

FINDING OF NO SIGNIFICANT IMPACT (FONSI)
U.S. DEPARTMENT OF VETERANS AFFAIRS
Proposed Demolition of the CLC Building D at the
U.S. Department of Veterans Affairs Atlanta Medical Center
Decatur, DeKalb County, Georgia

1.0 Introduction

The U.S. Department of Veterans Affairs (VA) completed an Environmental Assessment (EA), included herein by reference in its entirety, to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts to the human environment associated with the Proposed Action to demolish the Community Living Center (CLC) Building D (CLC Building) at the Atlanta VA Medical Center (Atlanta VAMC) located at 1670 Clairmont Road, Decatur, DeKalb County, Georgia.

The Atlanta VAMC provides healthcare services to approximately 130,000 Veterans residing in over 50 counties in northern Georgia. The CLC Building is a VA Nursing Home that provides short to long-term care options for Veterans in need. Constructed in 1979, the CLC Building no longer meets VA's current building requirements or desired design for providing optimal Veteran care.

Thus, the *purpose* of the Proposed Action is to demolish the CLC Building. The Proposed Action is *needed* to provide the Atlanta VAMC with a future opportunity to construct a new facility/facilities in the former building area that would meet modern VA building requirements and better serve Veterans in northern Georgia.

If the Proposed Action is not implemented, the CLC Building would be maintained in its current outdated condition. Additionally, there would not be an opportunity to utilize the area for a new facility/facilities that would better serve Veterans in northern Georgia.

The EA was prepared 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] Parts 1500-1508), and VA's NEPA implementing regulations, 38 CFR Part 26 (Environmental Effects of the U.S. Department of Veterans Affairs Actions).

2.0 Background

The Atlanta VAMC is located in a densely developed mixed residential/commercial corridor along Clairmont Road in the city of Decatur and the greater Atlanta metropolitan area. The Atlanta VAMC is approximately 8 miles northeast of downtown Atlanta.

Situated on 26 acres, the Atlanta VAMC began serving Veterans in 1966, utilizing a 10-story, 580-bed hospital building. Upon its opening, the Atlanta VAMC operated as a general medical and surgical hospital with extensive outpatient services. Currently, approximately 21.5 acres of the Atlanta VAMC have been developed. The Atlanta VAMC facilities offer a diverse assortment of services to Veterans in northwestern Georgia. The Atlanta VAMC currently provides 466 in-patient beds, a 40-bed domiciliary, and a 21-bed Residential Treatment Program.

The CLC Building is a three-story structure with a footprint of approximately 0.7 acres, located in the southeastern portion of the Atlanta VAMC and provides approximately 120 beds to eligible Veterans.

3.0 Description of Proposed Action and Alternatives

3.1 Proposed Action

Under the Proposed Action, VA would implement the demolition of the CLC Building at the Atlanta VAMC. Prior to demolition, all furniture and fixtures would be removed from the building, and regulated hazardous building materials (e.g. asbestos, lead-based paint) would be abated. All utilities within the CLC

Building would be disconnected and capped, and measures taken, if necessary, to reroute any utilities to avoid service disruptions elsewhere at the campus or surrounding area. National Pollutant Discharge Elimination System (NPDES) permit-required soil erosion control and stormwater management measures would be installed and maintained throughout the demolition and ground-restoration phasing. Proper dust minimization controls would be implemented during demolition, including the use of dust palliatives and water spray. Additional air quality controls would be implemented to include the use of Tier 4-compliant engines or similar technology on heavy construction machinery. Noise minimization measures would be employed, including the use of engine mufflers and idling restrictions, as well as limiting work to normal weekday hours. Safety measures would be employed to include fencing and signage around the construction area to ensure the safety of workers, staff, and visitors; these controls would be maintained throughout the construction phase.

The physical demolition phase of the building massing would then proceed for approximately 4 months. Excavators with hydraulic thumbs would then be used to carefully dismantle the building and its footings. During demolition, all debris would be loaded into dump trailers for off-site recycling (for concrete, metal, glass, wood), while non-recyclable or non-reusable material would be landfilled as construction debris.

Following demolition, the site would be graded and revegetated to match the surrounding area. The site would then be maintained as part of the existing Atlanta VAMC landscaping program.

The staff and Veterans who utilize the CLC Building would be temporarily relocated to other facilities within the Atlanta VAMC until permanent facilities are developed in place of the CLC Building.

Completion of the Proposed Action would occur over a period of approximately 12 months.

The Proposed Action would provide VA with a potential future opportunity to construct a new facility/facilities that meet modern standards for care and better serve Veterans in northern Georgia. Therefore, the Proposed Action would meet the purpose and need for action. No other reasonable action alternatives were carried forward for this EA.

3.2 No Action Alternative

In addition to the Proposed Action, VA evaluated a No Action Alternative as part of this EA as required by CEQ (40 CFR 1502.14). The No Action Alternative reflects the status quo and provides a comparative baseline against which to analyze the effects of the Proposed Action.

Under the No Action Alternative, the Proposed Action would not be implemented. The CLC Building would not be demolished. Services would continue in an outdated facility and would not meet VA's current standards for care. Existing conditions at the Atlanta VAMC would remain unchanged for the foreseeable future. VA would be impeded in its ability to construct a new facility/facilities in place of the CLC building that would better serve the Veteran population of northwestern Georgia. Thus, the No Action Alternative would not meet the purpose and need for action.

4.0 Environmental Analysis

As documented in the EA incorporated herein in its entirety, the Proposed Action would have no adverse or beneficial impact on geology, topography, wetlands, floodplains, surface water resources, coastal zone management, wildlife and habitat, or land use and zoning; therefore, these topics are excluded from the following summary. Additionally, implementing the Proposed Action is anticipated to be perceived as a positive development within the community and therefore would not generate substantial public controversy.

Aesthetics. Short-term, less-than-significant adverse impacts could occur to aesthetics due to the presence of heavy construction equipment, and unfinished stages of demolition which would impact the appearance of finished portions of the Atlanta VAMC. Demolition would also have the potential to release fugitive dust and fine particulate emissions. To minimize these potential impacts, demolition areas would be visually obscured by temporary fabric-covered privacy fencing, water trucks would be used to minimize fugitive

dust emissions, and gravel-covered pads would be installed at the construction exits to remove loose soil from equipment exiting on the construction site.

Air Quality. Short-term, negligible adverse impacts on air quality would occur from operating diesel-fueled construction equipment during demolition of the CLC Building. To minimize adverse impacts, construction equipment would be maintained in good working order, idling would be limited to less than three minutes, best management practices (BMPs) to suppress dust and stabilize exposed soils would be implemented to further minimize particulate emissions, and contractors would use equipment with Tier 4-compliant engines to the extent practicable to reduce emissions of particulate matter and nitrogen oxides. All anticipated emissions would be below the National Ambient Air Quality Standards General Conformity Rule *de minimus* thresholds.

Cultural Resources. The CLC Building was constructed in 1979 and is not 50 years old and does not have any architectural significance. Archeological resources are not anticipated to be encountered because the site is heavily disturbed and developed. The Proposed Action incorporates an inadvertent discovery plan to further avoid impacts to any archaeological resources encountered. VA has initiated Section 106 consultation with the State Historic Preservation Office Concurrence and requested concurrence with a finding of no adverse impact.

Soils. Short-term, less-than-significant adverse impact on soils could occur due to the increased potential for soil erosion and sedimentation of stormwater run-off. These potential impacts would be minimized by implementing NPDES-permit required BMPs specified in an Erosion, Sedimentation, and Pollution Control Plan.

Noise. Short-term, less-than-significant adverse impacts to sensitive noise receptors could occur due to noise generated from heavy construction equipment used for demolition of the CLC Building. Noise impacts would be minimized by providing construction workers with hearing protection, equipping construction equipment with appropriate sound-muffling devices, and limiting construction equipment engine idling to less than three minutes.

Socioeconomics. Short-term, less-than-significant beneficial impacts on socioeconomics could occur through the employment of local skilled and non-skilled workers and their utilization of area lodging and other services, and the employment and spending on equipment, supplies, and local services.

Community Services. Short-term, moderate adverse impacts on Veterans seeking access to a VA Nursing Home in northern Georgia would occur until such time that a replacement facility is placed in service. No impacts to other community services (e.g. police, fire, medical, schools, housing) would occur.

Solid Waste and Hazardous Materials. All regulated building materials (e.g. asbestos, lead-based paint) would be abated and disposed of off-site prior to building demolition. The Proposed Action would have a long-term beneficial impact from the removal of asbestos-containing materials from the Atlanta VAMC. Short-term, negligible adverse impacts could occur from the increase in the volume of non-hazardous construction debris solid waste from the building demolition. Demolition debris would be transported off-site to the nearest licensed landfill with available capacity for disposal.

Transportation and Parking. Short-term, negligible adverse impacts on transportation and parking could occur during demolition of the CLC Building due to the temporary increase in the number of vehicles (including both construction and worker vehicles) entering and exiting the Atlanta VAMC and the temporary closure of parking lots adjacent to the CLC Building. However, following demolition and site restoration, these parking lots would be returned to service.

Utilities. Short-term, less-than-significant adverse impact to stormwater conditions could occur due to sedimentation of stormwater runoff during demolition of the CLC Building. To minimize impacts, the

Proposed Action would comply with the *Energy Independence and Security Act* Section 438 Stormwater Management for Federal Facilities and employ NPDES-permit required BMPs.

5.0 Cumulative Impacts

Impacts from implementing the Proposed Action, in combination with those from past, present, and future developments (outlined in DeKalb County's 2021 Comprehensive 5-year Plan (DeKalb County, 2021)) at and in the vicinity of the Atlanta VAMC are not expected to increase impacts to a significant adverse level for any of the environmental resource topics analyzed in this EA.

6.0 Agency and Public Comment

VA notified relevant federal, state, and local agencies to allow them sufficient time to make known their environmental concerns that are specific to this Proposed Action. Upon the release of the Draft EA, VA mailed letters to notify the federal, state, and local agencies of the opportunity to review the Draft EA and provide comments during a 30-day review period. VA also made the Draft EA available for public comment during the 30-day review period. A Notice of Availability announcing the release of the Draft EA was published in the DeKalb County Public Library Decatur Branch at 215 Sycamore Street, Decatur, GA 30030; and available for electronic download from the VA website:

<https://www.atlanta.va.gov/news/index.asp>.

7.0 Finding of No Significant Impact

As a result of the analysis of impacts presented in the EA, summarized and incorporated in its entirety by reference herein, it is the conclusion of VA that, with the implementation of appropriate management, avoidance, and regulatory compliance measures, the Proposed Action would not generate significant public controversy and would cause no significant adverse impact on the human environment within the meaning of Section 102(2)(C) of the *National Environmental Policy Act* of 1969. Therefore, per the NEPA, the CEQ regulations, and 38 CFR Part 26, I am signing this FONSI and confirm that preparation of an Environmental Impact Statement for the Proposed Action is not required.



Mr. Troy Martinson, PE
Chief, Engineering Service
Atlanta VA Health Care System

12/16/2021
Date



Ann R. Brown, FACHE
Director
Atlanta VA Health Care System

12/20/21
Date

FINAL

**Environmental Assessment for the
Proposed Demolition of the CLC Building D at the
U.S. Department of Veterans Affairs Atlanta Medical Center
1670 Clairmont Road, Decatur, DeKalb County, Georgia**



US Department of Veterans Affairs

**Atlanta VA Health Care System
1670 Clairmont Drive
Decatur, GA 30033**

December 2021

EXECUTIVE SUMMARY

In this Environmental Assessment (EA), the U.S. Department of Veterans Affairs (VA) identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with the Proposed Action to demolish the Community Living Center (CLC) Building D (CLC Building) at the Atlanta VA Medical Center (Atlanta VAMC) located at 1670 Clairmont Road, Decatur, DeKalb County, Georgia.

