PUBLIC DRAFT

ENVIRONMENTAL ASSESSMENT

OF THE PROPOSED

ENHANCED-USE LEASE
VETERAN HOUSING DEVELOPMENT

CLEMENT J. ZABLOCKI VA MEDICAL CENTER
5000 WEST NATIONAL AVENUE
MILWAUKEE, WISCONSIN

DEPARTMENT OF VETERANS AFFAIRS

OFFICE OF ASSET ENTERPRISE MANAGEMENT
810 VERMONT AVENUE, NW
WASHINGTON, DC 20420

PREPARED BY:

TTL ASSOCIATES, INC.

JUNE 21, 2018

ENVIRONMENTAL ASSESSMENT

ABSTRACT

LEAD AGENCY:	Department of Veterans Affairs (VA)
COOPERATING AGENCIES:	None
TITLE OF PROPOSED ACTION:	Proposed Enhanced-Use Lease Veteran Housing Development
AFFECTED JURISDICTION:	Milwaukee, Milwaukee County, Wisconsin
POINT OF CONTACT:	Mr. Dean Schwaller, LPN, Program Specialist, Historical District Liaison, Community Engagement and Relations Division, Clement J. Zablocki VA Medical Center, 5000 West National Avenue, Milwaukee, Wisconsin 53295; Tel. (414) 389-3994
PROPONENTS:	Department of Veterans Affairs (VA)

DOCUMENT DESIGNATION: Draft Environmental Assessment (EA)

ABSTRACT: This Draft Environmental Assessment (EA) evaluates the Proposed Action of VA to lease, through its Enhanced-Use Lease (EUL) authority, an underused portion of the Clement J. Zablocki VA Medical Center (Milwaukee VAMC) located at 5000 West National Avenue in Milwaukee, Wisconsin for the development of affordable housing for Veterans who are homeless or at risk of becoming homeless. This EA discusses two alternatives: (1) *Preferred Action Alternative* – Entering into a long-term EUL agreement with a developer for the renovation of seven mostly vacant buildings (Buildings 1, 2, 14, 18, 19, 62 and 64) and the surrounding land (total of approximately four acres) in the northern portion of the Milwaukee VAMC campus for the development of affordable Veteran housing; and (2) the *No Action Alternative*. The EA evaluates possible effects 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; and environmental justice.

EXECUTIVE SUMMARY

This Environmental Assessment (EA) has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Department of Veterans Affairs (VA's) proposed lease, through its Enhanced-Use Lease (EUL) authority, of an underused portion of the Clement J. Zablocki VA Medical Center (Milwaukee VAMC) located at 5000 West National Avenue in Milwaukee, Wisconsin for the development of affordable Veteran housing. Preparation of this 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 EA has also been prepared in accordance with *VA NEPA Interim Guidance for Projects* dated 30 September 2010.

PROPOSED ACTION

VA's Proposed Action is to lease an underused portion of the Milwaukee VAMC campus for the development of affordable housing for Veterans who are homeless or at risk of becoming homeless.

PURPOSE AND NEED

The *purpose* of the Proposed Action is to return an underused portion of the Milwaukee VAMC campus to its highest and most beneficial use by renovating existing, mostly vacant buildings for housing for homeless Veterans. The project would include renovation/redevelopment of seven buildings to create approximately 100 housing units and supportive service space for Veterans and their families who are homeless or at risk of becoming homeless.

This project is *needed* to address Veteran homelessness in the Milwaukee area. The U.S. Department of Housing and Urban Development (HUD)'s 2016 Annual Homeless Assessment Report (AHAR) to Congress indicated 236 Veterans were homeless in Wisconsin and 3.4 percent of those were on the street in January 2016. In the City and County of Milwaukee, 97 Veterans were reported to be homeless and approximately 10 percent of those were on the street. This project is also needed to fully utilize the Milwaukee VAMC campus and to prevent continued deterioration of the underused historic site buildings.

ALTERNATIVES

This EA examines in depth two alternatives, the Preferred Action Alternative and the No Action Alternative.

PREFERRED ACTION ALTERNATIVE

VA's Preferred Action Alternative is to enter into a long-term EUL agreement with a developer for the renovation of seven mostly vacant buildings (Buildings 1, 2, 14, 18, 19, 62, and 64) and the surrounding land (total of approximately four acres) in the northern portion of the Milwaukee VAMC campus (the Site) for the development of affordable Veteran housing. The project would be a joint effort between the VA developer and the Housing Authority of the City of Milwaukee. Once completed, the Preferred Action Alternative would provide approximately 100 housing units and associated support facilities for Veterans and their families that are homeless or at risk of becoming homeless.

The Site is located within the Northern Branch, National Home for Disabled Volunteer Soldiers Historic District (Historic District), which is listed in the National Register of Historic Places (NRHP). All seven buildings are considered contributing resources to the Historic District. Six of the seven buildings (all except for Building 64, a garage) are also contributing resources to the NRHP-listed Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark (Historic Landmark). The proposed building renovations would be conducted in accordance with the Secretary of Interior's Standards for Rehabilitation, in coordination with the Wisconsin Historical Society (Wisconsin SHPO) and the National Park Service (NPS), to retain their historic integrity.

In addition to the proposed building renovations, the Preferred Action Alternative would include the construction of a small parking lot (approximately 37 spaces) to support the proposed housing and minor roadway improvements in the vicinity of the buildings.

NO ACTION ALTERNATIVE

Under the No Action Alternative, VA would not enter into an EUL with a developer for the rehabilitation and adaptive reuse of Buildings 1, 2, 14, 18, 19, 62, and 64 for homeless Veteran housing. Under this alternative, these historic buildings would remain mostly vacant and underutilized. Planned building renovation and maintenance would not be conducted or would be completed by VA at considerable cost, reducing its available resources to fulfill its mission to serve Veterans. The availability of affordable housing for homeless and at risk Veterans and their families would remain at present levels (underserved) in the Milwaukee area.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The affected environment of the Preferred Action Alternative Site and its immediate surroundings, or the Region of Influence (ROI) of the Proposed Action, is discussed in Section 3 of this EA.

The two considered alternatives, the Preferred Action Alternative and the No Action Alternative, are evaluated in this EA to determine their potential direct or indirect impact(s) on the physical, environmental, cultural, and socioeconomic aspects of the Proposed Action's ROI. Technical areas evaluated in this EA include:

- *Aesthetics*
- *Air Quality*
- *Cultural Resources*
- *Geology, Topography, and Soils*
- *Hydrology and Water Quality*
- *Wildlife and Habitat*
- *Noise*
- *Land Use*
- *Floodplains, Wetlands, and Coastal Zone Management*
- *Socioeconomics*
- *Community Services*
- *Solid and Hazardous Materials*
- *Transportation and Parking*
- *Utilities*
- *Environmental Justice*
- *Cumulative Impacts*
- *Potential for Generating Substantial Controversy*

PREFERRED ACTION ALTERNATIVE

The Preferred Action Alternative would result in the impacts identified throughout Section 3. These include potential adverse impacts to aesthetics, air quality, cultural resources, soils and geology, hydrology and water quality, wildlife and habitat, noise, solid and hazardous materials, transportation, utilities, and environmental justice. All of these impacts are less-than-significant and would be further reduced through careful coordination and implementation of the general BMPs and management measures, and compliance with regulatory requirements, as identified in Section 5.

The Preferred Action Alternative would result in beneficial short-term and long-term socioeconomic impacts. The Proposed Action would provide affordable housing to low-income Veterans who are homeless or at risk of becoming homeless. The Preferred Action Alternative would also have beneficial

cultural resource impacts as the deteriorating historic buildings at the Site would be rehabilitated to retain their historic integrity.

NO ACTION ALTERNATIVE

Under the No Action Alternative, the Proposed Action would not be implemented, the Site buildings would remain underutilized and would continue to deteriorate due to lack of funding for maintainance by VA, and Milwaukee area homeless Veterans would continue to be unserved. The No Action Alternative would limit VA's ability to serve Milwaukee area Veterans and their families, and would not meet the purpose of or need for the Proposed Action.

The following table summarizes the potential impacts of the Preferred Action Alternative and No Action Alternative.

Summary of Impact Analysis		
Resource / Issue	**Preferred Action**	**No Action**
Meets Purpose of and Need for Action	Yes	No
Aesthetics	Beneficial impact from the repair and rehabilitation of the existing historic Site buildings.	None
Air Quality	Minor dust and diesel particulate matter emissions during construction. Minor vehicle emissions during operation. No significant impact.	None
Cultural Resources	The Site is located within an NRHP-listed Historic District and Historic Landmark. All seven project buildings are identified as contributing resources to the Historic District. Building renovations would be conducted in accordance with the Secretary of Interior's Standards for Rehabilitation in coordination with the Wisconsin SHPO and the National Park Service to maintain their historic integrity with continued Section 106 consultation throughout the project. Beneficial impact of rehabilitating historic buildings while maintaining their historic integrity.	Mostly vacant historic buildings would continue to deteriorate due to lack of funding for maintenance by VA.
Geology and Soils	Minor short-term potential for erosion and sedimentation during limited earthwork construction; impacts would be minimized through best management practices and conformance with NPDES permit requirements (if applicable).	None
Hydrology and Water Quality	Nearest surface water is more than 650 feet from the Site. Minor short-term potential for erosion and sedimentation during limited earthwork construction; impacts would be minimized through best management practices and conformance with NPDES permit requirements (if applicable).	None

Summary of Impact Analysis		
Resource / Issue	**Preferred Action**	**No Action**
Wildlife and Habitat	New development is limited and located in a landscaped grassy area with few trees. Minor impacts. No Federally-listed protected species are likely to be impacted. State-protected flowering perennial plant may be located in or around the wooded near Buildings 18, 19, 62 and 64. Site design will include a buffer around the protected plants. Protected plant areas will be marked/flagged to prevent inadvertent impact during construction. No significant impact.	None
Noise	Minor short-term adverse noise impacts during construction.	None
Land Use	Beneficial impact as the mostly vacant, underutilized Site buildings would return to their highest and most beneficial use, consistent with long use of the Milwaukee VAMC campus of providing health care and supportive service to US Veterans.	The Site buildings would remain mostly vacant and underutilized.
Floodplains, Wetlands, and Coastal Zone Management	No wetlands are present at or near the Site and the Site is not located in a 100-year or 500-year floodplain. Milwaukee County is located in a coastal management zone for Lake Michigan; however, no impacts to surface waters that flow to Lake Michigan are anticipated.	None
Socioeconomics	No adverse impact. Possible short-term localized beneficial impact to employment during construction. Significant beneficial impact to Veterans in the Milwaukee area who are homeless or at risk for homelessness.	Homeless Veterans in the area would continue to be underserved.
Community Services	No adverse impact.	None
Solid and Hazardous Materials	Asbestos and lead-based paint abatement is required and would be conducted by licensed contractors. Minor petroleum and hazardous substance handling during construction. Typical household solid wastes generated during operation. No significant impact.	None
Transportation and Parking	Short-term adverse impact from construction traffic, primarily affecting internal Milwaukee VAMC roads. No parking impacts. Less than significant.	None
Utilities	No adverse impact.	None
Environmental Justice	No adverse impact.	None

Summary of Impact Analysis		
Resource / Issue	**Preferred Action**	**No Action**
Potential for Generating Substantial Controversy	None identified. Likely to receive considerable support from local historic preservation agencies and organizations interested in preserving the historic Site buildings.	None identified

CUMULATIVE IMPACTS

The EA also examines the potential cumulative effects of implementing each of the considered alternatives. This analysis finds that the Preferred Action Alternative, with the implementation of the management measures specified in this EA, would not result in significant adverse cumulative impacts to onsite or regional natural or cultural resources, and would maintain or enhance the socioeconomic environment of the area through long-term provision of affordable housing and supplemental services to the region's Veterans. The No Action Alternative would not produce these potential positive socioeconomic gains. No significant cumulative effects are identified.

AGENCY AND PUBLIC INVOLVEMENT

In 2016, VA entered into a National Historic Preservation Act (NHPA) Section 106 Programmatic Agreement (PA) with the Advisory Council on Historic Preservation (ACHP), the Wisconsin SHPO, and the NPS for undertakings at the Milwaukee VAMC campus that may affect the Historic District and Historic Landmark. Per the terms of the PA, in August 2016, VA initiated Section 106 consultation with the ACHP, NPS, Wisconsin SHPO, National Trust for Historic Preservation (NTHP), Milwaukee Preservation Alliance (MPA), and City of Milwaukee Historic Preservation Committee (MHPC) regarding the Proposed Action. Section 106 related documents are included as Appendix B and summarized in Section 3.4.

In August 2016, VA invited nine Federally-recognized Native American tribes, identified as having possible ancestral ties to the Site area, to participate in Section 106 consultation for the Proposed Action. The Tribes include the following: Bad River Band of the Lake Superior Tribe of the Chippewa; Forest County Potawatomi Community; The Ho-Chunk Nation; Lac Courte Oreilles Band of Lake Superior Chippewa Indians; Lac du Flambeau Band of Lake Superior Chippewa Indians; Oneida Nation of Wisconsin; Sokaogon Chippewa Community; St. Croix Chippewa Indians of Wisconsin; and Stockbridge-Munsee Community Band of Mohican Indians. None of the Tribes elected to participate in the Section 106 consultation.

Agencies consulted for this EA include: US Fish and Wildlife Service (USFWS); US Environmental Protection Agency (USEPA); US Army Corps of Engineers (USACE); US Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS); Wisconsin Department of Natural Resources (WDNR); WDNR Environmental Management Division (EMD); WDNR Fish, Wildlife and Parks Division (FWPD); Wisconsin Department of Transportation (WisDOT); Milwaukee County Department of Transportation (MCDOT); Milwaukee Department of Public Works (MDPW); Milwaukee Department of City Development (MDCD); Milwaukee Department of Neighborhood Services (MDNS); and Milwaukee Water Works (MWW). Responses were received from USACE, USEPA, WDNR, WisDOT, MDCD, and MWW and are incorporated into relevant areas of this EA and are summarized in Section 4.0. Copies of relevant correspondence are included in Appendix A.

VA, as the proponent of the Proposed Action, will publish and distribute the Draft EA for a 30-day public comment period, as announced by a Notice of Availability (NOA) published in a local newspaper of general circulation (Milwaukee Journal Sentinel). Review copies of the Draft EA will be made available for public review at the Milwaukee VAMC and a local public library. VA will respond to provided public comments within the Final EA.

