potential environmental effects; and documents the NEPA process.

Accordingly, the following list identifies the Federal, state, and local agencies, as well as Native American Tribes, that were consulted during development of this Draft EA:

- **Federal Agencies:** US Fish and Wildlife Service (USFWS), US Environmental Protection Agency (USEPA), US Army Corps of Engineers (USACE), US Department of Agriculture Natural Resources Conservation Service (USDA NRCS), US National Park Service (USNPS)
- **State Agencies:** Connecticut Department of Energy and Environmental Protection (CTDEEP), Connecticut Department of Economic and Community Development (CTDEDC), Connecticut State Historic Preservation Office (CTSHPO), Connecticut Department of Transportation (CTDOT), Southwest Conservation District (SWCD)

- **Local Agencies:** West Haven Building Department (WHBD), West Haven Housing Authority (WHHA), West Haven Inland Wetlands Watercourse Agency (WHIWWA), West Haven Parks and Recreation (WHPR), West Haven Department of Planning and Development (WHDPD), and West Haven Public Works Department (WHPWD)
- **Native American Tribes:** Mashantucket Pequot Indian Tribe, Mohegan Tribe of Indians of Connecticut

Documentation regarding historical preservation communications with the CTSHPO and Native American Tribes is provided in Appendix C and D, respectively. Other regulatory agency comments are provided in Appendix E. All comments received from these organizations have been incorporated into this Draft EA.

Additionally, the Draft EA has been made available for a 30-day public review period. During this period, the VA intends to hold a public meeting to discuss the NEPA process and the analyzes and conclusions presented in this Draft EA. In advance of the meeting, a Notice of Availability (NOA) will be published in a local newspaper regarding the start of the 30-day public comment period and the date and location of the public meeting. A copy of the NOA will be included in Appendix F-1. Minutes from the public meeting will be included in Appendix F-2. Public comments will be included in Appendix F-3 and addressed in the Final EA.

### **3.0 DEVELOPMENT OF ALTERNATIVES**

NEPA, and the regulations of CEQ and VA for implementing NEPA, require all reasonable alternatives to be rigorously explored and objectively evaluated. Accordingly, this chapter summarizes the process used to develop alternatives and provides a description of the subsequently selected Proposed Action and its alternatives, as well as alternatives considered but ultimately eliminated from further analysis, and the reasons for elimination.

#### **3.1 Screening Criteria**

As previously described, the West Haven VAMC was identified as a suitable location for a Fisher House, as thousands of veterans receive in-patient medical treatment every year at the West Haven VAMC. However, no free-of-charge lodging exists at the West Haven VAMC or elsewhere in Connecticut. Subsequently, in 2014 the West Haven VAMC and Fisher House Foundation identified the basic screening criteria: the proposed Fisher House required a minimum development area of approximately 30,420 square feet; at least 16 suites; and an on-campus location that would not result in a significant loss of on-campus parking. Due to the proposed demolition of Building 14, the screening criteria also required mitigation for historic preservation, which was identified by the CTSHPD as potentially including restoration of the West Haven VAMC entrance gate and wall. The screening criteria also included measures to address the potential parking shortages (to be evaluated in the future) resulting from the loss of 24 parking spaces caused by constructing and operating the Fisher House.

#### **3.2 Alternatives Considered**

##### **3.2.1 Proposed Action**

Based on the screening criteria, the Fisher House Foundation developed several designs and layouts for the Fisher House. The proposed design and layout that was selected by the West Haven VAMC and the Fisher House Foundation required the least amount of site clearing and disturbance, minimized loss of parking, and was least disruptive to on-going facility operations elsewhere at the West Haven VAMC. The most suitable location for the Fisher House was the 0.57-acre area currently occupied by Building 14 in the southeastern portion of the West Haven VAMC. The proposed location and design rendering are presented in Figures 2, 3A, and 3B.

Additionally, the Fisher House project has been designed to comply to the maximum extent technically feasible with Section 438 of the Energy Independence and Security Act (EISA 438) of 2007. EISA 438 requires federal facilities with a construction footprint exceeding 5,000 square feet to use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property in the post-development condition. Currently, the 0.57-acre area proposed for the Fisher House has 0.24 acres of impervious area (Draper Arden Associates, 2016). The proposed Fisher House design would increase the impervious area by 0.04 acres, for a total of 0.27 acres of impervious area. The remaining 0.3 acres of the 0.57-acre project area would be pervious (vegetated grounds). Designing the Fisher House project with a reduced footprint that includes a smaller Fisher House and eliminates new parking and access areas within the 0.57-acre boundary, allowed for only a minor increase in impervious area and was the best approach to meet the intention of EISA 438. Additionally, future stormwater from the impervious area would be directed to the existing stormwater sewer system (Draper Arden Associates, 2016).

As part of the Proposed Action, the Learning Recovery Center currently housed in Building 14 would be relocated to an as-of-yet undetermined location at the West Haven VAMC. The regulated building materials (lead-based paint, asbestos-containing materials) known to be present in Building 14 would be abated and transported under manifest to a licensed off-site disposal or recycling facility. Building 14 would then be demolished. Civil/site engineering work would be performed and the Fisher House would be constructed over the former Building 14 footprint.

Of the 42 parking spaces currently located at the southern end of Veterans Drive in the vicinity of Building 14, 24 spaces would be entirely eliminated (either by the Fisher House foundation or conversion to pervious vegetated ground). The remaining 18 parking spaces would be reserved for and restricted to Fisher House guests and staff. Following construction, the West Haven VAMC would be responsible for staffing, operating, and maintaining the Fisher House.

Due to the demolition of Building 14, which is a contributing resource to the historic district, mitigation for historical preservation is anticipated to include, at a minimum, restoration of the West Haven VAMC entrance gate and wall along Campbell Avenue. Specific mitigation will continue to be developed through the Section 106, and, once selected, would be documented in a MOA. Mitigation would be the second phase of the Proposed Action and would only occur if Building 14 is demolished as part of construction and operation of the Fisher House project.

The third phase of the Proposed Action includes the potential development of the approximately 0.46-acre northern area as a parking lot (providing 65 spaces) for the West Haven VAMC. The location of this proposed parking lot is depicted in Figure 4. As previously described, this third phase of the Proposed Action would only occur if Building 14 is demolished and the West Haven VAMC makes a future determination that the parking lot is needed to reduce on-site parking shortages caused by the Fisher House development. Because the need for the parking lot will be based on actual future conditions, the decision to develop the parking lot also will be determined at a future date. Accordingly, construction design plans for the parking lot have not been developed at this time. However, should the West Haven VAMC decide in the future to develop the parking lot, the parking lot will be designed to comply with all applicable federal and state regulations and to the maximum extent technically feasible with EISA 438. Additionally, the relevance of the potential effects of the parking lot on the environmental resources presented in this Draft EA will be reviewed, as current conditions and regulatory requirements may differ from those in the future. However, accounting for any future substantive differences, the construction and operation of the parking lot would otherwise incorporate the best management practices and impact minimization measures described in this Draft EA.

A summary of the Proposed Action elements is provided in the following outline. Permit requirements, regulatory compliance measures, best management practices, and mitigation measures are discussed in detail under Environmental Consequences in Section 5.0 and summarized under Best Management Practices and Mitigation Measures in Section 7.0.

### **Phase 1 – Demolish Building 14, Construct and Operate Fisher House**

- Implement design for an approximately 16-suite Fisher House. This is expected to take between 6-18 months after issuing a FONSI for compliance with NEPA.
- Relocate the Learning Recovery Center medical services from Building 14 to another existing medical treatment building at the West Haven VAMC.

- Notify CT Department of Public Health (CTDPH) in advance of asbestos abatement. Abatement of regulated building materials from Building 14. These materials include but are not limited to asbestos-containing building materials and lead-based paint.
- Prepare and obtain demolition permit from the City of West Haven. Notify CTDPH in advance of demolition. Demolish Building 14 and transport debris off-site for disposal or recycling.
- Prepare CTDEEP-compliant Soil Erosion and Sediment Control Plan and implement construction Best Management Practices (BMPs) to control and manage stormwater run-off.
- Perform civil/site engineering to prepare the 0.57-acre area for construction of the Fisher House.
- Construct the Fisher House.
  - Connect to existing utilities for potable water, sanitary sewer, stormwater, natural gas, electricity, and telecommunications.
  - Eliminate 24 of the current 42 parking spaces at the southern end of Veterans Drive. Convert these 24 impervious asphalt parking spaces to pervious vegetated grounds. The remaining 18 parking spaces will be maintained for future Fisher House guests and staff.
  - Landscape with non-invasive, native vegetation.
- Transfer ownership of the Fisher House to the VA. Operate and maintain the Fisher House.

### **Phase 2 – Mitigation for Historic Preservation**

- As part of the Section 106 consultation process, execute MOA with the CTSHPO and ACHP to provide mitigation for historic preservation, needed due to demolition of Building 14 (a contributing resource to the historic district). Implement mitigation actions to be stipulated in the MOA. The mitigation action is anticipated to include, at a minimum, the repair and restoration of the West Haven VAMC entrance gate and an adjoining brick masonry wall along Campbell Avenue and West Spring Street.
- Minimize and control lead dust generation by following CTDPH and U.S. Environmental Protection Agency (EPA) regulations for Lead-Based Paint Renovation, Repair and Painting Program.

### **Phase 3 – Construct and Operate Parking Lot**

- Analyze need for additional parking lot following operation of the Fisher House.
- Complete design to construct and operate a new parking lot with approximately 65 spaces over the approximately 0.46-acre (20,000 square feet) area in the northern portion of the West Haven VAMC. Ensure the design complies to the maximum extent technically feasible with EISA 438.
- Prepare CTDEEP-compliant Soil Erosion and Sediment Control Plan and implement construction BMPs to control and manage stormwater run-off.

- Perform civil/site engineering to prepare the 0.46-acre area for construction of the parking lot. Retain as much of the existing vegetation as is practical. Maintain existing or create new visual border around the east, west, and north perimeter of the parking lot construction area.
- Construct the parking lot. As needed, connect to existing West Haven VAMC stormwater sewer system and electric utility (lighting).
- During operation, maintain visual border around the aforementioned parking lot perimeter.

### **3.2.2 No Action Alternative**

Under the No Action Alternative, the Proposed Action would not be implemented and the current conditions at the West Haven VAMC would remain unchanged. Under the No Action Alternative, the need for free-of-charge housing for veterans and families would remain unmet at the West Haven VAMC and in Connecticut. However, Building 14 would not be demolished and would continue to house the Learning Recovery Center. Accordingly, repairs to the entrance gate and wall would not be made, as there would no longer be a need for mitigation for historic preservation. Furthermore, the Proposed Action describing the northern parking lot phase would not be implemented, as there would no longer be a need to off-set the loss of parking spaces around Building 14 associated with the Fisher House. The No Action alternative is assessed in this Draft EA to provide a comparative baseline analysis, as required by CEQ Regulations.

### **3.3 Alternatives Eliminated**

During development of the Fisher House design, the West Haven VAMC and the Fisher House Foundation considered two alternative on-site locations for the Fisher House: Proposed Site “A” and Proposed Site “B”, both located in the parking lot adjacent to Buildings 35A, 35, and 36 (Figure 5). Although these alternative locations would allow a Fisher House to be constructed within the West Haven VAMC, they would cause a loss of between 104 and 132 on-site parking spaces for veterans and staff. This loss would cause a long-term significant adverse impact on available on-site parking at the West Haven VAMC. As such, these alternative locations were determined to be unsuitable and eliminated from further analysis.

### **3.4 Alternatives Retained for Detailed Analysis**

The Proposed Action and the No Action Alternative have been retained for detailed analysis in this Draft EA. Additionally, based on the aforementioned purpose and need for the Fisher House project, the Proposed Action has been identified by the VA as the preferred action alternative.

**4.0 AFFECTED ENVIRONMENT**

**4.1 Environmental Resources Dismissed**

The potential impacts of the Proposed Action and the No Action Alternative on the following environmental resources were analyzed according to the methods described in Section 2.2. The results of this analysis indicated that the potential impacts were none-to-negligible because the impacts would be localized and immeasurable at the lowest level of detection. Accordingly, a brief summary table is provided below of the environmental resources dismissed from further detailed analysis.

**Table 1. Environmental Resources Dismissed from Further Analysis**

<b>Environmental Resource Dismissed</b>	<b>Rationale</b>
Land Use and Zoning	The Proposed Action is consistent with activities at the West Haven VAMC and with the City of West Haven Land Use and Zoning regulations. The Proposed Action will not cause changes in land use or zoning to properties adjacent to or in vicinity of the West Haven VAMC. Therefore, the Proposed Action will have no impact on these resources.
Wildlife and Habitat	There are no Federally-listed flora or fauna at the Proposed Action sites. There is not sufficient habitat at the Proposed Action sites to support populations of wildlife. Therefore, the Proposed Action will have no impact on these resources.
Floodplains, Wetlands, and Coastal Zone Management	The Proposed Action sites are not within a 100- or 500-year floodplain; is not within a Coastal Zone Management area; and there are no wetlands at or in vicinity of the Proposed Action sites. Therefore, the Proposed Action will have no impact on these resources.
Socioeconomics	The Proposed Action will not cause a measurable increase or decrease in the long-term socioeconomic condition of individuals or groups at the West Haven VAMC or in the local community. However, the Fisher House project is estimated to save lodging and meal costs for approximately 500 families per year, providing a substantial benefit to these families. Construction hiring will be minimal, short-term, and will not result in long-term employment. Operation of the Fisher House may utilize existing West Haven VAMC staff or require hiring fewer than 4-5 staff. This potential increase in long-term hiring will have a negligible impact on overall socioeconomic conditions in the local community. Therefore, the Proposed Action will have no impact on this resource.

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<b>Environmental Resource Dismissed</b>	<b>Rationale</b>
Utilities	The Proposed Action will utilize existing utilities already available at the site including water, sanitary sewer, stormwater sewer, electricity, gas, and telecommunications. The Proposed Action will use these utilities at a rate similar to Building 14, and this rate will not require the West Haven VAMC or outside utility providers to expand or upgrade their services or cause a deterioration or disruption in service to existing customers in the community. Therefore, the Proposed Action will have no impact on this resource.
Alternative Energy Sources	The Proposed Action does not include the installation or use of Alternative Energy Sources. Due to the relatively small size of the Fisher House development (0.57 acres), installation of alternative energy sources is not feasible, practical, or cost effective. Alternative Energy Sources are not applicable for the parking lot development.
Environmental Justice	The Proposed Action has no mechanisms to impact minority or low-income populations in the local community, nor cause changes in environmental policies that could disproportionately affect these populations. Therefore, the Proposed Action will have no impact on this resource.

**4.2 Completed VA Checklists**

**4.2.1 VA NEPA Checklist for Environmental Impact Assessment of Alternatives**

As required by the VA, the “NEPA Checklist for Environmental Impact Assessment of Alternatives” provided in Table 2 has been completed to summarize the environmental resources and their applicable project attributes considered in this Draft EA, and the resulting environmental impacts for each environmental resource. The checklist accounts for all phases of the Proposed Action.

**Table 2. VA NEPA Checklist for Environmental Impact Assessment of Alternatives**

<b>VA Checklist for Environmental Assessment of Alternatives</b>	
<b>Project Name</b>	Proposed Demolition of Building 14 and Construction and Operation of a Fisher House, Department of Veterans Affairs Connecticut Healthcare System West Haven Medical Center, West Haven, New Haven County, Connecticut
<b>Project Site</b>	West Haven VAMC, 950 Campbell Avenue, West Haven, CT
<b>Consultant Responsible for Environmental Assessment</b>	Mabbett & Associates, Inc. Contract Number: VA101F-12-D-0056 Task Order Number: VA101F-16-J-2628 awarded on May 10, 2016
<b>Alternative</b>	Proposed Action
<b>DEFINITIONS:</b>	
Short-term Impact (ST)	Short-term impacts are those that would occur only with respect to a particular activity, for a finite period, or only during the time required for construction or installation activities.
Long-term Impact (LT)	Long-term impacts are those that are more likely to be persistent and chronic.
Direct Impact (DI)	A direct impact is caused by an action and occurs around the same time at or near the location of the action.
Indirect Impact (IDI)	An indirect impact is caused by an action and might occur later in time or be farther removed in distance but still be a reasonably foreseeable outcome of the action.
Adverse Impact	Adverse effect is one having unfavorable or undesirable outcomes on the manmade or natural environment.
Beneficial-and-not-significant (B)	A beneficial effect is one having positive outcomes on the man-made or natural environment.
None-to-negligible (N)	None-to-negligible impact would be barely detectable and an EIS is not required for this impact.
Minimal-to-moderate (M)	Minimal-to-moderate impact is a potential impact that is less than significant and would not require specific mitigation measures, other than those dictated by regulatory and permitting requirements and an EIS is not required for this impact.
Significant-but-mitigated (MI)	Significant-if-not-mitigated would require specific mitigation measures beyond those associated with permit requirements but an EIS is not required for this impact.
Significant (S)	Significant-and-immitigable impact would have to be evaluated in an EIS.
<b>Notes: An X is marked in applicable cells for each resource below to indicate presence of applicable Project Attributes.</b>	

<b>Environmental Resource Topic</b>	<b>Project Attributes</b>	<b>Environmental Impacts</b>			
<b>1. Aesthetics</b>					
<b>Impacts</b>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input checked="" type="checkbox"/> N <input type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input checked="" type="checkbox"/> N <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/>				
<b>Project Attributes</b>					