The Atlanta VAMC covers approximately 26 acres, of which approximately 21.5 acres are currently developed with medical facilities and supporting infrastructure. The Atlanta VAMC opened in 1966 and currently provides healthcare services to approximately 130,000 Veterans residing in over 50 counties in northern Georgia.

The Atlanta VAMC CLC Building serves as a VA nursing home. Due to its age, the CLC Building no longer meets VA's current building requirements or desired design for providing optimal Veteran care. However, the Atlanta VAMC lacks available space for a new facility. Thus, VA identified the demolition of the existing CLC Building as the most cost effective and efficient alternative to provide future space for a potential future facility/facilities that would better meet VA standards for care and better serve Veterans in northern Georgia.

Purpose and Need

The *purpose* of the Proposed Action is to demolish the CLC Building. The Proposed Action is *needed* to provide the Atlanta VAMC with development space for a potential future facility that would better comply with modern VA building standards for modes of care at the Atlanta VAMC.

Alternatives

VA prepared this EA to evaluate the potential impacts of implementing the Proposed Action. This EA also evaluates the potential impact of a "No Action" alternative, defined as not implementing the Proposed Action and maintaining the conditions of the CLC Building as it currently exists at the Atlanta VAMC. The No Action alternative also provides a baseline for comparison of potential impacts against which the Proposed Action can be evaluated. These two alternatives are summarized below:

- The **Proposed Action** is the demolition of the CLC Building at the Atlanta VAMC. Under the Proposed Action, the CLC Building would be demolished, and the area of the former footprint would be graded and revegetated. Completion of the Proposed Action would occur over a period of approximately 12 months. The Proposed Action would provide VA with a future opportunity to construct a new facility/facilities in the former building area that would meet modern VA building requirements. Thus, the Proposed Action meets the purpose and need for action. The potential construction of a future facility/facilities in place of the CLC Building would be evaluated by VA under a separate NEPA analysis prior to implementing any future facility construction.
- The **No Action** alternative is to maintain the CLC Building in its current condition, which does not meet current VA building requirements or standards for care. There would not be an opportunity to utilize the area for a new facility/facilities that would better serve Veterans. Thus, the No Action alternative does not meet the purpose and need for action.

Affected Environment and Environmental Consequences

The following table summarizes the potential environmental impacts associated with implementing the Proposed Action or the No Action alternative.

Resource / Issue	Proposed Action	No Action
Aesthetics	Short-term, less-than-significant adverse impact during construction due to the use and presence of heavy construction equipment for building demolition and removal of demolition debris.	None.
Air Quality	Short-term, negligible adverse impact from operating construction equipment and construction vehicle emissions, as well as fugitive dust generation, during demolition.	None.
Cultural and Historical Resources	Less-than-significant adverse impacts from inadvertently encountering previously unknown cultural resources at grounds within the building footprint. Implementation of an inadvertent discovery plan and protocols would maintain potential impacts at less-than-significant adverse levels.	None.
Geology, Topography, and Soils	Short-term, less-than-significant adverse impact on soil due to potential erosion of exposed soil during demolition. Impacts minimized through NPDES permit-required BMPs. No impact to geology or topography.	None.
Water Resources and Floodplains	No impact to surface water or groundwater resources; there are no surface water bodies within the Proposed Action area, and groundwater would not be encountered during demolition due to depth below grade. CLC Building is partially located within 1% annual floodplain, but demolition would not induce flooding; demolition would also increase pervious surfaces and infiltration capacity of the grounds. The Atlanta VAMC also maintains and operates pump ducts and floodgates to minimize flooding throughout the Atlanta VAMC.	None.
Wetlands and Coastal Zone Management	No impact to wetlands or coastal zone resources. The Proposed Action site contains no wetlands and is not within a coastal zone management area	None.
Habitat and Wildlife	No impact to habitat or wildlife. The Proposed Action site is fully developed, landscaped, and contains no supportive habitat for listed species.	None.

Resource / Issue	Proposed Action	No Action
Utilities	Short-term negligible impact. Utility disconnections to the CLC Building would be coordinated with utility service providers to avoid service interruptions. Utilities to the site would remain capped until any potential future development occurs.	None.
Noise	Short-term, less-than-significant adverse impact to existing soundscape due to increased noise generated from construction equipment and building demolition. Impacts would be limited to visitors, staff, and on-site construction workers.	None.
Transportation and Parking	Short-term, negligible adverse impact on transportation and parking due to temporarily removal of parking spaces surrounding the CLC Building and rerouting traffic away from the immediate building footprint during demolition. The Atlanta VAMC has excess parking capacity. Parking spaces around the former building and be reopened following demolition.	None.
Socioeconomics	Short-term, less-than-significant beneficial impact on the local economy from expenditures for construction equipment, material supplies, lodging, and potential hiring of local construction workers.	None.
Community Services	Short-term, moderate adverse impact on Veterans seeking access to a VA Nursing Home in northern Georgia.	The No Action alternative would have short-term beneficial impacts by retaining the CLC function, but adverse impacts over the long-term due to the inadequate design of the building and inability to meet modern modes for care.
Solid Waste and Hazardous Materials	Short-term, negligible adverse impact from generation of construction debris. Long-term beneficial impact from removal of asbestos and other regulated building materials from the campus.	Asbestos would remain at the CLC Building, requiring continual management to prevent exposure hazards.

Resource / Issue	Proposed Action	No Action
Environmental Justice	No impact; no environmental justice communities within area.	None.
Land Use	No impact. The Proposed Action area is within the Atlanta VAMC property, owned by the federal government, and designated for hospital/medical use.	None.
Potential for Generating Substantial Controversy	The Proposed Action is anticipated to be accepted in the community because it would provide VA with the opportunity to construct a potential future facility that would better serve the needs of Veterans in northern Georgia.	The community may become concerned overtime that the VA CLC Building is not improved to meet current VA building standards or modes for care.

Agency and Public Involvement

During development of the Draft EA, VA notified stakeholders, including elected officials, relevant federal, state, and local agencies, and Native American Tribes, about the Proposed Action and requested stakeholder’s input on environmental concerns specific to this Proposed Action. No comments were received.

VA then completed the Draft EA and published a Notice of Availability (NOA) in the *Atlanta Journal-Constitution* on November 14, 15 and 16, 2021, to announce the opportunity to review the Draft EA and provide comments during a 30-day review period. The Draft EA was available for review in print at the DeKalb County Public Library Decatur Branch at 215 Sycamore Street, Decatur, GA 30030; and in electronic format from VA’s website at <https://www.atlanta.va.gov/news/index.asp>. VA also mailed the NOA to stakeholders to inform them about the Draft EA 30-day review period. No comments on the Draft EA were received from the public or stakeholders during the review period.

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APPENDICES

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Acronyms and Abbreviations

AADT	Annual Average Daily Traffic
ACM	Asbestos-Containing Materials
AIRFA	<i>American Indian Religious Freedom Act of 1987</i>
AMSL	Above Mean Sea Level
APE	Area of Potential Effect
ARPA	Archaeological Resource Protection Act of 1979
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CHP	Combined Heat and Power
CLC	Community Living Center
CO	Carbon Monoxide
CY	Cubic Yard
CZMA	Coastal Zone Management Act
EA	Environmental Assessment
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act
EO	Executive Order
ES&PC	Erosion, Sedimentation, and Pollution Control
FEMA	Federal Emergency Management Agency
FONSI	Finding of No Significant Impact
GA	Georgia
GAEPD	Georgia Environmental Protection Division
GCMP	Georgia Coastal Management Program
GCR	General Conformity Rule
GDOT	Georgia Department of Transportation
HUD	U.S. Department of Housing and Urban Development
lbs	Pounds
MARTA	Metropolitan Atlanta Rapid Transit Authority
µg/m ³	Micrograms per cubic meter
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO ₂	Nitrogen Dioxide
NOA	Notice of Availability
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NRCS	Natural Resources Conversation Service
NRHP	National Register of Historic Places
O ₃	Ozone
OSHA	Occupational Safety and Health Administration
PM	Particulate Matter

PPB	Parts per Billion
PPM	Parts per Million
ROI	Region of Influence
SCAB	South Coast Air Basin
SCAQMD	South Coast Air Quality Management District
SF	Square Foot
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
THPO	Tribal Historic Preservation Officer
TPY	Tons per Year
US	United States
USDA	US Department of Agriculture
USEPA	US Environmental Protection Agency
USFWS	US Fish and Wildlife Service
VA	US Department of Veterans Affairs
VAMC	Veterans Affairs Medical Center
VHA	Veterans Health Administration
VOC	Volatile Organic Compound

1 INTRODUCTION

The U.S. Department of Veterans Affairs (VA) Veterans Health Administration (VHA) is America's largest integrated health care system, providing care at 1,293 health care facilities, including 171 medical centers and 1,112 outpatient sites of care of varying complexity (VHA outpatient clinics), serving 9 million enrolled Veterans each year. VHA's primary mission is to provide medical care and services that improve the health and wellbeing of U.S. Veterans. VHA is the largest of three administrations that comprise the VA.

The Atlanta VA Medical Center (VAMC) is located at 1670 Clairmont Road in Decatur, Georgia. The medical center oversees seven VA Community-Based Outpatient Clinics (CBOCs) in Smyrna (Cobb County); Lawrenceville (Gwinnett County); Oakwood (Hall County); East Point (South Fulton County), Stockbridge (Henry County) and Newnan (Coweta County) and Blairsville (Union County) in addition to an outpatient clinic in Decatur and an outreach clinic in Rome, Georgia. This Environmental Assessment (EA) evaluates the potential impacts associated with VA's Proposed Action to demolish the Community Living Center (CLC) Building D (CLC Building) at the Atlanta VAMC.

This Environmental Assessment (EA) evaluates the potential impacts associated with VA's Proposed Action to demolish the Community Living Center (CLC) Building D (CLC Building) at the Atlanta VAMC.

1.1 Background and Existing Site Details

The Atlanta VAMC is located in a densely developed mixed residential/commercial corridor along Clairmont Road in the city of Decatur and the greater Atlanta metropolitan area (Figure 1). The Atlanta VAMC is approximately 8 miles northeast of downtown Atlanta.

Situated on 26 acres, the Atlanta VAMC began serving Veterans in 1966, utilizing a 10-story, 580-bed hospital building. Upon its opening, the Atlanta VAMC operated as a general medical and surgical hospital with extensive outpatient services.

The CLC Building was constructed in circa 1979 and is located in the southeastern portion of the Atlanta VAMC. The CLC Building is a 103,000 square-foot (SF), three (3) story facility constructed of concrete and steel, and provides approximately 120 beds to eligible Veterans. A CLC is a VA Nursing Home. There are over 100 CLCs across the country, with four in Georgia.

Over the years, other expansions have been added to the main hospital building and new buildings have been constructed. Currently, approximately 21.5 acres of the Atlanta VAMC have been developed. The Atlanta VAMC facilities offer a diverse assortment of services to Veterans in northwestern Georgia. The Atlanta VAMC currently provides 466 in-patient beds, a 40-bed domiciliary, and a 21-bed Residential Treatment Program. The Atlanta VAMC is classified as a Complexity Level 1A tertiary care facility currently serving the needs of more than 130,000 Veterans residing in 50 counties across northwestern Georgia.