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SECTION 1: INTRODUCTION

1.1 Introduction

This section provides introductory and background information concerning the Proposed Action for proper analytical context and identifies the purposed of and need for the Proposed Action and the Federal decision to be made. A summary of public/agency involvement (and key issues identified) is provided in Section 4. Federal, State, and local regulations applicable to the Proposed Action are identified in Section 11.

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the Department of Veterans Affairs' (VA's) proposed lease, through its Enhanced-Use Lease (EUL) authority, of an underused portion of the Clement J. Zablocki VA Medical Center (Milwaukee VAMC) campus located at 5000 West National Avenue, Milwaukee, Wisconsin for the development of affordable housing for Veterans who are homeless or at risk of becoming homeless. Figures 1-4 depict the location of the Milwaukee VAMC campus and the proposed EUL area.

Preparation of this 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 EA has been prepared in accordance with VA's *NEPA Interim Guidance for Projects* (2010).

In accordance with the above regulations, this 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.

This EA examines in-depth two alternatives, the Preferred Action Alternative and the No Action Alternative, defined as follows:

- *Preferred Action Alternative*: Enter into a long-term EUL agreement with a developer for the renovation of seven mostly vacant buildings (Buildings 1, 2, 14, 18, 19, 62 and 64) and the surrounding area (total of approximately four acres) in the northern portion of the Milwaukee VAMC campus for the development of affordable Veteran housing. Once completed, the Preferred Action Alternative would provide approximately 100 housing units and associated support facilities for Veterans and their families who are homeless or at risk of becoming homeless.

- *No Action Alternative:* Do not enter into an EUL with a developer for the rehabilitation and adaptive reuse of Buildings 1, 2, 14, 18, 19, 62 and 64 for homeless Veteran housing. These buildings would remain mostly vacant and underutilized. Homeless Veterans in the Milwaukee area would remain underserved.

1.2 Background

The Milwaukee VAMC was initially constructed in the 1860s as the Northwestern Branch of the National Home for Disabled Volunteer Soldiers (NHDVS) to provide care and transitional housing to returning Civil War veterans in Wisconsin. The five-story, multi-chromatic Gothic Revival style Main Building, constructed on the campus's highest elevation, was designed to hold administrative, domiciliary, and

medical functions, dining facilities, and a chapel and meeting hall, as well as a laundry and bath rooms. The hospital, barracks, administration building, theater, steam plant and social hall were built in close proximity to the Main Building, while the private residences were located to the periphery. The private residences were quarters for chaplains and staff. In the 1930s, the NHDVS transitioned to the Veterans Administration with newer hospital and auxiliary building construction occurring in the southern portion of the campus (WSSAS 2018). Over time, the original (northern) portion of the campus became less significant for providing medical/housing services and the historic buildings became underused and/or vacated.

The Preferred Action Alternative Site (Site) is located in the northern portion of the Milwaukee VAMC campus. Seven mostly vacant buildings (Buildings 1, 2, 14, 18, 19, 62, and 64) and the surrounding areas, totaling approximately four acres, are included in the Site. The Site is located within the Northwestern Branch, National Home for Disabled Volunteer Soldiers Historic District (Historic District) which is listed in the National Register of Historic Places (NRHP). All seven buildings are considered contributing resources to the Historic District. Six of the seven buildings (all buildings except Building 64, a garage) are also contributing resources to the Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark (Historic Landmark).

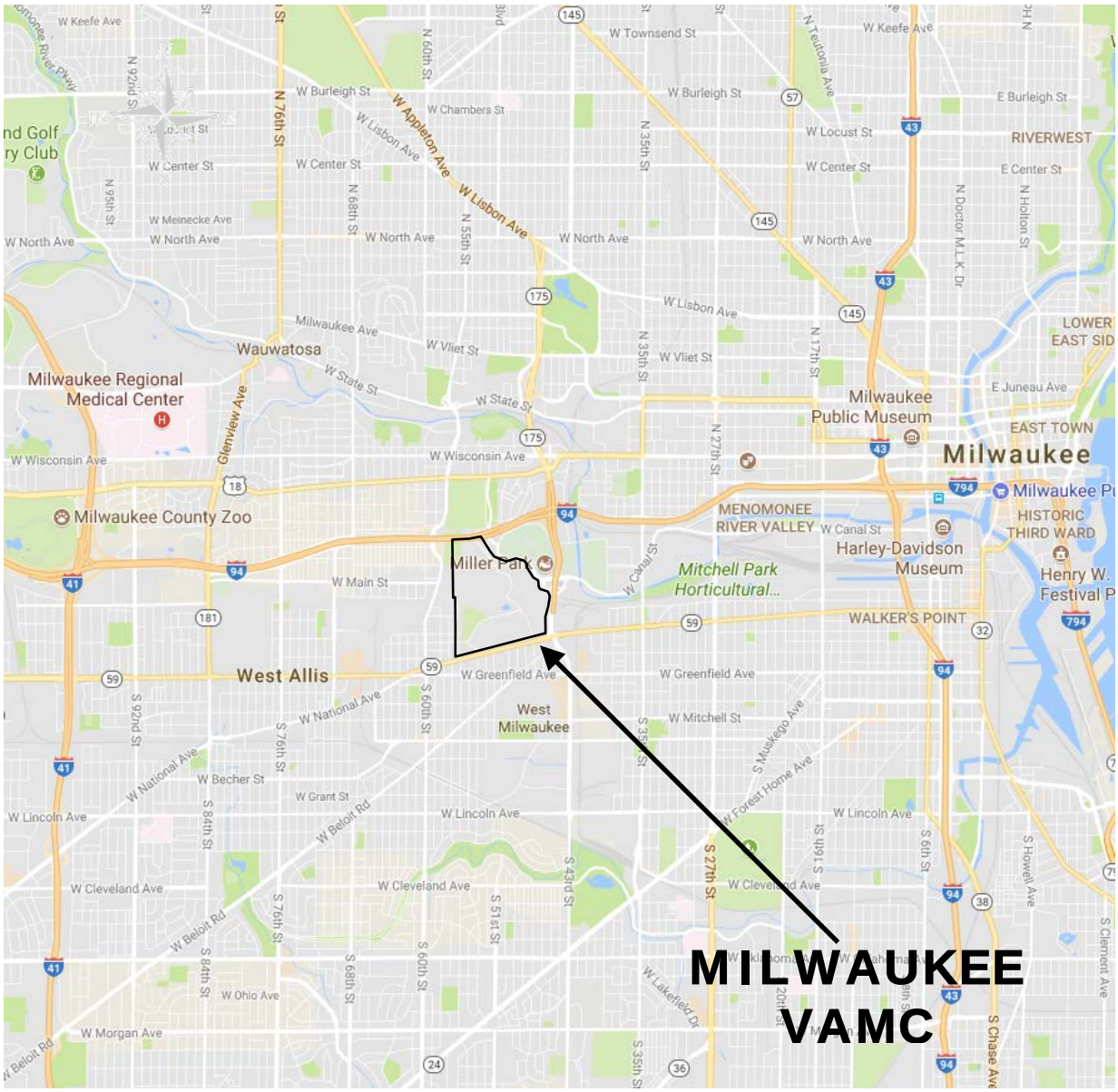

FIGURE 1.0
REGIONAL LOCATION MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED EUL VETERAN
HOUSING DEVELOPMENT
CLEMENT J. ZABLOCKI VA MEDICAL CENTER
MILWAUKEE, WISCONSIN

PREPARED FOR
U.S. DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF ASSET ENTERPRISE MANAGEMENT
WASHINGTON, D.C.

TTL PROJECT NO.

15871.01

TTL associates inc
Environmental, Geotechnical Engineering & Testing

FIGURE 2.0
VICINITY AERIAL PHOTOGRAPH

ENVIRONMENTAL ASSESSMENT
PROPOSED EUL VETERAN
HOUSING DEVELOPMENT
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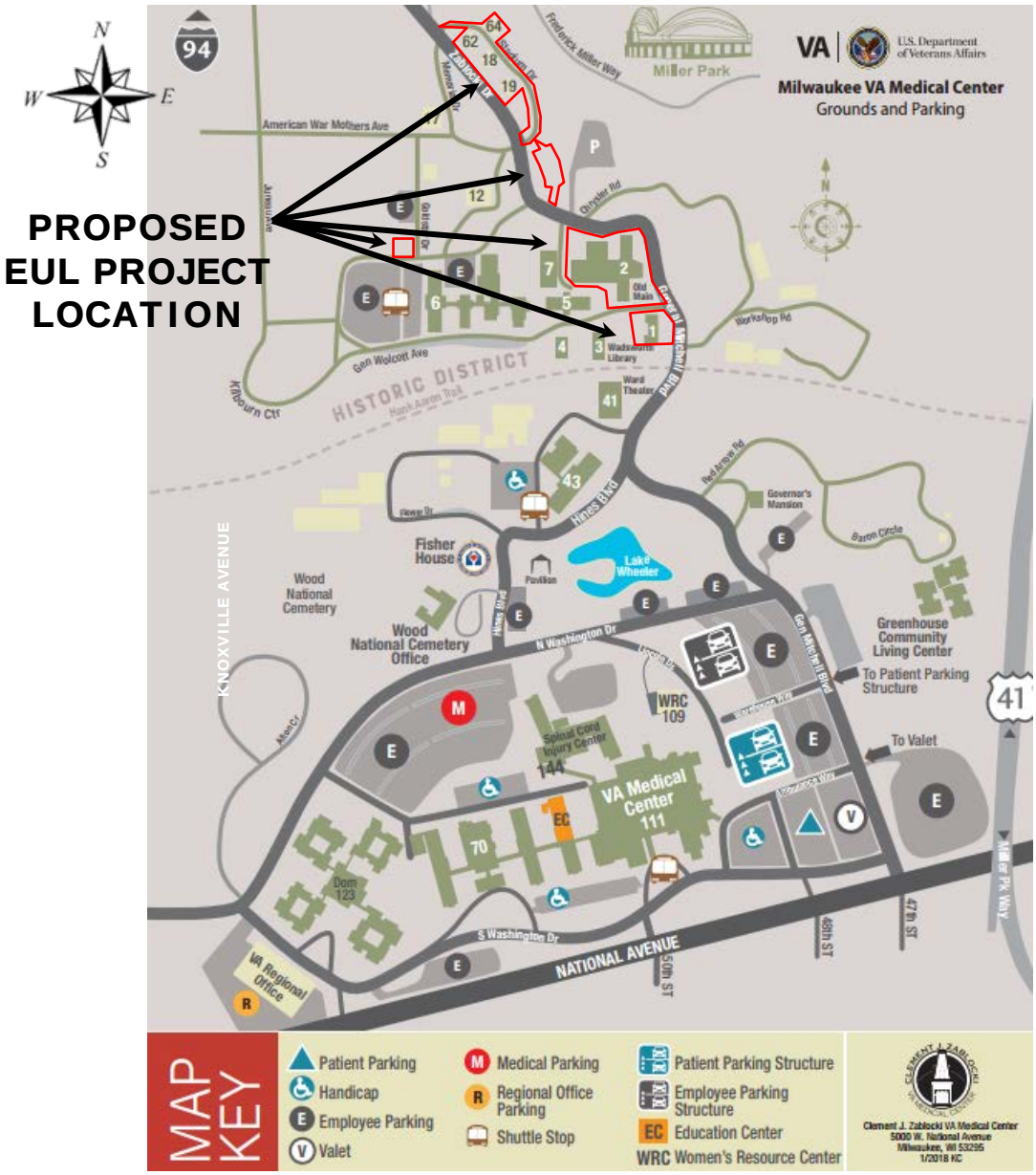

FIGURE 3.0
MILWAUKEE VAMC CAMPUS MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED EUL VETERAN
HOUSING DEVELOPMENT
CLEMENT J. ZABLOCKI VA MEDICAL CENTER
MILWAUKEE, WISCONSIN

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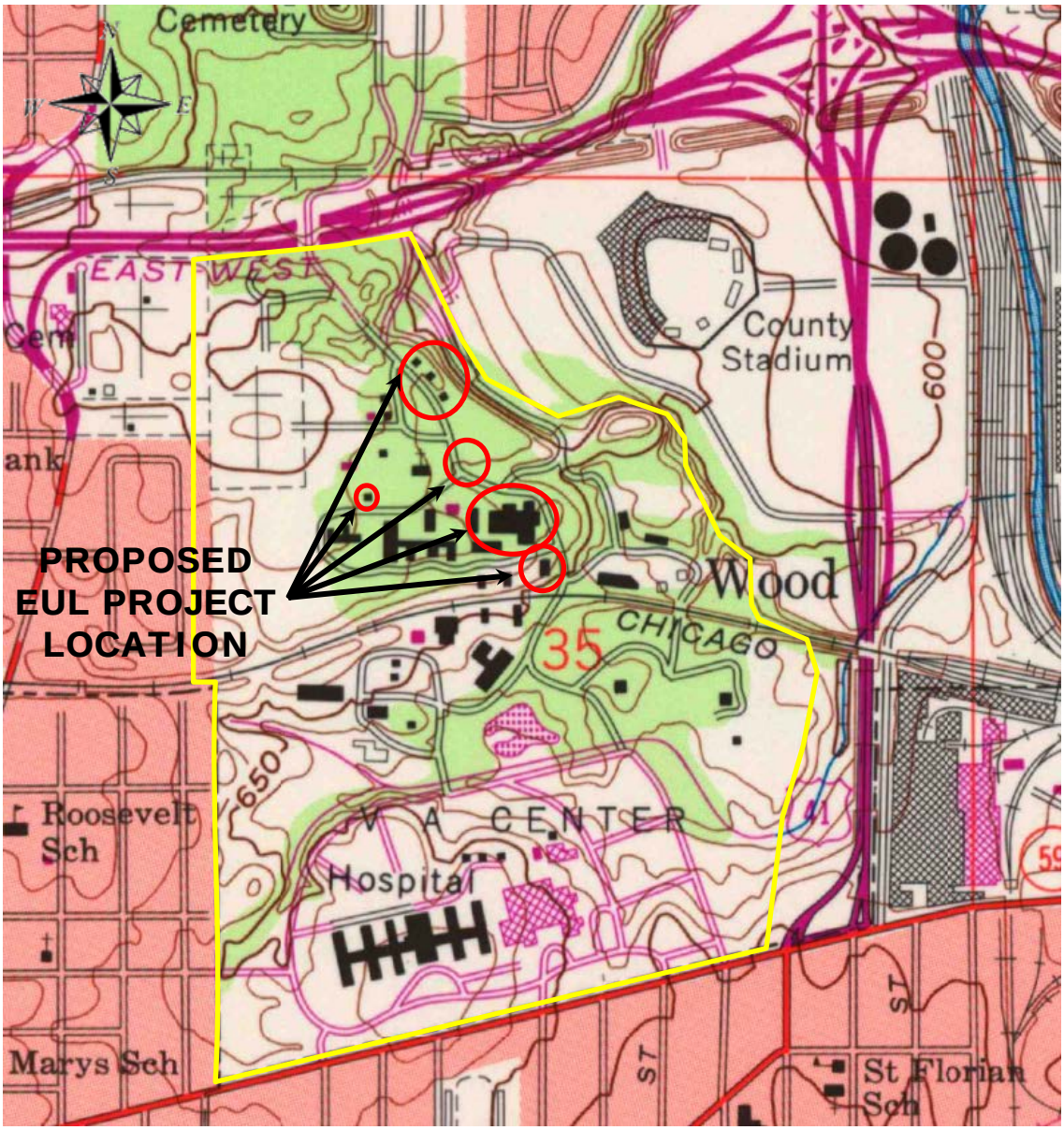

FIGURE 4.0
TOPOGRAPHIC MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED EUL VETERAN
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1.3 Purpose and Need

The *purpose* of the Proposed Action is to return an underused portion of the Milwaukee VAMC campus to its highest and most beneficial use by renovating existing, mostly vacant buildings for housing for homeless Veterans. The project would include renovation/redevelopment of seven buildings to create approximately 100 housing units and supportive service space for Veterans and their families who are homeless or at risk of becoming homeless.