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Environmental Resource Topic	Project Attributes	Environmental Impacts			
PSD and Title V Permits	<input type="checkbox"/>				
Fuel Burning	<input checked="" type="checkbox"/>				
Stationary Gasoline tanks	<input type="checkbox"/>				
Incinerator	<input type="checkbox"/>				
Ozone depleting refrigerants (sources may include chillers, freezers, refrigerators, water fountains, vending machines)	<input type="checkbox"/>				
<b>4. Cultural Resources</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input checked="" type="checkbox"/> M <input checked="" type="checkbox"/> N <input type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
<u>Project Attributes</u>					
National Registry Property	<input checked="" type="checkbox"/>				
Criteria of Adverse Effect	<input checked="" type="checkbox"/>				
Action Requires Tribal Coordination	<input checked="" type="checkbox"/>				
Action Requires SHPO Coordination	<input checked="" type="checkbox"/>				
Eligible Property	<input checked="" type="checkbox"/>				
Architecturally Significant Property	<input type="checkbox"/>				
Section 106 Report	<input checked="" type="checkbox"/>				
<b>5. Topography, Geology, and Soils</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input checked="" type="checkbox"/> N <input type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
<u>Project Attributes</u>					
Seismic Safety Building Codes and Standards	<input type="checkbox"/>				
Boulders and Ledge Outcrops	<input type="checkbox"/>				
Farmland	<input type="checkbox"/>				
Disturbance of Geology and Soils	<input checked="" type="checkbox"/>				
Storm Water and Sediments	<input checked="" type="checkbox"/>				
Dewatering	<input type="checkbox"/>				
Contaminated Soil	<input type="checkbox"/>				
Contaminated Groundwater	<input type="checkbox"/>				
Abandoned Underground Storage Tanks	<input type="checkbox"/>				
<b>6. Hydrology and Water Resources</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input checked="" type="checkbox"/> N <input type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input checked="" type="checkbox"/> N <input type="checkbox"/> B <input type="checkbox"/>				
<u>Project Attributes</u>					
Potential for Erosion and/or Sedimentation (NPDES)	<input checked="" type="checkbox"/>				
Alteration/Quality Change of Surface Water Drainage	<input checked="" type="checkbox"/>				

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Environmental Resource Topic	Project Attributes	Environmental Impacts			
Potential for Contamination of Water Regime (From Hazardous/Toxic Wastes)	<input checked="" type="checkbox"/>				
Alteration/Quality Change of Groundwater Regime	<input type="checkbox"/>				
Wetlands	<input type="checkbox"/>				
Land disturbance of more than 1 acre	<input type="checkbox"/>				
<b>7. Solid Waste and Hazardous Materials</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input checked="" type="checkbox"/> M <input checked="" type="checkbox"/> N <input type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
<u>Project Attributes</u>					
Street Removal/Demolition	<input type="checkbox"/>				
Construction Site Stockpiling	<input type="checkbox"/>				
Bulk Operational Waste	<input type="checkbox"/>				
Earth and/or Rock Debris	<input type="checkbox"/>				
Concrete Debris	<input checked="" type="checkbox"/>				
Hazardous Waste	<input type="checkbox"/>				
PCB Containing Material	<input checked="" type="checkbox"/>				
Asbestos Containing Material	<input checked="" type="checkbox"/>				
Lead Containing Material	<input checked="" type="checkbox"/>				
Radioactive Waste	<input type="checkbox"/>				
Hazardous Material	<input type="checkbox"/>				
<b>8. Traffic, Transportation and Parking</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input checked="" type="checkbox"/> N <input type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input checked="" type="checkbox"/> N <input type="checkbox"/> B <input type="checkbox"/>				
<u>Project Attributes</u>					
Alteration of Public Transportation	<input type="checkbox"/>				
Alteration of Existing On-Site Roads or Parking	<input checked="" type="checkbox"/>				
Alteration of Facility Access Roads	<input type="checkbox"/>				
Construction of New Roads or Parking	<input checked="" type="checkbox"/>				
<b>9. Noise</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input checked="" type="checkbox"/> N <input type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
<u>Project Attributes</u>					
Utility Source Generation	<input type="checkbox"/>				
Operational	<input type="checkbox"/>				
Traffic	<input type="checkbox"/>				
Vibrations	<input type="checkbox"/>				
Construction	<input checked="" type="checkbox"/>				

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Environmental Resource Topic	Project Attributes	Environmental Impacts			
<b>10. Wildlife and Habitat</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
<u>Project Attributes</u>					
Presence of Endangered or Threatened Wildlife Species	<input type="checkbox"/>				
Tree Removal	<input checked="" type="checkbox"/>				
Groundcover Removal	<input checked="" type="checkbox"/>				
Presence of Significant Wildlife	<input type="checkbox"/>				
<b>11. Floodplains, Wetlands and Coastal Zone Management</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
<u>Project Attributes</u>					
100-Year Floodplain	<input type="checkbox"/>				
Coastal Zone Management Area	<input type="checkbox"/>				
500-Year Floodplain	<input type="checkbox"/>				
Critical Environmental Area of Wetlands	<input type="checkbox"/>				
Critical Action (EO 11988)	<input type="checkbox"/>				
<b>12. Socioeconomics</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input checked="" type="checkbox"/>				
<u>Project Attributes</u>					
Reduction to Wages to Area	<input type="checkbox"/>				
Local Purchase of Goods and Services	<input type="checkbox"/>				
Additional Wages Will be Available to Area	<input type="checkbox"/>				
Increase or Decrease in Direct Workforce	<input type="checkbox"/>				
<b>13. Community Services</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input type="checkbox"/> B <input checked="" type="checkbox"/>				
<u>Project Attributes</u>					
Alteration of Public Facilities	<input checked="" type="checkbox"/>				
Alteration of Public Services	<input checked="" type="checkbox"/>				
Alteration of Public Utilities	<input type="checkbox"/>				
Parks, Schools and Libraries	<input type="checkbox"/>				
Child Care Centers and Health Care Centers	<input type="checkbox"/>				
Fire and police Protection	<input type="checkbox"/>				

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Environmental Resource Topic	Project Attributes	Environmental Impacts			
<b>14. Utilities</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
<u>Project Attributes</u>					
Water System, Supply	<input checked="" type="checkbox"/>				
Incinerator	<input type="checkbox"/>				
Storm Water Drainage	<input checked="" type="checkbox"/>				
Air Conditioning and Refrigeration	<input type="checkbox"/>				
Sanitary sewers	<input checked="" type="checkbox"/>				
Electrical	<input checked="" type="checkbox"/>				
Excavation	<input checked="" type="checkbox"/>				
Heat Generation	<input type="checkbox"/>				
Maintenance and Repair	<input checked="" type="checkbox"/>				
Chilled Water	<input type="checkbox"/>				
Steam and Condensate	<input type="checkbox"/>				
Underground Storage Tanks	<input type="checkbox"/>				
Telephone and Fiber Optic Cables	<input checked="" type="checkbox"/>				
Gas	<input checked="" type="checkbox"/>				
Drinking Water Storage, Distribution and Treatment	<input type="checkbox"/>				
Medical Gas System (Oxygen, Vacuum and Medical Air)	<input type="checkbox"/>				
<b>15. Alternative Energy Sources</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
<u>Project Attributes</u>					
Solar Panels	<input type="checkbox"/>				
Solar Heater	<input type="checkbox"/>				
Geo-thermal	<input type="checkbox"/>				
Wind Power	<input type="checkbox"/>				
<b>16. Environmental Justice</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
<u>Project Attributes</u>					
Impact on Minority and Low Income Population Under EO 12898.	<input type="checkbox"/>				
Impact on Children Under EO 13045	<input type="checkbox"/>				
<b>17. Cumulative Impacts</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				

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Environmental Resource Topic	Project Attributes	Environmental Impacts			
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input type="checkbox"/> B <input checked="" type="checkbox"/>				
<u>Project Attributes</u>					
The Geographic Region of Influence (ROI)	<input checked="" type="checkbox"/>				
Past and Current Projects	<input checked="" type="checkbox"/>				
Known Future Actions	<input checked="" type="checkbox"/>				
<b>18. Potential for Generating Substantial Controversy</b>					
<u>Impacts</u>					
Construction	LT <input type="checkbox"/> ST <input checked="" type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input checked="" type="checkbox"/> B <input type="checkbox"/>				
Operation	LT <input checked="" type="checkbox"/> ST <input type="checkbox"/> S <input type="checkbox"/> MI <input type="checkbox"/> M <input type="checkbox"/> N <input type="checkbox"/> B <input checked="" type="checkbox"/>				
<u>Project Attributes</u>					
Indirect or Direct Effects on Community Organizations	<input checked="" type="checkbox"/>				
Interpretation of How the Action will Effect Community Response is in Question	<input type="checkbox"/>				
Consistent with Profile of Community	<input checked="" type="checkbox"/>				

**4.2.2 VA Checklist for Project Compliance with Federal Legal Authorities**

As required by the VA, this checklist presented in Table 3 has been completed to confirm that the VA will be in compliance with all requirements of Federal legal authorities that are applicable to the Proposed Action described in this Draft EA.

**Table 3. VA Checklist for Project Compliance with Federal Legal Authorities**

<b>VA Checklist: Project Compliance with Federal Legal Authorities</b>		
<b>Project</b>	Proposed Demolition of Building 14 and Construction and Operation of a Fisher House, Department of Veterans Affairs Connecticut Healthcare System, West Haven Medical Center, West Haven, New Haven County, Connecticut	
<b>Project Compliance Assessor</b>	Mabbett & Associates, Inc.	
<b>Compliance Status Codes</b>		
FI – Requires Further Investigation		
MR – Mitigation Required, Non Compliance Anticipated		
CA – Compliance Anticipated		
NA – Not Applicable		
<b>Compliance Status</b>	<b>Resource Numbers From VA NEPA Checklist for Environmental Impact Assessment of Alternatives</b>	<b>Federal Legal Authority</b>
<b>Executive Orders</b>		
NA	11	EO 11988, Floodplain Management (100-year, critical action, or 500-year)
NA	11	EO 11990, Protection of Wetlands
NA	10	EO 11987, Exotic Organisms
CA	3	EO 12088, Federal Compliance with Pollution Control Standards
NA	16	EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations
NA	4	EO 13006, Locating Federal Facilities on Historic Properties in Our Nation’s Central Cities
NA	4	EO 13007, Indian Sacred Sites
CA	4	EO 13175, Indian Tribes
NA	4	EO 13287, Preserve America
CA	3, 15	EO 13693, Planning for Federal Sustainability in the Next Decade (Note: EO 13693 revoked EOs 13423 and 13514)
<b>Federal Laws and Regulations</b>		
MR, CA	4	Advisory Council on Historic Preservation Regulations, Protection of Historic and Cultural Properties (36 CFR 800)
CA	3, 7	Clean Air Act (CAA)

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<b>Compliance Status</b>	<b>Resource Numbers From VA NEPA Checklist for Environmental Impact Assessment of Alternatives</b>	<b>Federal Legal Authority</b>
NA	11	Coastal Barrier Resources Act (PL 93-523)
NA	11	Coastal Zone Management Act (16 USC 1451 et. Seq.), amended by PL 101-508)
NA	7	Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)
NA	8	Determination of No Hazard to Air Navigation (FAA Advisory Circular 70/7460-1 K Change 2)
CA	7	Emergency Planning and Community Right-to-Know Act (EPCRA)
NA	10	Endangered Species Act (ESA) as amended (PL 93-205)
CA	5, 6, 14	Energy Independence and Security Act of 2007 (EISA)
CA	7	EPA Regulations on Determination of Reportable Quantities for Hazardous Substance (40 CFR 117)
NA	6, 11	EPA Regulations on Discharge of Dredged or Fill Material into Navigable Waters (40 CFR 230)
CA	7	EPA Regulations on Polychlorinated Biphenyls Manufacturing, Processing, Distribution in Commerce and Use Prohibitions (40 CFR 761)
CA	5, 6	EPA Regulations on the National Pollutant Discharge Elimination System (40 CFR 122)
NA	5	Farmland Protection Policy Act (FPPA)
NA	5, 7	Federal Environmental Pesticide Act
NA	5, 7	Federal Food, Drug and Cosmetic Act
NA	5, 7	Federal Insecticide, Fungicide and Rodenticide Act
NA	6, 7	Federal Water Pollution Control Act, Sec 313, as amended by Clean Water Act of 1977 (33 USC 1323)
NA	7, 12, 16	Food Quality Protection Act
NA	11	Marine Mammal Protection Act
NA	11	Migratory Bird Treaty Act
CA	All	National Environmental Policy Act (NEPA)
CA	4	National Historic Preservation Act (NHPA)
CA	4	Native American Graves Protection and Repatriation Act (NAGPRA)
CA	9	Noise Control Act of 1972
NA	7	Oil Pollution Act
NA	7	Resource Conservation and Recovery Act (RCRA)
NA	6	Safe Drinking Water Act (SDWA), Sec 1447 (PL 93-523)
CA	7	Spill Prevention, Control and Countermeasure Plans (SPCC)

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<b>Compliance Status</b>	<b>Resource Numbers From VA NEPA Checklist for Environmental Impact Assessment of Alternatives</b>	<b>Federal Legal Authority</b>
CA	7	Toxic Substance Compliance Act
NA	6, 10	Wild and Scenic Rivers Act (16 USC 1274 et seq.)

## **5.0 ENVIRONMENTAL CONSEQUENCES**

This Section describes the baseline (existing) environmental, cultural, and socioeconomic conditions at the Proposed Action sites within the West Haven VAMC and in the general vicinity (refer to Figures 1 and 2), with emphasis on those environmental resources that would be potentially impacted by the Proposed Action. The Phase 1 ESA provided in Appendix B includes photographs, with captions, of these existing conditions as related to the Proposed Action sites. Under each environmental resource area, the potential direct and indirect effects of implementing the Proposed Action and the No Action Alternative on each environmental resource are identified. Potential cumulative impacts are discussed in Section 5.9. BMPs and mitigation measures, as well as permits and regulatory compliance required for the Proposed Action, are discussed for each environmental resource. Additionally, a summary list of the permits discussed in this section is provided in Appendix G. Furthermore, Appendix I contains copies of relevant supporting reports and documentation (prepared by others) that were used to analyze potential impacts caused by the Proposed Action and No Action alternative.

### **5.1 Aesthetics**

#### **5.1.1 Significance Criteria**

An alternative could significantly affect visual resources if it resulted in abrupt changes to the complexity of the landscape and skyline (i.e., in terms of vegetation, topography, or structures) when viewed from points readily accessible by the public.

#### **5.1.2 Regulatory Requirements**

The City of West Haven attempts to maintain aesthetic quality of the area through Chapter 106 (Zoning) of the West Haven Code of Ordinances (WHCO), which are, however, not applicable to VA as a Federal agency.

#### **5.1.3 Existing Conditions**

##### **Proposed Fisher House Site**

As previously described in the background for the West Haven VAMC in Section 1.1, the approximately 0.57-acre site is located in the southeast corner of the West Haven VAMC campus, at the southern end of Veterans Drive (see Figure 2). The aesthetic condition of this site is primarily influenced by the presence of Building 14, the entrance gate and masonry wall, (additional details regarding these cultural resources are discussed under Section 5.3), and several mature coniferous and deciduous trees and shrubs located on the south and east sides of the site. To the north and east of Building 14 are asphalt-paved parking lots utilized by Veterans and staff, and a sewage line manhole and a stormwater catchment basin. A steep grass-covered hillside on the west side of the site also contributes to the aesthetic condition of the site. However, the aforementioned masonry wall is approximately 5-feet high and therefore effectively obstructs the view of Building 14 from West Spring Street and Campbell Avenue.

Beyond the southeast concern of the West Haven VAMC where the site is located, the aesthetic condition is primarily influenced by Campbell Avenue (to the east) and West Spring Street (to the south), mixed residential and commercial properties (to the east and south), and the Oak Grove Cemetery (to the east) (see Figure 2). A traffic light is present at the intersection of West Spring Street and Campbell Avenue. Both streets are highly trafficked. The Connecticut

Turnpike (Interstate 95) is located approximately 500-feet south of the West Haven VAMC (see Figure 1).

### **Proposed Parking Lot Site**

The proposed parking lot site is an approximately 0.46-acre rectangular area located in the northern portion of the West Haven VAMC, with Terrace Avenue to the north, Overlook Street to the west, and residential properties to the east, north, and west. To the south is the West Haven VAMC (parking lots 9 and 10).

The proposed parking lot site is currently dirt and vegetated with approximately 50 trees, mostly coniferous, with an understory dominated by poison ivy. A poison ivy-covered chain-link fence is present on the west, north, and east sides. The wooded area is currently used to stage various equipment (large metal storage containers, vehicles) used by the West Haven VAMC or contractors performing work at the West Haven VAMC. The vegetation covering the fence effectively obstructs the view of the proposed parking lot site from Terrace Avenue and the residential properties to the east, north, and west.

#### **5.1.4 Effects of the No Action Alternative**

Under the No Action Alternative, no changes to existing aesthetic conditions would occur because the Proposed Action would not be implemented. The No Action Alternative would have a long-term, direct, beneficial-but-not-significant effect on aesthetics by retaining Building 14, and by maintaining the wooded appearance of the northern proposed parking lot site. However, under the No Action alternative, restoration and repair of the entrance gate and masonry wall would not occur, and the aesthetic condition of this specific resource is anticipated to continue to deteriorate over time, resulting in a minimal-to-moderate adverse aesthetic effect.

#### **5.1.5 Effects of the Proposed Action**

### **Proposed Fisher House**

#### **Demolition/Construction**

The Proposed Action would result in short-term, direct, minimal-to-moderate adverse effects on aesthetic conditions. These impacts would be caused by the ultimate loss of Building 14, and the construction equipment associated with demolishing Building 14, grading the site, and constructing the Fisher House. These construction-related impacts would cease once demolition/clearing and construction are finished.

Aesthetics would change due to the loss of Building 14, a contributing feature to the historic district, visible to passersby from West Spring Street and Campbell Avenue. However, vehicles driving through this intersection are able to view Building 14 for only as long as they are waiting at the traffic signal, while pedestrians on Campbell Avenue and West Spring Street may have a longer view while walking past the area. Therefore, the adverse effect on the aesthetic condition of the site during demolition/construction on passersby would be short-term, direct, and minimal-to-moderate.

Although the loss of Building 14 would be considered to cause a significantly adverse effect on historical resources, the loss would cause only a minimal-to-moderately adverse effect on aesthetics. This is because the historic district is comprised of 17 other buildings as well as the ornamental gate and wall (VA, 2014). As described in the following Cultural Resources

discussion under Section 3.5, a draft MOA is currently in preparation by the VA, CTSHP, and ACHP, that will stipulate the commitments the VA will take to mitigate the adverse effect to the historic property caused by demolishing Building 14. Although a final MOA was not available as of the date of this Draft EA, the mitigation for historic preservation is anticipated to include, at a minimum, maintenance of the remaining contributing resources, as well as restoration and repair of the entrance gate and wall. This mitigation will further ensure the minimal-to-moderate adverse effect on aesthetics caused by the loss of Building 14 will remain at or below this level.