The Atlanta VAMC also serves as a teaching hospital. It is affiliated with the Emory University School of Medicine and Morehouse School of Medicine to provide advanced technology, education, and research opportunities for students.

The main medical center officially established as "Main Tower Building-C" is located in the central portion of the Atlanta VAMC. There are a variety of specialized care facilities attached to the Main Tower Building-C, including the "Primary Urgent Care Building-B" northeast of the

Main Tower Building, the emergency room or “Ambulatory Care Building-B” northwest of the Main Tower Building, and “Clinical Addition Building-A” southwest of the Main Tower Building. A separate research facility, “Research Building-13” resides in the northwestern portion of the Atlanta VAMC campus, adjacent to the on-site water tank and pump house. Additional separate facilities include “Modular Building-M” located in the western portion of the site, the VA Atlanta Regional Office designated as the “VBA Office Building” located in the northern portion of the site, and the CLC Building and adjacent “Combined Heat and Power (CHP) Plant” located in the southeastern portion of the Atlanta VAMC. Ten parking lots and six parking decks are located throughout the Atlanta VAMC; the Atlanta VAMC currently has excess parking capacity. A campus map including formal facility designations provided by the Atlanta VAMC is included in Figure 2.

The Atlanta VAMC is accessible to visitors from a formal main entrance, the “Northern Entrance”, located off Clairmont Road which turns into Southern Lane. Also accessible by Clairmont Road is a secondary entrance, which is located south of the Northern Entrance between “Parking Deck-K” and “Parking Lot-11”. Clairmont Road is located along the eastern boundary of the Atlanta VAMC, and Southern Lane is located along the northern portion of the Atlanta VAMC.

Figure 1. Atlanta VAMC Site Location Map

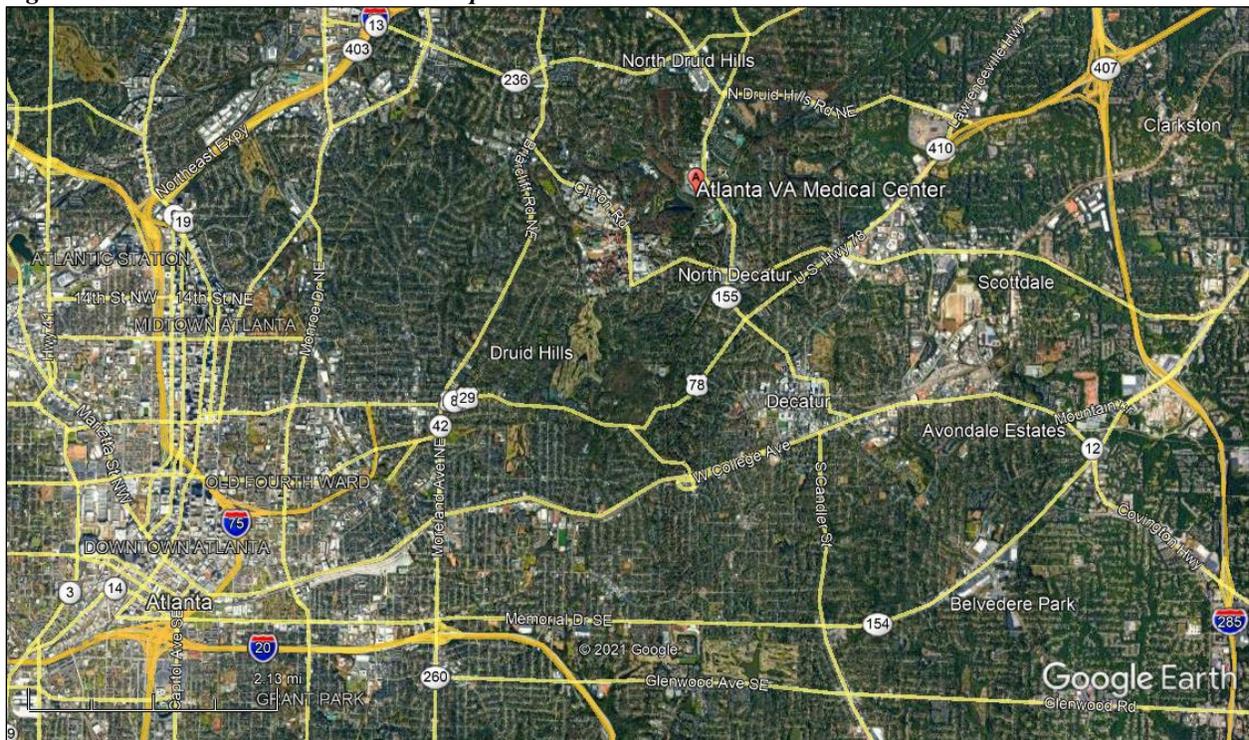
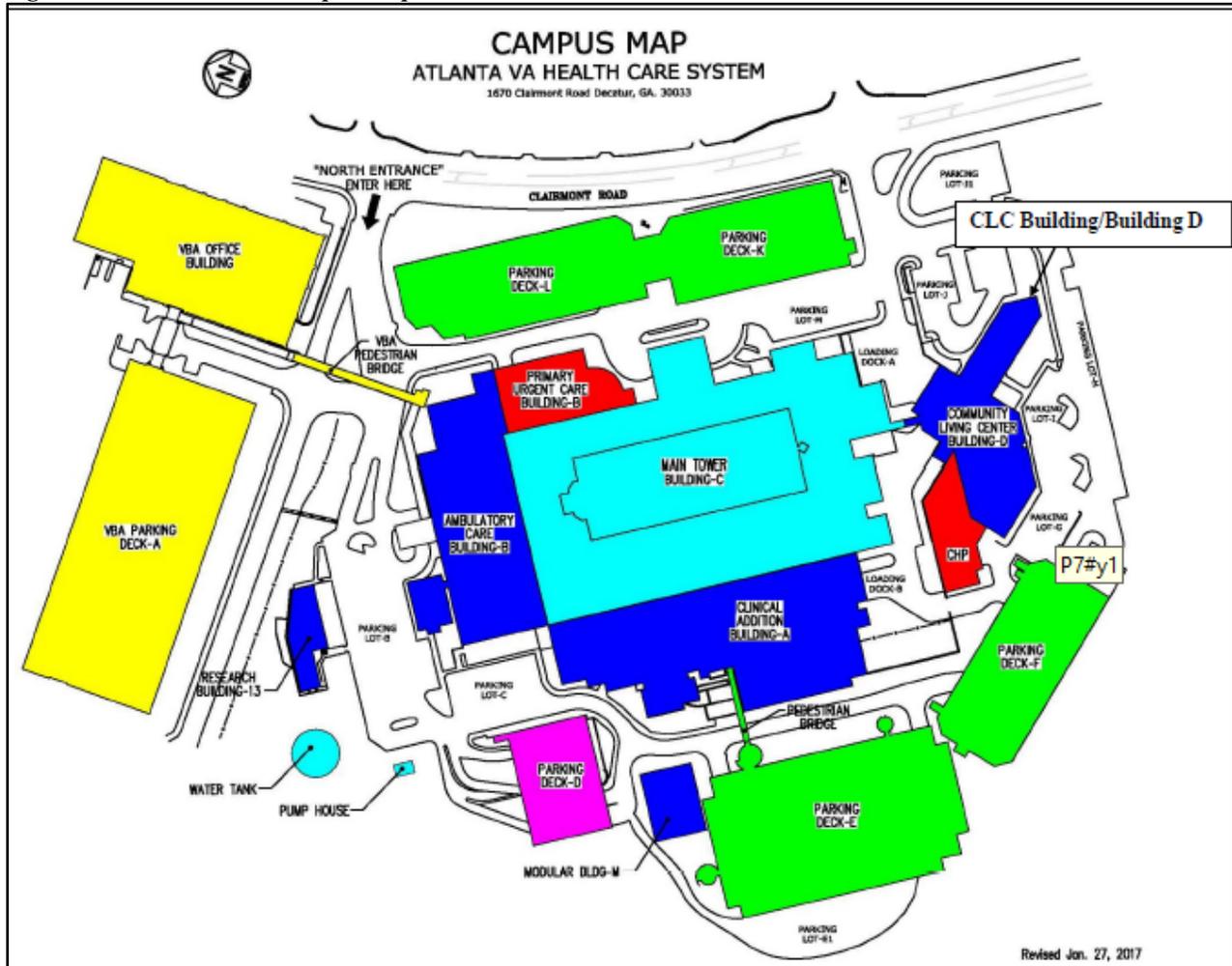


Figure 2. Atlanta VAMC Campus Map



1.2 Problem Statement

Veterans are a demographic that have a significant need for easily accessible care services. According to the 2015-2019 American Community Survey, the Veteran population ages 65 or older numbered in excess of 18.2 million (VA, 2021). Currently, there are approximately 629,000 Veterans residing in Georgia, including approximately 36,000 in DeKalb County (USCB, 2020).

VA's VHA strives to serve an ever-changing Veteran population through a diverse variety of care services ranging from disability and financial benefits, long-term housing, suicide-prevention hotlines, telemedicine, Vet centers, and primary medical services.

As part of this mission, VHA provides CLCs, which is a VA nursing home. Unlike many nursing homes in the past, a CLC resembles "home" as much as possible. Veterans may stay for a short time or, in rare instances, for the rest of their life. It is a place where Veterans can receive nursing home level of care, which includes help with activities of daily living (e.g., bathing and getting dressed) and skilled nursing and medical care. The mission of a CLC is to restore each Veteran to his or her highest level of well-being. It is also to prevent declines in health and to provide comfort at the end of life.

The current Atlanta VAMC CLC Building is physically and functionally outdated and does not meet VA's current standards for care. Accordingly, VA developed a Proposed Action to demolish the CLC Building and temporarily landscape and revegetate the area. This would provide VA with a potential future opportunity to construct a new facility/facilities that meet modern standards for care and better serve Veterans in Georgia.

1.3 Purpose and Need for the Proposed Action

The *purpose* of the Proposed Action is to demolish the CLC Building.

The Proposed Action is *needed* to provide the Atlanta VAMC with development space for a potential future facility that would better comply with VA's current building requirements and modern standards for care.

1.4 Regulatory Requirements

Prior to implementing a Proposed Action, VA is required to consider the potential impacts of the action on the human environment in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code 4321 et seq.), the White House Council on Environmental Quality (CEQ) "Regulations Implementing the Procedural Provisions of NEPA" (40 Code of Federal Regulations [CFR] 1500–1508), VA's NEPA regulations titled "Environmental Effects of the Department of Veterans Affairs Actions" (38 CFR Part 26), and VA's NEPA Interim Guidance for Projects (VA, 2010).

An Environmental Assessment (EA) provides sufficient evidence and analysis for determining potential impacts to the human environment. VA must apply the NEPA review process and use the information to make an informed decision prior to undertaking a Proposed Action. Based on the EA, VA may issue a Finding of No Significant Impact (FONSI), which is a decision document that briefly presents the reasons why an action would not have a significant effect on the human environment. Conversely, when an action may have a significant adverse impact on the environment, VA may consider issuing a Notice of Intent to prepare an Environmental Impact Statement EIS.

1.5 Scope of the Analysis

VA has prepared this EA to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with implementing the construction and operational elements of the Proposed Action. Additionally, this EA evaluates the potential impacts associated with taking No Action (that is, not implementing the Proposed Action).