This project is *needed* to address Veteran homelessness in the Milwaukee area. The U.S. Department of Housing and Urban Development (HUD)'s 2016 Annual Homeless Assessment Report (AHAR) to Congress indicated 236 Veterans were homeless in Wisconsin and 3.4 percent of those were on the street in January 2016. In the City and County of Milwaukee, 97 Veterans were reported to be homeless and approximately 10 percent of those were on the street. This project is also needed to fully utilize the Milwaukee VAMC campus and to prevent continued deterioration of the underused historic site buildings.

1.4 Decision-Making

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed EUL Veteran housing development at the Milwaukee VAMC in Milwaukee, Wisconsin.

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 regulations identified in Section 1.1.

In accordance with the above regulations, VA has prepared this EA. This 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; and documents the NEPA process.

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

1.5 Related Environmental Documents

Related environmental documents include:

- AAI Phase I Environmental Site Assessment, Enhanced-Use Lease Development Project, Milwaukee VA Soldiers Home Historic District, Milwaukee, Wisconsin, prepared by The Sigma Group and dated September 2017.
- Pre-Renovation Asbestos, Lead-Based Paint, and Hazardous Materials Inspection Report, Milwaukee Soldiers Home Project – Building #2 "Old Main", North Mitchell Boulevard, Milwaukee, Wisconsin, prepared by The Sigma Group and dated September 2017.

SECTION 2: DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

This Section provides information regarding the Proposed Action and its alternatives, including those that VA initially considered, but eliminated, and the reasons for eliminating them. The screening criteria and process developed and applied by VA to hone the number of viable sites are described, providing the reader with an understanding of VA's rationale in ultimately analyzing two alternatives, the Preferred Action Alternative and the No Action Alternative, in this EA.

2.2 Proposed Action

VA's Proposed Action is to lease an underused portion of the Milwaukee VAMC campus to a developer for the development of affordable housing for Veterans who are homeless or at risk of becoming homeless.

2.3 Alternatives Analysis

The NEPA, CEQ Regulations, and 38 CFR Part 26 require reasonable alternatives to be explored and objectively evaluated. Alternatives that are eliminated from detailed study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered "reasonable" only if it would enable VA to more fully utilize the Milwaukee VAMC campus and provide affordable Veteran housing (i.e., the alternative must meet the purpose of and need for the Proposed Action). "Unreasonable" alternatives would not enable VA to meet the purpose of and need for the Proposed Action.

2.3.1 Alternatives Development

VA undertook a sequential planning and screening process, seeking viable alternatives for the Proposed Action. Specific space requirements for the proposed affordable Veteran housing facility were identified and evaluated by VA. VA considers the following as screening criteria for site selection:

- No cost for land acquisition
- Locate facility in the underserved and/or undersupplied area by VA
- Proximity to a mass transit system sufficient to service the facility, as applicable
- Minimal wetlands, surface water or other potential environmental impacts

Based on the availability of existing underutilized structures and land at the Milwaukee VAMC campus, which is located in an underserved area for affordable Veteran housing, and the redevelopment plan offered by the proposed EUL developer, VA did not seek other alternatives for the Proposed Action. The existing Milwaukee VAMC fulfills all VA requirements for site selection. No other available government-owned properties that met these criteria were identified.

2.3.2 Evaluated Alternatives

This EA examines in depth two alternatives, the Preferred Action Alternative and the No Action Alternative.

PREFERRED ACTION ALTERNATIVE

VA's Preferred Action Alternative is to enter into a long-term EUL agreement with a developer for the renovation of seven mostly vacant buildings (Buildings 1, 2, 14, 18, 19, 62, and 64) and the surrounding area (approximately four acres of land) in the northern portion of the Milwaukee VAMC campus for the development of affordable Veteran housing. The project would be a joint effort between the VA developer and the Housing Authority of the City of Milwaukee. Once completed, the Preferred Action Alternative would provide approximately 100 housing units and associated support facilities for Veterans and their families who are homeless or at risk of becoming homeless. The Preferred Action Alternative Site location is depicted on Figures 2 through 5.

The following summarizes the existing buildings and renovation plans.

- Building 1 (also known as Administration Building) was constructed in the 1896, is approximately 17,600 square feet and 2 stories. Building 1 was historically used for administrative offices and meeting spaces. Building 1 would be converted into 14 single occupancy units with a common kitchen and dining area, community and living rooms, and supportive program offices.

- Building 2 (also known as Old Main) was constructed in 1869, is approximately 133,730 square feet and six stories. Building 2 was historically utilized as a housing and care facility for Veteran patients, with portions utilized for research and staff housing. Old Main has not been occupied by patients since approximately 1989. More recently, Old Main was utilized for storage of records, medical supplies, furniture, etc. Building 2 would be converted into 72 one-bedroom and 8 two-bedroom apartment units. Building 2 would also include large community spaces, resources centers, fitness area, and offices for building management, home healthcare, and counseling.

- Building 14 (single-family dwelling) was constructed in 1909, is approximately 3,630 square feet and two stories. Building 14 would be renovated and remain a single-family home.

- Building 18 (residential duplex) was constructed in the 1916, is approximately 7,370 square feet and two stories. Building 18 would be renovated and remain a duplex.

- Building 19 (residential duplex) was constructed in 1921 and is approximately 7,640 square feet and two stories. Building 19 would be renovated and remain a duplex.

- Building 62 (residential duplex) was constructed in 1922, is approximately 7,316 square feet and two stories. Building 62 would be renovated and remain a duplex.

- Building 64 (garage) was constructed in 1938 and is a six-car garage that serves Buildings 18, 19, and 62. Building 64 would be renovated and remain a garage.

All seven buildings are contributing resources to the Historic District. The building renovations would be conducted in accordance with the Secretary of Interior's Standards for Rehabilitation, in coordination with SHPO and the NPS, to retain their historic integrity.

In addition to the proposed building renovations, the Preferred Action Alternative would include the construction of a small parking lot (approximately 37 spaces) located northwest of Building 2 to support the proposed housing and minor roadway improvements in the vicinity of the buildings.

The project is anticipated to be executed in two separate phases with SHPO and NPS consultation at each phase. The first phase would include the Building 2 renovations and the small parking lot construction. The second phase would include the Buildings 1, 14, 18, 19, 62, and 64 renovations.

The Preferred Action Alternative Site effectively provides the sufficient combination of land, location, and existing, required infrastructure and meets the purpose of and need for the Proposed Action.

NO ACTION ALTERNATIVE

Under the No Action Alternative, VA would not enter into an EUL with a developer for the rehabilitation and adaptive reuse of Buildings 1, 2, 14, 18, 19, 62, and 64 for homeless Veteran housing. Under this alternative, these historic buildings would remain mostly vacant and underutilized. Planned building rehabilitation and maintenance would not be conducted by VA due to the considerable cost, which would reduce its available resources to fulfill its mission to serve Veterans. The availability of affordable housing for homeless and at risk Veterans and their families would remain at present levels (underserved) in the Milwaukee area.

The No Action Alternative would limit the capability of VA to provide needed affordable housing to Veterans in the region, would leave portions of the Milwaukee VAMC campus underutilized, and would not meet the purpose of or need for the Proposed Action. However, this alternative was retained to provide a comparative baseline analysis as required under CEQ Regulations.

2.3.3 Alternatives Eliminated From Further Consideration

As described in Section 2.3.1, VA eliminated alternative sites for the proposed affordable Veteran housing facility through a screening process. The existing Milwaukee VAMC campus contains underutilized buildings that fulfill all VA requirements for site selection. No other available government-owned properties that met these criteria were identified. As such, no other alternatives were considered.

FIGURE 5.0
PROPOSED EUL DEVELOPMENT AREAS

ENVIRONMENTAL ASSESSMENT
PROPOSED EUL VETERAN
HOUSING DEVELOPMENT
CLEMENT J. ZABLOCKI VA MEDICAL CENTER
MILWAUKEE, WISCONSIN

PREPARED FOR
U.S. DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF ASSET ENTERPRISE MANAGEMENT
WASHINGTON, D.C.

TTL PROJECT NO.

15871.01

TTL associates inc
Environmental, Geotechnical Engineering & Testing

SECTION 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.1 Introduction

This Section describes the baseline (existing) environmental, cultural, and socioeconomic conditions at the Preferred Action Alternative Site (see Figures 1-5) and its general vicinity (i.e., the Proposed Action's Region of Influence (ROI)), with emphasis on those resources potentially impacted by the Proposed Action. Appendix C provides photographs, with captions, of the Preferred Action Alternative Site and its vicinity. Under each resource area (Sections 3.2 through 3.16), the potential direct and indirect effects of implementing the Preferred Action Alternative and the No Action Alternative are identified. Potential cumulative impacts are discussed in Section 3.17.

In this 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 EA, the terms "*effects*" and "*impacts*" are synonymous. Where appropriate and clearly discernible, each impact is identified as either adverse or beneficial.

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 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.

Significance criteria for resource areas considered in this EA are as follows:

- *Aesthetics*
- *Air Quality*
- *Cultural Resources*
- *Geology, Topography, and Soils*
- *Hydrology and Water Quality*
- *Wildlife and Habitat*
- *Noise*
- *Land Use*
- *Floodplains, Wetlands, and Coastal Zone Management*
- *Socioeconomics*
- *Community Services*
- *Solid and Hazardous Materials*
- *Transportation and Parking*
- *Utilities*
- *Environmental Justice*
- *Cumulative Impacts*
- *Potential for Generating Substantial Controversy*

3.2 Aesthetics

The Preferred Action Alternative Site is located in an urban area in the northwestern portion of the City of Milwaukee and is located in the northern portion of the Milwaukee VAMC campus (see Figures 1 through 5). The Site is approximately four acres, including seven mostly vacant buildings (Buildings 1, 2, 14, 18, 19, 62, and 64) and approximately 0.3-acre of landscaped grassy campus land between Buildings 2 and 19 that is proposed to be constructed into a small (approximately 37-space) paved parking lot.

The Site areas are surrounded by land owned and maintained by VA. The majority of the land surrounding the Site is occupied by buildings, parking lots, and landscaped areas associated with the Milwaukee VAMC campus. The area to the northeast of Buildings 18, 19, 62, and 64 is sloping, undeveloped wooded land along the boundary of the Milwaukee VAMC campus. Beyond the wooded area, approximately 100 feet from the Site, is a paved parking lot associated with Miller Park (Milwaukee Brewers baseball stadium). The area west of Buildings 14 and 62 is a portion of Wood National Cemetery. Refer to Figure 5.

3.2.1 Effects of the Preferred Action Alternative

The Proposed Action includes the renovation and repair/rehabilitation of existing Buildings 1, 2, 14, 18, 19, 62, and 64. The exterior facades of the buildings would generally not be disturbed beyond repairs/rehabilitation to the current structures, which would maintain their historic integrity. As such, the project would have minor beneficial impact to the exterior aesthetics.

Grounds development would include the construction of a small parking lot (approximately 37 spaces, 0.3-acre) between Buildings 2 and 19. This area is currently grassy land with a few trees and is surrounded by another parking lot and roads. The proposed parking lot would be visually consistent with other VAMC campus development in this area and would not be visible off-campus. The proposed parking lot would have minor aesthetic impacts. Other grounds development activities (minor road widening, etc.) would have negligible aesthetic impacts.

3.2.2 Effects of the No Action Alternative

Under the No Action Alternative, the proposed project would not be completed and no beneficial aesthetics impacts (building renovation) would result.

3.3 Air Quality

3.3.1 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_x)
- Ozone (O_3)
- Particulate matter (PM), divided into two size classes:

  Aerodynamic size less than or equal to 10 micrometers (PM_{10})

  Aerodynamic size less than or equal to 2.5 micrometers ($PM_{2.5}$)
- Sulfur dioxide (SO_2)

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.

According to the USEPA Green Book (December 2017), Milwaukee County is a designated maintenance area for particulate matter ($PM_{2.5}$) and sulfur dioxide (SO_2). Milwaukee County is in full attainment for the remaining NAAQS.

3.3.2 Sensitive Receptors

Sensitive air quality receptors in the vicinity of the Site include the VA medical facilities located in the southern portion of the Milwaukee VAMC campus and residences located approximately 900 feet west of the Site. No other sensitive air quality receptors are located in the vicinity of the Site.