Demolition and construction activities would cause a short-term, direct, minimal-to-moderate adverse effect on aesthetics in context to the four residential homes located on the southern side of West Spring Street and which will have a direct view of the construction area. The effect is not anticipated to increase to a significant level because of the limited number of individuals impacted and the limited duration of the construction period.

### **Operation**

Operation of the Fisher House would have a long-term, none-to-negligible adverse impact on aesthetics. The architecture of the Fisher House would be consistent with regional styles, and few if any trees will be removed. The vegetation surrounding the Fisher House will continue to be professionally landscaped. For these reasons, the presence of the Fisher House is not anticipated to cause any significant adverse effects on aesthetics.

### **Entrance Gate and Wall**

There would be a none-to-negligible impact on aesthetics during restoration and repair of the entrance gate and wall. Restoration/repair workers would have a temporary presence at the gate and wall, which would temporarily obstruct the view of these contributing features to the historic district. However, restoration and repair of the gate and wall would ultimately improve the condition and appearance of these features. Therefore, the overall aesthetic impact of this phase would be beneficial-and-not significant.

### **Proposed Parking Lot**

#### **Construction**

Construction of the proposed parking lot would cause short- and long-term, direct, minimal-to-moderate adverse effect on aesthetics due to the long-term loss of a wooded area, as well as the temporary presence of construction vehicles. The effect would be most noticeable to residential abutters located north, east, and west of this area. The impact would not be significantly adverse because this area is currently visible to only a limited number of abutting residences, and the construction equipment would demobilize from the site following clearing and paving. Additionally, the West Haven VAMC would likely maintain a vegetated buffer around the eastern, western, and northern boundaries of this site.

#### **Operation**

Operation of the parking lot would have a long-term, direct, minimal-to-moderate adverse impact on aesthetics due to the permanent conversion of a formerly wooded area to a paved parking lot with no immediately apparent aesthetic value. The impact would not be significantly adverse because there are fewer than four or five residences that would have a direct view of the parking lot. The West Haven VAMC could further reduce the minimal-to-moderate adverse impact by

maintaining a vegetated fence around the northern, western, and eastern perimeter of the parking lot.

### **5.1.6 Permit Requirements**

No permits associated with aesthetic conditions are required for the Proposed Action.

### **5.1.7 Best Management Practices**

To minimize potential adverse aesthetic impacts to adjoining properties, VA would implement the following BMPs for the Fisher House, gate and wall restoration/repair, and parking lot phases:

#### **Demolition/Construction/Repair**

- Utilize dust control to reduce airborne emissions
- Limit land clearing and tree removal to the maximum extent practicable. Replant using native, non-invasive vegetation
- Design the Fisher House consistent with regional architectural style

#### **Operation**

- Landscape the Fisher House site with native, non-invasive vegetation and professional maintain the landscape
- Maintain or create a natural or constructed fence around the proposed parking lot

### **5.1.8 Mitigation Measures**

No project-specific mitigation measures are required for aesthetics. However, as previously described, mitigation for historic preservation will have an ancillary benefit on the aesthetic condition of other contributing features to the West Haven VAMC historic district. Additional discussion regarding this mitigation is described under Cultural Resources in Section 5.3.

## **5.2 Air Quality**

### **5.2.1 Significance Criteria**

An alternative could have a significant air quality effect if it would result in substantially higher air pollutant emissions or cause established air quality standards to be exceeded.

### **5.2.2 Regulatory Requirements**

#### **Ambient Air Quality**

The ambient air quality in an area can be characterized in terms of whether or not it complies with the primary and secondary National Ambient Air Quality Standards (NAAQS). The Clean Air Act, as amended (CAA and CAAA) requires the USEPA to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS are provided for the following principal pollutants, called “criteria pollutants” (as listed under Section 108 of the CAA):

- Carbon monoxide (CO)
- Lead (Pb)
- Nitrogen oxides (NO<sub>x</sub>)

- Ozone (O<sub>3</sub>)
- Particulate matter (PM), divided into two size classes:
  - Aerodynamic size less than or equal to 10 micrometers (PM<sub>10</sub>)
  - Aerodynamic size less than or equal to 2.5 micrometers (PM<sub>2.5</sub>)
- Sulfur dioxide (SO<sub>2</sub>)

Areas are designated by the USEPA as “attainment”, “non-attainment”, “maintenance”, or “unclassified” with respect to the NAAQS. Regions in compliance with the standards are designated as “attainment” areas. In areas where the applicable NAAQS are not being met, a “non-attainment” status is designated. Areas that have been classified as “non-attainment”, but are now in compliance can be re-designated “maintenance” status if the state completes an air quality planning process for the area. Areas for which no monitoring data is available are designated as “unclassified”, and are by default considered to be in attainment of the NAAQS.

Gases that trap heat in the atmosphere are often called greenhouse gases. Some greenhouse gases, such as carbon dioxide, occur naturally and are emitted to the atmosphere through natural processes and human activities. Other greenhouse gases (e.g., fluorinated gases) are created and emitted solely through human activities. The principal greenhouse gases that enter the atmosphere because of human activities are:

- Carbon dioxide (CO<sub>2</sub>)
- Methane (CH<sub>4</sub>)
- Nitrous oxide (N<sub>2</sub>O)
- Fluorinated gases (e.g., hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride)

Gases in the atmosphere can contribute to the greenhouse effect both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other greenhouse gases, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the earth. Other than EPA requirements for Mandatory Reporting of Greenhouse Gases Rule (74 CFR 56260), which requires reporting of greenhouse gas data and other relevant information from large sources and suppliers in the United States, no general GHG regulatory guidelines are in place. The purpose of the rule is to collect accurate and timely GHG data to inform future policy decisions. Additionally, the GHG goals in the VA Strategic Sustainability Performance Plan (updated June 30, 2014; VA, 2014b) include reducing Scope 1 and Scope 2 GHG emissions by 29.8% by 2020, relative to Fiscal Year (FY) 2008, and reducing Scope 3 GHG emissions by 10% by 2020, relative to FY 2008.

In 2013, the President issued EO 13653, Preparing the United States for the Impacts of Climate Change, to build upon the progress made by agencies subsequent to EO 13514. EO 13653 requires that agencies update their climate change adaptation policies and plans. In June 2014, the VA fulfilled this requirement by preparing the Climate Change Adaptation Plan (VA, 2014b).

Additionally, the CAA regulates criteria pollutants as well as 188 specifically listed hazardous air pollutants (HAPs). The Title V Operating Permit Program under 40 CFR 70 requires sources that meet the definition of a “major source” of criteria pollutants or HAPs to apply for and obtain

a Title V operating permit. A major source of HAPs has the potential to emit (PTE) more than 10 tons per year (tpy) of any individual HAP, or 25 tpy of any combination of HAPs. The definition of major source for criteria pollutants is dependent on the air quality attainment status of the region where the source is located (i.e., areas that are in attainment or non-attainment with the NAAQS). Major sources have a PTE more than 100 tpy of any criteria pollutant in an attainment area or lower levels in various classifications of non-attainment (i.e. marginal, moderate, serious, severe, and extreme).

### **State and Local Regulations**

As mandated by the Code of Federal Regulations, the CTDEEP developed and promulgated the Abatement of Air Pollution Regulations (Connecticut General Statutes, Section 22a-174), which are implemented by CTDEEP Bureau of Air Management. An applicable section of these regulations limits the idling of mobile sources to three minutes. This regulation applies to most vehicles such as trucks and other diesel engine-powered vehicles commonly used on construction sites.

The City of West Haven maintains local air quality through Chapter 67 (Air Pollution) of the WHCO. The ordinance requires that no person shall construct, reconstruct, install or alter any equipment capable of emitting into the open air smoke, soot, dust, fumes, odors, vapors, noxious gases or products of combustion or of incomplete combustion or any equipment, the use of which may eliminate or reduce or control the emission of any air contaminant, until an installation permit for such construction or reconstruction shall have been issued by the City of West Haven Air Pollution Control Director.

### **Conformity with State Implementation Plans**

The General Conformity Provision of the CAA of 1970 (42 USC 7401 *et seq.*; 40 CFR Parts 50-87) Section 176(c), including the USEPA's implementation mechanism, the General Conformity Rule (40 CFR Part 51, Subpart W), prohibits the Federal government from conducting, supporting, or approving any actions that do not conform to a USEPA-approved State Implementation Plan (SIP). A SIP is a state's self-authored blueprint for achieving and maintaining compliance with the goals of the CAA. Federal agencies prepare written Conformity Determinations for Federal actions in or affecting NAAQS non-attainment areas or maintenance areas when the total direct and indirect emissions of non-attainment pollutants (or their precursors) exceed specified thresholds. Conformity with the SIP is demonstrated if project emissions fall below threshold values.

### **EPA Asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP)**

Air toxics regulations under the CAA specify work practices for asbestos to be followed during demolitions and renovations of all facilities, including, but not limited to, structures, installations, and buildings (excluding residential buildings that have four or fewer dwelling units). The regulations require a thorough inspection where the demolition or renovation operation will occur. The regulations require the owner or the operator of the renovation or demolition operation to notify the appropriate delegated entity (CTDPH) before any demolition, or before any renovations of buildings that contain a certain threshold amount of regulated asbestos-containing material. The rule requires work practice standards that control asbestos emissions. Work practices often involve removing all asbestos-containing materials, adequately wetting all regulated asbestos-containing materials, sealing the material in leak tight containers and

disposing of the asbestos-containing waste material as expediently as practicable, as the regulation explains in greater detail.

These work practice standards are designed to minimize the release of asbestos fibers during building demolition or renovation, waste packaging, transportation and disposal.

The rule generally requires that asbestos-containing waste material be sealed in a leak-tight container while wet, labeled, and disposed of properly in a landfill qualified to receive asbestos waste. Landfills have special requirements for handling and securing the asbestos containing waste to prevent releases of asbestos into the air. Transportation vehicles that move the waste from the point of generation to the asbestos landfill are required to have special labeling requirements and waste shipment recordkeeping requirements.

### **5.2.3 Existing Conditions**

Sensitive air quality receptors in the immediate vicinity of the Fisher House site and the Parking Lot site include single and multi-family residential properties. The closest school is Notre Dame High School, located approximately 0.5-miles north of the West Haven VAMC. No other sensitive receptors were identified in the vicinity of the West Haven VAMC.

Current operation of Building 14 does not generate a significant source of GHG emissions (e.g., from boilers, generators, or other minor equipment).

According to the USEPA Green Book, New Haven County, Connecticut is currently designated as a *non-attainment area* for 1-hour ozone (serious), 1997 standard 8-hour ozone (moderate), and 2008 standard 8-hour ozone (moderate) (USEPA, 2016).

### **5.2.4 Effects of the No Action Alternative**

Under the No Action Alternative, the Proposed Action would not be implemented and there would be no change to the existing air quality condition, and therefore no adverse effects would occur. While the proposed parking lot area would remain wooded under the No Action alternative, the West Haven VAMC could decide to develop this area for other purposes in the future, resulting in the clearing of trees in this area.

### **5.2.5 Effects of the Proposed Action**

#### **Proposed Fisher House**

#### **Demolition/Construction**

Demolition and construction are anticipated to cause short-term, minimal-to-moderate adverse impacts on air quality. Vehicles/engines associated with demolition and construction work will burn fuel, resulting in emissions of criteria pollutants, while particulate matter may be released into the air from demolition/construction activities including excavation, grading, and vehicles traveling on paved and unpaved surfaces. Dust from construction activities can lead to adverse health effects and nuisance concerns, such as reduced visibility on nearby roadways. The Proposed Action includes implementing BMPs, discussed in the following section, to reduce and control dust emissions during demolition/construction activities, further minimizing these anticipated short-term, minimal-to-moderately adverse effects.

Additionally, demolition of Building 14, which contains asbestos and lead-based paint, could release asbestos fibers and lead dust into the air. However, the Proposed Action includes

abatement of asbestos and lead-based paint prior to demolition, and transportation of these materials off-site for disposal. Additional discussion of abatement is provided in the following Solid and Hazardous Materials heading under Section 5.6. Accordingly, demolition of Building 14 is not anticipated to result in a release of these hazardous air pollutants to cause a significantly adverse effect on air quality.

### **Operation**

Operating the Fisher House would cause a none-to-negligible adverse impact on air quality. No new regulated sources of emissions are required to operate the Fisher House.

### **Entrance Gate and Wall**

Restoration and repair of the entrance gate and wall would have a none-to-negligible impact on air quality. If lead-based paint is present on the entrance gate, restoration and repair could release lead dust into the air. However, the VA will conduct a survey for lead-based paint and, if lead-based paint is present, it will be abated prior to any restoration and repair work. Therefore, this phase of the Proposed Action would cause only a minimal-to-moderately adverse effect on air quality.

### **Proposed Parking Lot**

#### **Construction**

Construction of the parking lot is anticipated to cause short-term, minimal-to-moderate adverse effects on air quality. Similar to the prior discussion for the Fisher House construction phase, these effects would be caused by emissions generated from construction equipment used during vegetation clearing, site grading, and paving. BMPs similar to the Fisher House project phase would be implemented to ensure these effects remain at or below minimal-to-moderately adverse levels.

#### **Operation**

Operation of the parking lot would cause none-to-negligible adverse effects on air quality. While the parking lot would provide additional parking spaces at the West Haven VAMC, it would not cause a measurable increase in the number of vehicles (and associated emissions) traveling to and from the West Haven VAMC.

### **5.2.6 Permit Requirements**

At least 10 days prior to asbestos abatement activities, an asbestos abatement notification will be made by the CT-licensed abatement contractor to the CTDPH. All abatement will be managed by acceptable asbestos abatement management plans to minimize the potential for hazardous releases and exposures to workers, discussed further in Section 5.6. Additionally, all other regulated building materials, including lead-based paint, shall be abated from Building 14 prior to demolition, and appropriately transported off-site for proper disposal or recycling. These management measures would ensure the Proposed Action also complies with EPA NESHAP.

The West Haven VAMC is located in a non-attainment area; as such, a Record of Non-Applicability (RONA) under the Clean Air Act of 1990 would be required if the air emissions from the Proposed Action phases exceeded the *de minimis* emission levels (100 tons per year for carbon monoxide, nitrogen oxides, and chlorofluorocarbons). However, it is not anticipated that

the *de minimis* emission levels would be exceeded by any combination of the Proposed Action phases.

### **5.2.7 Best Management Practices**

In response to a request for input regarding the EA of the proposed West Haven VAMC parking lot (VA, 2015), the CTDEEP Office of Environmental Review (OER) made a series of recommendations regarding the use of construction equipment that meets the latest USEPA or California Air Resources Board (CARB) standards, or equipment with the best available controls on diesel emissions, and other measures that would maintain and promote air quality.

Implementing these recommendations and other BMPs will reduce combustion-related emissions as well as fugitive dust emissions during demolition, construction, and/or restoration and repair, and would further minimize the potential minimal-to-moderate, short-term effects on air quality associated with each phase of the Proposed Action. Accordingly, the VA's construction contractor would implement the following BMPs:

- Comply with the City of West Haven air quality regulations, to the extent practicable.
- Use appropriate dust suppression methods during onsite construction activities. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-moving activities during high wind conditions.
- Maintain an appropriate speed to minimize dust generated by vehicles and equipment on unpaved surfaces.
- Cover haul trucks with tarps.
- Stabilize previously disturbed areas with vegetation or mulching if such area would be inactive for several weeks or more.
- Visually monitor all construction activities regularly, and particularly during extended periods of dry weather, and implement dust control measures when appropriate.
- Use of newer off-road and on-road construction equipment that meets the latest EPA or CARB standards, to the extent practicable.
- Limit the idling of mobile sources to three minutes.
- Maintain mature trees to the extent practicable.

### **5.2.8 Mitigation Measures**

No project-specific mitigation measures are required.

## **5.3 Cultural Resources**

### **5.3.1 Significance Criteria**

An alternative could have a significant effect on cultural resources if it would: result in damage, destruction, or demolition to an archaeological site or building that is eligible or listed on the National Register of Historic Places; promote neglect of such a resource, resulting in resource deterioration or destruction; introduce audio or visual intrusion to such a resource; or decrease access to resources of value to federally recognized Native American tribes. Impact assessment

for cultural resources focuses on properties that are listed in or considered eligible for the National Register of Historic Places or are National Historic Landmarks.

### **5.3.2 Regulatory Requirements**

Cultural resources are historic properties as defined in the National Historic Preservation Act (NHPA), cultural items as defined in the Native American Graves Protection and Repatriation Act (NAGPRA), archeological resources as defined in the Archaeological Resources Protection Act (ARPA), sacred sites as defined in EO 13007 to which access is provided under the American Indian Religious Freedom Act (AIRFA), and collections as defined in 36 CFR 79, *Curation of Federally Owned and Administered Collections*. Requirements set forth in NEPA, NHPA, ARPA, NAGPRA, AIRFA, 36 CFR 79, EO 13007, and Presidential Memorandum on *Government-to-Government Relations with Native American Tribal Governments* define the basis of VA's compliance responsibilities for management of cultural resources. Regulations applicable to VA's management of cultural resources include those promulgated by the ACHP and the US National Park Service (NPS).

For proposed actions, Federal agencies are required to consult with Federally-recognized Native American Tribes in accordance with the NEPA, NHPA, NAGPRA, and EO 13175. VA consulted with two Federally-recognized Native American tribes, the Mashantucket Pequot Tribal Nation and to the Mohegan Indian Tribe, as part of this NEPA process, in accordance with 36 CFR 800.2 and EO13175, *Consultation and Coordination with Indian Tribal Governments*, 6 November 2000. These tribes were identified as having possible ancestral ties to the area as identified by the SHPO and/or the Native American Consultation Database (NACD), were invited by VA to participate in the NEPA EA process as Sovereign Nations per EO 13175. Accordingly, VA sent a coordination and consultation letter to the Mashantucket Pequot Tribal Nation on November 27, 2015, and to the Mohegan Indian Tribe on December 1, 2015. Although the VA previously informed the CTSHPO on October 21, 2015 that the Narragansett Indian Tribe of Rhode Island would be invited to be a consulting party, the VA subsequently determined that this tribe did not need to be included as a consulting party, and therefore a consultation request letter was not sent.