VA, as a federal agency, is required to incorporate environmental considerations into its decision-making process for the actions it proposes to undertake. This is done according to the regulations and guidance identified above. As such, this EA:

- Informs the public of the possible environmental impacts of the Proposed Action and its considered alternatives, as well as methods to reduce these impacts;
- Provides for public, state, inter-agency, and tribal input into VA's planning and evaluation;
- Documents the NEPA process; and
- Supports informed decision-making by the federal government.

This EA also identifies the actions to which VA would commit to minimize environmental effects, as required under NEPA, its implementing regulations from CEQ (40 CFR 1500–1508) and VA (38 CFR Part 26), and VA's NEPA guidance (VA, 2010). The decision to be made is whether—

having considered the potential physical, environmental, cultural, and socioeconomic effects—VA should implement the Proposed Action including, as appropriate, measures to reduce adverse effects.

It is noted that a separate NEPA analysis would be performed prior to development of any potential future construction of a major new facility/facilities at the Atlanta VAMC.

2 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

NEPA, and the regulations of CEQ and VA for implementing NEPA, require all reasonable alternatives to be rigorously explored and objectively evaluated. This chapter summarizes the process used to develop alternatives and provides a description of the subsequently selected Proposed Action and its alternative.

The alternatives evaluated in this EA are the Proposed Action and No Action. The Proposed Action is described in detail in the following section. The No Action Alternative is evaluated in this EA pursuant to NEPA requirements and provides a baseline against which the potential impacts from implementing the Proposed Action may be evaluated.

No reasonable alternatives that would adequately meet the purpose and need for action have been identified by VA. Therefore, the alternatives evaluated in this EA are the Proposed Action and No Action.

2.1 Proposed Action

Under the Proposed Action, VA would implement the construction of new loop road and utility infrastructure upgrades to provide better vehicular access and flow, additional parking spaces, and betterment of underground site utilities. Prior to construction,

all utilities within the CLC Building would be disconnected and capped, and measures taken, if necessary, to reroute any utilities to avoid service disruptions elsewhere at the campus or surrounding area. National Pollutant Discharge Elimination System (NPDES) permit-required soil erosion control and stormwater management measures would be installed and maintained throughout the demolition and ground-restoration phasing. Proper dust minimization controls would be implemented during demolition, including the use of dust palliatives and water spray. Additional air quality controls would be implemented to include the use of Tier 4-compliant engines or similar technology on heavy construction machinery. Noise minimization measures would be employed, including the use of engine mufflers and idling restrictions, as well as limiting work to normal weekday hours. Safety measures would be employed to include fencing and signage around the construction area to ensure the safety of workers, staff, and visitors; these controls would be maintained throughout the construction phase.

The physical demolition phase of the building massing would then proceed for approximately 4 months. Excavators with hydraulic thumbs would then be used to carefully dismantle the building and its footings. During demolition, all debris would be loaded into dump trailers for off-site recycling (for concrete, metal, glass, wood), while non-recyclable or non-reusable material would be landfilled as construction debris.

Following demolition, the site would be graded and revegetated to match the surrounding area. The site would then be maintained as part of the existing Atlanta VAMC landscaping program.

The staff and Veterans who utilize the CLC Building would be temporarily relocated to other facilities within the Atlanta VAMC until permanent facilities are developed in place of the CLC Building.

The Proposed Action would occur over a period of approximately 12 months.

2.1.1 No Action Alternative

The No Action alternative serves as a benchmark against which the effects of the Proposed Action can be evaluated, as required under the CEQ (40 CFR Part 1502.14). For this project, No Action is defined as not implementing the Proposed Action. The CLC Building would not be demolished. Services would continue in an outdated facility and would not meet VA's current standards for care. Existing conditions at the Atlanta VAMC would remain unchanged for the foreseeable future.

The No Action Alternative would not meet the purpose and need for action. Thus, VA would be impeded in its ability to construct a new facility/facilities in place of the CLC building that would better serve the Veteran population of northwestern Georgia.

2.1.2 Alternatives Identified but Not Evaluated in Detail

VA considered renovating the CLC Building as an alternative to the Proposed Action. Under this alternative, such renovations would require extensive maintenance to numerous building components, such as office areas, patient service areas, dormitories, and mechanical and electrical systems. VA excluded this alternative from further analysis because it would still not enable the CLC Building to meet VA's current building standards or modes of care. Additionally, continual maintenance would be required on other aging building systems, which would not be cost or time effective. Additionally, following renovations, the presence of the CLC Building would still not achieve VA's desired layout for the Atlanta VAMC.

3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

This section presents the detailed analysis of potential impacts to the physical, environmental, cultural, and socioeconomic resources anticipated from implementing the Proposed Action or the No Action alternative. The analysis for each resource includes a description of the existing conditions, applicable regulatory requirements associated with implementing the Proposed Action, and any resource-specific management measures necessary to minimize any potential adverse impacts.

For the purposes of this EA, the Proposed Action site is the approximately 1.5-acre area encompassing the CLC Building, including the immediately adjacent parking spaces and landscaped grounds. A broader “Region of Influence” is analyzed for selected topics, such as air quality and noise, where impacts may occur beyond the Proposed Action site. This EA also considers the impacts of the Proposed Action on these resources in relation to DeKalb County’s 2021 Comprehensive 5-year Plan (DeKalb County, 2021).

3.1 Criteria for Analysis of Impacts

The specific criteria for evaluating the potential environmental impacts of the Proposed Action and the No Action alternative are described in the following sections. The significance of an action is also measured in terms of its context and intensity. The context and intensity of potential environmental impacts are described in terms of duration, the magnitude of the impact, and whether they are adverse or beneficial, as summarized in the following paragraphs:

- **Short-term or long-term.** In general, short-term impacts are those that would occur only with respect to a particular activity, for a finite period, or only during the time required for construction or installation activities. Long-term impacts are those that are more likely to be persistent and chronic. Impacts must also be reasonably foreseeable and have a reasonably close causal relationship to the proposed action or alternatives.
- **Less-than-significant (negligible, minor, moderate), or significant.** These relative terms are used to characterize the magnitude or intensity of an impact. Negligible impacts are generally those that might be perceptible but are at the lower level of detection. A minor impact is slight, but detectable. A moderate impact is readily apparent. Significant impacts are those that, in their context and due to their magnitude (severity), have the potential to meet the thresholds for significance set forth in CEQ regulations (40 CFR Part 1508.27) and, thus, warrant heightened attention and examination for potential means for mitigation to fulfill the policies set forth in NEPA. Significance criteria by resource area are presented in the following sections.
- **Adverse or beneficial.** An adverse impact is one having unfavorable or undesirable outcomes on the human-made or natural environment. A beneficial impact is one having positive outcomes on the human-made or natural environment.

3.2 Environmental Resources Dismissed from Further Analysis

The potential impacts of the Proposed Action and the No Action Alternative on the following environmental resources were analyzed, but the potential impacts were determined to be none-to-negligible because the impacts would be localized and immeasurable at the lowest level of detection. A summary is provided below of the environmental resources dismissed from further detailed analysis.

Table 1. Environmental Resources Dismissed from Further Analysis

Environmental Resource Dismissed	Rationale
Land Use and Zoning	<p>The Proposed Action is consistent with the intended use of the grounds for VA functions. The Proposed Action is not subject to the City of Decatur Land Use and Zoning regulations. However, the Proposed Action would not cause or induce changes in land use or zoning to properties adjacent to or in vicinity of the Atlanta VAMC. Therefore, the Proposed Action would have no impact on land use or zoning issues.</p>
Wildlife and Habitat	<p>The Atlanta VAMC property was assessed via the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) online system. The results indicated the potential occurrence of one federally listed plant species within the property: Michaux's Sumac (<i>Rhus michauxii</i>). A copy of the IPaC results is included in Appendix A.</p> <p>However, the Proposed Action site does not provide conditions suitable for Michaux's Sumac due to longstanding routine landscaping and mowing of the grounds. Additionally, the site generally does not provide habitat for wildlife, as the majority of the site is developed with buildings and impervious surfaces, and there is a high level of human activity (pedestrians, vehicle traffic) that is not conducive to supporting wildlife or providing habitat. The undeveloped wooded areas outside of the Atlanta VAMC would not be impacted under this Proposed Action and would continue to provide habitat to existing wildlife common to the area.</p> <p>Therefore, the Proposed Action would have no impact on these resources.</p>
Wetlands	<p>The Proposed Action site was assessed via the USFWS National Wetlands Inventory online database. The results indicated that there are no wetlands, vernal pools (protected under the Natural Resources Protection Act), marshes, or surface waters present.</p> <p>The nearest wetland is a freshwater forested/shrub wetland located outside of the Atlanta VAMC property, approximately 340-feet southwest of the CLC Building. The Proposed Action area has no mechanisms to adversely impact this wetland. Additionally, the Atlanta VAMC maintains stormwater engineering controls within the property to ensure stormwater is properly managed, such that stormwater does not cause soil erosion and sedimentation of run-off is minimized before it is discharged or infiltrated into the ground.</p>

Environmental Resource Dismissed	Rationale
	Therefore, the Proposed Action would have no impact on wetlands.
Coastal Zone Management	<p>According to Section 307 of the Coastal Zone Management Act (CZMA), federal actions with reasonably foreseeable coastal effects are subject to the federal consistency no matter where they occur – whether within or outside of the state’s coastal zones.</p> <p>The Atlanta VAMC is located outside of the Georgia Coastal Management Program (GCMP) coastal zone boundary, and the Proposed Action has no mechanisms to reasonably impact coastal zone resources. Thus, pursuant to 15 CFR §930.33(a)(2), VA has determined that the Proposed Action would have no effects on any coastal use or resource, a negative determination under 15 CFR §930.35 would not be required, and further coordination with the GCMP under Section 307 of the CZMA would not be required.</p> <p>Therefore, the Proposed Action would have no impact on this resource.</p>

Resource areas that are evaluated in further detail in this EA include: aesthetics; air quality; cultural resources; geology, topography, and soils; hydrology and water quality; noise; floodplains; socioeconomics; community services; solid waste and hazardous materials; transportation and parking; utilities; and environmental justice.

3.3 Aesthetics

Aesthetics refers to the visual resources, including natural and human-made features that give a particular piece of land its aesthetic properties. A combination of natural and built features influence and contribute to the aesthetic environment of an area. Natural features may include topography and vegetation, which may have been altered over time by human action, while built features can include buildings and other constructed elements. Beneficial or adverse impacts may occur depending on how changes to the existing aesthetic environment are perceived by human receptors, which can include visitors and residents living adjacent to and in the vicinity of the area.

3.3.1 Existing Environment

The Proposed Action site is dominated by the CLC Building, parking lots I, J, J1, H, and a small landscaped area with several sparsely planted trees. The area surrounding the Proposed Action site is further influenced by building massing associated with the CHP, parking deck K, main tower building C, and parking deck F. Thus, the visual appearance of the Proposed Action site is one of substantial development for medical buildings and associated support infrastructure.

Features surrounding the Atlanta VAMC that contribute to the visual character and scenic quality of the community include wooded land, walking trails, Lullwater Preserve (located approximately 260-feet southwest of the site), South Fork Peachtree Creek (located approximately 130-feet south

of the site), Chandler Lake (located approximately 370-feet southwest of the site), Clairmont Lake (located approximately 220-feet east of the site), and Clairmont Road. Other development surrounding the Atlanta VAMC influences the regional viewscape and includes the Emory University facilities (located 600-feet southeast of the site), University of West Alabama SACS building (located approximately 400-feet west of the site), Decatur Highlands residential community (located approximately 200-feet east of the site), and the Clairmont Reserve Apartment Homes residential community (located approximately 400-feet southeast of the site).