3.3.3 Effects of the Preferred Action Alternative

Air emissions generated from the Proposed Action would have less-than-significant direct and indirect, short-term and long-term adverse impacts to the existing air quality environment around the Site. Impacts would include short-term and long-term increased air emission levels as a result of: 1) construction activities; and 2) operation of the proposed Veteran housing facility.

Proposed Action construction activities could result in short-term air quality impacts, primarily due to the creation of dust. Dust can result from a variety of activities, including excavating, grading, and vehicle traffic on paved and unpaved surfaces. Dust from construction can lead to adverse health effects and nuisance concerns, such as reduced visibility on nearby roads. Only minor earthwork is planned as part of the project. Dust emissions would be minor. The construction contractor would implement dust control best management practices (BMPs), such as the use of water and the suspension of earth moving activity during high wind conditions, to minimize dust emissions. Construction-related emissions would also include the exhaust from the operation of construction equipment, including diesel particulate matter (DPM). The construction contractor would use newer equipment with emissions controls and would minimize time that equipment is idling (BMP) to reduce construction equipment exhaust emissions, including DPM. Implementation of BMPs, discussed in Section 5, would control and minimize dust and construction equipment exhaust releases to the air.

Asbestos containing materials (ACM) are present within the Site buildings in areas that would be disturbed by the proposed renovation activities. These ACM would be removed by licensed asbestos abatement contractors, prior to planned renovation activities, in accordance with applicable regulations, to prevent the release of asbestos fibers to the air during building renovation.

Following the completion of the Proposed Action renovation/construction activities, the Site would be used for housing with only minor air emissions associated with the operation of standard heating and ventilation systems and minor vehicular exhaust emissions.

The General Conformity Rule of the CAA prohibits the Federal government from conducting, supporting, or approving actions that do not conform to the State Implementation Plan (SIP), the State's plan for achieving and maintaining compliance with the CAA. Federal agencies are required to prepare written Conformity Determinations for Federal actions affecting NAAQS non-attainment or maintenance areas when emissions of non-attainment pollutants exceed specified thresholds. Conformity with the SIP is demonstrated if project emissions fall below threshold values. The minor air emissions associated with the Proposed Action are anticipated to be well below the de minimis levels for $PM_{2.5}$ and SO_2. As such, a formal Conformity Determination is not necessary.

3.3.4 Effects of the No Action Alternative

Under the No Action Alternative, no air quality impacts would occur.

3.4 Cultural Resources

Cultural resources include historic and prehistoric archaeological resources, as well as historic structures in the built environment. This impact analysis focused on sites and structures listed in, or eligible for nomination to, the National Register of Historic Places (NRHP), and the regulations (36 CFR Part 800) for implementing Section 106 of the National Historic Preservation Act of 1966.

The Site is located within the Northwestern Branch, National Home for Disabled Volunteer Soldiers Historic District (Historic District), which is listed in the NRHP. All seven project buildings, constructed between 1869 and 1938, are identified as contributing resources to the Historic District. Six of the seven buildings (all buildings except for the garage, Building 64) are also contributing resources to the Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark (Historic Landmark), which is also listed in the NRHP. In addition, Soldiers Home Reef National Historical Landmark (located approximately 700 feet northeast of Building 2) is listed on the NRHP and Wood National Cemetery is a contributing resource to the Historic District and Historic Landmark.

3.4.1 Effects of the Preferred Action Alternative

VA entered into a Programmatic Agreement (PA) with the Advisory Council on Historic Preservation (ACHP), the Wisconsin SHPO, and the NPS for undertakings at the Milwaukee VAMC campus that may affect the Historic District and Historic Landmark. The Proposed Action would be conducted in accordance with the PA. Per the terms of the PA, as an EUL project, the Proposed Action also requires separate Section 106 consultation. VA initiated this consultation in August 2016.

The proposed building renovations would be conducted in accordance with the Secretary of Interior's Standards for Rehabilitation in coordination with the Wisconsin SHPO and the NPS to retain their historic integrity. The Project would be developed in the following phases: Phase 1 - Building 2 and small parking lot; Phase 2 - Buildings 1, 14, 18, 19, 62, and 64.

The Historic Preservation Certification Application for historic tax credits that describes the planned rehabilitation activities for the entire project was submitted to the SHPO and NPS in March 2017. An amendment for each development Phase with design drawings will be submitted to NPS and SHPO for approval. On November 13, 2017, SHPO approved the first development phase of the project (Building 2 and the new small parking lot) with a determination of no adverse effect. With continued Section 106 consultation throughout the project, no adverse effect is anticipated. The Preferred Action Alternative would have beneficial cultural resource impacts as the mostly vacant, deteriorating historic site buildings would be rehabilitated to retain their historic integrity.

Section 106 Correspondence is included in Appendix B.

3.4.2 Effects of the No Action Alternative

Under the No Action Alternative, the historic buildings would remain underutilized and would continue to deteriorate as VA is unlikely to be able to fund renovation, resulting in adverse cultural resources impacts.

3.5 Geology and Soils

Milwaukee County is located in the Central Lowland physiographic province. The province is part of the Interior Plains division of the United States. Characteristic features of the Central Lowland province are flat lands with geomorphic remnants of glaciation. The four major stages of glaciation that occurred in southeast Wisconsin laid the foundation for the physiology, topography and soils of Milwaukee County. The last and most influential stage of glaciation was the Wisconsin stage that ended in Wisconsin about 11,000 years ago.

The bedrock formations underlying the unconsolidated surface deposits of Milwaukee County consist of Niagara Dolomite of Silurian-age. The bedrock of Milwaukee County is primarily covered by deep, unconsolidated glacial deposits, attaining thickness ranging from 20 feet in some areas of Milwaukee County to an excess of 500 feet in some buried pre-glacial valleys (MCLWRMP 2006).

In Wisconsin, karst landscapes are present along Lake Michigan, including Milwaukee County, due to the presence of carbonate bedrock (dolomite). Dolomite is much less easily dissolved than limestone and creates fewer and smaller voids and cavities (UW 2018). No evidence of sinkholes was observed on the Site or adjoining areas during TTL's Site reconnaissance in December 2017.

Wisconsin rarely has earthquakes and they are not considered to be a major danger to the state. The most recent earthquake near Milwaukee happened in March 2015, measured 2.9 on the Richter scale, and occurred approximately 2 miles west northwest of Lake in the Hills, Illinois (approximately 60 miles southeast of the Milwaukee VAMC). This area has records of 7 earthquakes ranging from 2.6 to 4.2 magnitude since 1985 to present (USGS 2018).

A review of the Milwaukee, Wisconsin United States Geological Survey (USGS) Topographic Quadrangle (dated 1958, photorevised 1971) indicated that the surficial topography in the northern portion of the Milwaukee VAMC campus generally slopes from west to east. Elevations at the Site range from almost 690 feet above mean sea level (amsl) near Building 14 to approximately 660 feet amsl near Building 1 (Figure 4).

According to the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey, the Site is located in an unmapped area. File information provided by the Wisconsin Department of Natural Resource (WDNR) for the Milwaukee VAMC campus indicates soils at the campus consist of silty clay and clayey silt with variable amounts of sand and gravel (glacial till) to a depth of at least 35 feet below grade.

3.5.1 Prime and Unique Agricultural Land Soils

Prime and Unique Farmlands are regulated in accordance with the 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 Site is located within a developed, urban area and is not subject to the requirements of the FPPA.

3.5.2 Effects of the Preferred Action Alternative

Less-than-significant impacts to geology are anticipated. No active significant faults are known extend through the subsurface geology at the Site and no evidence of local sinkholes was observed. As such, no impacts associated with seismic hazards or sinkhole development are identified. No significant impacts to mineral resources are anticipated, as the Proposed Action would not involve the commercial extraction of mineral resources, nor affect mineral resources considered important on a local, State, national, or global basis. In addition, no farmland soils would be impacted.

During construction, less-than-significant, direct and indirect, short-term soil erosion and sedimentation impacts would be possible as the subsurface utilities are installed, the small parking lot is constructed, minor roadway modifications are implemented, and other project components are constructed. Construction would remove the vegetative cover and disturb the soil surface. The soil would then be susceptible to erosion by wind and surface runoff. Exposure of the soils during

construction has the potential to result in increased sedimentation to stormwater management systems and offsite discharges of sediment-laden runoff. Such potential adverse erosion and sedimentation effects would be prevented through utilization of appropriate BMPs and adherence to the terms of an approved General Permit to Discharge Construction Site Storm Water Runoff under the Wisconsin Pollutant Discharge Elimination System (WPDES) including the development and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP), if required (if construction activities disturb more than one acre of land).

Once construction is complete, no long-term erosion and sedimentation impacts would be anticipated due to the nature of the Proposed Action. No long-term soil erosion impacts would occur as a result of the minor increased impervious surfaces associated with the small parking lot. Runoff from the parking lot would be designed to infiltrate Site soils near the parking lot or discharge to the Milwaukee VAMC stormwater sewer system.

3.5.3 Effects of the No Action Alternative

Under the No Action Alternative, no construction would occur. No impacts to soils, topography, or geology would occur at the Site.

3.6 Hydrology and Water Quality

3.6.1 Surface Waters

The Site is located in the Menomonee River watershed, which discharges into Lake Michigan at the Milwaukee harbor. Stormwater at the Site generally infiltrates into onsite soils or flows towards stormwater system catch basins located along the Milwaukee VAMC campus roads.

No surface water is present on the Site. The nearest surface waters are a pond (Lake Wheeler), located approximately 670 feet south of Building 1 in the southern portion of the Milwaukee VAMC campus and Wood Creek, located approximately 1,500 feet east of the Site. Wood Creek flows to the Menomonee River, located approximately one half mile east of the Site, which discharges to Lake Michigan, located approximately four miles east of the Site.

According to the USFWS National Wetlands Inventory (NWI) online wetland mapper and observations during the December 2017 site reconnaissance, no surface water features were identified on or adjacent to the Site.

3.6.2 Groundwater

Groundwater is contained in one of four aquifers underlying Milwaukee County. The sand and gravel aquifer can occur up to 200 feet deep, and contains unconsolidated sand, gravel, and soil materials deposited from glacial ice that covered the region approximately 11,000 years ago. The eastern dolomite aquifer occurs beneath the sand and gravel formation. It was deposited approximately 400 million years ago and is 300 to 400 feet thick. It consists of both the Niagara dolomite formation and an underlying shale layer (Maquoketa shale). Most potable water used in the county for domestic use comes from this formation. The sandstone and dolomite aquifer occurs beneath the eastern dolomite formation in deposits between 425 and 600 million years old. This deep aquifer is tapped mainly by industrial users that use substantial quantities of water. The crystalline bedrock aquifer is located beneath the sandstone and dolomite aquifer in formations more than 600 million years old. The aquifer is not a primary source of water in Milwaukee County due to the quality and reliability of this water source and the extreme depth (MCLWRMP 2006).

No site-specific information pertaining to the groundwater conditions was identified for the Site.

3.6.3 Effects of the Preferred Action Alternative

The Preferred Action Alternative would not result in significant impacts to surface water features, provided that the BMPs described in Section 5 are implemented. These BMPs would control construction-related impacts of soil erosion and sedimentation and would provide appropriate post-construction stormwater management.

It is not anticipated that groundwater would be impacted by the Proposed Action. If shallow groundwater is encountered during the limited deeper excavating during construction (such as for utility installation), appropriate groundwater engineering controls would be utilized to ensure no adverse effects to groundwater. The Site buildings would be connected to the municipal water system and would not use on-site groundwater. Impacts to groundwater are anticipated to be less-than-significant.

3.6.4 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to water resources at the Site or surrounding areas would occur.

3.7 Wildlife and Habitat

3.7.1 Vegetation and Wildlife

The Site is located within the Milwaukee VAMC campus, which is largely developed with buildings, paved parking areas and roads, and maintained grassy land with scattered trees. No natural vegetation communities supportive of wildlife species are present at the Site. Limited natural vegetation communities are present at the rest of the Milwaukee VAMC campus.

3.7.2 Threatened and Endangered Species

As part of the preparation of this EA, the USFWS and various State natural resources' agencies were contacted to identify any potential for the presence of State or Federally-listed species on or in the vicinity of the Site.

According to the USFWS Information for Planning and Conservation (IPaC) internet application, one Federally-listed protected species was identified for the vicinity of the Site (the Northern Long-eared Bat). However, based on the habitat requirements for the species (large tracts of wooded land in proximity to water), Northern Long-eared Bats are not likely to occur on the project Site or surrounding area.

According to the WDNR, one State-listed threatened species (flowering perennial plant) has been documented on the Milwaukee VAMC campus. WDNR redacted the name of the plant species from its publicly available records to avoid disturbance of the population. The population at the Milwaukee VAMC is reportedly located in patches on the edge of and within the wooded area around the northeastern periphery of the Milwaukee VAMC campus, near Miller Park. This wooded area is not part of the defined Site boundaries; however, Buildings 18, 19 and 62 are located near this area and Building 64 (garage) is located adjacent to the tree line. The patches of State-protected flowering plants have been marked by the Milwaukee VAMC Grounds Department. The Milwaukee VAMC entered into a Rare Plant Stewardship Memorandum of Understanding (MOU) with the WDNR to protect the on-campus State-protected plant populations in 1994.

3.7.3 Effects of the Preferred Action Alternative

The Preferred Action Alternative is not likely to have significant adverse effects on wildlife or habitat. Grassy vegetation and approximately three trees would be removed to construct the small parking lot. Minor vegetation disturbance would occur during utility installation and minor planned road

modifications. The removal of the grassy vegetation and trees would have negligible biological resource effects. Based on the habitat requirements for the Northern Long-eared Bat, this Federally-protected species is not likely to occur on or near the project Site or be impacted by the Proposed Action.

No land disturbance is planned for the areas where the State-protected flowering plant species occurs at the Milwaukee VAMC campus; however, populations of the plant may exist in the vicinity of Buildings 18, 19, 62 and 64. VA would designate and mark no disturbance areas in the vicinity of the protected plants to prevent inadvertent, incidental impacts. Project plans would include a buffer of undisturbed land around these areas. With these BMPs and management measures, no impacts to the protected plant is likely.

3.7.4 Effects of the No Action Alternative

Under the No Action Alternative, no renovaton/construction activities would be conducted and no impacts to biological resources would occur.