### **5.3.3 Existing Conditions**

In 2013, the VA surveyed the West Haven VAMC for NRHP eligibility and prepared a report intended to satisfy the requirements under Section 106 of the Historic Preservation Act and in accordance with 36 CFR 800.11(d) (Woodard & Curran, 2013). Building 14 and the Campbell Avenue gate were identified among 20 contributing features to an eligible NRHP historic district, with a period of significance of 1916-1958, in a draft NRHP nomination prepared in 2014 (VA, 2014).

As described in the draft NRHP form (VA, 2014), Building 14 is noted by “the red brick exterior, stone detailing at the windows, including keystones at the jack arches, and stone water table. A Palladian window pierces the upper portion of the north facing wall, and the front gable roof is sheathed in slate. Gabled dormers with arched upper window sashes line the east and west elevations. These features combine to give the building a Colonial Revival appearance” (VA, 2014). The draft NHRP form described the former entrance gates as “...consisting of brick posts with concrete caps culminating in decorative urns. Smaller pedestrian gates flank the central vehicular gate. Ornate ironwork, comprised of scrolls, tassels, flowers, and shields curve along

the upper section; a lantern serves as the central focal point for the decorative, delicate work. “Veterans Administration Hospital” arches across the gate. The gates are relatively plain in comparison. Iron pickets and a middle rail form the framework; the shorter pickets are capped in embellished arrow finials” (VA, 2014).

The draft NRHP form was submitted to the CTSHPO on September 17, 2015. On October 21, 2015, the VA sent a letter to the CTSHPO explaining the Proposed Action. The VA requested CTSHPO concurrence with the VA’s opinion and determination that the demolition of Building 14 would result in an Adverse Effect to a historic property.

Additionally, the VA has prepared a draft MOA among the VA, CTSHPO, ACHP, and the Fisher House Foundation to document the VA’s anticipated commitment to provide mitigation for historical preservation as a result of demolishing Building 14 (VA, May 9, 2016). Although the draft MOA included a commitment to restore and repair of the entrance gate and wall, and continued maintenance of other contributing features to the historic district at the West Haven VAMC, the specific mitigation will continue to be developed through the Section 106 consultation process and documented in a final MOA. As of the date of this Draft EA, the final MOA among the aforementioned parties has not yet been executed.

It is noted that as part of the VA’s 2015 EA for the development of the 250-space parking lot, an *Initial Cultural Resources Impact Prediction Report*, dated March 9, 2015 (Cultural Resources Report) was prepared by Gray and Pape, Inc. for the “Site” (referenced in VA, 2015). The EA stated that “Site” soils were described by NRCS as disturbed or capped with fill, which was corroborated by a geotechnical investigation of the “Site,” and that the proposed action to develop a 250-space parking at the “Site” under consideration did not have the potential to affect subsurface cultural deposits (archaeological resources) and recommended no further action. The EA states that the CTSHPO concurred that the development of the 250-space parking lot would not affect known historic properties.

However, the VA has not conducted a similar subsurface cultural resources investigation within the proposed Fisher House site or the proposed parking lot site. As part of the Proposed Action described in this Draft EA, the VA will continue Section 106 consultations with the CTSHPO to resolve whether the Proposed Action is likely to have “no adverse effect” on subsurface cultural deposits at either site. Additionally, the MOA may also include an “Inadvertent Discovery” SOP for potential subsurface resources if required by the CTSHPO.

#### **5.3.4 Effects of the No Action Alternative**

Under the No Action Alternative, the Proposed Action would not be implemented, and the adverse effect otherwise associated with demolishing Building 14 would not occur. Any potential subsurface cultural deposits would remain undisturbed at the proposed Fisher House site and the proposed parking lot site. However, the entrance gate and wall would not be restored/repared and are anticipated to continue to deteriorate.

### **5.3.5 Effects of the Proposed Action**

#### **Proposed Fisher House**

##### **Demolition/Construction**

Demolition of Building 14 would have an adverse effect to the historic property, if not mitigated. However, the Proposed Action includes mitigation for historic preservation. Although the MOA has not yet been agreed upon, the VA anticipates that mitigation will include, at a minimum, restoration and repair of the entrance gate and wall, and continued maintenance of other contributing features to the historic district at the West Haven VAMC. Accordingly, for the purposes of this Draft EA, the loss of Building 14 has a significant-but-mitigated effect on the cultural resources topic. Additionally, consultation with the CTSHPO will continue to determine whether the MOA should address potential subsurface cultural resources. The MOA may also include an “Inadvertent Discovery” SOP for potential subsurface resources if required by the CTSHPO.

Construction of the Fisher House is not anticipated to cause adverse effect to any other contributing feature to the historic district at the West Haven VAMC. However, should any cultural or historic artifacts or resources become uncovered during site grading, the VA shall inform the CTSHPO and take any actions requested by the SHPO.

##### **Operation**

Operation of the Fisher House would cause none-to-negligible adverse effects on cultural resources. Operation of the Fisher House does not require subsurface disturbances or impacting any of the other contributing features to the historic district at the West Haven VAMC.

#### **Proposed Parking Lot**

##### **Construction and Operation**

Construction and operation of the proposed Parking Lot is anticipated to cause none-to-negligible adverse effects on cultural resources. Although the West Haven VAMC has been highly developed, there is no readily available historical information indicating whether or not this wooded area was previously disturbed. However, construction of the parking lot is not anticipated to require subsurface excavation (apart from removal of tree stumps) that would require disturbance to potential subsurface cultural or historic artifacts or resources. However, as previously described, consultation with the CTSHPO will continue to determine whether the MOA should address potential subsurface cultural resources and include an “Inadvertent Discovery” SOP.

### **5.3.6 Permit Requirements**

No permits associated with cultural resources are required to implement the Proposed Action.

### **5.3.7 Best Management Practices**

Should human remains or other cultural items as defined by NAGPRA be discovered during construction of any phase of the Proposed Action, the construction contractor would immediately cease work until VA, a qualified archaeologist, and the CTSHPO are contacted to properly identify and appropriately treat discovered items in accordance with applicable State and Federal law(s).

Should any other cultural or historic artifacts or resources become uncovered during construction during any phase of the Proposed Action, the VA will inform the CTSHPO and take any actions requested and/or required by the CTSHPO.

### **5.3.8 Mitigation Measures**

The specific mitigation for historical preservation, due to the loss of Building 14, will be developed through continued consultation among the VA, SHPO, and ACHP, and is anticipated to include, at a minimum, historic preservation of the West Haven VAMC's ornate entrance gate on Campbell Avenue, which also was identified as a contributing element in the draft NRHP nomination but currently is in poor condition and not operational. The VA anticipates executing the final MOA to affirm the selected commitments for mitigation for historic preservation, prior to demolition of Building 14. The mitigation would be performed as part of the second phase of the Proposed Action, occurring only if Building 14 is demolished.

## **5.4 Topography, Geology and Soils**

### **5.4.1 Significance Criteria**

If an alternative would result in an increased geologic hazard or a change in the availability of a geologic resource, or change topographic features resulting in detrimental changes in stormwater runoff quality or quantity, or result in the loss of productive agricultural land, it could have a significant effect. Such geologic and soil hazards would include, but not be limited to, seismic vibration, land subsidence, and slope instability.

### **5.4.2 Regulatory Requirements**

There are no regulatory requirements related to topography and geology applicable to the Proposed Action. The applicable regulatory requirements for soil pertain to minimizing soil erosion through stormwater management and engineering controls.

Under the EISA Section 438, federal facilities with a construction footprint exceeding 5,000 square feet are required to use site planning, design, construction, and maintenance strategies to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property in the post-development condition. Compliance with EISA 438 would be required for each phase of the Proposed Action; that is, the Fisher House project phase is required to demonstrate compliance separately from the parking lot phase.

Under CTDEEP *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015), stormwater discharges from construction sites where one or more acres are to be disturbed, regardless of project phasing, require an NPDES permit from the CTDEEP. Based on consultation with CTDEEP, the one-acre threshold is limited to only the area that is disturbed (e.g. where soil may be exposed). The Fisher House phase of the Proposed Action will only disturb an approximately 0.27-acre area, while the proposed parking lot will disturb an approximately 0.46-acre area, and the restoration of the entrance gate and wall will not disturb any area. Therefore, accounting for all phases, the Proposed Action would disturb a total of approximately 0.77 acres, which is less than the one-acre threshold established by CTDEEP when a project needs to obtain a *Construction General Permit* (Mabbett, 2016b).

For the Fisher House project phase and the parking lot phase, a separate CTDEEP-compliant Soil Erosion and Sediment Control (SESC) Plan is required to be completed by the VA. The SESC Plan does not require CTDEEP review or approval. The SESC Plan would fulfill the requirements of Connecticut's Soil Erosion and Sediment Control Act (§§ 22a-325 through 22a-329 of the Connecticut General Statutes).

Prime and Unique Farmlands are regulated in accordance with the USDA Farmland Protection Policy Act (FPPA) (7 USC 4201, *et seq.*) to ensure preservation of agricultural lands that are of Statewide or local importance. Soils designated as prime farmland are capable of producing high yields of various crops when managed using modern farming methods. Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, and without intolerable soil erosion. Unique farmlands are also capable of sustaining high crop yields and have special combinations of favorable soil and climate characteristics that support specific high-value foods or crops. The NRCS states that projects that may irreversibly convert (directly or indirectly) farmland soils to nonagricultural use and are completed by a Federal agency or completed with the assistance of a Federal agency, must file a Farmland Conversion Impact Rating form AD-1006 with NRCS.

### **5.4.3 Existing Conditions**

#### **Topography**

The West Haven VAMC is located in the southern portion of New Haven County. Both the proposed Fisher House site and the proposed Parking Lot site are relatively flat. A review of the New Haven, Connecticut USGS Topographic Quadrangle (Figure 7) indicated that the elevation of the proposed Fisher House site is at approximately 80 feet above mean sea level (amsl) and relatively flat, with a slight eastward slope. However, a steep eastward facing slope is present to the west of Building 14.

The proposed Parking Lot site is at approximately 140 feet amsl, with no apparent slope. However, elevations of surrounding areas are generally lower at approximately 120-140 feet amsl.

#### **Geology**

Connecticut lies within the Coastal Lowland portion of the New England Upland Physiographic Section of the New England Physiographic Province. Glacial meltwater deposits in the area consist of nonsorted, generally nonstratified mixtures of grain-sizes ranging from clay to large boulders. The matrix of most tills is composed dominantly of sand and silt. Boulders within and on the surface of tills range from sparse to abundant. The glacial and post-glacial deposits are underlain by Precambrian igneous rocks (primarily granite) and bedrock outcropping is common (USGS, 2005). The geology underlying both sites is anticipated to be the similar.

Based on currently available data, no active significant faults are known extend through the subsurface geology at the West Haven VAMC.

#### **Soils**

The USDA NRCS Web Soil Survey classifies soils throughout the West Haven VAMC as Penwood-Urban land complex. These soils are noted to be excessively drained and have rapid

permeability. They are strongly acidic from the parent material of sandy glaciofluvial deposits from sandstone and shale. Penwood-Urban land complex is typically found in urban and suburban development as lawns, gardens, woodlands, or brushland between structures. The USDA NRCS Web Soil Survey map is provided in Figure 8.

According to the USDA NRCS Web Soil Survey, none of the West Haven VAMC soils are characterized as prime farmland. Therefore, preparation of a Farmland Conversion Impact Rating form AD-1006 is not required for the Proposed Action.

#### **5.4.4 Effects of the No Action Alternative**

Under the No Action Alternative, the Proposed Action would not be implemented, existing conditions would be unchanged, and no impacts to soil, topography, or geology would occur.

#### **5.4.5 Effects of the Proposed Action**

##### **Proposed Fisher House**

##### **Demolition/Construction**

Short-term, minimal-to-moderate adverse effects are anticipated to be caused by demolition/construction activities for the Fisher House project phase. Site work will require disturbing a total of approximately 0.27 acres of the soil surface within the 0.57-acre site. Disturbance will involve subsurface excavation for utility and foundation work, grading the site, removal of vegetative cover, and soil compaction. Soil that is exposed by such disturbance could be susceptible to erosion by wind and surface runoff, which in turn has the potential to result in off-site discharges of sediment-laden runoff. Additionally, compaction can reduce the infiltration rate of the soil, leading to increased run-off potential and increased soil erosion.

To address and limit the adverse effects of construction on soil quality, the Fisher House project phase will include the preparation of CTDEEP-compliant SESC and implementation of the specified BMPs, as discussed in the following section. A CTDEEP *Construction General Permit* is not required because the project will disturb less than one acre.

As previously described, the Fisher House project phase has been designed to comply with EISA 438 to the maximum extent technically feasible by reducing the site footprint (smaller Fisher House, no new parking or access areas) to limit the creation of new impervious surfaces to 0.03 acres and utilizing existing West Haven VAMC stormwater management infrastructure (catchment basins) to capture run-off.

Once construction is complete, no further soil erosion and sedimentation impacts are anticipated. The exposed soils will be planted with native, non-invasive vegetation, allowing precipitation and run-off to infiltrate into the soil, while run-off from impervious surfaces will be directed to the existing stormwater catchment basins operated by the West Haven VAMC.

None-to-negligible adverse impacts to topography or geology are anticipated during demolition and construction. No impacts associated with seismic hazards were identified. No significant impacts to mineral resources are anticipated, as the Fisher House project phase would not involve the commercial extraction of mineral resources, nor affect mineral resources considered important on a local, State, national, or global basis.

## **Operation**

During operation, none-to-negligible long-term impacts would be anticipated to topography, geology, and soils. Operation will not require any additional subsurface earthwork, and the West Haven VAMC will professionally maintain the vegetation used to cover and stabilize previously disturbed soils to prevent erosion. The West Haven VAMC will continue to direct stormwater that does not infiltrate into impervious surfaces to existing catchment basins currently operated by the West Haven VAMC; the West Haven VAMC will continue maintaining these catchment basins to ensure they continue to function properly.

## **Proposed Parking Lot**

### **Construction**

Short-term, minimal-to-moderate adverse effects are anticipated to be caused by construction activities for the northern parking lot, which encompasses an approximately 0.46-acre area. Site work (tree and stump clearing) will require disturbing the soil surface, grading the site, and compacting soil. Soil that is exposed by such disturbance could be susceptible to erosion by wind and surface runoff, which in turn has the potential to result in off-site discharges of sediment-laden runoff. Additionally, compaction can reduce the infiltration rate of the soil, leading to increased run-off potential and increased soil erosion.

To address and limit the adverse effects of construction on soil quality, the Parking Lot project phase will include the preparation of a separate CTDEEP-compliant SESC and implementation of the specified BMPs, as discussed in the following section. A CTDEEP *Construction General Permit* is not anticipated to be required because the Fisher House project phase as currently proposed will disturb approximately 0.27 acres of land, which is less than the one-acre threshold above which a CTDEEP *Construction General Permit* would be required. Even when considering all phases of the Proposed Action, the total area of disturbance for the Fisher House phase (approximately 0.27 acres) and the parking lot phase (0.46 acres) remains at less than one acre.

A formal design for the proposed parking lot has not been prepared, as the West Haven VAMC may ultimately decide not to implement the parking lot project. However, should the West Haven VAMC decide to implement the parking lot project, a design will be prepared to comply with EISA 438 to the maximum extent technically feasible to maintain pre-development hydrology. It is anticipated that the parking lot would also utilize the existing West Haven VAMC stormwater management infrastructure (catchment basins) to capture run-off.

Once construction is complete, no further soil erosion and sedimentation impacts are anticipated. The exposed soils will be covered with asphalt (or similar structurally-competent material), while run-off from impervious surfaces will be directed to the existing stormwater catchment basins operated by the West Haven VAMC.

None-to-negligible adverse impacts to topography or geology are anticipated during construction. No impacts associated with seismic hazards were identified. No significant impacts to mineral resources are anticipated, as the parking lot project phase would not involve the commercial extraction of mineral resources, nor affect mineral resources considered important on a local, State, national, or global basis.

## **Operation**

Long-term, none-to-negligible adverse impacts are anticipated during operation of the proposed parking lot. The parking lot would be graded to direct stormwater run-off into existing catchment basins currently operated by the West Haven VAMC, thereby preventing potential erosion.

### **5.4.6 Permit Requirements**

No specific permits are required for the Fisher House project phase or the parking lot project phase. While not a permit, each phase of the Proposed Action is required to be compliant with EISA Section 438. Additionally, each phase is required to have a separate CTDEEP-compliant SESC.

### **5.4.7 Best Management Measures**

The construction contractor will implement the BMPs required in the SESC. These BMPs will ensure the adverse effects to soil will not increase above short-term, minimal-to-moderate levels. The BMPs include but are not limited to:

- Implement sediment and erosion control measures in the SESC, such as silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures; re-spread stockpiled topsoil; and seed/re-vegetate areas temporarily cleared of vegetation.
- Retain on-site vegetation to the maximum extent possible.
- Plant and maintain soil-stabilizing vegetation on disturbed areas.
- Use native, non-invasive vegetation to re-vegetate disturbed soils. Professionally maintain vegetation during operation.
- As recommended by CTDEEP OER, use of Low Impact Development (LID) or green infrastructure practices such as water quality swales and rain gardens to manage infiltration of stormwater. Key strategies for effective LID include: managing stormwater close to where precipitation falls; infiltrating, filtering, and storing as much stormwater as feasible; managing stormwater at multiple locations throughout the landscape; conserving and restoring natural vegetation and soils; preserving open space and minimizing land disturbance; designing the site to minimize impervious surfaces; and providing for maintenance and education.
- Implementation of a maintenance plan to ensure the long-term effectiveness of existing stormwater treatment structures or measures (such as oil/grit separators, or swales, etc.) to limit and reduce soil erosion and sedimentation of run-off.