The Atlanta VAMC is visible to vehicles traveling on Clairmont Road and Southern Lane. Clairmont Road is located along the eastern boundary of the Atlanta VAMC, and Southern Lane is located along the northern portion of the Atlanta VAMC.

Due to the presence of a densely wooded buffer along the Atlanta VAMC southern, western, northern property boundary, much of the aforementioned external development and scenic features surrounding the Atlanta VAMC are not visible from within the hospital grounds. Likewise, this buffer also prevents views into the Atlanta VAMC from the surrounding area, with the exception of the eastern portion of the Atlanta VAMC. This side is not buffered and is directly in view of Clairmont Road. However, the CLC Building is located approximately 500-feet west from both of the nearby residential communities. Additionally, both residential communities maintain their own vegetative buffers, such that direct views of the CLC Building are obstructed by vegetation on those properties.

3.3.2 Thresholds of Significance

The Proposed Action would be considered to have a significant effect to visual impacts if: long-term alteration of the viewshed would occur that would require mitigation; negative alterations to the viewshed of a historical resource would be expected; and it was not compliant with the overall viewshed of adjacent areas.

3.3.3 Environmental Consequences

3.3.3.1 Proposed Action

During the demolition phase of the Proposed Action, construction equipment would be present in the southern portion of the Atlanta VAMC, likely to be staged in parking lots J and I closest to the CLC Building for up to 12 months, with the actual demolition of building massing taking approximately 2 months. The presence of heavy equipment and trucks, and unfinished stages of building demolition would temporarily impact the visual quality of the southern portion of the Atlanta VAMC. However, the southern portion of the Proposed Action area consists of parking lots which would be temporarily closed during construction. Additionally, this area of the Atlanta VAMC is not readily visible from elsewhere on campus, nor visible from outside of the campus. Therefore, construction activities would only be visible from a limited area within the Atlanta VAMC. Additionally, temporary privacy fencing would be installed around the construction site to further obstruct the view of on-going construction activities.

Demolition activities of the building massing has the potential to release fugitive dust. Additionally, any construction activities that expose underlying soils has the potential to collect on construction vehicle tires and be tracked onto the Atlanta VAMC roadways, generating nuisance concerns about the appearance of the construction site.

To minimize these potential adverse impacts, the construction contractor would implement industry-standard construction best management practices (BMPs) to limit fugitive dust generation and tracking of loose soil onto roadways. These BMPs include the use of water trucks or other dust

palliatives for dust suppression; physically removing loose soil from construction vehicles' tires before leaving the construction site; and, if necessary, installing gravel pads at the construction exit to further prevent the tracking of soil onto roadways.

Following demolition and site grading, the contractor would plant native, non-invasive, drought-tolerant vegetation to re-stabilize exposed soils. The former CLC Building area would appear as a vegetated landscape and be professionally maintained by the Atlanta VAMC facilities staff.

These impact minimization measures and BMPs would ensure that the Proposed Action would have a short-term, less-than-significant adverse impact on aesthetics. When considered on a cumulative basis with other current and future developments in the area, impacts from the Proposed Action would not rise to significant adverse level.

3.3.3.2 No Action

Under the No Action alternative, no changes to the current aesthetic or visual character of the grounds would occur at the Proposed Action site. The existing CLC Building would remain as it currently exists for the foreseeable future.

3.4 Air Quality

Air quality refers to the concentration of air contaminants in a specific location. Air quality is determined by the type and amount of pollutants emitted into the atmosphere, the size and topography of the air basin, and the prevailing meteorological conditions.

3.4.1 Existing Environment

3.4.1.1 Regional Climate

Weather and climate are important influences on air resources. On average, Georgia receives approximately 50 inches of rainfall per year. February is the wettest month of the year with average rainfall of 4.74 inches, while both April and May are historically the driest months, both with an average rainfall of 3.6 inches (NOAA, 2020).

3.4.1.2 Air Quality Standards

The *Clean Air Act* (CAA) and its subsequent amendments require the U.S. Environmental Protection Agency (USEPA) to establish National Ambient Air Quality Standards (NAAQS) for pollutants that may endanger public health or welfare (USEPA, 2021). The USEPA has promulgated primary and secondary NAAQS for six criteria pollutants: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), lead (Pb), particulate matter (PM; particulate matter sized 10 microns or less (PM₁₀) and particulate matter sized 2.5 microns or less (PM_{2.5}), and sulfur dioxide (SO₂). Primary standards set limits to protect public health, and secondary standards set limits to protect public welfare (Table 2). The CAA also gives the authority to states to establish air quality rules and regulations stricter than the federal standards.

Georgia has developed an Air Quality State Implementation Plan (SIP) that outlines regulations, control measures, and strategies to achieve compliance with NAAQS (GAEPD, 2021). The Air Protection Branch of Georgia's Environmental Protection Division (GAEPD) implements the SIP.

Table 2. National Ambient Air Quality Standards

NAAQS Pollutant	Primary/Secondary	Averaging Time	Level ⁽¹⁾	Form
Carbon Monoxide	Primary	8-hour	9 ppm	Not to be exceeded more than once per year
		1-hour	35 ppm	
Nitrogen Dioxide	Primary	1-hour	100 ppb	98th percentile, averaged over 3 years
	Primary and secondary	Annual	53 ppb	Annual Mean
Ozone	Primary and secondary	8-hour	70 ppb	Annual 4 th highest daily maximum 8-hr concentration, averaged over 3 years
Particulate Matter (PM _{2.5})	Primary	Annual	12 µg/m ³	Annual mean, averaged over 3 years
	Secondary	Annual	15 µg/m ³	Annual mean, averaged over 3 years
	Primary and secondary	24-hour	35 µg/m ³	98th percentile, averaged over 3 years
Particulate Matter (PM ₁₀)	Primary and secondary	24-hour	150 µg/m ³	Not to be exceeded more than once per year on average over 3 years
Lead	Primary and secondary	Rolling 3-month average	0.15 µg/m ³	Not to be exceeded
Sulfur Dioxide	Primary	1-hour	75 ppb	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
	Secondary	3-hour	0.5 ppm	Not to be exceeded more than once per year

1 – Units of measure for the standards are parts per million (ppm) by volume, parts per billion (ppb) by volume, and micrograms per cubic meter of air (µg/m³)

3.4.1.3 Clean Air Act Conformity

The 1990 amendments to the CAA require federal agencies to ensure that their actions conform to the SIP in a nonattainment area. Under Section 176(c) of the CAA, a project is in “conformity” if it corresponds to a SIP’s purpose of eliminating or reducing the severity and number of violations of the NAAQS and achieving their expeditious attainment. Conformity further requires that such activities would not:

- cause or contribute to any new violations of any standards in any area;
- increase the frequency or severity of any existing violation of any standards in any area; or
- delay timely attainment of any standard or any required interim emission reductions or other milestones in any area.

The USEPA published final rules on general conformity (40 CFR Parts 51 and 93) in the Federal Register on November 30, 1993. The General Conformity Rule (GCR) (CAA Part 176(c)(4)) applies to all federal actions in nonattainment or maintenance areas. This rule requires that any federal action meet the requirements of a SIP or Federal Implementation Plan. More specifically, CAA conformity is ensured when a federal action would not cause a new violation of the NAAQS; contribute to an increase in the frequency or severity of violations of NAAQS; or delay the timely attainment of any NAAQS, interim progress milestones, or other milestones toward achieving compliance with the NAAQS. Air Quality Control Regions that comply with the NAAQS are designated “attainment” areas by the USEPA, while areas where the standards are not met are designated as “non-attainment” areas.

DeKalb County is designated as in attainment for all criteria pollutants, with the exception of 8-Hour O₃ (marginal non-attainment) (USEPA, 2021). The O₃ is likely attributed to vehicle emissions and other industrial processes within industrialized areas located within DeKalb County.

The rules specify *de minimis* emission levels by pollutant to determine the applicability of conformity requirements for a project. The corresponding *de minimis* threshold values for each criteria pollutant is 100 tons per year.

The potential emissions associated with the Proposed Action are required to be compared to the GCR *de minimis* thresholds.

A federal action is exempt from the GCR requirements if the action's total net emissions are below the *de minimis* threshold or are otherwise exempt per 40 CFR 51.153. There are two main components to the overall process: an applicability analysis to determine whether a conformity determination is required, and, if it is, a conformity determination to demonstrate that the action conforms to the SIP. If the Proposed Action emissions are below the thresholds, then a full Conformity Determination is not required.

3.4.1.4 Existing Emissions Sources

Current emissions sources at the Atlanta VAMC are primarily associated with operation of the CHP. The GAEPD issued a Title V Air Quality Permit to regulate the emissions from the Atlanta VAMC CHP (effective March 24, 2015).

3.4.1.5 Sensitive Receptors

CEQ's NEPA regulations require evaluation of the degree to which the proposed action affects public health (40 CFR Part 1508.27). Children, elderly people, and people with illnesses are especially sensitive to the effects of air pollutants; therefore, hospitals, schools, convalescent facilities, religious institutions, and residential areas are considered to be sensitive receptors, particularly when located within 0.25 miles from the emissions source.

The Atlanta VAMC maintains patient beds that are considered the nearest hospital receptor. Sensitive receptors outside of the Atlanta VAMC include residents of the Clairmont Reserve Apartment Homes and the Decatur Highlands apartment complexes, both of which are located approximately 500-feet east from the CLC Building. Other sensitive receptors within 0.25 miles of the CLC Building include persons at the Emory Autism Center and the Early Emory Center for Child Development of the Emory University Clairmont Campus located approximately 650-feet south of the CLC Building.

No religious institutions or convalescent facilities were identified within 0.25 miles of the CLC Building.

3.4.2 Thresholds of Significance

An impact to air quality would be considered significant if it were to affect the achievement or maintenance of NAAQS.

3.4.3 Environmental Consequences

3.4.3.1 Proposed Action

The demolition phase of the Proposed Action would involve asbestos abatement, demolition of building massing, and on-road truck hauling of the demolition debris to an off-site recycling and/or disposal facility. The following sections describe the primary construction activities that would generate criteria pollutants and management measures to minimize potential air quality impacts.

3.4.3.1.1 Particulate Matter Emissions

Construction would require heavy equipment with petroleum-fueled engines, resulting in emissions of criteria pollutants (with the exception of lead, which is no longer an additive in these

fuels). Demolition of the CLC Building would also generate particulate matter. The amount of particulate matter emissions generated can be estimated from the amount of ground disturbance that would occur during demolition. The building footprint is approximately 30,000 SF (0.7 acres).

Total suspended particulates were calculated using the emission factor for heavy construction activity operations from “AP-42, Compilation for Air Pollutant Emission Factors” (USEPA, 1995), to provide a conservative estimate of particulate matter emissions. Particulate emissions estimated to be generated during construction of the Proposed Action area presented in Table 3.

Table 3. Estimate of Particulate Emissions during Construction of the Proposed Action

Total Area (acre)	Exposed Area (acre)	Construction Duration (months)	Emission Factor (tons/acre/month) ¹	Control Efficiency (%)	Total Suspended Particulate Emissions (tons/year)
0.69	0.69	4	1.2	50%	1.656

1 – Emission factor for Heavy Construction Operations (USEPA, 1995).