3.8 Noise

The existing noise environment around the Site is relatively quiet. The Site is located in an area of the Milwaukee VAMC that is underutilized and generally not frequented by VA employees or patients. Periodic increased noise occurs at the northeasterly located Miller Park during game days (game and associated traffic noise). No other notable noise-generating sources are present in the immediate vicinity of the Site. As such, the noise environment of the Site can be characterized as that typical of a mixed use, mostly residential area.

3.8.1 Sensitive Receptors

Sensitive noise receptors in the region of influence (ROI) of the Site include residences located approximately 900 feet west of the Site and the VA medical facilities located in the southern portion of the Milwaukee VAMC campus. No other sensitive noise receptors are located in the vicinity of the Site. No schools are located within 0.25-mile of the Site.

3.8.2 Effects of the Preferred Action Alternative

The Proposed Action would have short-term impacts to the existing noise environment due to construction activities. Noise generating sources during construction activities would be associated primarily with standard construction equipment and construction equipment transportation. These increased noise levels could directly affect the nearby residential areas and other Milwaukee VAMC campus locations.

Construction activities generate noise by their very nature and are highly variable, depending on the type, number, and operating schedules of equipment. Construction projects are usually executed in stages, each having its own combination of equipment and noise characteristics and magnitudes. Exterior construction activities are expected to be relatively minor and generally typical of other similar construction projects and would include mobilization, site preparation, excavation, utility development, heavy equipment movement, and paving roadways and the small parking areas. The most prevalent noise source at typical construction sites is the internal combustion engine. General construction equipment using engines includes, but is not limited to: heavy, medium, and light equipment such as excavators; roller compactors; front-end loaders; bulldozers; graders; backhoes; dump trucks; water trucks; concrete trucks; pump trucks; utility trucks; cranes; and lube, oil, and fuel trucks.

Peak noise levels vary at a given location based on line of sight, topography, vegetation, and atmospheric conditions. In addition, peak noise levels would be variable and intermittent because each piece of equipment would only be operated when needed. However, peak construction noise levels

would be considerably higher than existing noise levels. Relatively high peak noise levels in the range of 93 to 108 dBA (decibels, A-weighted scale) would occur on the active construction site, decreasing with distance from the construction areas. Generally speaking, peak noise levels within 50 feet of active construction areas and material transportation routes would most likely be considered "striking" or "very loud", comparable to peak crowd noise at an indoor sports arena. At approximately 200 feet, peak noise levels would be loud - approximately comparable to a garbage disposal or vacuum cleaner at 10 feet. At 0.25 mile, construction noise levels would generally be quiet enough so as to be considered insignificant, although transient noise levels may be noticeable at times.

Combined peak noise levels, or worst-case noise levels when several loud pieces of equipment are used in a small area at the same time, are expected to occur rarely, if ever, during the project. However, under these circumstances, peak noise levels could exceed 90 dBA within 200 feet of the construction area, depending on equipment being used.

Although noise levels would be quite loud in the immediate area, the intermittent nature of peak construction noise levels would not create the steady noise level conditions for an extended duration that could lead to hearing damage. Construction workers would follow standard Federal Occupational Safety and Health Administration (OSHA) requirements to prevent hearing damage.

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

Indirect impacts include noise from workers commuting and material transport. Area traffic volumes and noise levels would increase slightly as construction employees commute to and from work at the project area, and delivery and service vehicles (including trucks of various sizes) transit to and from the Site. Because trucks are present during most phases of construction and would enter and exit the site via local thoroughfares, truck noises tend to impact more people over a wider area. For this Proposed Action, persons in the project area would experience temporary increases in traffic noise during day-time hours. These effects would be temporary and intermittent.

Based on the proposed residential use of the facility, no notable increase in operational noise level is anticipated.

3.8.3 Effects of the No Action Alternative

Under the No Action Alternative, the noise environment of the Site would not be altered.

3.9 Land Use

The Site includes approximately four acres of land consisting of seven mostly vacant buildings (Buildings 1, 2, 14, 18, 19, 62, and 64) and a 0.3-acre area of mostly landscaped land. The site has been owned by the Federal government and used to provide health care services and housing for Veterans since the 1860s. The Site buildings were constructed between 1869 and 1938 and are contributing resources to the Historic District located on the Milwaukee VAMC campus.

3.9.1 Effects of the Preferred Action Alternative

The Preferred Action Alternative would renovate the Site buildings for residential use (affordable housing for Veterans and their families who are homeless or at-risk of becoming homeless). The overall land use pattern would not be changed, as the Milwaukee VAMC was originally designed for medical treatment and residential rehabilitation services for Veterans. The Proposed Action would return these buildings to their highest and most beneficial use, while maintaining their historic integrity, a significant beneficial land use effect.

3.9.2 Effects of the No Action Alternative

Under the No Action Alternative, no beneficial land use impacts associated with the Proposed Action would occur. The Site buildings would remain mostly vacant and underutilized.

3.10 Wetlands, Floodplains, and Coastal Zone Management

3.10.1 Wetlands

This section discusses wetlands at or near the Site and surface waters (streams) as they pertain to wetlands. Additional information regarding surface waters in the vicinity of the Site area is provided in Section 3.6.

No surface waters or wetlands were identified at the Site or adjacent properties on the USFWS NWI online wetland mapper or observed during TTL's December 2017 site reconnaissance. Lake Wheeler, located approximately 670 feet south of Building 1 in the southern portion of the Milwaukee VAMC campus, is depicted on the NWI map as a freshwater pond. The nearest wetlands are depicted approximately 1,200 feet southwest and 1,700 feet southeast of the Site (Figure 6).

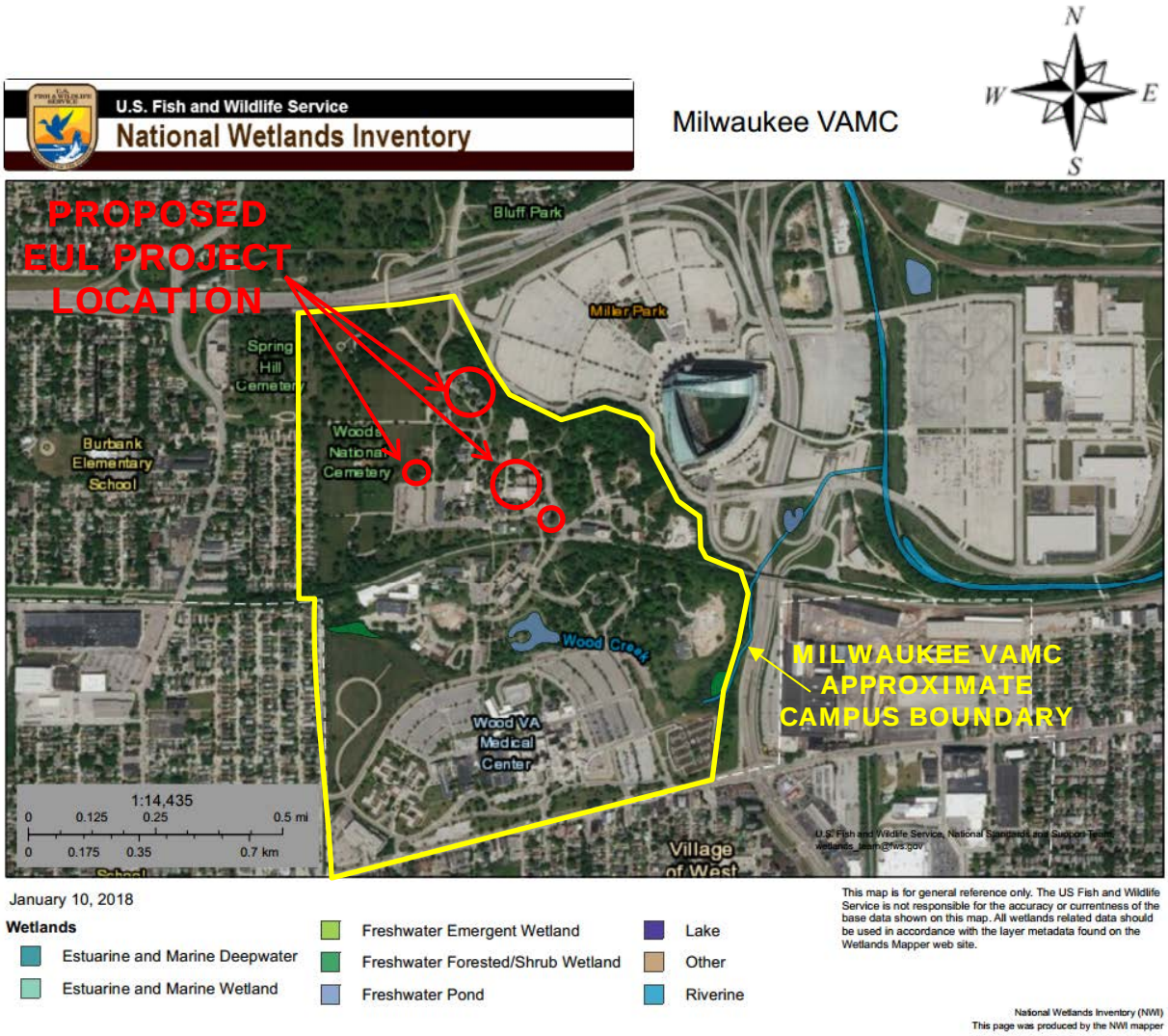

FIGURE 6.0
NATIONAL WETLAND INVENTORY MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED EUL VETERAN
HOUSING DEVELOPMENT
CLEMENT J. ZABLOCKI VA MEDICAL CENTER
MILWAUKEE, WISCONSIN

PREPARED FOR
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Environmental, Geotechnical Engineering & Testing

3.10.2 Floodplains

EO 11988, *Floodplain Management*, requires Federal agencies to avoid, to the extent possible, long-term and short-term impacts on 100-year floodplains that may result from their actions. This EO outlines the procedure that Federal agencies must follow when proposing development within a floodplain. The purposed of the EO is to have each Federal agency "take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by floodplains in carrying out its responsibilities."

According to available Federal Emergency Management Agency (FEMA) floodplain mapping, the Site and surrounding areas are not located in the 100-year or 500-year floodplain (FEMA Flood Insurance Rate Map No. 55079C0088E dated September 26, 2008).

3.10.3 Coastal Zone

The Coastal Zone Management Act (CZMA) was promulgated to control nonpoint pollution sources that affect coastal water quality. The CZMA of 1990, as amended (16 USC 1451 *et seq.*) encourages States to preserve, protect, develop, and where possible, restore or enhance valuable natural coastal resources such as wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as the fish and wildlife using those habitats.

All of Milwaukee County, which borders Lake Michigan, is located within a Coastal Management Area (CMA) managed by the Wisconsin Coastal Management Program (WCMP). However, all Federally-owned land is excluded from the CMA.

3.10.4 Effects of the Preferred Action Alternative

The Preferred Action Alternative would not result in impacts to wetlands or floodplains.

Based on the Site's distance from Lake Michigan (approximately four miles east), the distance to the nearest surface water (Wood Creek) that flows to Lake Michigan (approximately 1,500 feet east), and the nature of the Proposed Action, the Preferred Action Alternative would have no coastal zone impacts.

3.10.5 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to wetlands, floodplains, or coastal zones would occur.

3.11 Socioeconomics

The following subsections identify and describe the socioeconomic environment of the City of Milwaukee, Milwaukee County, and the State of Wisconsin. Presented data provide an understanding of the socioeconomic factors that have developed the area. Socioeconomic areas of discussion include the local demographics of the area, regional and local economy, local housing, and local recreation activities. Data used in preparing this section were collected from the 2010 Census of Population and Housing (US Census Bureau), subsequent US Census Bureau data, and the US Department of Commerce Bureau of Economic Analysis (BEA).

3.11.1 Demographics

The City of Milwaukee's estimated population in 2016 was 598,672 citizens. Milwaukee County's estimated population in 2016 was 955,306 citizens. The estimated population total for Wisconsin in 2016 was 5,754,798 residents. Baseline information identified that the City of Milwaukee and Milwaukee County have a larger minority population than the State of Wisconsin as a whole (Table 1).

Minority population rates specific to the Site area are discussed in Section 3.16 (Environmental Justice).

Table 1. Demographic Data for Milwaukee, Milwaukee County, and Wisconsin

Area	All Individuals (2016 Estimate)	Population Under 18 Age Years (%) (2016)	Population Over 65 Age Years (%) (2016)	Minority (%) (2016)	High School Graduates (%) (2016)	Veterans (2016)
Wisconsin	5,754,798	22.6	15.2	13.8	91.4	367,227
Milwaukee County	955,306	24.5	12.2	38.9	86.9	46,833
Milwaukee	598,672	26.5	9.6	54.0	82.5	24,067

Source: US Census Bureau, 2010 Census, Profile of General Demographic Characteristics, 2012-2016.

3.11.2 Employment and Income

The City of Milwaukee and Milwaukee County have lower median household income than the State of Wisconsin as a whole and that Milwaukee has higher population below the poverty level than Milwaukee County and the State of Wisconsin as a whole (Table 2). Income levels specific to the Site area are discussed in Section 3.16 (Environmental Justice).

Table 2. Regional Income

Area	Number of Households	Median Household Income ($)	Population Below Poverty Level (%)	Unemployment Rate (%) February 2018
Wisconsin	2,310,246	54,610	12.7	2.9
Milwaukee County	382,778	45,263	21.2	3.6
Milwaukee	230,784	36,801	28.4	3.2

Source: US Census Bureau, 2010 Census, Profile of General Demographic Characteristics, 2012-2016.
US Department of Labor, Bureau of Labor Statistics

3.11.3 Commuting Patterns

Residents of Milwaukee are largely dependent on personal automobiles for transportation to and from work. Other methods of transit include carpooling, public transportation [Milwaukee County Transit System (MCTS) bus] and walking. The average commuting time in Milwaukee was approximately 22 minutes in 2016.

3.11.4 Protection of Children

Because children may suffer disproportionately from environmental health risks and safety risks, EO 13045, *Protection of Children From Environmental Health Risks and Safety Risks*, was introduced in 1997 to prioritize the identification and assessment of environmental health risks and safety risks that may affect children and to ensure that Federal agencies' policies, programs, activities, and standards address environmental risks and safety risks to children.