### **5.4.8 Mitigation Measures**

No project-specific mitigation measures are required.

## **5.5 Hydrology and Water Resources**

### **5.5.1 Significance Criteria**

This section focuses on surface water and groundwater resources. If an alternative would result in a reduction in the quantity or quality of water resources for existing or potential future use, it

could have a significant effect. A significant effect could occur if the demand exceeded the capacity of the potable water system.

### **5.5.2 Regulatory Requirements**

As previously described, EISA Section 438 requires a federal facility with a project footprint that exceeds 5,000 square feet to use site planning, design, construction, and maintenance strategies for the property to maintain or restore, to the maximum extent technically feasible, the predevelopment hydrology of the property with regard to the temperature, rate, volume, and duration of flow. The Fisher House project phase and the proposed parking lot phase each have footprints greater than 5,000 square feet. According, each project is required to comply with EISA Section 438. This regulatory requirement pertains to protecting surface water through the management of stormwater run-off volume and quality.

Additional regulatory requirements to limit and manage stormwater run-off to protect surface water include preparation and implementation of separate SESC Plans for the Fisher House project and parking lot project phases.

### **5.5.3 Existing Conditions**

#### **Surface Water**

There are no surface water bodies present at the West Haven VAMC. The nearest surface water bodies are the West River and the Cove River (Mabbett, 2016).

The West River is located approximately one mile east from the West Haven VAMC. The West River is classified as a Class SD/SB waterbody, indicating that the water quality is impaired. It has a Class SB water quality goal, which would allow the following designated uses: fishing, swimming & recreation, healthy marine habitat, commercial shellfish harvesting (requires purification), and industrial supply.

The Cove River is located approximately two miles south from the West Haven VAMC. The Cove River is classified as a Class A waterbody, with the following designated uses: potential drinking water supply; fish and wildlife habitat; recreational use; agricultural and industrial supply and other legitimate uses including navigation.

Stormwater run-off from the proposed Fisher House or Parking Lot sites does not have the potential to flow directly into these surface water bodies due to distance and the presence of obstructing man-made physical features (e.g. roads) between the West Haven VAMC and these surface waters.

#### **Groundwater**

Aquifers that supply fresh groundwater to the West Haven VAMC include New England crystalline rock aquifers. Areas where thin or barely permeable glacial deposits of till blanket the bedrock, surficial aquifers are not readily available and the bedrock itself is an important source of water (Groundwater Atlas of the U.S.; USGS, 1995). According to the CTDEEP Aquifer Protection Program, the City of West Haven is not included as an area with a protected aquifer (CTDEEP, 2016). The CTDEEP ECO map classifies groundwater beneath the West Haven VAMC as “GB.” The CTDEEP defines “GB” groundwater resources as “groundwater designated for industrial process water and cooling waters; base flow for hydraulically connected surface water bodies; presumed not suitable for human consumption without treatment.”

There are no State wells or public water supply (PWS) systems located within a one-mile radius of the West Haven VAMC (Mabbett, 2016). However, six water wells are located within a one-mile radius of the West Haven VAMC. These wells were installed as part of the National Water Inventory System (NWIS) to enable the USGS to collect data on groundwater in the area.

Within the West Haven VAMC, groundwater has been encountered between 3- and 5.4-feet below ground surface (bgs) (Lobdell Consultants, 2015). Based on topography of the West Haven VAMC, groundwater likely flows from both sites to the east toward Campbell Avenue, though local groundwater flow may vary due to the presence of underground utilities such as sewers, storm drains, and heterogeneous subsurface soil conditions.

#### **5.5.4 Effects of the No Action Alternative**

Under the No Action Alternative, no impacts to hydrology and water resources would occur. The Proposed Action would not be implemented, therefore, current hydrological conditions would remain unchanged, as no new impervious areas would be created, and stormwater run-off would continue to infiltrate into vegetated ground and/or enter existing West Haven VAMC stormwater catchment basins.

#### **5.5.5 Effects of the Proposed Action**

##### **Proposed Fisher House**

##### **Demolition/Construction**

Short-term, minimal-to-moderate adverse effects are anticipated to be caused by construction activities for the Fisher House project phase. These effects are primarily associated with an increase in impervious surface area by 0.03 acres, and potential sedimentation of stormwater run-off. As previously described in Section 5.4 (Soil), site work will require disturbing the soil surface, grading the site, and compacting soil. Soils exposed during demolition/construction could be eroded and sedimentation of stormwater run-off could occur. Although sediment-laden stormwater is unlikely to reach the aforementioned surface water bodies due to the distance (1-2 miles), demolition/construction could result in short-term, minimal-to-moderate adverse impacts to surface water resources if stormwater management controls are not implemented. The increase in impervious surface area will also decrease the pervious area available for precipitation to infiltrate into the ground and recharge the underlying groundwater. However, the decreased infiltration volume is considered to be negligible in context to the total recharge volume that occurs at the West Haven VAMC and regionally.

As previously described, the Fisher House project phase has been designed to comply with EISA 438 to the maximum extent technically feasible by reducing the site footprint (smaller Fisher House, no new parking or access areas) to limit the creation of new impervious surfaces to 0.03 acres and utilizing existing West Haven VAMC stormwater management infrastructure (catchment basins) to capture run-off. Additionally, BMPs specified in the SESC will be implemented to further minimize sedimentation of run-off.

Once construction is complete, no further soil erosion and sedimentation impacts are anticipated. The exposed soils will be planted with native, non-invasive vegetation, allowing precipitation and run-off to infiltrate into the soil, while run-off from impervious surfaces will be directed to the existing stormwater catchment basins operated by the West Haven VAMC.

During demolition/construction, an accidental release of fuel or hydraulic fluid from construction vehicles could cause a short-term, minimal-to-moderate adverse effect on groundwater quality, if the release was not stopped and/or remediated prior to contact with groundwater. To minimize this potential effect, all construction vehicles will be equipped with spill kits, and contractors will be properly trained on their use. The West Haven VAMC will notify CTDEEP immediately should a release of regulated chemicals occur, and implement required remedial measures to protect groundwater quality.

Once construction is complete, no further sedimentation impacts are anticipated. The exposed soils will be planted with native, non-invasive vegetation, allowing precipitation and run-off to infiltrate into the soil, while run-off from impervious surfaces will be directed to the existing stormwater catchment basins operated by the West Haven VAMC. Construction equipment will be demobilized from the site, eliminating the potential for accidental releases to groundwater.

### **Operation**

Operation of the Fisher House would result in long-term, none-to-negligible adverse impacts on surface water or groundwater resources. Stormwater runoff will continue to be directed to the existing stormwater catchbasin system at the West Haven VAMC. Additionally, there are no anticipated operational activities at the Fisher House that would cause an adverse impact to groundwater, such as handling, storing, or disposing of hazardous or toxic wastes.

### **Proposed Parking Lot**

#### **Construction**

Short-term, minimal-to-moderate adverse effects are anticipated to be caused by construction activities for the parking lot project phase. These effects are primarily associated with an increase in impervious surface area by approximately 0.46 acres, and potential sedimentation of stormwater run-off. As previously described in Section 5.4 (Soil), site work will require disturbing the soil surface, grading the site, and compacting soil. Soils exposed during construction could be eroded and sedimentation of stormwater run-off could occur. Although sediment-laden stormwater is unlikely to reach the aforementioned surface water bodies due to the distance (1-2 miles), construction could result in short-term, minimal-to-moderate adverse impacts to surface water resources if stormwater management controls are not implemented. The increase in impervious surface area will also decrease the pervious area available for precipitation to infiltrate into the ground and recharge the underlying groundwater. However, the decreased infiltration volume is considered to be negligible in context to the total recharge volume that occurs at the West Haven VACM and regionally.

As previously described, the parking lot project phase is a potential action the need for which will be decided by West Haven VAMC in the future. Accordingly, construction design plans have not yet been developed. However, the parking lot design will be prepared to comply with EISA 438 to the maximum extent technically feasible to maintain pre-development hydrology. It is anticipated that the parking lot would also utilize the existing West Haven VAMC stormwater management infrastructure (catchment basins) to capture run-off. Additionally, BMPs specified in a parking lot-specific SESC will be implemented to further minimize sedimentation of run-off.

During construction, an accidental release of fuel or hydraulic fluid from construction vehicles could cause a short-term, minimal-to-moderate adverse effect on groundwater quality, if the

release was not stopped and/or remediated prior to contact with groundwater. To minimize this potential effect, all construction vehicles will be equipped with spill kits, and contractors will be properly trained on their use. The West Haven VAMC will notify CTDEEP immediately should a release of regulated chemicals occur, and implement required remedial measures to protect groundwater quality.

Once construction is complete, no further soil erosion and sedimentation impacts are anticipated. The exposed soils will be covered with asphalt (or similar structurally-competent material), while run-off from impervious surfaces will be directed to the existing stormwater catchment basins operated by the West Haven VAMC. Additionally, construction equipment will be demobilized from the site, eliminating the potential for accidental releases to groundwater.

## **Operation**

Operation of the parking lot is anticipated to have a long-term, minimal-to-moderate adverse impact on hydrology and water resources. The conversion of the approximately 0.46-acre area from a pervious surface to a paved impervious surface would increase the volume of surface water run-off. Rather than infiltrating into the soil, run-off would be transported as sheet flow across the parking lot surface, where it would be presumably directed south toward existing stormwater catchbasins at the West Haven VAMC. It is anticipated that the existing stormwater drainage and conveyance system for the parking lots 9 and 10 would be adequate to handle the additional stormwater volume from the proposed parking lot.

### **5.5.6 Permits Required**

No specific permits are required for the Fisher House project phase or the parking lot project phase. As previously described, each phase of the Proposed Action is required to be compliant with EISA Section 438. Additionally, each phase is required to have a separate CTDEEP-compliant SESC. Implementation of these stormwater management controls would also protect surface water resources.

### **5.5.7 Best Management Practices**

To minimize potential adverse impacts to surface water and groundwater during demolition/construction and operation, the construction contractor will implement the SESC and BMPs previously described under Section 5.4 (Soil). These controls include but are not limited to the following BMPs:

- Install and monitor erosion-prevention measures, such as silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures; re-spread stockpiled topsoil; and seed/re-vegetate areas temporarily cleared of vegetation.
- Retain on-site vegetation to the maximum extent possible.
- Plant and maintain soil-stabilizing vegetation on disturbed areas.
- Use native vegetation to re-vegetate disturbed soils. Maintain vegetation to prevent exposing soils to erosive forces.
- Use LID or green infrastructure practices such as water quality swales and rain gardens to manage infiltration of stormwater. Maintain these systems in good working order.

- Ensure construction vehicles are equipped with spill kits and workers are properly trained in their operation; these kits will be deployed in the event a release of petroleum-based fluids in order to prevent contamination of the underlying groundwater. Notify VA, West Haven VAMC, and CTDEEP in the event of an accidental release of fuel or hydraulic fluid.

### **5.5.8 Mitigation Measures**

No project-specific mitigation measures are required.

## **5.6 Solid and Hazardous Materials**

### **5.6.1 Significance Criteria**

An alternative could have a significant effect if it would result in a substantial increase in the generation of hazardous wastes, increase the exposure of persons to hazardous materials or toxic substances, increase the presence and release of hazardous or toxic materials in the environment, or place substantial restrictions on property use due to hazardous waste, materials, or site remediation.

### **5.6.2 Regulatory Requirements**

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (i.e., through either physical or chemical reactions) to human health or the environment. Regulated hazardous substances are identified through a number of Federal laws and regulations. The most comprehensive list is contained in 40 CFR 302, and identifies quantities of these substances, when released to the environment, that require notification to a Federal agency. Hazardous wastes, defined in 40 CFR 261.3, are considered hazardous substances. Generally, hazardous wastes are discarded materials (e.g., solids or liquids) not otherwise excluded by 40 CFR 261.4 that exhibit a hazardous characteristic (i.e., ignitable, corrosive, reactive, or toxic), or are specifically identified within 40 CFR 261. Petroleum products are specifically exempted from 40 CFR 302, but some are also generally considered hazardous substances due to their physical characteristics (i.e., especially fuel products), and their ability to impair natural resources.

#### *Prior to Abatement*

A pre-demolition survey for regulated building materials (including but not limited to asbestos, lead, PCBs, and mercury) is required prior to demolition (e.g. destructive inspection including roofing that meets NESHAP requirements for asbestos). Additionally, representative samples of building materials must be collected and submitted waste characterization analysis of potential demolition debris, including but not limited to lead TCLP analysis. Based on the waste characterization analyses results, an abatement plan must be prepared and included in the A/E design plan. Furthermore, the asbestos abatement plan must be prepared by a CT-licensed project designer.

The CT Department of Public Health (CTDPH) regulates asbestos abatement and lead repair and renovation activities. An Asbestos Abatement Notification must be submitted to the CTDPH prior to asbestos abatement. The asbestos abatement plan must be prepared by a CT-licensed project designer, and the asbestos abatement must be performed by a CTDPH-licensed asbestos abatement contractor.

Prior to Demolition

CTDEEP requires a Construction and Demolition Waste Management Plan identifying the types of debris that will be generated by the project and identifying how all waste streams will be handled. Additionally, prior to demolition, CTDEEP requires any organization proposing to dispose of a "special waste" (not hazardous) or asbestos, to prepare and submit an *Application Form for Special Waste or Asbestos Disposal Authorization* (DEP-WEED-APP-200) to apply for a *Special Waste Disposal Authorization* (authorized under Sections 22a-208a-1, 22a-209-1, and 22a-209-8 of the Regulations of Connecticut State Agencies (RCSA)).

Additionally, prior to demolition, a demolition permit must be obtained from the City of West Haven, in accordance with the 2012 Connecticut General Statutes: *Title 29 - Public Safety and State Police, Chapter 541 - Building, Fire and Demolition Codes. Fire Marshals and Fire Hazards. Safety of Public and Other Structures.*

Furthermore, at least 10 days prior to demolition, a Demolition Notification Form must be submitted to CTDPH. However, if an Asbestos Abatement Notification was previously submitted to the CTDPH, the submission of the Demolition Notification Form is not required provided that an Asbestos Abatement Notification Form was previously submitted to the CTDPH. In that case, the Asbestos Abatement Notification Form submitted to CTDPH satisfies the notification requirement for demolition of the facility. In all cases of demolition, one and only one form (Notification of Demolition Form or Asbestos Abatement Notification Form, as applicable) shall be sufficient to satisfy the CTDPH notification requirements detailed in Section 19a-332a-3 of the RCSA.

As a general recommendation, CTDEEP has indicated that development plans, in urban areas and entail soil excavation, should include a protocol for sampling and analysis of potentially contaminated soil. Soil with contaminant levels that exceed the applicable criteria of the Remediation Standard Regulations, which is not hazardous waste, is considered to be "special waste". As previously described, the disposal of special wastes requires authorization from CTDEEP Waste Engineering and Enforcement Division prior to delivery to any solid waste disposal facility in Connecticut. If clean fill is to be segregated from waste material, there must be strict adherence to the definition of clean fill, as provided in Section 22a-209-1 of the RCSA. Additionally, the regulations prohibit the disposal of more than 10 cubic yards of stumps, brush or woodchips on the site, either buried or on the surface.

CTDEEP Waste Engineering & Enforcement Division has also issued a *General Permit for Contaminated Soil and/or Sediment Management* (DEP-SW-GP-001). It establishes a uniform set of environmentally protective management measures for stockpiling soils when they are generated during construction or utility installation projects where contaminated soils are typically managed (held temporarily during characterization procedures to determine a final disposition). Temporary storage of less than 1,000 cubic yards of contaminated soils (which are not hazardous waste) at the excavation site does not require registration, provided that activities are conducted in accordance with the applicable conditions of the general permit. Registration is required for on-site storage of more than 1,000 cubic yards for more than 45 days or transfer of more than 10 cubic yards off-site.

### Demolition Waste Transport and Disposal

The CTDEEP and EPA regulate the transport and disposal of demolition-related debris that contains regulated quantities of hazardous materials (e.g. lead, PCBs, metals) and “special waste” and asbestos.

### **5.6.3 Existing Conditions**

#### **Proposed Fisher House Site**

An Asbestos-Containing Material & Lead-Containing Paint Survey Report for Building 14 was prepared by Mabbett on September 16, 2011 (Mabbett, 2011). This report, prepared for Operational and Maintenance purposes, noted asbestos-containing material was present in flooring caulk, sink undercoating, pipe-joint insulation, corrugated-pipe insulation, black electrical conduit caulk, brown Moroccan linoleum, and felt under linoleum within specific accessible areas in Building 14; however, roofing materials and other inaccessible areas were not inspected. At the time of the inspection, in August 2010, all the building materials were in good condition. This report also noted that lead concentrations in the surveyed painted surfaces exceeded 0.1 milligram per square centimeter (mg/cm<sup>2</sup>), the VISN 1 threshold, throughout the basement, first, and second floors as well as limited areas of the exterior of Building 14. At the time of the inspection, the lead-based paint was noted to range from intact to poor condition.

A radon survey at Building 14 was completed by EnviroMed Services Inc. (EnviroMed, 2009). This report concluded that there were no radon concentrations above the USEPA-recommended exposure limit of 4.0 picoCuries per liter of air (pCi/L), and as such, no corrective actions were recommended.

A Phase I Environmental Site Assessment (ESA) of the site was performed by Mabbett in June 2016 (Mabbett, 2016). The Phase I ESA included a site visit, interviews with persons knowledgeable about the site, a review of historic information, and a review of local, State and Federal environmental regulatory information for the site and surrounding area. The following Recognized Environmental Conditions (RECs) were identified at the site as part of the Phase I ESA:

- Asbestos-containing building materials
- Lead-based paint (in interior and exterior painted building surfaces)
- Based on the age of Building 14, it is possible that building materials (e.g. caulks, glaze) containing PCBs at regulated concentrations are present. Prior to demolition of the Site, Mabbett recommended that the VA conduct a pre-demolition hazardous materials survey for regulated materials including but not limited to asbestos, lead, PCBs, and mercury, throughout the interior and exterior (including the roof system) of Building 14.

#### **Entrance Gate**

Based on the age of the entrance gate, it is possible that lead-based paint is present on this structure. However, to date, a lead-based paint survey has not been conducted to assess whether lead is present on the entrance gate.