3.4.3.1.2 Off-Road Construction Equipment Emissions

Off-road, diesel-fueled heavy construction equipment, such as excavators, loaders, and backhoes, would emit criteria pollutants during the approximately 4-month building massing demolition and grounds grading phase. Table 4 presents the construction equipment and frequency of use estimated for the Proposed Action (Table 4).

Emissions were estimated using “Off-Road – Model Mobile Source Emission Factors” for the year 2022 from the California South Coast Air Quality Management District (SCAQMD, 2020) because Georgia or the VA have not issued emission factors. The applicable emission factors are presented in Table 5. The annualized total emissions for these construction activities are presented in Table 6.

Table 4. Estimated Construction Equipment Use

Equipment Type	Number of Units	Operational Hours/Day	Total Days/Year
Tractors/Loaders/Backhoes	3	4	120
Excavator	3	8	120

Table 5. SCAB Fleet Average Emission Factors (Diesel)

Equipment Type	Emissions Factors ⁽¹⁾				
	CO (lb/hr)	VOC ⁽²⁾ (lb/hr)	NO ₂ (lb/hr)	SO ₂ (lb/hr)	PM ⁽³⁾ (lb/hr)
Tractors/Loaders/Backhoes	0.3599	0.0384	0.2302	0.0008	0.0095
Excavator	0.5104	0.0648	0.3171	0.0013	0.0136

1 - From South Coast Air Basin (SCAB), emission factor year 2022; composite emission factors used.

2 - VOCs are considered equivalent to Reactive Organic Gases for calculating non-road construction equipment emissions.

3 - PM emissions represent combined PM₁₀ and PM_{2.5}.

Table 6. Total Criteria Pollutant Emissions from Construction Equipment

Equipment Type	CO (tons)	VOC (tons)	NO ₂ (tons)	SO ₂ (tons)	PM (tons)
Tractors/Loaders/Backhoes	0.259	0.028	0.166	0.001	0.007
Excavator	0.735	0.093	0.457	0.002	0.020
Total Emissions (tpy)	0.994	0.121	0.622	0.002	0.026
<i>de minimis</i> level (tpy)	100	100	100	100	100

3.4.3.1.3 On-Road Heavy-Duty Construction/Haul Trucks

Construction of the Proposed Action would utilize on-road heavy-duty vehicles, such as multi-axle dump trailers and flatbed trucks, to transport the demolition debris off site. Table 7 presents a summary of the approximate number of vehicles and frequency of use during the approximately 4-month construction period. Table 8 present a summary of the emissions estimated for on-road diesel-fueled heavy-duty vehicles (greater than 8,501 lbs) using emissions factors specific to Georgia for the year 2022 (USAF, 2020).

The following assumptions were made to estimate the number of on-road heavy-duty haul trucks for the 4-month construction period:

- The CLC Building’s 103,000 SF of building massing equates to approximately 3,815 cy.
- One typical multi-axel dump trailer (or roll-off box) can hold approximately 20 cubic yards (cy) of debris. Thus, approximately 200 trucks would be required to contain and transport the demolition debris off site.

Table 7. On-Road Heavy-Duty Diesel Vehicle Estimates

Factor	Estimated Number
Estimated Number of On-Road Heavy-Duty Vehicles	200
Estimated miles traveled per trip ⁽¹⁾	80
Total miles travelled⁽²⁾	16,000

1 - The estimated average distance from Atlanta VAMC to a debris management/recycling facility is estimated to be 40 miles; therefore, a truck would travel 80 miles round trip.

2 - Total number of trucks multiplied by the miles per trip.

Table 8. On-Road Heavy-Duty Diesel Vehicle Emissions

On-Road Heavy-Duty Diesel Vehicle	Total mileage	CO	VOC	NO ₂	SO ₂	PM ₁₀	PM _{2.5}
Emissions, lbs/mile	16,000 ⁽¹⁾	0.0034	0.0008	0.0090	<0.0001	0.0003	0.0003
Emissions, lbs/project	--	54	13	144	0.4	4	4
Emissions, tons/project	--	0.027	0.007	0.072	0.0002	0.002	0.002

1 - Total miles travelled, from Table 7.

3.4.3.1.4 Construction Workers’ Vehicle Emissions

Emissions were estimated from construction workers’ vehicles in use during the Proposed Action demolition phase. On average, approximately 50 workers per day are estimated to support the demolition phase, with each worker traveling to and from the Atlanta VAMC over a distance of approximately 20 miles per day for 260 days per year, and anticipating a commuting factor of 0.6. This is equivalent to a total of 156,000 miles traveled annually (50 workers * 260 days * 20 miles/vehicle * 0.6). Table 9 presents emission factors specific to Georgia for emission year 2022 for gasoline-fueled light-duty vehicles (passenger cars and trucks) (USAF, 2020). Table 10 presents the estimated emissions from construction workers’ vehicles.

Table 9. Construction Worker - Emissions Factors for Light-Duty Gasoline-Fueled Vehicles

Light-Duty Gasoline-Fueled Vehicles	CO	VOC	NO ₂	SO ₂	PM ₁₀	PM _{2.5}
Emissions factors (lbs/mile)	0.0061972	0.0004872	0.0003439	0.0000044	0.0000132	0.0000110

Table 10. Construction Worker - Emissions from Light-Duty Gasoline-Fueled Vehicles

Light-Duty Gasoline-Fueled Vehicles	CO	VOC	NO ₂	SO ₂	PM ₁₀	PM _{2.5}
Emissions, lbs/year ⁽¹⁾	966.8	76.0	53.7	0.7	2.1	1.7
Emissions, tpy	0.4834	0.0380	0.0268	0.00034	0.0010	0.0009

1- Lbs/mile calculation from Table 9 (emission factor multiplied by the total miles travelled annually [156,000 miles]).

Total Construction Emissions

The total estimated emissions associated with the demolition phase of the Proposed Action are presented in Table 11. Based on these estimates, none of the criteria pollutant concentrations exceed the General Conformity *de minimis* threshold limits. Thus, a formal General Conformity Determination would not be needed. Demolition activities would result in only short-term, negligible adverse impacts on air quality. When considered on a cumulative basis with other current and future developments in the area, the Proposed Action would not have a significant adverse effect on air quality.

Table 11. Total Emissions for the Proposed Action Demolition Phase

NAAQS:	CO	VOC	NO ₂	SO ₂	PM ₁₀	PM _{2.5}
Fugitive Dust Emissions	N/A	N/A	N/A	N/A	0.00037	0.000056
Off-Road Construction Equipment	0.994	0.121	0.622	0.002	0.026	
Heavy Duty Diesel Truck Construction Equipment Emissions	0.027	0.007	0.072	0.0002	0.002	0.002
Construction Worker Vehicle Emissions	0.483	0.0380	0.0268	0.00034	0.0010	0.0009
Total Construction Emission (tpy)	1.504	0.166	0.7208	0.00254	0.02937	0.0029
<i>de minimis</i> threshold (tpy)	100	100	100	100	100	100

N/A – Not Applicable

3.4.3.1.5 Air Quality Impact Minimization Measures

Additionally, the Proposed Action would incorporate the following activity- and material-specific BMPs to limit the emissions of criteria pollutants from engines, control airborne dust, and avoid the release of dust that may be laden with regulated building materials.

- Prior to performing rehabilitation activities that may disturb asbestos-containing building materials or lead-based paint, licensed contractors would perform abatement and/or encapsulation, followed by off-site transport and disposal of the material, according to all applicable federal, state, and local regulations.
- Contractors would use equipment with Tier 4-compliant engines to reduce emissions of particulate matter and nitrogen oxides to meet emission standards established by USEPA and California Air Resources Board.
- Limit the idling of mobile emission sources to three minutes; after three minutes turn engines off.
- Cover beds of all incoming and outgoing haul trucks with tarps.
- Visually monitor all construction activities on a daily basis, and particularly during

- extended periods of dry weather; implement additional dust control measures as needed
- Implement dust suppression methods identified in VA’s Specification 01 57 19: Temporary Environmental Controls. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of dust-generating activities during sustained high wind conditions (10-40 miles per hour [mph] with gusts at or above 50 mph).
 - Maintain speed of construction vehicles on paved roads within the Atlanta VAMC and the vicinity at posted limits. This would minimize dust generated by vehicles and equipment on paved surfaces. On any unpaved surfaces at the construction area, vehicle speeds would be maintained at or below 5 miles per hour to prevent dust generation of any exposed soil.
 - Stabilize exposed soil with vegetation or mulching to minimize erosion and dust generation.
 - During demolition, install filter media over hospital building air intakes to avoid intake of fugitive dust.

Once demolished, the CLC Building site would be graded and revegetated, and have no further mechanisms to generate criteria pollutants. Operational emissions would be consistent with routine landscaping that currently occurs around the CLC Building.

3.4.3.2 No Action

Under the No Action alternative, no short- or long-term changes in the type or quantities of air emissions would occur. Therefore, under the No Action alternative, current baseline air emissions would continue unchanged for the foreseeable future. However, known asbestos-containing materials would remain within the CLC Building. Routine building maintenance would be performed to ensure that asbestos is not released into or from the building environment.

3.5 Cultural and Historical Resources

Cultural resources are generally defined as the physical remains of a people’s way of life and include historical architecture and archaeology.

Several federal laws and regulations—including the National Historic Preservation Act (NHPA) of 1966, as amended, the Archaeological and Historic Preservation Act of 1974, the *American Indian Religious Freedom Act* of 1987 (AIRFA), the Archaeological Resource Protection Act of 1979 (ARPA), and the *Native American Graves Protection and Repatriation Act* (NAGPRA) of 1997—have been established to manage cultural resources. Cultural resources include “historic properties” as defined by the NHPA, “cultural items” as defined by the NAGPRA, “archaeological resources” as defined by the ARPA, “sacred sites” as defined by EO 13007 to which access is afforded under AIRFA, and collections and associated records as defined in 36 CFR 79.

The NHPA outlines federal policy to protect historic properties and promote historic preservation in cooperation with other nations, tribal governments, states, and local governments. Section 106 of the NHPA require federal agencies to identify, evaluate, inventory, and protect historic properties (i.e. those listed or eligible for listing in the National Register of Historic Places [NRHP]) that are under their jurisdiction and control. Federal agencies must delineate the Area of Potential Effect (APE) within which impacts from a proposed action may occur, identify historic properties present within the APE, assess the potential effects of the undertaking on those historic properties and consider ways to avoid, minimize and mitigate any adverse effects. The APE is the geographic area in which an undertaking may directly or indirectly cause changes in the use or character of a historic property. An undertaking is any federal action with the potential to affect

historic properties. Federal agencies are further required to initiate consultation with the State Historic Preservation Officer (SHPO) for actions that may impact historic properties. The Georgia Department of Community Affairs serves as the SHPO in Georgia.

3.5.1 Existing Environment

As previously indicated, initial development of the Atlanta VAMC began in 1966 with the construction of a 10-story, 580-bed hospital building. At the time, the area around the 26-acre property was suburban in character with little development nearby. Surface parking lots surrounded the hospital building, and an undeveloped wooded buffer surrounded the campus.

The Atlanta VAMC has not been evaluated for its potential to qualify for the National Register of Historic Places. The baseline age established by NHPA for historic resources is 50 years or older. Although the main hospital building is 55 years of age, it does not possess significant architectural features and is not known to have been associated with any important events in VA's history or medical history. Additionally, the Proposed Action is limited to the demolition of the CLC Building, which was constructed in circa 1979 and is 42 years old.