Children are not regularly present at the Site or the immediate surrounding area. Children may be present in the residential areas farther west of the Site. No schools or children outdoor recreational areas (playgrounds, etc.) are located in the immediate vicinity of the Site.

3.11.5 Effects of the Preferred Action Alternative

Construction activities associated with the Proposed Action would result in beneficial impacts through the purchase of materials and supplies, and employment of workers to complete the renovation and construction activities. These effects would be temporary in nature. Although beneficial to the local economy, neither the construction activities of the Proposed Action nor the subsequent operation of the facility would be expected to have a significant measurable impact on the overall socioeconomic characteristics of the region. The Proposed Action would not stimulate any significant changes to the overall demographics, housing, or public services.

The Proposed Action would provide affordable housing for Veterans and their families that are homeless or at risk of being homeless, a significant beneficial socioeconomic impact to this underserved population within the Milwaukee area.

No adverse health or safety risks to children are anticipated to result from proposed construction activities. Children are not currently regularly present at the Site. Construction areas would be secured to prevent unauthorized access by children from the nearby residential areas. The construction contractor would limit and control construction dust and noise as discussed in Sections 3.3 and 3.8, thereby minimizing adverse effects to children in the area.

3.11.6 Effects of the No Action Alternative

The No Action Alternative would result in no construction and no increased short-term or long-term economic benefit due to VA's action. Under this alternative, no construction or service professional jobs would be created, and no additional incidental spending (e.g., at local restaurants, and shops) by an increased number of Veterans living and potentially working in the area.

Most importantly, the inability of VA to provide adequate, affordable housing facilities to homeless or at-risk Veterans commensurate with the current and anticipated future needs would result in a adverse, long-term impact to these Veterans.

3.12 Community Services

The Site is located within the Milwaukee Public Schools (MPS) district. This school district includes 169 neighborhood schools, neighborhood specialty schools, citywide specialty schools, comprehensive middle and high schools, charter schools, and alternative schools (MPS 2018). Burbank School (K4-8) is located approximately 2,300 feet west of Building 14. There are no additional K-12 schools located within 0.5-mile of the Site (Google Earth 2018).

The City of Milwaukee Police and Fire Departments provide police and fire protection and emergency medical services to the Site and its vicinity.

The Wisconsin Department of Transportation (WisDOT), Milwaukee County Department of Transportation (MCDOT), and the City of Milwaukee Department of Public Works (MDPW) provide maintenance to primary roads and bridges in the vicinity of the Milwaukee VAMC.

The Hank Aaron State Trail, a rail trail built in the location of the former Chicago, Milwaukee, St. Paul and Pacific Railway railroad tracks that crosses the central portion of the Milwaukee VAMC campus, is located approximately 80 feet south of Building 1. Miller Park (Milwaukee Brewers baseball stadium) adjoins the Milwaukee VAMC campus to the northeast. There are no additional developed recreational facilities in the vicinity of the Site.

The Milwaukee VAMC main hospital building is located approximately 1,500 feet south of the Site. There are no additional hospitals or medical facilities located within one mile of the Site.

Public transportation is provided to the Milwaukee VAMC area by MCTS bus service. MCTS services the Milwaukee VAMC via two bus routes (Route 23 and the Blue Line Express Service) with a bus stop near the main hospital building, approximately 2,000 feet south of the Site.

3.12.1 Effects of the Preferred Action Alternative

No additional load is expected to be placed on the fire or police departments as a result of the Proposed Action. Use of other public or community services as a result of the Proposed Action is not expected. As such, the Proposed Action is expected to have a negligible impact on local public services.

3.12.2 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to community services would be anticipated.

3.13 Solid and Hazardous Materials

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.

A Phase I Environmental Site Assessment (Phase I ESA) was conducted for the Site in September 2017. The Phase I ESA indicated that the Site has been developed since at least 1869 and has been a part of the larger VA campus since at least 1869. Portions of the Site have been utilized for Veteran care and housing, staff housing, research, and administrative support. No Recognized Environmental Conditions (RECs) were identified in association with the Site. The Phase I ESA noted that numerous underground storage tanks (USTs) have historically been located at the Milwaukee VAMC campus. Based on the Phase I ESA research, it did not appear that any of the USTs were located at the Site. However, based on the number of tanks registered to the Milwaukee VAMC, and the age of the buildings at the Site, the Phase I ESA indicated that it is possible that USTs were historically or are currently present at the Site.

The WDNR provided several files related to USTs, leaking USTs (LUSTs), hazardous/medical waste generation and management, and spills at the Milwaukee VAMC campus. UST/LUST information was provided for the areas around the main hospital building (Building 111, approximately 1,600 feet south of the Site), the maintenance area (Buildings 107 and 20, approximately 400 feet east of the Site), the central boiler plant area (Buildings 112 and 45, approximately 500 feet south of the Site), and a dormitory area (Building 123, approximately 2,000 feet southwest of the Site). None of the provided information is specific to the Site. Based on a review of the provided information, it is unlikely that the USTs, LUST incidents and other spills identified in WDNR records have impacted the Site.

3.13.1 Effects of the Preferred Action Alternative

The Proposed Action would result in short-term, less-than-significant adverse impacts due to the increased presence and use of petroleum and hazardous substances during construction. An increase in construction vehicle traffic would increase the likelihood for release of vehicle operating fluids (e.g., oil, diesel, gasoline, antifreeze, etc.) and maintenance materials. As such, a less-than-significant, direct, short-term adverse impact is possible. Implementation of standard construction BMPs would serve to ensure this impact is further minimized.

The Site buildings contain ACM that would be removed by licensed asbestos abatement contractors prior to building renovation. Lead-based paint (LBP) may also be removed or encapsulated with a new layer of paint as part of the proposed renovation activities. ACM, LBP, and other hazardous building

materials removed from the structures would be properly disposed of in accordance with applicable regulations.

Based on the 2017 Phase I ESA and information provided by WDNR, no contaminated soil is anticipated to be encountered during the Proposed Action construction activities. If a previously unknown UST is discovered, it would be removed in accordance with applicable State regulations.

No significant adverse long-term impacts during operation of the Proposed Action are anticipated. The proposed Veteran housing facility would create municipal wastes typically generated at a residential facility. Therefore, there would be minimal impacts to the property from the implementation of the Proposed Action.

3.13.2 Effects of the No Action Alternative

Under the No Action Alternative, no asbestos or LBP removal or renovation activities would occur.

3.14 Transportation and Parking

Access to the Site buildings is provided by roads within the Milwaukee VAMC campus that are operated and maintained by VA. Off-campus roads are regulated by the Wisconsin Department of Transportation (WisDOT), Milwaukee County Department of Transportation, and the Milwaukee Department of Public Works.

Public transportation is provided to the Milwaukee VAMC by MCTS bus service. MCTS services the Milwaukee VAMC via two bus routes (Route 23 and the Blue Line Express Service), with a bus stop near the main hospital building, approximately 2,000 feet south of the Site.

Inside of the Milwaukee VAMC campus, access to Building 1 is provided by General Mitchell Boulevard to the east and General Wolcott Avenue to the north. Access to Building 2 is provided by General Wolcott Avenue to the south and General Mitchell Boulevard to the east and north. Access to Building 14 is provided by Goldstar Drive to the east and General Wolcott Avenue to the south. Access to Buildings 18, 19, 62, and 64 is provided by General Mitchell Boulevard/Zablocki Drive to the southwest and Stadium Drive. All interior Milwaukee VAMC roads are two-lane paved roadways and operates at a good Level of Service.

Access to the Milwaukee VAMC campus is available via four entrances from West National Avenue to the south, one entrance from West Washington Street to the west, and two entrances (North General Mitchell Boulevard/Zablocki Drive) from the north. Nearby roads are illustrated on Figures 4 and 5.

3.14.1 Effects of the Preferred Action Alternative

The Preferred Action Alternative would have short-term and long-term, direct and indirect, minor transportation impacts. Construction traffic, consisting of trucks, workers' personal vehicles, and construction equipment, would create minor increased traffic volumes in the local area, but is not expected to cause delays. Installation and connection of utilities, located within or adjacent to the Site could also impact local internal Milwaukee VAMC roadways. These activities could result in minor traffic congestion, as well as a potential need to detour traffic around the area during utility work.

During operation, Milwaukee VAMC roads and public roadways in the vicinity of the Site would experience minor additional traffic as a result of use of the Site buildings for the proposed residential development. It is not expected that the Proposed Action would result in a significant increase in vehicle trips to the Milwaukee VAMC campus. A small parking lot (approximately 37 spaces) would be constructed as part of the Proposed Action to address the parking needs of the residents, employees, and visitors to the project buildings. Minor campus roadway improvements may be completed, but would not alter traffic flow or patterns.

3.14.2 Effects of the No Action Alternative

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

3.15 Utilities

Basic utilities in the City of Milwaukee (i.e., water, sewer, natural gas, and electric) are provided by various utility providers. As part of the preparation of this EA, local utility providers were researched to determine the availability of required utilities in the vicinity of the Site. The following identifies the utility providers to the Site:

- **We Energies** supplies electricity and natural gas services to the Site vicinity.
- The **City of Milwaukee** provides potable water, sanitary sewer, and stormwater services to the Site vicinity.
- Various companies provide telecommunication services to the Site vicinity.

3.15.1 Effects of the Preferred Action Alternative

The renovation of the buildings for residential use would create additional demand for utility services above the current level (low because of low to no occupancy). Buildings 14, 18, 19 and 62 are relatively small and have been fully occupied in the past for residential use. The existing utility services for these buildings are likely sufficient to handle levels required by the project. However, based on the age of the utility lines, some may be replaced during the construction activities. The project would include more extensive renovation and utility upgrades for Buildings 1 and 2 (particularly Building 2). Project utility requirements for Building 2 may exceed the current available capacity of the Milwaukee VAMC campus. New high voltage electrical service and natural gas lines, and possibly water and sanitary sewer lines, would likely be required for the project. The required additional utility services, if not available at the Milwaukee VAMC campus, are likely available in the campus area. There would be a minimal overall impact; the project is not anticipated to require a significant use of resources.

3.15.2 Effects of the No Action Alternative

Under the No Action Alternative, no utility impacts would occur.

3.16 Environmental Justice

In 1994, EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was issued to focus attention of Federal agencies on human health and environmental conditions in minority and low-income communities and to ensure that disproportionately high and adverse human health or environmental effects on these communities are identified and addressed.

According to the USEPA-developed EJSCREEN (an environmental justice mapping and screening internet application), the Site is located in an area with a disproportionately high concentration of minority (47 percent) and low income (48 percent) populations relative to that of Wisconsin as a whole (18 percent and 30 percent, respectively).

3.16.1 Effects of the Preferred Action Alternative

No significant adverse environmental justice effects would be anticipated with the Preferred Action Alternative. Although the Site is located in an area with disproportionately high minority and low-income populations, the Preferred Action Alternative would have very little impact on the residents in the area. However, the Proposed Action would provide affordable housing for regional Veterans who

are homeless or at risk of becoming homeless, a significant direct beneficial impact to low-income Veterans.

3.16.2 Effects of the No Action Alternative

Under the No Action Alternative, no redevelopment would occur at the Site and there would be no environmental justice effects.

3.17 Cumulative Impacts

As defined by CEQ Regulations in 40 CFR Part 1508.7, cumulative impacts are those which "result from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions, without regard to the agency (Federal or non-Federal) or individual who undertakes such other actions." Cumulative impact analysis captures the effects that result from the Proposed Action in combination with the effects of other actions taken during the duration of the Proposed Action in the same geographic area. Because of extensive influences of multiple forces, cumulative effects are the most difficult to analyze.

NEPA requires the analysis of cumulative environmental effects of a Proposed Action, or set of actions, on resources that may often be manifested only at the cumulative level, such as traffic congestion, air quality, noise, biological resources, cultural resources, socioeconomic conditions, utility system capacities, and others.

3.17.1 Effects of the Preferred Action Alternative

The Site is located within the northern portion of the Milwaukee VAMC campus and is surrounded by other portions of the campus. The Region of Influence (ROI) of the Proposed Action is small and mostly limited to the Milwaukee VAMC campus. The Milwaukee VAMC campus was initially established in the 1800s and is almost fully developed.

As Veterans' needs for health care services and the delivery of health care services evolve, VA constructs new facilities to meet its changing needs. As such, additional projects at the Milwaukee VAMC campus are being considered. However, no specific, near term development projects are planned for the Site area. Based on the nature of the project and the minor impacts associated with the Proposed Action, cumulative impacts as a result of the Proposed Action in combination with other Milwaukee VAMC projects would be less-than-significant.

The WisDOT provided a link to file information pertaining to an EIS completed for the I-94 East-West Corridor 70th Street to 16th Street Project (Corridor Project) dated January 2016 and a Record of Decision dated September 2016. A portion of the Corridor Project northerly adjoins the Milwaukee VAMC. As part of the Corridor Project, the Zablocki Drive bridge and the freeway entrance and exit ramps at the General Mitchell Boulevard interchange would be removed and replaced. The Corridor Project would not impact land associated with the Site, but would alter traffic flow to the Milwaukee VAMC campus. Based on the small increase of traffic anticipated to be generated from the Proposed Action, the cumulative transportation impacts with the Corridor Project would be less than significant.

3.17.2 Effects of the No Action Alternative

Under the No Action Alternative, the proposed Veteran housing developed would not be conducted and there would be no cumulative impacts.

3.18 Potential for Generating Substantial Public Controversy

As discussed in Section 4.0, VA has solicited input from various Federal, State, and local government agencies regarding the Proposed Action. Several of these agencies have provided input; none of the input has identified opposition or controversy related to the Proposed Action.

The Proposed Action is not anticipated to generate substantial controversy. The Milwaukee VAMC currently provides medical services for Veterans, and the Proposed Action would expand support services available to homeless Veterans in the community.

It is anticipated that the Proposed Action would receive considerable support from local historic preservation agencies and organizations, and others interested in preserving the historic structures at the Site. The Proposed Action would repair and rehabilitate these important structures and would maintain their historic integrity and character.

VA will publish and distribute the Draft EA for a 30-day public comment period. Based on the significant positive effects of the Proposed Action and the findings of this Draft EA (no significant adverse environmental impact), it is not anticipated that there will be substantial public controversy regarding the Proposed Action or Preferred Action Alternative.

SECTION 4: PUBLIC 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 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. A record of agency coordination and public involvement associated with this EA is provided in Appendix A and Appendix E.