### **Proposed Parking Lot Site**

No record of solid or hazardous materials releases or RECs were identified for the proposed parking lot site.

#### **5.6.4 Effects of the No Action Alternative**

Under the No Action Alternative, Building 14 would continue to operate as the Learning Recovery Center. The West Haven VAMC would continue to implement the recommendations specified in the Operation and Maintenance Plan (Mabbett, 2011) to minimize the risk of exposing staff and patients to identified asbestos and lead hazards. Should the condition of asbestos-containing building materials or lead-based paint worsen, these regulated materials could pose a long-term, minimal-to-moderate adverse impact on these receptors. Additionally, restoration and repair of the entrance gate would not occur. If lead-based paint is present on the entrance gate, it could continue to deteriorate and release *de minimis* quantities (not regulated) of lead-based dust into the environment.

#### **5.6.5 Effects of the Proposed Action**

### **Proposed Fisher House**

#### **Demolition/Construction**

Demolition of Building 14 is anticipated to have a short-term, minimal-to-moderate adverse effect on the environment due to the potential for release of solid and hazardous materials. The effect would be minimized because regulated building materials would first be identified, then abated, and finally transported off-site for disposal and/or recycling. By removing these hazards prior to demolition, it reduces the risk of exposing these hazards to workers, staff, patients and visitors at the West Haven VAMC, as well as any immediately adjacent abutters. These management activities are incorporated into the Fisher House project phase of the Proposed Action; a summary of these activities is presented in the following discussion on Permit Requirements and BMPs.

During demolition/construction, an accidental release of fuel or hydraulic fluid from construction vehicles could cause a short-term, minimal-to-moderate adverse effect on groundwater quality, if the release was not stopped and/or remediated prior to contact with groundwater. To minimize this potential effect, all construction vehicles will be equipped with spill kits, and contractors will be properly trained on their use. The West Haven VAMC will notify CTDEEP immediately should a release of regulated chemicals occur, and implement required remedial measures to protect groundwater quality.

#### **Operation**

The operation of the Fisher House is anticipated to have long-term, none-to-negligible adverse effect on solid and hazardous materials. Apart from typical cleaning supplies, no storage, handling, or use of solid or hazardous materials is projected to occur during the operation of the Fisher House.

Accordingly, operation of the Fisher House would not result in a substantial increase in the generation of solid or hazardous materials, increase the exposure of persons to hazardous or toxic substances, increase the presence of hazardous or toxic materials in the environment, or

place substantial restrictions on solid and hazardous materials management elsewhere at the West Haven VAMC.

### **Entrance Gate and Wall**

Restoration and repair of the entrance gate is anticipated to have a none-to-negligible adverse effect on the environment due to the potential for release of lead-based paint debris, if lead-based paint is present. The effect would be minimized because a survey would first be conducted to identify locations where lead-based paint is present. Based on the survey, workers would effectively manage and reduce the risk associated with this work by complying with the CTDPH and EPA *Lead Renovation, Repair and Painting Program* requirements. These management activities will be incorporated into the entrance gate and wall project phase of the Proposed Action; a summary of these activities is presented in the following discussion on Permit Requirements and BMPs.

### **Proposed Parking Lot**

#### **Construction**

Construction of the parking lot is anticipated to have a short-term, none-to-negligible adverse effect on solid and hazardous materials. No solid or hazardous materials would be generated during construction of the proposed parking lot. Additionally, no solid or hazardous materials are stored in this area. Therefore, construction of the proposed parking lot is not anticipated to encounter or result in the release any regulated solid or hazardous materials.

During construction of the parking lot, an accidental release of fuel or hydraulic fluid from construction vehicles could cause a short-term, minimal-to-moderate adverse effect on groundwater quality, if the release was not stopped and/or remediated prior to contact with groundwater. To minimize this potential effect, all construction vehicles will be equipped with spill kits, and contractors will be properly trained on their use. The West Haven VAMC will notify CTDEEP immediately should a release of regulated chemicals occur, and implement required remedial measures to protect groundwater quality.

#### **Operation**

Operation of the proposed parking lot is anticipated to have a long-term, none-to-negligible adverse impact on solid and hazardous materials. No solid or hazardous materials are anticipated to be stored, handled, or managed at the proposed parking lot.

### **5.6.6 Permit Requirements**

#### **Abatement**

Prior to abatement, a CT-licensed asbestos inspector will conduct a pre-demolition survey for regulated building materials (including but not limited to asbestos, lead, PCBs, and mercury) prior to demolition (e.g. destructive inspective including roofing that meets NESHAP requirements for asbestos). The PCB survey should be performed consistent with the requirements of 40 CFR 761. Additionally, representative samples of building materials must be collected and submitted waste characterization analysis of potential demolition debris, including but not limited to lead TCLP analysis. Based on the waste characterization analyses results, an abatement plan will be prepared and included in the A/E design plan. Furthermore, the asbestos abatement plan will be prepared by a CT-licensed project designer. During this process, other

regulated building materials requiring special waste disposal procedures (based on the results of prior waste characterization sampling) will be managed accordingly in advance of demolition.

Additionally, prior to abatement, the West Haven VAMC (or their CTDPH-licensed asbestos abatement contractor) will prepare and submit an asbestos abatement notification to the CTDPH. The licensed abatement contractor will then perform the asbestos abatement.

### Demolition

Based on the results of the waste characterization analyses and anticipated demolition debris, the West Haven VAMC (or their contractor) will prepare a CTDEEP-compliant Construction and Demolition Waste Management Plan, as well as prepare and submit an *Application Form for Special Waste or Asbestos Disposal Authorization* (DEP-WEED-APP-200) to apply for a *Special Waste Disposal Authorization* to obtain an authorization from CTDEEP to dispose of a "special waste" (not hazardous) or asbestos.

Additionally, prior to demolition of Building 14, the West Haven VAMC (or their contractor) will prepare and submit an application and subsequently obtain a demolition permit from the City of West Haven, in accordance with the 2012 Connecticut General Statutes: *Title 29 - Public Safety and State Police, Chapter 541 - Building, Fire and Demolition Codes. Fire Marshals and Fire Hazards. Safety of Public and Other Structures*. The contractor will also submit a notice to CTDPH prior to and once Building 14 is demolished.

### Waste Disposal

The West Haven VAMC (or their contractor) will manage, transport, and dispose of all regulated hazardous and special wastes and asbestos according to applicable CTDEEP and EPA requirements.

### **5.6.7 Best Management Practices**

To reduce potentially adverse solid and hazardous materials effects, contractors will implement any BMPs specified within any of the aforementioned permits, as well as standard construction BMPs, to ensure that demolition and construction activities do not result in releases of solid or hazardous materials to the environment. These BMPs include:

- Construction contractors will maintain vehicles in good working order and maintain an emergency spill kit on-site at all times. Ensure workers are properly trained in spill kit operation. Notify VA, West Haven VAMC, and CTDEEP in the event of an accidental release of fuel or hydraulic fluid.
- Implement all BMPs to be identified in the Construction and Demolition Waste Management Plan.

During operation of the proposed Fisher House and parking lot, VA would continue to manage any operational-related solid and hazardous materials in accordance with VA's SOPs and applicable Federal and State laws governing the use, generation, storage, or transportation of solid or hazardous materials. Additionally, the West Haven VAMC will limit the use of chemical fertilizers around the Fisher House and follow label guidelines for the application of all routine maintenance chemicals currently used at West Haven VAMC.

## **5.6.8 Mitigation Measures**

No project-specific mitigation measures are required.

## **5.7 Transportation and Parking**

### **5.7.1 Significance Criteria**

An alternative could have a significant effect on infrastructure if it would increase demand over capacity, requiring a substantial system expansion or upgrade, or if it would result in substantial system deterioration over the current condition. For instance, an alternative could have a significant effect on traffic if it would increase the volume of traffic beyond the existing road capacity, cause parking availability to fall below minimum local standards, or require new or substantially improved roadways or traffic control systems.

### **5.7.2 Regulatory Requirements**

Traffic for public roads within the vicinity of the Site is regulated by the Connecticut Department of Transportation (CTDOT) and the City of West Haven, Department of Public Works. Traffic and roadways within the West Haven VAMC is managed by the West Haven VAMC.

There are no applicable traffic or transportation regulatory requirements associated with the Proposed Action.

### **5.7.3 Existing Conditions**

Building 14 is located at the southern end of Veterans Drive within the West Haven VAMC; this two-lane road is the only vehicle road providing access to the site. A pedestrian walkway extends from Building 14 to the Service Road and other areas of the West Haven VAMC. Roadways and walkways within the West Haven VAMC are depicted on Figure 9.

There are 42 parking spaces currently located at the southern end of Veterans Drive in the vicinity of Building 14. These parking spaces are used by visitors and staff at Building 14, as well as by visitors and staff at other building located along Veterans Drive, including Buildings 11, 11a, 12, 12a, and 14a.

A Traffic and Safety Review performed in 2014 by Ron Müller & Associates evaluated circulation, access, and safety of the West Haven VAMC to make recommendations of potential improvement measures to increase pedestrian and vehicular safety and capacity (Ron Müller and Associates, 2014). The Traffic Study stated that all of the intersections at the West Haven VAMC operated at Level of Service (LOS) of C or better, with the exception of the weekday afternoon peak southbound approach to the Four Corners intersection (LOS D). The Traffic Study stated that Ring Road currently operates at a LOS of A/B. The Traffic Study did not evaluate vehicle use along Veterans Drive.

In general, parking at the West Haven VAMC is limited. Currently, approximately 1,800 parking spots are present within the West Haven VAMC, and approximately 200 off-campus, leased parking spaces are located at 325 Campbell Avenue, approximately one mile south of the West Haven VAMC campus. The West Haven VAMC currently operates a shuttle service to transport patients and staff to and from this off-site parking lot. Based on an estimated deficiency of approximately 400 on-site parking spaces, the VA completed a Final EA and FONSI to acquire approximately 2-acre of land adjacent to the western boundary of the West Haven VAMC in

order to construct and operate and approximately 250-space parking lot (VA, 2015). As of the date of this Draft EA, the parking lot has not been constructed.

Public transportation (bus) provided by CTTransit is available at and in vicinity of the West Haven VAMC. The New Haven Metro Area Bus System Map indicates that bus line B provides direct and routine access to the West Haven VAMC from points throughout the metro area (CTTransit, 2016).

#### **5.7.4 Effects of the No Action Alternative**

Under the No Action Alternative, no transportation or parking impacts would occur.

#### **5.7.5 Effects of the Proposed Action**

##### **Proposed Fisher House**

##### **Demolition/Construction**

Prior to demolition/construction of the Fisher House, the Learning Recovery Center would be relocated to another facility at the West Haven VAMC. The staff and patients would utilize existing on- or off-site parking, and/or public transportation.

During demolition/construction activities, the 42 parking spaces at the southern end of Veterans Drive would no longer be available to staff and visitors at Buildings 11, 11a, 12, 12a, and 14a. These staff and visitors would be required to utilize existing on- or off-site parking, and/or public transportation.

The loss of this parking area at the southern end of Veterans Drive during demolition/construction would cause a long-term, minimal-to-moderate adverse impact on parking, primarily to the population of visitors and staff associated with Building 11, 11a, 12, 12a and 14a. Other visitors and staff at the West Haven VAMC are not anticipated to be impacted by this loss of parking because the location of these parking spots is relatively far from other medical and operational facilities elsewhere at the West Haven VAMC.

Demolition/construction activities are anticipated to cause a short-term, none-to-negligible adverse impact on traffic along Veterans Drive, but no impact on other roadways within or outside of the West Haven VAMC. This effect would be caused by the travel on Veterans Drive of construction vehicles needed to demolish Building 14 and construct the Fisher House. These construction vehicles will not require road closings or special permits to travel along this roadway.

##### **Operation**

Of the 42 parking spaces currently at the end of Veterans Drive, 24 spaces will be permanently eliminated during operation of the Fisher House. The remaining 18 spaces will be reserved for guests of the Fisher House. Therefore, operation of the Fisher House is anticipated to continue to cause a short- to long-term, minimal-to-moderate adverse impact on parking, primarily to the population of visitors and staff associated with Building 11, 11a, 12, 12a and 14a, as this population will be restricted from using the Fisher House parking lot.

The time period associated with this minimal-to-moderate adverse impact on parking will depend on whether the VA's proposed 250-space parking lot is constructed and available for use, and whether the proposed norther parking lot (65-spaces) included in this Proposed Action requires

construction. Should either parking lot be constructed, the minimal-to-moderate adverse impacts on parking are likely to decrease to none-to-negligible levels, as between 65 and 250 parking spaces would become available to off-set the parking shortage.

### **Proposed Parking Lot**

#### **Construction**

Construction of the proposed parking lot is anticipated to cause a short-term, none-to-negligible adverse impact on transportation and parking at the West Haven VAMC, and no impact on areas outside of the West Haven VAMC. Construction would not result in the short- or long-term loss of parking at the West Haven VAMC. However, construction would eliminate the availability of the northern area as a staging area for equipment such as the storage containers (currently present there).

Construction traffic, consisting of workers' personal vehicles and construction equipment, would have a none-to-negligible impact on traffic volumes within the West Haven VAMC or in the local area. This is because the size of the construction project is confined to this northern area, is relatively small (0.46 acres), and would not require a large number of construction vehicles. It is anticipated that the construction vehicles would likely be staged within or just outside the northern area (but still within the West Haven VAMC) while clearing, grading, and paving is performed.

#### **Operation**

Operation of the proposed parking lot is anticipated to cause a short-term, none-to-negligible beneficial impact on parking at the West Haven VAMC. This beneficial impact is limited because although the additional parking spaces (up to 65) created by the northern parking lot will offset the 42 spaces lost along Veterans Drive, the northern parking lot will not significantly decrease the long-term need for additional on-site parking at the West Haven VAMC.

Additionally, the beneficial impact of the northern parking lot for visitors and staff will be reduced because the northern area will no longer provide space for the storage of equipment (e.g. storage containers) that are currently staged in this area.

Therefore, the operation of the proposed parking lot is anticipated to have no long-term, net beneficial impact on transportation and parking at the West Haven VAMC.

#### **5.7.6 Permit Requirements**

There are no permit requirements related to transportation and parking associated with the Proposed Action.

#### **5.7.7 Best Management Practices**

Implementing BMPs to reduce transportation and parking impacts would minimize the potential impacts on roadways within the West Haven VAMC and in the local community. As part of the Proposed Action, transportation impacts would be maintained at acceptable levels through implementation of the following BMPs:

- Ensure debris and/or soil is not deposited on local roadways during the construction period.

- Ensure construction activities do not adversely affect traffic flow on Veterans Drive or on local roadways; construction traffic would be timed to avoid peak travel hours.

### **5.7.8 Mitigation Measures**

No project-specific mitigation measures are required.

## **5.8 Noise**

### **5.8.1 Significance Criteria**

An alternative could have a significant noise effect if it would generate new sources of substantial noise, increase the intensity or duration of noise levels to sensitive receptors, or result in exposure of more people to unacceptable levels of noise.

### **5.8.2 Regulatory Requirements**

**Federal Regulations.** Sound levels, resulting from multiple single events, are used to characterize noise effects from vehicle activity and are measured in Day-Night Average Sound level (DNI). The DNI noise metric incorporates a “penalty” for nighttime noise events to account for increased annoyance. DNI is the energy-averaged sound level measured over a 24-hour period, with a 10 decibel (dBA) penalty assigned to noise events occurring between 10:00 p.m. and 7:00 a.m. DNI values are obtained by averaging sound exposure levels over a given 24-hour period. DNI is the designated metric of the Federal government for measuring noise and its impacts on humans. According to the Federal Aviation Administration (FAA) and the U.S. Department of Housing and Urban Development criteria, residential units and other noise-sensitive land uses are “clearly unacceptable” in areas where the noise exposure exceeds 75 dBA DNI, “normally unacceptable” in regions exposed to noise between 65 and 75 dBA DNI, and “normally acceptable” in areas exposed to noise of 65 dBA DNI or less. The Federal Interagency Committee on Noise developed land use compatibility guidelines for noise in terms of DNI (FICON, 1992). For outdoor activities, the USEPA recommends 55 dBA DNI as the sound level below which there is no reason to suspect that the general population would be at risk from any of the effects of noise (USEPA, 1974).

**Department of Veterans Affairs Environmental Protection Specifications.** The VA has prepared requirements to mitigate noise in the VA specification "Environmental Protection" controlling noise levels (VA, 2009). Section 01568, EP-5 (F) of VA's environmental protection specifications includes specific mitigating actions that would be required of any development on VA property to reduce construction-related noise. In particular, construction activities would mainly be limited to between the hours of 7:30 AM and 6:00 PM and would comply to the extent practicable with the City of West Haven noise levels (Chapter 154 (Noise) of the West Haven City Ordinance). In addition, all equipment is required to be properly maintained and muffled such that noise levels of specific equipment would not exceed the predicted noise levels shown in Table 4. VA also requires monitoring of noise levels at least once every 5 days during high-noise generating construction activities.

**Table 4. Predicted Noise Levels for Construction Equipment**

<b>Construction Category and Equipment</b>	<b>Predicted Noise Level at 50 feet (dBA)</b>
<b>Clearing and Grading</b>	
Bulldozer	80
Grader	80–93
Truck	83–94
Roller	73–75
<b>Excavation</b>	
Backhoe	72–93
Jackhammer	81–98
<b>Construction</b>	
Concrete mixer	74–88
Welding generator	71–82
Crane	75–87
Paver	86–88

Source: USEPA, 1971

### **5.8.3 Existing Conditions**

The existing noise environment around the site is dominated by operations (mostly vehicle traffic) associated with the West Haven VAMC with lower noise levels associated with vehicle traffic and the residential activities to the north and south of the site along Campbell Avenue and West Spring Street. No other notable noise-generating sources are present in the immediate vicinity of the site. As such, the site’s noise environment can be characterized as that typical of a suburban area.

### **5.8.4 Effects of the No Action Alternative**

Under the No Action Alternative, the noise environment at and surrounding the West Haven VAMC would not change.