3.5.1.1 Area of Potential Effects (APE)

The APE consists of the area where the proposed project has the potential to cause both direct and indirect effects on historic properties. For this project, the entire Atlanta VAMC campus is included in the APE. This APE was selected because it represents a contiguous area of buildings and functions that collectively represent the Atlanta VAMC.

As part of the Draft EA, VA initiated Section 106 consultation with the SHPO on September 3, 2021. VA informed the SHPO in writing about the proposed undertaking and included a determination of finding that the undertaking would have no adverse effect due to the age of the CLC Building and lack of historic conditions. A copy of this correspondence is included in Appendix A. The SHPO did not issue comments regarding the Section 106 consultation or on the Draft EA.

3.5.1.2 Native American Resources and Consultation

For all federally proposed actions, federal agencies are required to consult with federally recognized Native American Tribes in accordance with NEPA, NHPA, NAGPRA, EO 13007, *Indian Sacred Sites*, and EO 13175, *Consultation and Coordination with Indian Tribal Governments*. During the preparation of the Draft EA, VA sent a letter on September 13, 2021, to solicit early input on the Proposed Action from the following three federally recognized Native American tribes having ancestral ties to DeKalb County, GA, as listed in the U.S. Department of Housing and Urban Development (HUD) Tribal Directory Assessment Tool (HUD, 2021). A copy each letter is included in Appendix A. Responses were not received from the Tribes. These Tribes were notified when the Draft EA was released for a 30-day review and comment period. No comments were received.

- Alabama-Quassarte Tribal Town
- Coushatta Tribe of Louisiana
- Muscogee (Creek) Nation

3.5.2 Thresholds of Significance

Impacts to cultural resources would be considered significant if VA's actions were to diminish the integrity of a historic property or archaeological site such that it would no longer be eligible for listing in the NRHP.

3.5.3 Environmental Consequences

3.5.3.1 Proposed Action

No effects on cultural resources are anticipated from the Proposed Action. The Proposed Action site has been highly disturbed as a result of the development of the CLC Building and surrounding medical center facilities.

Additionally, the Proposed Action is limited to the demolition of the CLC Building, which is 42 years of age. Due to the project's limited footprint, the Proposed Action has no mechanisms to adversely impact the Atlanta VAMC or its surrounding community. As previously described, VA initiated Section 106 consultation with the SHPO and Native American Tribes; no comments were received.

3.5.3.1.1 Inadvertent Discovery Plan

In the event that ground-breaking activities and development of infrastructure during the Proposed Action lead to disturbance and/or removal of previously undiscovered cultural resources, the following Inadvertent Discovery plan would be implemented to ensure no adverse impact occurs to these resources.

In accordance with NHPA's *Act of 1979* and NAGPRA's EO 13007, VA would implement an "Inadvertent Discovery" plan. Under this plan, if prehistoric or historic artifacts that could be associated with Native American, early European, or American settlement are encountered at any time during construction or operation of the expansion areas, VA would cease all activities involving subsurface disturbance in the vicinity of the discovery. Should human remains or other cultural items, as defined by NAGPRA, be discovered during project construction, the construction contractor would immediately cease work until VA, a qualified archaeologist, any affected tribes, and the SHPO, are contacted to properly identify and appropriately treat discovered items in accordance with applicable state and federal law(s). The work would not resume in the area of the discovery until the resource has been documented and evaluated for eligibility for the NRHP, in compliance with Section 106 of the NHPA.

3.5.3.2 No Action

The No Action Alternative would have no impact on cultural resources because demolition would not occur, leaving potentially undiscovered cultural resources undisturbed.

3.6 Geology, Topography, and Soils

3.6.1 Existing Environment

3.6.1.1 Geology

The Atlanta VAMC is located in the Piedmont region of Georgia, which is a west-to-northeast trending landscape located between the Blue Ridge Mountains and the Upper Coastal Plain (USGS, 2021). Bedrock underlying the Piedmont physiographic provinces consists of many different types of metamorphic and igneous rocks that are complexly related. Rock type varies markedly from place to place. For example, Piedmont rocks are divided into more than 90 units on the 1976 geologic map of Georgia. The main rock types are gneiss and schist of various compositions; however, extremely fine-grained rocks, such as phyllite and metamorphosed volcanic tuff, ash, and flows are common in places. Locally, quartzite and marble are present (USGS, 2021).

3.6.1.2 Topography

The Piedmont is characterized by rolling hills and isolated monadnocks, composed mostly of metamorphic rock that is uniform in its resistance to erosion (USGS, 2021). The existing topography of the Atlanta VAMC consists of a slightly sloped landscape ranging from approximately 880-feet above mean sea level (amsl) at the lowest point (near the southwest portion of the campus) to approximately 920-feet amsl at the highest (near the northeast portion of the campus).

3.6.1.3 Soils

The Proposed Action area was assessed via the United States Department of Agriculture (USDA) Natural Resources Conversation Service (NRCS) soil survey mapping function. According to the map (Figure 3), 100% of the soil present within the Proposed Action area is defined as “Ud—Urban land” (USDA-NRCS, 1979). USDA_NRCS defines this soil profile as significantly changed by human-transported materials or human-altered materials, otherwise known as soils in largely built or developed environments. A detailed description of the mapped soil unit is provided below.

Figure 3. USDA-NRCS Soil Map



Note: See definition of Ud code in paragraph below

Urban land (Ud): This map unit consists of part of the metropolitan area of Atlanta and the cities of Decatur, Avondale Estates, Clarkston, Stone Mountain, Lithonia, and Tucker (USDA-NRCS, 1979). The Southern Piedmont landscape is mainly ridgetops and hillsides associated with

drainageways and flood plains. Commonly, the soil has been cut, filled, shaped, and smoothed. In places, the cuts are deep and expose weathered mica schist, granite, or gneiss.

Urban land is mainly business districts, shopping centers, schools, parking lots, motels, industries, housing developments, and airports. A few minor areas are wooded or in grass. Erosion is a severe hazard in most areas during construction. Runoff from uplands is a hazard in urban areas on flood plains (USDA-NRCS, 1979).

3.6.2 Thresholds of Significance

The Proposed Action would be considered to have a significant effect to geology, soils and topography impacts if it:

- Causes the substantial loss of soils, or compaction to the extent that makes it impossible to establish native vegetation within two growing seasons;
- Disturbs a land area larger than 1,000 acres;
- Causes a permanent loss of soil productivity that results from converting previous soils into impervious ground on more than 5-percent of the property;
- Results in topography that does not comply with the overall topography of adjacent land; and,
- Removes or alters soils and causes structural instability to surrounding buildings or infrastructure.

3.6.3 Environmental Consequences

3.6.3.1 Proposed Action

3.6.3.1.1 Geology

The Proposed Action would not encounter or modify bedrock underlying the Proposed Action site. Therefore, construction of the Proposed Action would have no mechanism to impact geologic resources.

3.6.3.1.2 Topography

The Proposed action does not require landscape-level changes to topography. Therefore, construction of the Proposed Action would have no mechanism to impact topographic features.

3.6.3.1.3 Soils

The Proposed Action demolition phase would expose soils and increase the potential for erosion. Soil erosion from construction activities is regulated in Georgia under the Georgia Erosion & Sedimentation Act of 1975 (OCGA Title 12, Chapter 7).

Accordingly, NPDES permit would be obtained by the construction contractor, and permit-required and -approved BMPs specified in an Erosion, Sedimentation, and Pollution Control (ES&PC) Plan, consistent with the Georgia Soil & Water Conservation Commission guidance, would be implemented and maintained to minimize soil erosion and sedimentation resulting from land-disturbing activity. As warranted, the ES&PC Plan may be approved by the Local Issuing Authority prior to its implementation. BMPs may include but are not limited to:

- Silt fences around the area of disturbance
- Re-vegetation of bare soils
- Mulching of bare soils
- Wet suppression of soils to reduce wind erosion
- Covering of any soil stockpile

- Preserving existing site vegetation
- Construction monitoring and reporting

Additionally, soil quality could be impacted in the event of the accidental release of petroleum-based fluids (diesel, hydraulic fluid) from construction vehicles and equipment. Petroleum can degrade soil quality if the release is not immediately remediated. To avoid such potential releases and impacts, construction equipment would be properly maintained in good working order and equipped with emergency spill kits, with workers trained on the proper deployment of kits. This would ensure that construction contractors are prepared to respond to an emergency release of petroleum-based fluids, contain the release, and prevent impacts to soil. Additionally, construction equipment would be refueled in designated areas with impervious surfaces to avoid potentially impacting soil from spilled fuel.

By utilizing appropriate erosion and sedimentation BMPs, stormwater management BMPs, adherence to the terms of the NPDES permit ES&PC Plan, and revegetating the site following demolition, impacts from construction of the Proposed Action on soil would be minimized to short-term, less-than-significant adverse levels. When considered on a cumulative basis with other current and future developments in the area, impacts from the Proposed Action would not be significant.

3.6.3.2 No Action

No changes to the site would occur from implementation of the No Action alternative; therefore, no impacts to geology, topography, or soils would occur. Baseline conditions would remain, as described above.

3.7 Water Resources and Floodplains

The Proposed Action would be considered to have a significant impact on water resources (surface water or groundwater) if:

- It could cause an exceedance of a total maximum daily load;
- It could cause a change in the impairment status of that water feature; or
- It could cause an unpermitted direct impact on a water of the United States.

Floodplains are those areas that will be inundated by a flood event having a defined chance of exceedance in any given year. The Proposed Action would be considered to have a significant impact on floodplains if the action:

- Reduces water availability or supply to existing users;
- Overdrafts groundwater basins;
- Exceeds safe annual yield of water supply sources;
- Threatens or damages unique hydrologic characteristics;
- Endangers public health by creating or worsening health hazard conditions; or,
- Violates established laws or regulations adopted to protect floodplains.