4.1 Public Review

VA, as the proponent of the Proposed Action, will publish and distribute the Draft EA for a 30-day public comment period, as announced by a Notice of Availability (NOA) published in a local newspaper of general circulation (Milwaukee Journal Sentinel). Review copies of the Draft EA will be made available for public review at the Milwaukee VAMC and a local public library. VA will respond to provided comments within the Final EA.

4.2 Agency Coordination

In 2016, VA entered into a Section 106 Programmatic Agreement (PA) with the ACHP, the Wisconsin SHPO, and the NPS for undertakings at the Milwaukee VAMC campus that may affect the Historic District and Historic Landmark. Per the terms of the PA, in August 2016, VA initiated Section 106 consultation with the ACHP, NPS, Wisconsin SHPO, National Trust for Historic Preservation (NTHP), Milwaukee Preservation Alliance (MPA), and City of Milwaukee Historic Preservation Committee (MHPC) regarding the Proposed Action. Section 106 related documents are included as Appendix B and summarized in Section 3.4.

Agencies consulted for this EA include: US Fish and Wildlife Service (USFWS); US Environmental Protection Agency (USEPA); US Army Corps of Engineers (USACE); US Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS); Wisconsin Department of Natural Resources (WDNR); WDNR Environmental Management Division (EMD); WDNR Fish, Wildlife and Parks Division (FWPD); Wisconsin Department of Transportation (WisDOT); Milwaukee County Department of Transportation (MCDOT); Milwaukee Department of Public Works (MDPW); Milwaukee Department of City Development (MDCD); Milwaukee Department of Neighborhood Services (MDNS); and Milwaukee Water Works (MWW).

Responses were received from USEPA, USACE, WDNR, WisDOT, MDCD, and MWW. Input provided by these agencies is detailed and addressed in the appropriate resource sub-sections of Section 3. Written correspondence from the agencies is provided in Appendix A. The following summarizes that input, which VA used to focus this EA's analysis:

- USEPA provided general recommendations regarding preparation of the EA and the Proposed Action. USEPA recommended: implementing air quality BMPs during construction, including reducing diesel emissions; discussing how the Proposed Action may affect, positively or detrimentally, impaired streams; indicate whether wetlands or streams may be impacted; implementing erosion control by reseeding exposed soil with native plants and grasses; using energy efficient materials for renovations to the extent possible given the historic nature of the buildings, renewable energy, and permeable pavement for paved surfaces; reusing and recycling of construction materials; properly disposing hazardous materials generated during renovation activities (including asbestos and lead-containing materials); conducting radon

testing prior to renovations; and providing habitat for pollinators including planting native plant species.

- USACE indicated that they do not have any existing or currently planned projects for water resources in the Site vicinity and there are no proposed studies for the area. As such, USACE had no data related to environmental conditions in the Site area. USACE indicated the Site would be evaluated for permit considerations by the Brookfield Wisconsin Regulatory Field Office. USACE also stated the Site is located in an area where no Flood Insurance Rate Map panel is printed; however, the area is labeled as "No Special Flood Hazard Areas."

- The WDNR provided several files containing information related to environmental concerns, surface and groundwater resources, natural resources, soils and geologic data, socioeconomics, and air quality. WDNR indicated there is currently an active construction stormwater permit for Parking Lots 4 and 7 at the Milwaukee VAMC. Other files provided include documentation regarding USTs located near the main hospital (Building 111, approximately 1,600 feet south of the Site), the maintenance area (Buildings 107 and 20, approximately 400 feet east of the Site), the central boiler plant area (Buildings 112 and 45, approximately 500 feet southwest of the Site), and Building 123 (dormitories, over 2,000 feet southwest of the Site); hazardous/medical waste generation and management; and spills at the Milwaukee VAMC campus. None of the provided information is specific to the Site portion of the Milwaukee VAMC campus. WDNR also provided information regarding a State-threatened protected perennial flowering plant located on the Milwaukee VAMC campus. WDNR redacted the name of the plant species from its publicly available records to avoid disturbance of the population. Patches of the State-protected plant have been documented to be present within and around the wooded area of the campus near Miller Park. This wooded area is not part of the Site; however, it is located near Buildings 18, 19, 62 and 64. The patches of State-protected flowering plants have been marked by the Milwaukee VAMC Grounds Department and would be avoided during the implementation of the Proposed Action.

- WisDOT provided a link to file information pertaining to an EIS completed for the I-94 East-West Corridor 70th Street to 16th Street Project (Corridor Project) dated January 2016. A portion of the Corridor Project northerly adjoins the Milwaukee VAMC campus. As part of the Corridor Project, the freeway entrance and exit ramps at the General Mitchell Boulevard interchange would be removed and replaced by a new local road interchange under the Stadium Interchange, with a new frontage road that connects to General Mitchell Boulevard. A short segment of General Mitchell Boulevard would be reconstructed. Zablocki Drive would remain at its present location, and its bridge over I-94 would be replaced and raised, requiring reconstruction of short segments of Zablocki Drive on each side of the new bridge. The off-interstate improvements include upgrades at Miller Park Way/West National Avenue to provide for the additional traffic volumes.

- The MDCD indicated they do not have specific information to provide in regards to the Site and provided no comments regarding the Proposed Action.

- The MWW indicated they have no facilities within the VAMC campus and have no information or comments related to the Proposed Action.

4.3 Native American Consultation

In August 2016, VA invited nine Federally-recognized Native American tribes, identified as having possible ancestral ties to the Site area, to participate in Section 106 consultation for the Proposed Action. The Tribes include the following: Bad River Band of the Lake Superior Tribe of the Chippewa; Forest County Potawatomi Community; The Ho-Chunk Nation; Lac Courte Oreilles Band of Lake Superior Chippewa Indians; Lac du Flambeau Band of Lake Superior Chippewa Indians; Oneida Nation of Wisconsin; Sokaogon Chippewa Community; St. Croix Chippewa Indians of Wisconsin; and

Stockbridge-Munsee Community Band of Mohican Indians. None of the Tribes elected to participate in the Section 106 consultation.

SECTION 5: MANAGEMENT AND MITIGATION MEASURES

This section summarizes the management measures that are proposed to minimize and maintain potential adverse effects at acceptable, less-than-significant levels. No mitigation measures are required or proposed for the Proposed Action.

Per established protocols, procedures, and requirements, the VA developer would implement BMPs and would satisfy all applicable regulatory requirements in association with the design, construction, and operation of the proposed Veteran housing development at the Site. These "management measures" are described in this EA, and are included as components of the Preferred Action Alternative. "Management measures" are defined as routine BMPs and/or regulatory compliance measures that are regularly implemented as part of proposed activities, as appropriate, across Wisconsin. In general, implementation of such management measures would maintain impacts at acceptable levels for all resource areas analyzed. These are different from "mitigation measures," which are defined as project-specific requirements, not routinely implemented as part of development projects, necessary to reduce identified potentially significant adverse environmental impacts to less-than-significant levels.

5.1 Management Measures

The routine BMPs and management measures summarized in Table 3 would be included by the VA developer in the Preferred Action Alternative to minimize and maintain potential adverse effects at less-than-significant levels.

Table 3. Best Management Practices and Minimization Measures Incorporated into the Proposed Action

Technical Resource Area	Best Management Practice / Minimization Measure
Aesthetics	Complete Site building renovations in accordance with the Secretary of Interior's Standards for Rehabilitation to maintain historic integrity.
Air Quality	Use appropriate dust suppression methods (such as the use of water, dust palliative, covers, suspension of earth moving in high wind conditions) during onsite construction activities.
	Stabilize disturbed areas through re-vegetation or mulching if the area would be inactive for several weeks or longer.
	Implement measures to reduce diesel particulate matter (DPM) emissions from construction equipment, such as reducing idling time and using newer equipment with emissions controls.
	Remove asbestos containing materials (ACM) present within the Site buildings prior to conducting renovation activities that would disturb the materials in accordance with applicable regulations.

Table 3. Best Management Practices and Minimization Measures Incorporated into the Proposed Action

Technical Resource Area	Best Management Practice / Minimization Measure
Cultural Resources	Complete Section 106 consultation with the Advisory Council oh Historic Preservation (ACHP), National Park Service (NPS), Wisconsin State Historic Preservation Office (SHPO), National Trust for Historic Preservation (NTHP), Milwaukee Preservation Alliance (MPA), and the City of Milwaukee Historic Preservation Committee (MHPC) for each development phase of the project.
	Complete the Site building renovations in accordance with the Secretary of Interior's Standards for Rehabilitation, in coordination with SHPO and the NPS, to retain their historic integrity.
Geology, Topography, and Soils	Control soil erosion and sedimentation impacts during construction by implementing erosion prevention measures and complying with the Wisconsin NPDES permitting process (if construction activities disturb more than one acre of land). Implement stormwater runoff and erosion management control BMPs, such as earth berms, vegetative buffers and filter strips, reseeding exposed soils, and spill prevention and management techniques to protect surface water quality.
Hydrology and Water Quality	Use low impact development practices, to the extent practicable, during the project design to minimize stormwater runoff.
	Control soil erosion and sedimentation impacts during construction.
	Ensure the project design includes sufficient on-site stormwater management so as not to adversely affect the water quantity/quality in receiving waters and/or offsite areas.
Wildlife and Habitat	Ensure the project design includes a buffer of undisturbed land around the area(s) where the State-listed protected flowering plant species occurs near the Site (the vicinity of Buildings 18, 19, 62 and 64). Designate and mark no disturbance areas around the protected plants to prevent inadvertent incidental impacts during construction.
	Native species should be used to the extent practicable when re-vegetating land disturbed by construction to avoid the potential introduction of non-native or invasive species. Incorporate pollinator-suitable habitat where possible.
Noise	Limit, to the extent possible, construction and associated heavy truck traffic to occur between 8:00 a.m. and 9:00 p.m. (per Milwaukee Noise Ordinance) on Monday through Friday, or during normal, weekday, work hours.
	Locate stationary operating equipment as far away from sensitive receptors as possible.
	Select material transportation routes as far away from sensitive receptors as possible.
	Shut down noise-generating heavy equipment when it is not needed.
	Maintain equipment per manufacturer's recommendations to minimize noise generation.
	Encourage construction personnel to operate equipment in the quietest manner practicable (e.g., speed restrictions, retarder brake restrictions, engine speed restrictions, etc.).

Table 3. Best Management Practices and Minimization Measures Incorporated into the Proposed Action	
Technical Resource Area	**Best Management Practice/Minimization Measure**
Land Use	None required.
Wetlands, Floodplains, and Coastal Zone Management	None required.
Socioeconomics	None required.
Community Services	None required.
Solid and Hazardous Materials	Properly remove and dispose of ACM from the Site buildings prior to renovation activities by licensed asbestos abatement contractors.
	Properly remove and dispose of lead-based paint (LBP) and/or encapsulate LBP painted surfaces within the Site buildings during renovation activities by licensed contractors.
	Comply with applicable Federal and State laws governing the use, generation, storage, and transportation of solid and hazardous materials.
	If a previously unknown underground storage tank (UST) is during construction activities, it should be emptied and removed according to applicable Wisconsin regulations and guidelines.
Transportation and Parking	Ensure construction activities do not adversely affect traffic flow on local roadways; construction would be timed to avoid peak travel hours.
	Ensure debris and/or soil is not deposited on local roadways during the construction activities.
Utilities	Submit design plans to each utility provider to determine the specific replacement connection/extension requirements and implement the necessary requirements.
Environmental Justice	None required.

5.2 Mitigation Measures

No project-specific mitigation measures are require or proposed for the Preferred Action Alternative.

SECTION 6: SUMMARY AND CONCLUSIONS

This Draft EA evaluates the Proposed Action of VA to lease, through its EUL authority, an underused portion of the Clement J. Zablocki VA Medical Center (Milwaukee VAMC) located at 5000 West National Avenue in Milwaukee, Wisconsin for the development of affordable housing for Veterans who are homeless or at risk of becoming homeless. This EA discusses two alternatives: (1) *Preferred Action Alternative* – Entering into a long-term EUL agreement with a developer for the renovation of seven mostly vacant buildings (Buildings 1, 2, 14, 18, 19, 62 and 64) and the surrounding land (total of approximately four acres) in the northern portion of the Milwaukee VAMC campus for the development of affordable Veteran housing; and (2) the *No Action Alternative*. The EA evaluates possible effects 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; and environmental justice.