### **5.8.5 Effects of the Proposed Action**

#### **Proposed Fisher House and Proposed Parking Lot**

##### **Demolition/Construction**

The noise generated during demolition and construction of the Proposed Action would have a short-term, minimal-to-moderate adverse impact on sensitive receptors, including the residential properties located along the eastern end of West Spring Street, Terrace Avenue, and Overlook Street. The noise from demolition and construction equipment would be localized and intermittent during machinery operations. The proposed demolition and construction activities would be expected to result in noise levels comparable to those indicated in Table 5. These sound levels were predicted at 50-1,500 feet from a given source. These sound levels were estimated by calculating the anticipated noise from several pieces of equipment and then estimating the decrease in noise levels at various distances from the source of the noise. Noise is a logarithmic function and is not calculated as simply an additive function.

**Table 5. Predicted Noise Levels Based on Distance from Source**

<b>Distance from Construction Equipment (Feet)</b>	<b>Predicted Noise Level (dBA)</b>
50	90 to 94
100	84 to 88
150	81 to 85
200	78 to 82
400	72 to 76
800	66 to 70
1,500	Less than 64

Areas that could be most affected by noise from demolition and construction include those closest to the Proposed Action. Indoor noise levels would be expected to be 15-25 decibels lower than outdoor levels.

Additionally, West Haven VAMC visitors and staff in buildings located along Veterans Drive would experience temporary increases in construction traffic noise during day-time hours. These impacts are anticipated to be short-term, minimal-to-moderately adverse because the noise would be temporary and similar to existing levels generated by normal traffic along Campbell Avenue.

### **Operation**

Operation of the Fisher House and the proposed parking lot is anticipated to cause long-term, none-to-negligible adverse impacts on the aforementioned sensitive receptors. The Fisher House operational activities would include passenger vehicle traffic along Veterans Drive. This traffic would produce noise levels similar to traffic along Campbell Avenue. Likewise, vehicles parking at the proposed parking lot would not generate noise levels atypical of current vehicle parking operations at the West Haven VAMC.

#### **5.8.6 Permit Requirements**

No noise-related permits are required to implement the Proposed Action.

#### **5.8.7 Best Management Practices**

Implementing BMPs to reduce noise generated during construction would further minimize the potential impacts on the local noise environment. The construction contractor will implement the following typical noise control BMPs, as applicable. These measures would be briefed to the contractor at the construction kick-off meeting, and daily at tailgate safety meetings. The onsite construction manager would be responsible to immediately address noise issues, if they arise.

During demolition/construction, the construction contractor shall provide sound-deadening devices on equipment and take noise abatement measures necessary to comply with VA's noise control requirements (VA, 2009), as well as the following noise management BMPs:

- Use shields or other physical barriers to restrict noise transmission.
- Provide soundproof housings or enclosures for noise producing machinery.
- Use efficient silencers on equipment air intakes.
- Use efficient intake and exhaust mufflers on internal combustion engines that are maintained so equipment performs below noise levels specified.

- Conduct truck loading, unloading, and hauling operations so that noise is kept to a minimum.
- Make best efforts to conduct construction activities between the hours of 7:00 am and 7:00 pm (weekdays) and 8:00 am and 7:00 pm (weekends).
- Select material transportation routes as far away from sensitive receptors as possible.
- Shut down noise-generating heavy equipment when it is not needed.
- Encourage construction personnel to operate equipment in the quietest manner practicable (e.g., speed restrictions, retarder brake restrictions, engine speed restrictions, etc.).

### **5.8.8 Mitigation Measures**

No project-specific mitigation measures are required.

## **5.9 Cumulative Impacts**

CEQ regulations stipulate that the cumulative effects analysis should consider the potential environmental effects resulting from “the incremental impacts of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions” (40 CFR 1508.7). Cumulative impacts can result from individually minor, but collectively substantial, actions undertaken over a period of time by various agencies (Federal, state, and local) or individuals. Informed decision making is served by consideration of cumulative impacts resulting from projects that are proposed, under construction, recently completed, or anticipated to be implemented in the reasonably foreseeable future.

Past activities are those actions that occurred within the geographic scope of cumulative effects that have shaped the current environmental conditions of the project site. For many resource areas, the effects of past actions are now part of the existing environment and are included in the description of the affected environment.

The scope of the cumulative effects analysis involves the timeframe and geographic extent to which effects could be expected to occur, and a description of the resources that could be cumulatively affected. The geographic Region of Influence (ROI) is an important consideration when discussing cumulative effects from construction and operations. For the purposes of this analysis, the ROI was determined to be the West Haven VAMC. While this ROI is limited, only other projects within the West Haven VAMC can be reasonably anticipated to have an impact on the environment within the campus. The West Haven VAMC Facilities Department was consulted to identify other projects for evaluation in the context of the cumulative effects analysis.

### **5.9.1 Projects with the Potential for Cumulative Effects**

The proposed construction of the approximately 250-space parking lot at the West Haven VAMC was identified as a project with the potential for cumulative effects. The proposed parking lot would be constructed on an approximately 2-acre area (currently grass covered) located to the west of the West Haven VAMC and east of Glade Street. The Final EA and FONSI for this proposed parking lot did not identify any significant impacts to the environment (VA, 2015).

Additionally, Appendix H includes summary slides depicting projects identified for consideration under the West Haven VAMC Master Plan, which extends through 2022. These generally include infrastructure improvements as well as potential parking garage (130-280 spaces) in the central portion of the West Haven VAMC.

Cumulative impacts from the proposed 250-space parking lot and potential Master Plan projects are not anticipated to increase the effects of the Proposed Action analyzed in this Draft EA. This is because the effects from the Proposed Action are generally minimal-to-moderate, have a localized ROI, and are not anticipated to increase in significance because the proposed elements are common construction projects with low complexity, limited construction duration, and opportunity to generate substantial public controversy.

Therefore, the cumulative effects from the Proposed Action and potential future projects are not anticipated to increase to an adversely significant level.

### **5.10 Potential for Generating Substantial Public Controversy**

There are no known or anticipated activities associated with the Proposed Action likely to generate substantial issues among West Haven VAMC stakeholders, regulatory agencies, or the general public from implementation of the Proposed Action. No unmitigated significant impacts of an adverse nature from construction or operation of the Proposed Action on any of the environmental resources have been identified in the Draft EA. With respect to resources, no issues have been identified that are believed to create conflicts with humans or with the environment that would appear to be controversial. Any issues raised during the public comment period will be addressed in the Final EA.

As discussed in Section 6, VA has solicited input from various Federal, State, and local government agencies, and Native American Tribes, regarding the Proposed Action. Input from these organizations have been incorporated into the Draft EA. Additionally, the Final EA will consider comments received from the public during the 30-day review period for the Draft EA.

Based on the Proposed Action and the findings of this Draft EA, it is anticipated that there will be no substantial public controversy regarding the Proposed Action.

## **6.0 AGENCY COORDINATION AND PUBLIC INVOLVEMENT**

### **6.1 Public and Agency Involvement**

VA invites public participation in decision-making on new proposals through the NEPA process. Public participation with respect to decision-making on the Proposed Action is guided by 38 CFR Part 26, VA's policy for implementing the NEPA. Additional guidance is provided in VA's *Environmental Compliance Manual* (VA, 1998) and VA's *NEPA Interim Guidance for Projects* (VA, 2010). Consideration of the views and information of all interested persons promotes open communication and enables better decision-making. Agencies, organizations, and members of the public with a potential interest in the Proposed Action, such as minority, low-income, and disadvantaged persons, are urged to participate. The following sections describe agency coordination and public involvement efforts associated with this Draft EA.

#### **6.1.1 Public Review**

VA, as the Federal proponent of the Proposed Action, will publish and make this Draft EA available for a 30-day public comment period. The start of the comment period will be announced in a NOA published in the *New Haven Register*. The Draft EA will be made available for public review at the West Haven VAMC, the West Haven Library, and on the West Haven VAMC website. Comments received during the 30-day public review will be addressed and documented in the Final EA. Public comments and an affidavit of the NOA will be included in Appendix F.

Additionally, a public meeting will be held during the 30-day review period to inform the public and stakeholders about the project. The VA will announce the details (date, location) of the meeting in the same NOA described above. Comments received during the public meeting will be addressed and documented in the Final EA. A transcript of the public comments and responses made during the meeting will also be included in Appendix F.

#### **6.1.2 Agency Coordination**

Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) is a Federally-mandated process for informing and coordinating with other governmental agencies regarding Federal Proposed Actions. CEQ Regulations require intergovernmental notifications prior to making any detailed statement of environmental impacts. Through the IICEP process, VA notifies relevant Federal, State, and local agencies and allows them sufficient time to make known their environmental concerns specific to a Proposed Action. Comments and concerns submitted by these agencies during the IICEP process are subsequently incorporated into the analysis of potential environmental impacts conducted as part of the Draft EA. This coordination fulfills requirements under EO 12372 (superseded by EO 12416, and subsequently supplemented by EO 13132), which requires Federal agencies to cooperate with and consider State and local views in implementing a Federal proposal. It also constitutes the IICEP process for this Draft EA.

Accordingly, during preparation of this Draft EA the VA requested input from the following agencies:

U.S. National Park Service

U.S. Fish and Wildlife Service - Northeast Region

U.S. Environmental Protection Agency Region 1  
U.S. Army Corps of Engineers  
U.S. Department of Agriculture Natural Resources Conservation Service  
Natural Resource Conservation Service (NRCS)  
Connecticut Department of Economic and Community Development  
CTDEEP Office of Environmental Review  
CTDEEP Bureau of Air Management  
CTDEEP Aquifer Protection Program  
CTDEEP Wildlife Division  
Southwest Conservation District (SWCD)  
Connecticut Department of Transportation  
West Haven Building Department  
West Haven Housing Authority  
West Haven Inland Wetlands Watercourse Agency  
West Haven Parks and Recreation  
West Haven Department of Planning and Development  
West Haven Public Works Department

Any input provided by these agencies has been detailed and incorporated into the appropriate environmental resource sub-sections in Section 5. Copies of the consultation letters and correspondence from the CTSHPO are provided in Appendix C, while all other regulatory agencies are provided in Appendix E.

### **6.1.3 Native American Consultation**

VA consulted with two federally recognized Native American tribes as part of this NEPA process, in accordance with 36 CFR 800.2 and EO 13175, *Consultation and Coordination with Indian Tribal Governments*, dated November 6, 2000. These tribes, Mashantucket Pequot Indian Tribe and the Mohegan Tribe of Indians of Connecticut, identified as having possible ancestral ties to the area by the CTSHPO or the NACD, were invited by VA to participate in the NEPA Draft EA process as Sovereign Nations per EO 13175. Accordingly, VA sent a coordination and consultation letter to the Mashantucket Pequot Tribal Nation on November 27, 2015, and to the Mohegan Indian Tribe on December 1, 2015. Copies of the letters are included in Appendix D. As of the date of this Draft EA, VA has not received any responses from the Tribes.

**7.0 BEST MANAGEMENT PRACTICES AND MITIGATION MEASURES**

This section summarizes the management and mitigation measures identified in Section 5.

The Proposed Action would cause no significant adverse impacts on the quality of human health or the environment because it incorporates the following management measures (BMPs/environmental protection measures) and mitigation measures.

Management measures are routine measures and/or regulatory compliance actions that are regularly implemented as part of development projects, as appropriate, across Connecticut. These management measures are incorporated into the Proposed Action and are required to ensure that adverse impacts remain at or below minimal-to-moderate levels and do not become significant over time, either directly or indirectly, individually or cumulatively, for all of the environmental resources analyzed in this Draft EA. The management measures are reiterated in Section 7.1

Mitigation measures are defined as project-specific requirements not routinely implemented as part of development projects and which are necessary to reduce potentially significant adverse impacts to less-than-significant levels. The Proposed Action incorporates a specific mitigation action to reduce the otherwise significantly adverse impact that demolition of Building 14 would cause on cultural resources. The mitigation measure is reiterated in Section 7.2

Per established protocols, procedures, and requirements, the VA (and contractors) will implement the management and mitigation measures and will satisfy all applicable regulatory requirements in association with implementation of the Proposed Action.

**7.1 Management Measures**

With implementation of these management measures, specified for the following environmental resources, the adverse impacts associated with the Proposed Action on these resources will remain at or below minimal-to-moderate levels; no significant impact would occur. In addition to the following management measures routinely implemented during commercial construction projects, the Proposed Action will incorporate the management measures identified in the VA’s Master Construction Specifications (MF04) for construction standards for temporary environmental controls, demolition, and waste management (VA, 2009).

Environmental Resource	Management Measures	
	Demolition/Construction	Operation
<b>Aesthetics</b>	<ul style="list-style-type: none"> <li>• Utilize dust control</li> <li>• Limit land clearing and tree removal</li> <li>• Design the Fisher House consistent with regional architectural style</li> <li>• Maintain existing vegetated fence around proposed parking lot</li> </ul>	<ul style="list-style-type: none"> <li>• Landscape with native vegetation</li> <li>• Maintain vegetation</li> </ul>
<b>Air Quality</b>	<ul style="list-style-type: none"> <li>• Perform asbestos abatement according to the asbestos abatement management plan prepared by a CT-licensed asbestos project designer.</li> </ul>	None are necessary.

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Environmental Resource	Management Measures	
	Demolition/Construction	Operation
	<ul style="list-style-type: none"> <li>• Implement all safety measures identified in the asbestos abatement management plan.</li> <li>• Remove/manage all regulated and/or hazardous building materials prior to demolition.</li> <li>• Manage/dispose of regulated and hazardous building materials (lead paint, mercury lamps, PCBs, refrigerants, etc.) according to applicable CTDEEP, CTDHS, and EPA regulations.</li> <li>• Comply with the City of West Haven air quality regulations, to the extent practicable.</li> <li>• Use appropriate dust suppression methods during onsite construction activities. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-moving activities during high wind conditions.</li> <li>• Maintain an appropriate speed to minimize dust generated by vehicles and equipment on unpaved surfaces.</li> <li>• Cover haul trucks with tarps.</li> <li>• Stabilize previously disturbed areas with vegetation or mulching if such area would be inactive for several weeks or more.</li> <li>• Visually monitor all construction activities regularly, and particularly during extended periods of dry weather, and implement dust control measures when appropriate.</li> <li>• Use of newer off-road and on-road construction equipment that meets the latest EPA or CARB standards, to the extent practicable.</li> <li>• Limit the idling of mobile sources to three minutes.</li> </ul>	

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Environmental Resource	Management Measures	
	Demolition/Construction	Operation
	<ul style="list-style-type: none"> <li>• Maintain mature trees to the extent practicable.</li> </ul>	
<b>Cultural Resources</b>	<ul style="list-style-type: none"> <li>• Should human remains or other cultural items as defined by NAGPRA be discovered during project construction, the construction contractor would immediately cease work until VA, a qualified archaeologist, and the SHPO are contacted to properly identify and appropriately treat discovered items in accordance with applicable State and Federal law(s).</li> <li>• Mitigation: See MITIGATION MEASURES in Section 7.2</li> </ul>	Mitigation: See MITIGATION MEASURES in Section 7.2
<b>Topography, Geology and Soils</b>	<ul style="list-style-type: none"> <li>• Develop Fisher House and parking lot to comply to the maximum extent technically feasible with EISA 438.</li> <li>• Prepare and implement CTDEEP-compliant SESC Plan BMPs to control erosion and sedimentation.</li> <li>• Incorporate Low Impact Development or green infrastructure practices and an appropriately designed stormwater system.</li> <li>• Retain on-site vegetation to the maximum extent possible.</li> <li>• Plant and maintain soil-stabilizing vegetation on disturbed areas.</li> <li>• Use native, non-invasive vegetation to re-vegetate disturbed soils.</li> <li>• Ensure construction vehicles are equipped with spill kits and workers are properly trained in their operation. Notify VA, West Haven VAMC, and CT DEEP in the event of an accidental release of fuel or hydraulic fluid.</li> </ul>	<ul style="list-style-type: none"> <li>• Maintain vegetation in previously exposed soil areas.</li> <li>• Implementation of a maintenance plan to ensure the long-term effectiveness of stormwater treatment structures or measures (such as oil/grit separators, or swales, etc.).</li> <li>• Annual inspections of stormwater structures/measures.</li> <li>• Annual removal of accumulated pollutants, as necessary.</li> <li>• Maintain any LID or green infrastructure in good working order.</li> </ul>
<b>Hydrology and Water Resources</b>	<ul style="list-style-type: none"> <li>• Install and monitor erosion-prevention measures, such as silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, straw bales, rip-</li> </ul>	<ul style="list-style-type: none"> <li>• Maintain vegetation to prevent exposing soils to erosive forces.</li> </ul>

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Environmental Resource	Management Measures	
	Demolition/Construction	Operation
	<p>rap, and/or other sediment control structures; re-spread stockpiled topsoil; and seed/re-vegetate areas temporarily cleared of vegetation.</p> <ul style="list-style-type: none"> <li>• Retain on-site vegetation to the maximum extent possible.</li> <li>• Plant and maintain soil-stabilizing vegetation on disturbed areas.</li> <li>• Use native vegetation to re-vegetate disturbed soils.</li> <li>• Use LID or green infrastructure practices such as water quality swales and rain gardens to manage infiltration of stormwater.</li> <li>• Ensure construction vehicles are equipped with spill kits and workers are properly trained in their operation; these kits will be deployed in the event a release of petroleum-based fluids in order to prevent contamination of the underlying groundwater. Notify VA, West Haven VAMC, and CTDEEP in the event of an accidental release of fuel or hydraulic fluid.</li> </ul>	<ul style="list-style-type: none"> <li>• Maintain any LID or green infrastructure in good working order.</li> </ul>
<b>Solid and Hazardous Materials</b>	<ul style="list-style-type: none"> <li>• Conduct pre-demolition survey for regulated and hazardous building materials, including PCBs per 40 CFR 761.</li> <li>• Perform waste characterization analysis on anticipated demolition debris, including TCLP for lead.</li> <li>• Prepare asbestos abatement plan completed by a CT-licensed project designer.</li> <li>• Prepare a CTDEEP-compliant Construction and Demolition Waste Management Plan, as well as prepare and submit an <i>Application Form for Special Waste or Asbestos Disposal Authorization</i>.</li> </ul>	<ul style="list-style-type: none"> <li>• Continue to manage any operational-related solid and hazardous materials in accordance with VA's SOPs and applicable Federal and State laws governing the use, generation, storage, or transportation of solid or hazardous materials.</li> <li>• Follow label directions for all cleaning chemicals currently used at the West Haven VAMC.</li> <li>• Limit the use of chemical fertilizers, pesticides, and herbicides for lawn</li> </ul>

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Environmental Resource	Management Measures	
	Demolition/Construction	Operation
	<ul style="list-style-type: none"> <li>• Prepare and submit an Asbestos Abatement Notification to the CTDPH.</li> <li>• Perform asbestos abatement (by CT-licensed abatement firm) according to the asbestos abatement management plan.</li> <li>• Implement all safety measures identified in the asbestos abatement management plan.</li> <li>• Prior to demolition, remove/manage/dispose of regulated and hazardous building materials (lead paint, mercury lamps, PCBs, refrigerants, etc.) according to applicable CTDEEP, CTDHS, and EPA regulations.</li> <li>• Prior to demolition, prepare and submit an application and subsequently obtain a demolition permit from the City of West Haven, in accordance with the 2012 Connecticut General Statutes: Title 29 - Public Safety and State Police, Chapter 541. Follow all general industry best management practices for demolition and construction.</li> <li>• Submit a notice to CTDPH prior to Building 14 demolition (only if an Asbestos Abatement Notification is not already submitted).</li> <li>• During demolition and construction, ensure contractors maintain emergency spill kits and utilize them in the event fuel or hydraulic fluid is accidentally released.</li> <li>• Follow all petroleum release, notification, and cleanup measures specified by CTDEEP.</li> </ul>	<p>maintenance around the building.</p>
<b>Transportation and Parking</b>	<ul style="list-style-type: none"> <li>• Ensure debris and/or soil is not deposited on local roadways during the construction period.</li> </ul>	<ul style="list-style-type: none"> <li>• Install signage indicating that parking is reserved for Fisher House guests.</li> </ul>

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Environmental Resource	Management Measures	
	Demolition/Construction	Operation
	<ul style="list-style-type: none"> <li>• Ensure construction activities do not adversely affect traffic flow on Veterans Drive or on local roadways; construction traffic would be timed to avoid peak travel hours.</li> </ul>	
<b>Noise</b>	<ul style="list-style-type: none"> <li>• Use shields or other physical barriers to restrict noise transmission.</li> <li>• Provide soundproof housings or enclosures for noise producing machinery.</li> <li>• Use efficient silencers on equipment air intakes.</li> <li>• Use efficient intake and exhaust mufflers on internal combustion engines that are maintained so equipment performs below noise levels specified.</li> <li>• Conduct truck loading, unloading, and hauling operations so that noise is kept to a minimum.</li> <li>• Make best efforts to conduct construction activities between the hours of 7:00 am and 7:00 pm (weekdays) and 8:00 am and 7:00 pm (weekends).</li> <li>• Select material transportation routes as far away from sensitive receptors as possible.</li> <li>• Shut down noise-generating heavy equipment when it is not needed.</li> <li>• Encourage construction personnel to operate equipment in the quietest manner practicable (e.g., speed restrictions, retarder brake restrictions, engine speed restrictions, etc.).</li> </ul>	None are necessary.

Based on the analysis of effects for the Proposed Action presented in this Draft EA, no management measures were identified as being required for the following technical resource areas: *Wetlands, Floodplains, and Coastal Zone Management; Socioeconomics; Community Services; and Environmental Justice.*

**7.2 Mitigation Measures**

The demolition of Building 14 would cause a long-term, direct, significant adverse impact on cultural resources. However, the Proposed Action incorporates the following measure to mitigate this otherwise significant impact.

Environmental Resource	Mitigation Measure	
	Demolition/Construction	Operation
Cultural Resources	<ul style="list-style-type: none"> <li>• Prepare and execute a MOA among the VA, CTSHPO, ACHP, and Fisher House Foundation that will stipulate commitments VA will take to mitigate the adverse impact caused by the loss of Building 14. Anticipated mitigation for historical preservation may include, but not be limited to, restoration and repair of the entrance gate and wall. The MOA may also include an “Inadvertent Discovery” SOP for potential subsurface resources, if required by the CTSHPO.</li> </ul>	<ul style="list-style-type: none"> <li>• Monitor to ensure commitments stipulated in MOA are implemented.</li> </ul>

**7.3 Unavoidable Adverse Impacts**

**Construction.** Unavoidable adverse impacts would result from the demolition/construction phase of the Proposed Action; however, implementation of the aforementioned management and mitigation measures will ensure that none of the unavoidable adverse impacts exceed a minimal-to-moderate level on an individual or cumulative basis.

Many of these unavoidable adverse impacts are similar to those caused by standard industrial construction projects, such as a short-term, direct increases in noise levels.

Other adverse impacts are otherwise avoidable. For example, prior to demolition of Building 14, asbestos abatement and removal of other regulated and/or hazardous building materials will be performed according to EPA and CTDPH regulations. This type of abatement activity is a common industrial practice. When the required safety measures are implemented, adverse impacts to air quality are avoided. Likewise, stormwater management controls will be identified and implemented to minimize soil erosion and sedimentation of stormwater runoff during demolition and construction activities. Therefore, by incorporating these management and mitigation measures into the Proposed Action, the unavoidable adverse effects from implementing the Proposed Action will be maintained at or below moderate levels.

The loss of 24 parking spaces at the southern end of Veterans Drive, as caused by construction and operation of the Fisher House, will cause an unavoidable effect on the availability of on-site parking at the West Haven VAMC. However, the West Haven VAMC recently completed a Final EA and FONSI for the proposed development of a new 250-space parking lot immediately adjacent to the western boundary of the West Haven VAMC. Additionally, the West Haven VAMC 2020 Master Plan also proposes an on-site parking garage with 130-280 spaces in the

central portion of the West Haven VAMC. Accordingly, the West Haven VAMC will determine at a future date whether the loss of the 24 parking spaces along Veterans Drive creates a significant impact on parking availability at such a time in the future that the development of the northern area parking lot (providing 65 parking spaces) is needed.

**Energy Resources.** The use of nonrenewable energy resources during demolition/construction and operation of the Proposed Action is an unavoidable occurrence. Demolition/construction and operation of the Proposed Action would require the use of fossil fuels, a non-renewable natural resource. Energy supplies, although relatively small, would be committed to operating the Fisher House. Renewable energy options were considered but deemed to be not cost effective given the scale of the Fisher House building project. However, the Fisher House will incorporate energy-efficient building materials (windows, doors, insulation) to reduce the amount of energy required to operate the facility. None-to-negligible energy resources would be required to operate the proposed parking lot.

## **8.0 CONCLUSIONS**

This Draft EA was performed to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Proposed Action and No Action Alternative. The Draft EA was prepared according to NEPA, CEQ, 38 CFR Part 26, and the VA *NEPA Interim Guidance for Projects*. The Draft EA conclusions were additionally informed through consultation with regulatory agencies and Native American Tribes performed to identify regulatory concerns and associated management and/or mitigation actions needed to further reduce potential adverse associated with implementing the Proposed Action. Furthermore, public comments received during the 30-day public review period will be considered and addressed in the Final EA.

Based on the Draft EA analyses and input, implementing the Proposed Action with the aforementioned management and mitigation measures will cause no significant impact of an adverse nature, either directly or indirectly, over a short- or long-term, independently or cumulatively, on the environmental resources analyzed, including: aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat, including threatened and endangered species; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomics; community services; solid and hazardous materials; transportation and parking; utilities; alternative energy sources; and environmental justice. Additionally, the Proposed Action incorporates mitigation for historical preservation, which reduces the otherwise significantly adverse impact on cultural resources to a minimal-to-moderate level.

The Proposed Action incorporates attainment of following permits, notifications, and/or approvals per phase of the Proposed Action (also summarized in Appendix G):

### Phase 1 (Demolition of Building 14 and Construction and Operation of the Fisher House)

- EISA 438 Compliance Demonstration
- Asbestos Abatement Notification (in lieu of CTDPH Notification of Demolition Form submittal); Asbestos Abatement, other Regulated Building Materials Abatement
- Demolition Notification and Permit
- Soil Erosion and Sedimentation Control Plan
- Construction and Demolition Waste Management Plan and Application Form for Special Waste Disposal Authorization

### Phase 2 (Mitigation for Historical Preservation)

- Execute MOA

### Phase 3 (Northern Area Parking Lot)

- EISA 438 Compliance Demonstration
- Soil Erosion and Sedimentation Control Plan

Accordingly, the analyses presented in this Draft EA provide sufficient evidence to conclude that the effects of the Proposed Action support a Finding of No Significant Impact (FONSI), and that an Environmental Impact Statement (EIS) is not required.

## **9.0 LIST OF PREPARERS**

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## **11.0 LIST OF ACRONYMS AND ABBREVIATIONS**

ACHP Advisory Council on Historic Preservation	DNI Day-Night Average Sound
AIRFAmerican Indian Religious Freedom Act	EA Environmental Assessment
amsl above mean sea level	EIS Environmental Impact Statement
ARPA Archaeological Resources Protection Act	EISA Energy Independence and Security Act
bgs Below Ground Surface	EO Executive Order
BMP Best Management Practice	EPA United States Environmental Protection Agency
CAA Clean Air Act	EPCRA Emergency Planning and Community Right-to-Know Act
CAAA Clean Air Act Amendments	ESA Endangered Species Act
CARB California Air Resources Board	FAA Federal Aviation Administration
CBOC Community Based Outpatient Clinics	FEMA Federal Emergency Management Agency
CEQ Council on Environmental Quality	FIRM Flood Insurance Rate Map
CERCLA Comprehensive Environmental Response, Compensation, and Liability Act	FONSI Finding of No Significant Impact
CERCLA Comprehensive Environmental Response, Compensation, and Liability Act	FPPA Farmland Protection Policy Act
CFR Code of Federal Regulations	FY Fiscal Year
CGP Construction General Permit	GHG Greenhouse Gas
CH <sub>4</sub> Methane	HAP Hazardous Air Pollutant
CO Carbon Monoxide	IICEP Interagency and Intergovernmental Coordination for Environmental Planning
CO <sub>2</sub> Carbon Dioxide	LID Low Impact Development
CTDEDC Connecticut Department of Economic and Community Development	LOS Level of Service
CTDEEP Connecticut Department of Energy and Environmental Protection	mg/cm <sup>2</sup> milligram per square centimeter
CTDOT Connecticut Department of Transportation	MOA Memorandum of Agreement
CTDPH Connecticut Department of Public Health	N <sub>2</sub> O Nitrous Oxide
dBA Decibel	NAAQS National Ambient Air Quality Standards
	NACD Native American Consultation Database

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NAGPRA Native American Graves Protection and Repatriation Act  
 NEPA National Environmental Policy Act  
 NESHAP National Emission Standards of Hazardous Air Pollutants  
 NHPA National Historic Preservation Act  
 NOA Notice of Availability  
 NO<sub>x</sub> Nitrogen Oxides  
 NPDES National Pollution Discharge Elimination System  
 NRCS Natural Resources Conservation Service  
 NRHP National Register of Historic Places  
 NRHP National Register of Historic Places  
 NWIS National Water Inventory System  
 O<sub>3</sub> Ozone  
 OER CTDEEP Office of Environmental Review  
 Pb Lead  
 PCB Polychlorinated biphenyls  
 pCi/L picoCuries per liter  
 Phase I ESA Phase I Environmental Site Assessment  
 PM Particulate matter  
 PM<sub>10</sub> Particulate matter less than or equal to 10 micrometers in aerodynamic size  
 PM<sub>2.5</sub> Particulate matter less than or equal to 2.5 micrometers in aerodynamic size  
 PTE Potential to Emit  
 PWS Public Water Supply  
 RCRA Resource Conservation and Recovery Act  
 RCSA Regulations of Connecticut State Agencies  
 REC Recognized Environmental Condition

ROI Region of Influence  
 RONA Record of Non-Applicability  
 SDWA Safe Drinking Water Act  
 SESC Soil Erosion and Sediment Control  
 SHPO Connecticut Department of Economic and Community Development, State Historic Preservation Office  
 SIP State Implementation Plan  
 SME Subject Matter Expert  
 SO<sub>2</sub> Sulfur dioxide  
 SOP Standard Operating Procedures  
 SPCC Spill Prevention, Control and Countermeasure Plans  
 SWCD Southwest Conservation District  
 SWPPP Storm Water Pollution Prevention Plan  
 TPY Tons per year  
 USACE United States Army Corps of Engineers  
 USC United States Code  
 USDA United State Department of Agriculture  
 USFWS United States Fish and Wildlife Service  
 USGS United States Geological Survey  
 USNPS United States National Park Service  
 VA Department of Veterans Affairs  
 VACHS VA Connecticut Healthcare System  
 VAMC Veterans Affairs Medical Center  
 WHBD West Haven Building Department  
 WHCO West Haven Code of Ordinances

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WHDPD West Haven Department of  
Planning and Development

WHHA West Haven Housing Authority

WHIWWA West Haven Inland Wetlands  
Watercourse Agency

WHPR West Haven Parks and  
Recreation

WHPWD West Haven Public Works  
Department

## **12.0 APPENDICES**

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List of Environmental Permits and Notifications

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**ASSUMPTIONS:**

The following assumptions were made in the determination of requirements for permits and notifications:

The total area of disturbance for the Proposed Action is less than 1 acre. This is based on the following:

- 0.27 acres of disturbance during construction of the Fisher House, as presented in the Fisher House project EISA 438 Memo dated May 6, 2016 (Draper Aden Associates, 2016);
- 0.46 acres for the norther area parking lot at the West Haven VAMC, as presented in the project correspondence between VA CFM, West Haven VAMC, and Mabbett, dated July 15, 2016.

Should the total area of disturbance for any phase of the Proposed Action increase above 1 acre, the following permit requirements shall be reevaluated.

Requirements		Responsibilities		
Permit or Notification	Remarks	Fisher House Facility Design Consultant	Construction Contractor (for Construction, Demolition or Abatement)	West Haven VAMC
EISA 438 Compliance Determination Memo	No a specific permit or notification, but design must demonstrate compliance with EISA 438 to the maximum extent technically feasible for any project footprint over 5,000 square feet. Separate compliance determinations must be made for the Fisher House project phase and the parking lot phase of the Proposed Action.	Prepare memo for Fisher House project phase.  For the parking lot phase, the A/E firm responsible for that phase would prepare memo.	Construct project(s) according to approved design.	Review and approve memo.

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Requirements		Responsibilities		
Permit or Notification	Remarks	Fisher House Facility Design Consultant	Construction Contractor (for Construction, Demolition or Abatement)	West Haven VAMC
Demolition Permit (submitted to the City of West Haven Building Department, which the State has delegated authority to)	<p>See the following for details for Demolition Permit: (<a href="http://www.cityofwesthaven.com/documentcenter/view/293">http://www.cityofwesthaven.com/documentcenter/view/293</a>)</p> <p>The demolition permit statute is: 2012 Connecticut General Statutes: <i>Title 29 - Public Safety and State Police, Chapter 541 - Building, Fire and Demolition Codes. Fire Marshals and Fire Hazards. Safety of Public and Other Structures.</i></p>		Demolition contractor is responsible for obtaining permit and that includes preparation, signature and submittal of permit application. Provide WH VAMC copies of permit application and permit.	Include requirement in RFP for construction contractor
Asbestos Abatement Notification to the CT Department of Health	<p>At least 10 days prior to asbestos abatement activities, an asbestos abatement notification shall be made by the CT-licensed abatement contractor to the CTDPH.</p> <p>There is no similar notification process required for lead abatement specific to this project.</p>		<p>Abatement contractor is responsible for preparation of notification document, signature and submittal. Provide WH VAMC copies of notification.</p> <p>The asbestos abatement plan must be prepared by a CT-licensed project designer.</p>	Include requirement in RFP for construction contractor.

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Requirements		Responsibilities		
Permit or Notification	Remarks	Fisher House Facility Design Consultant	Construction Contractor (for Construction, Demolition or Abatement)	West Haven VAMC
Soil Erosion and Sedimentation Control Plan consistent with <i>Connecticut General Statutes §22a-327(5)</i> (“CGS”)	<p>A Soil Erosion and Sedimentation Control Plan must be prepared by a licensed engineer, but it does not require approval by CTDEEP or the local municipality.</p> <p>Separate SESC Plans are required for the Fisher House project phase and the parking lot phase of the Proposed Action.</p>	<p>Prepare plan and obtain signature of WH VAMC.</p> <p>For the parking lot phase, the A/E firm responsible for that phase would prepare the SESC Plan.</p>	Implement plan	Sign and include requirement to implement plan in RFP for construction contractor.
CTDEEP-compliant Construction and Demolition Waste Management Plan, and submit an Application Form for Special Waste or Asbestos Disposal Authorization (DEP-WEED-APP-200) to apply for a Special Waste Disposal Authorization (authorized under Sections 22a-208a-1, 22a-209-1, and 22a-209-8 of the Regulations of Connecticut State Agencies (RCSA))	Submit prior to demolition.		Prepare and implement plan	Sign and include requirement to implement plan in RFP for demolition/construction contractor.
CTDPH Notification of Demolition Form (optional, see remarks)	<p>Submit at least ten (10) days prior to the start of demolition as required by the Regulations of Connecticut State Agencies (RCSA), Section 19a-332a-3. Fee is \$50.</p> <p>The submission of the Notification of Demolition Form is not required provided that an Asbestos Abatement Notification Form was previously submitted to the CTDPH involving abatement related to the demolition of the facility. In that case, the Asbestos Abatement Notification Form submitted to the agency satisfied the notification requirement for demolition of the facility. In all cases of demolition, one and only one form (Notification of Demolition Form or Asbestos Abatement Notification Form, as applicable) shall be sufficient to satisfy the Department of Public Health notification requirements detailed in Section 19a-332a-3 of the RCSA.</p>		Prepare and submit form.	Review and approve form.

**APPENDIX H**

**Current and Future Projects in the West Haven Master Plan**

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