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Milwaukee Code of Ordinances: http://city.milwaukee.gov/cityclerk/ordinances

Milwaukee County: http://county.milwaukee.gov/

Milwaukee County Transit System: https://www.ridemcts.com/

Milwaukee Public Schools: http://mps.milwaukee.k12.wi.us/en/home.htm

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US Army Corps of Engineers: http://www.usace.army.mil

US Bureau of Census (2000 and 2010 US Census Data): http://www.census.gov

USDA NRCS Web Soil Survey: https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx

US Environmental Protection Agency: https://www.epa.gov

US Fish and Wildlife Service: https://www.fws.gov

US Geological Survey: https://store.usgs.gov/map-locator, https://earthquake.usgs.gov/earthquakes/map/

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Wisconsin Department of Transportation: http://wisconsindot.gov/Pages/home.aspx

SECTION 9: LIST OF ACRONYMS AND ABBREVIATIONS

AADT	Annual Average Daily Traffic
ACHP	Advisory Council on Historic Preservation
ACM	Asbestos-containing materials
AHAR	Annual Homeless Assessment Report
amsl	above mean sea level
BEA	Bureau of Economic Analysis
BMP	Best Management Practice
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CEQ	President's Council on Environmental Quality
CFR	Code of Federal Regulations
CMA	Coastal Management Area
CO	Carbon monoxide
CZMA	Coastal Zone Management Act
DoD	Department of Defense
DPM	Diesel particulate matter
EA	Environmental Assessment
EIS	Environmental Impact Statement
EJSCREEN	USEPA Environmental Justice Screening Application
EMD	Environmental Management Division
EO	Executive Order
ESA	Environmental Site Assessment
EUL	Enhanced-Use Lease
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
FWPD	Fish, Wildlife and Parks Division
GHG	Greenhouse gas
HUD	US Department of Housing and Urban Development
IPaC	USFWS Information for Planning and Conservation
LBP	Lead-based paint
LOS	Level of Service
MBTA	Migratory Bird Treaty Act
MCDOT	Milwaukee County Department of Transportation
MCLWRMP	Milwaukee County Land and Water Resource Management Plan
MCTS	Milwaukee County Transit System
MDCD	Milwaukee Department of City Development
MDNS	Milwaukee Department of Neighborhood Services
MDPW	Milwaukee Department of Public Works
MHPC	Milwaukee Historic Preservation Committee
MPA	Milwaukee Preservation Alliance
MPS	Milwaukee Public Schools
MWW	Milwaukee Water Works
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act
NHDVS	National Home for Disabled Volunteer Soldiers
NOA	Notice of Availability
NO_X	Nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places
NTHP	National Trust for Historic Preservation
NWI	National Wetlands Inventory
O_3	Ozone
PA	Programmatic Agreement
Pb	Lead
PM	Particulate Matter
$PM_{2.5}$	Particulate matter less than or equal to 2.5 micrometers in aerodynamic size
PM_{10}	Particulate matter less than or equal to 10 micrometers in aerodynamic size
REC	Recognized Environmental Condition
ROI	Radius of Influence
SHPO	Wisconsin Historical Society (State Historic Preservation Office)
SIP	State Implementation Plan
SWPPP	Stormwater Pollution Prevention Plan
TTL	TTL Associates, Inc.
US	United States
USACE	US Army Corps of Engineers
USC	United States Code
USDA	US Department of Agriculture
USEPA	US Environmental Protection Agency
USFWS	US Fish and Wildlife Service
USGS	US Geological Survey
UW	University of Wisconsin
VA	Department of Veterans Affairs

VAMC	VA Medical Center
WCMP	Wisconsin Coastal Management Program
WDNR	Wisconsin Department of Natural Resources
WisDOT	Wisconsin Department of Transportation
WSSAS	West Side Soldier's Aid Society

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Forest County Potawatomi Community

The Ho-Chunk Nation

Lac Courte Oreilles Band of Lake Superior Chippewa Indians

Lac du Flambeau Band of Lake Superior Chippewa Indians

Oneida Nation of Wisconsin

Sokaogon Chippewa Community

St. Croix Chippewa Indians of Wisconsin

Stockbridge-Munsee Community Band of Mohican Indians

SECTION 11: LIST OF ENVIRONMENTAL PERMITS REQUIRED

11.1 Regulatory Framework

This EA has been prepared under the provisions of, and in accordance with the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, and 38 CFR Part 26. In addition, the EA has been prepared as prescribed in VA's NEPA Interim Guidance for Projects (VA 2010). Federal, State, and local laws and regulations specifically applicable to this Proposed Action are specified, where appropriate, within this EA, and include:

- Advisory Council on Historic Preservation Regulations, Protection of Historic and Cultural Properties (36 CFR 800).
- Coastal Zone Management Act (16 USC 1451 ET SEQ, AMENDED BY PL 101¬508).
- Endangered Species Act (ESA) of 1973, as amended (7 USC 136; 16 USC 1531 et seq.).
- EPA Regulations on Determination of Reportable Quantities for Hazardous Substances (40 CFR 117).
- Executive Order 11988, *Floodplain Management* (24 May 1977).
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- Executive Order 13514/Energy Independence Security Act (EISA) Section 438.
- Executive Order 13423, *Strengthening Federal Environmental, Energy, and Transportation Management* (24 January 2007).
- Executive Order 13514, *Federal Leadership in Environmental, Energy, and Economic Performance* (5 October 2009).
- Farmland Protection Policy Act (FPPA) (7 USC 4201, *et seq*.)
- Federal Clean Air Act (CAA) of 1990 (42 USC 7401 *et seq*., as amended).
- Federal Clean Water Act (Federal Water Pollution Control Act) of 1948, as amended (1972, 1977) (33 USC 1251 *et seq*.); Sections 401 and 404.
- Final Guidance for Federal Departments and Agencies on Consideration of Greenhouse Gas Emissions and the Effects of Climate Change in National Environmental Policy Act Reviews.
- Mandatory Reporting of Greenhouse Gases Rule (74 FR 56260).
- Migratory Bird Treaty Act (MBTA; 16 USC 703-712, 3 July 1918; as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986, and 1989).
- Native American Graves Protection and Repatriation Act, as amended (NAGPRA) (25 USC 3001 et seq.).

- National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800).
- Noise Control Act of 1972.
- Wisconsin Pollution Discharge Elimination System. EPA Regulations on the National Pollutant Discharge Elimination System (40 CFR 122).
- City of Milwaukee Code of Ordinances.

11.2 Environmental Permits Required

In addition to the regulatory framework of the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, 38 CFR Part 26, and VA's *NEPA Interim Guidance for Projects,* the following Federal, State, and/or local environmental permits are required as part of this Proposed Action, and include:

- Wisconsin Pollution Discharge Elimination System (if earthwork should exceed 1 acre).

SECTION 12: GLOSSARY

100-Year Flood – A flood event of such magnitude that it occurs, on average, every 100 years; this equates to a one percent chance of its occurring in a given year.

Aesthetics – Pertaining to the quality of human perception of natural beauty.

Ambient - The environment as it exists around people, plants, and structures.

Ambient Air Quality Standards - Those standards established according to the CAA to protect health and welfare (AR 200-1).

Aquifer - An underground geological formation containing usable amounts of groundwater which can supply wells and springs.

Asbestos - Incombustible, chemical-resistant, fibrous mineral forms of impure magnesium silicate used for fireproofing, electrical insulation, building materials, brake linings, and chemical filters. Asbestos is a carcinogenic substance.

Attainment Area - Region that meets the National Ambient Air Quality Standard (NAAQS) for a criteria pollutant under the CAA.

Bedrock - The solid rock that underlies all soil, sand, clay, gravel and loose material on the earth's surface.

Best Management Practices (BMPs) - Methods, measures, or practices to prevent or reduce the contributions of pollutants to U.S. waters. Best management practices may be imposed in addition to, or in the absence of, effluent limitations, standards, or prohibitions (AR 200-1).

Commercial land use – Land use that includes private and public businesses (retail, wholesale, etc.), institutions (schools, churches, etc.), health services (hospitals, clinics, etc.), and military buildings and installations.

Compaction - The packing of soil together into a firmer, denser mass, generally caused by the pressure of great weight.

Contaminants - Any physical, chemical, biological, or radiological substances that have an adverse effect on air, water, or soil.

Council on Environmental Quality (CEQ) - An Executive Office of the President composed of three members appointed by the President, subject to approval by the Senate. Each member shall be exceptionally qualified to analyze and interpret environmental trends, and to appraise programs and activities of the Federal Government. Members are to be conscious of and responsive to the scientific, economic, social, aesthetic, and cultural needs of the Nation; and to formulate and recommend national policies to promote the improvement of the quality of the environment.

Criteria Pollutants - The CAA of 1970 required the USEPA to set air quality standards for common and widespread pollutants in order to protect human health and welfare. There are six "criteria pollutants": ozone (O_3), carbon monoxide (CO), sulfur dioxide (SO_2), lead (Pb), nitrogen dioxide (NO_2), and particulate matter.

Cultural Resources - The physical evidence of our Nation's heritage. Included are: archaeological sites; historic buildings, structures, and districts; and localities with social significance to the human community.

Cumulative Impact - The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).

Decibel (dB) - A unit of measurement of sound pressure level.

Direct Impact - A direct impact is caused by a Proposed Action and occurs at the same time and place.

Emission - A release of a pollutant.

Endangered Species - Any species which is in danger of extinction throughout all or a significant portion of its range.

Environmental Assessment (EA) - An EA is a publication that provides sufficient evidence and analyses to show whether a proposed system will adversely affect the environment or be environmentally controversial.

Erosion - The wearing away of the land surface by detachment and movement of soil and rock fragments through the action of moving water and other geological agents.

Agricultural land - Cropland, pastures, meadows, and planted woodland.

Fauna - Animal life, especially the animal characteristics of a region, period, or special environment.

Flora - Vegetation; plant life characteristic of a region, period, or special environment.

Floodplain - The relatively flat area or lowlands adjoining a river, stream, ocean, lake, or other body of water that is susceptible to being inundated by floodwaters.

FONSI - Finding of No Significant Impact, a NEPA document.

Fugitive Dust - Particles light enough to be suspended in air, but not captured by a filtering system. For this document, this refers to particles put in the air by moving vehicles and air movement over disturbed soils at construction sites.

Geology - Science which deals with the physical history of the earth, the rocks of which it is composed, and physical changes in the earth.

Groundwater - Water found below the ground surface. Groundwater may be geologic in origin and as pristine as it was when it was entrapped by the surrounding rock or it may be subject to daily or seasonal effects depending on the local hydrologic cycle. Groundwater may be pumped from wells and used for drinking water, irrigation, and other purposes. It is recharged by precipitation or irrigation water soaking into the ground. Thus, any contaminant in precipitation or irrigation water may be carried into groundwater.

Hazardous Substance - Hazardous materials are defined within several laws and regulations to have certain meanings. For this document, a hazardous material is any one of the following:

Any substance designated pursuant to section 311 (b)(2)(A) of the Clean Water Act.

Any element, compound, mixture, solution, or substance designated pursuant to Section 102 of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Any hazardous substance as defined under the Resource Conservation and Recovery Act (RCRA).

Any toxic pollutant listed under TSCA.

Any hazardous air pollutant listed under Section 112 of CAA.

Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to Subsection 7 of TSCA.

The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance in a above. 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). A list of hazardous substances is found in 40 CFR 302.4.

Hazardous Waste - A solid waste which, when improperly treated, stored, transported, or disposed of, poses a substantial hazard to human health or the environment. Hazardous wastes are identified in 40 CFR 261.3 or applicable foreign law, rule, or regulation.

Hazardous Waste Storage - As defined in 40 CFR 260.10, ". . . the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere".

Hydric Soil - A soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic (oxygen-lacking) conditions that favor the growth and regeneration of hydrophytic vegetation. A wetland indicator.

Indirect Impact - An indirect impact is caused by a Proposed Action that occurs later in time or farther removed in distance, but is still reasonably foreseeable. Indirect impacts may include induced changes in the pattern of land use, population density or growth rate, and related effects on air, water, and other natural and social systems. For example, referring to the possible direct impacts described above, the clearing of trees for new development may have an indirect impact on area

wildlife by decreasing available habitat.

Industrial Land Use – Land uses of a relatively higher intensity that are generally not compatible with residential development. Examples include light and heavy manufacturing, mining, and chemical refining.

Isolated Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, but do not have a direct connection to the Waters of the US.

Jurisdictional Wetland – Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, and have a direct connection to the Waters of the US. These wetlands are regulated by the USACE.

Listed Species - Any plant or animal designated as a State or Federal threatened, endangered, special concern, or candidate species.

Mitigation - Measures taken to reduce adverse impacts on the environment.

San Antonio Sources - Vehicles, aircraft, watercraft, construction equipment, and other equipment that use internal combustion engines for energy sources.

Monitoring - A process of inspecting and recording the progress of mitigation measures implemented.

National Ambient Air Quality Standards (NAAQS) - Nationwide standards set up by the USEPA for widespread air pollutants, as required by Section 109 of the Clean Air Act (CAA). Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), ozone (O_3), particulate matter, and sulfur dioxide (SO_2).

National Environmental Policy Act (NEPA) - U.S. statute that requires all Federal agencies to consider the potential effects of Proposed Actions on the human and natural environment.

Non-attainment Area - An area that has been designated by the EPA or the appropriate State air quality agency as exceeding one or more National or State ambient air quality standards.

Parcel - A plot of land, usually a division of a larger area.

Particulates or Particulate Matter - Fine liquid or solid particles such as dust, smoke, mist, fumes, or smog found in air.

Physiographic Region - A portion of the Earth's surface with a basically common topography and common morphology.

Pollutant - A substance introduced into the environment that adversely affects the usefulness of a resource.

Potable Water - Water which is suitable for drinking.

Prime Agricultural land - A special category of highly productive cropland that is recognized and described by the US Department of Agriculture's Soil Conservation Service and receives special protection under the Surface Mining Law.

Remediation - A long-term action that reduces or eliminates a threat to the environment.

Riparian Areas - Areas adjacent to rivers and streams that have a high density, diversity, and productivity of plant and animal species relative to nearby uplands.

River Basin - The land area drained by a river and its tributaries.

Sensitive Receptors - Include, but are not limited to, asthmatics, children, and the elderly, as well as specific facilities, such as long-term health care facilities, rehabilitation centers, convalescent centers, retirement homes, residences, schools, playgrounds, and childcare centers.

Significant Impact - According to 40 CFR 1508.27, "significance" as used in NEPA requires consideration of both context and intensity.

Context. The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the Proposed Action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.

Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

Small quantity generator - A generator who generates greater than 220 pounds but less than 2,200 pounds of hazardous waste in a calendar month and who does not accumulate more than 13,200 pounds of hazardous waste at any one time (if either threshold is exceeded, the generator becomes a large quantity generator). A small quantity generator may accumulate hazardous waste up to 180 days from the accumulation start date.

Soil - The mixture of altered mineral and organic material at the earth's surface that supports plant life.

Solid Waste - Any discarded material that is not excluded by section 261.4(a) or that is not excluded by variance granted under sections 260.30 and 260.31.

Threatened species - Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

Topography - The relief features or surface configuration of an area.

Toxic Substance - A harmful substance which includes elements, compounds, mixtures, and materials of complex composition.

Waters of the United States - Include the following: (1) All waters which are currently being used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide. (2) All interstate waters including interstate wetlands. (3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds; the use, degradation or destruction of which could affect interstate or foreign commerce.

Watershed - The region draining into a particular stream, river, or entire river system.

Wetlands - Areas that are regularly saturated by surface or groundwater and, thus, are characterized by a prevalence of vegetation that is adapted for life in saturated soil conditions. Examples include swamps, bogs, fens, marshes, and estuaries.

Wildlife Habitat - Set of living communities in which a wildlife population lives.

APPENDIX A

AGENCY CORRESPONDENCE

APPENDIX B

SECTION 106 CORRESPONDENCE

APPENDIX C

PHOTOGRAPH LOGS

APPENDIX D

OTHER RELEVANT ENVIRONMENTAL DATA

APPENDIX E

PUBLIC NOTICES AND COMMENTS