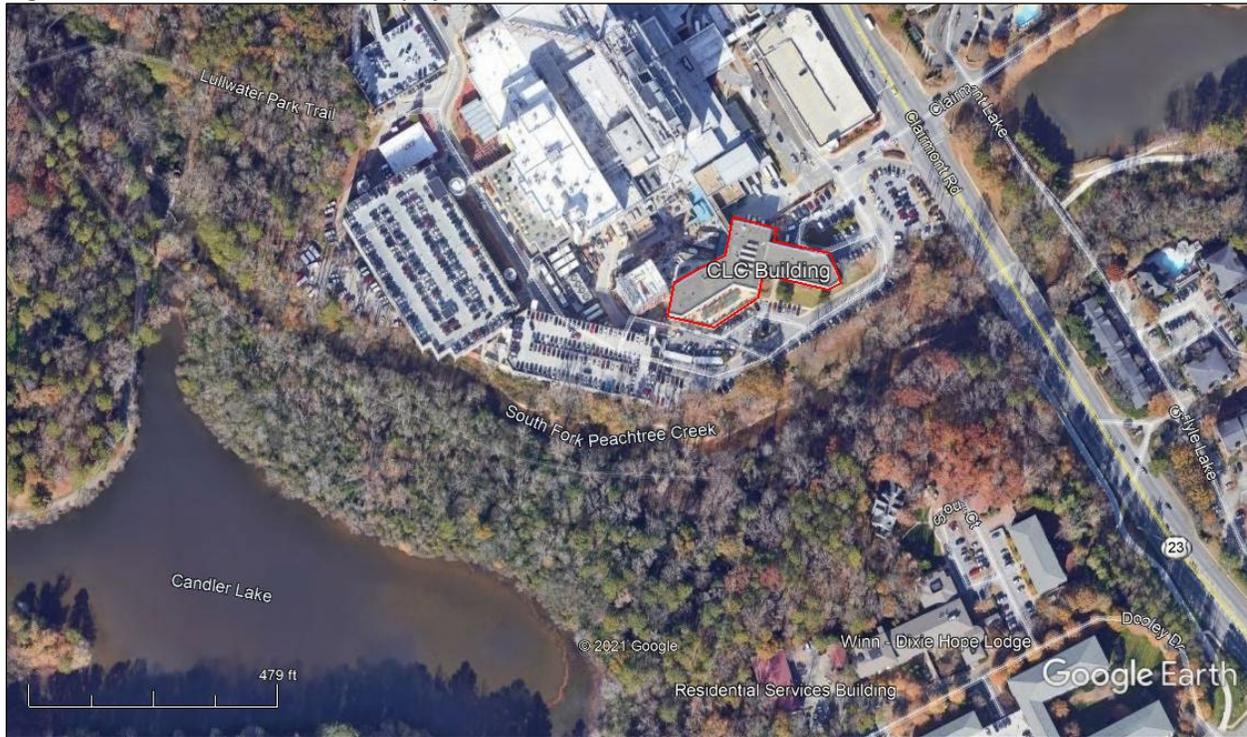
3.7.1 Existing Environment

3.7.1.1 Surface Water Resources

The Atlanta VAMC is located within the 27.8-square-mile South Fork Peachtree Creek Watershed. No streams or surface water bodies are present on the Atlanta VAMC property. The nearest waterbody is the South Fork Peachtree Creek, which is located approximately 130-feet south of the CLC Building site (Figure 4). The South Fork Peachtree Creek was reported as impaired due

to bacteria and other microbes and degraded aquatic life by GAEPD in 2020 (USEPA, 2021). Located directly south of the South Fork Peachtree Creek is a river, which flows east and discharges into Candler Lake. Candler Lake is classified as a freshwater pond and is the largest waterbody within the South Fork Peachtree Creek Watershed. Candler lake is located approximately 600-feet southwest of the CLC Building.

Figure 4. Water Resources in Vicinity of the Atlanta VAMC



3.7.1.2 Groundwater Resources

Contrasting geologic features and landforms of the physiographic provinces of Georgia affect the quantity and quality of groundwater throughout the state (USGS, 2021). As previously described, the Atlanta VAMC is located in the Piedmont region of Georgia, where groundwater is transmitted through secondary openings along fractures, foliation, joints, contacts, or other features in the crystalline bedrock. Groundwater is anticipated to be present at approximately 7-10 feet below the ground surface at the CLC Building site (USGS, 2021). The Atlanta VAMC does not utilize groundwater resources underlying the property for any facility function.

3.7.1.3 Floodplains

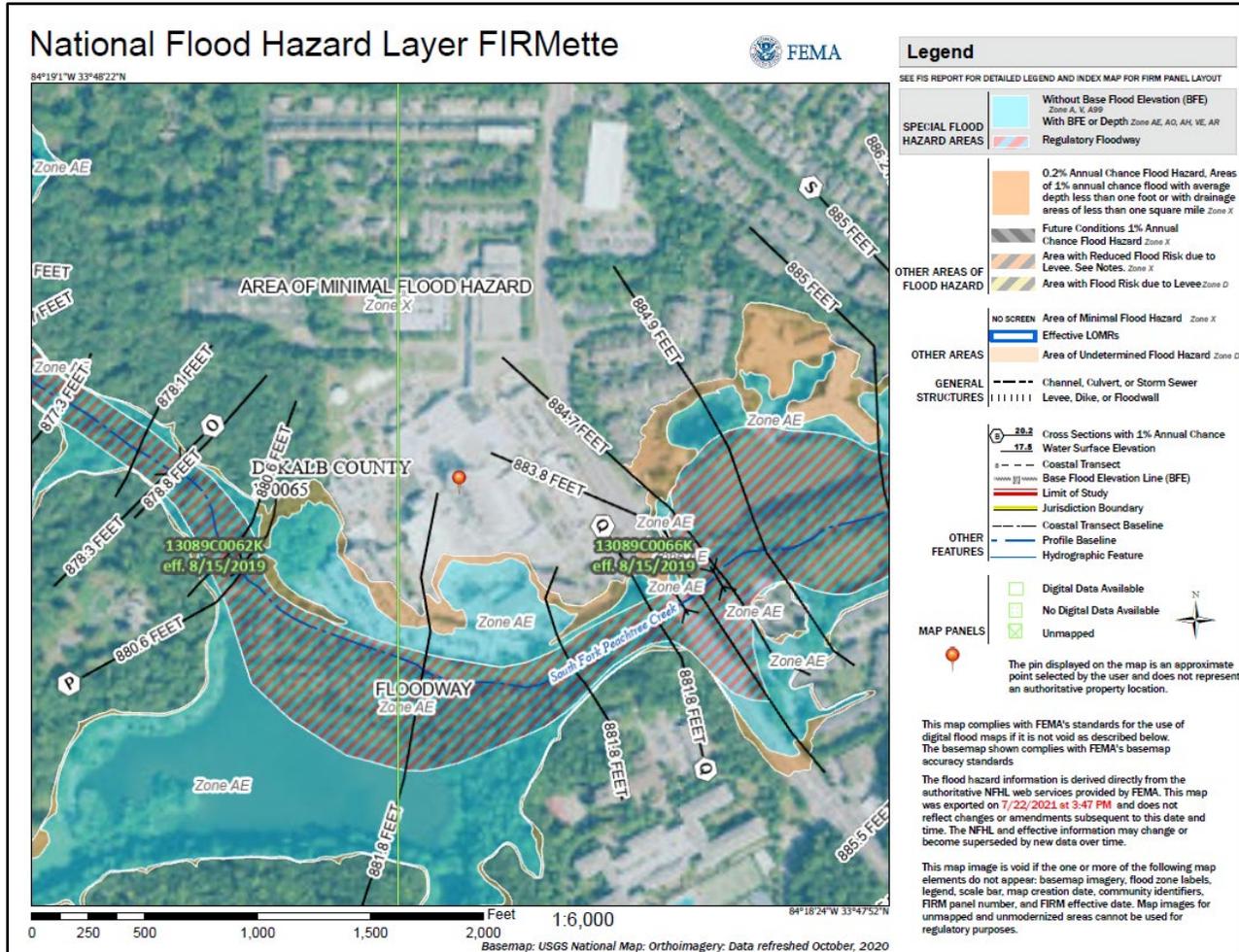
Based on review of available Federal Emergency Management Agency (FEMA) Flood Zone Maps for DeKalb County, code number 130065, the Proposed Action site is featured on boundary map 13089C0066K, effective August 15, 2019 (FEMA, 2021) (Figure 5).

The western portion of the CLC Building site is located within “Flood Zone AE”, which is defined by FEMA as an area at high risk for flooding. Specifically, a Flood Zone AE area presents the 1% annual chance floodplain, which is vulnerable to riverine and or coastal (tidal) flooding that would be expected to occur on average about once every 100 years. This area is more commonly referred to as the base flood area or the 100-year flood plain (FEMA, 2021).

The remaining area of the CLC Building site is located in Zone X, which is defined as an area of minimal flood hazard (FEMA, 2021).

The Atlanta VAMC operates a number of pump ducts and floodgates around the CLC Building to minimize flooding of built resources. During flood events, floodwaters flow to the pump ducts and floodgates to avoid impact to the campus or surrounding features.

Figure 5. FEMA Floodplain Map (floodplain boundary map 13089C0066K)



3.7.2 Thresholds of Significance

Impacts to water resources would be considered significant if VA’s actions: exceed applicable federal and state regulatory limits for surface water quality or result in unpermitted direct impacts to waters of the U.S.; substantially affect surface water drainage or stormwater runoff; substantially affect groundwater quantity or quality; or are inconsistent with enforceable policies under the CZMA.

3.7.3 Environmental Consequences

3.7.3.1 Proposed Action

3.7.3.1.1 Water Resources

As previously indicated, there are no surface waters present at the Atlanta VAMC. Thus, the Proposed Action would not involve construction in, on, or over surface waters, and would thereby not result in disturbance, alteration, or filling of any surface waters on or around the site.

Although the South Fork Peachtree Creek is approximately 130-feet from the Proposed Action area, there is a vegetative buffer between the stream and the CLC Building that would decrease the potential for any impact to this water body. Additionally, stormwater management BMPs would be implemented during the demolition phase of the Proposed Action to further prevent any off-site impacts to this surface water resource.

The Proposed Action is not anticipated to encounter groundwater or require dewatering during demolition of any subsurface building massing features. Therefore, the Proposed Action has no mechanism to impact groundwater.

3.7.3.1.2 Floodplains

Although the Proposed Action site is partially located in floodzone AE, the demolition of the CLC Building would not induce flooding either on-site or downstream of the Atlanta VAMC, nor change of the baseflood elevation of the site. Following demolition, the site would be graded and revegetated, thereby reducing the area of impervious surfaces subject to flooding. Therefore, the Proposed Action would have no adverse impact on floodplain conditions on or off site.

3.7.3.2 No Action

No changes to the Proposed Action site would occur from implementation of the No Action alternative; therefore, no changes to water resources or floodplains would occur. However, there would be no decrease in impervious surfaces, as would occur under the Proposed Action. Baseline conditions would remain, as described above.

3.8 Noise

Sound occurs when vibrations that travel through a medium are interpreted by the biological elements of the ear. Noise occurs when sounds become undesirable, unpleasant, or damaging. Noise-sensitive receptors are residences, hospitals, libraries, recreation areas, and religious institutions.

Sound pressure levels are quantified in decibels (dB), which is dependent on both frequency and intensity, and is given a level on a logarithmic scale. The way the human ear hears sound intensity is quantified in A-weighted decibel (dBA), which are level “A” weights according to weighting curves. Sound levels for common activities and construction work are presented in Table 12. Noise levels and durations from these activities would vary depending on the specific equipment being used, and the impact from this noise on a receptor would depend on the distance between the receptor and the source of the noise. Generally, noise levels decrease by approximately 6 dBA for every doubling of distance for point sources (such as a single piece of construction equipment), and approximately 3 dBA for every doubling of distance for line sources (such as a stream of motor vehicles on a busy road at a distance).

The National Institute for Occupational Safety and Health recommends that individuals working in an environment of 85 dBA or louder for an eight-hour workday limit their exposure to this noise level and wear protective earwear to help manage and prevent hearing loss due to noise exposure.

3.8.1 Noise Receptors

Sensitive noise receptors are defined as properties where frequent human use occurs and where a lowered noise level would be of benefit. Sensitive noise receptors are considered to be residences, hospitals, libraries, recreation areas, religious institutions, and other similar uses.

The nearest sensitive noise receptors to the CLC Building include the hospital buildings within the Atlanta VAMC, followed by the Clairmont Reserve Apartment Homes and the Decatur Highlands apartment complexes, both of which are located approximately 500-feet east from the CLC Building. Other sensitive noise receptors within 0.25 miles of the CLC Building include the Emory Autism Center and the Early Emory Center for Child Development buildings of the Emory University Clairmont Campus, which are located approximately 650-feet south from the CLC Building, and the Lullwater Preserve located approximately 1,070-feet from the CLC Building.

No religious institutions, libraries, or convalescent facilities were identified within 0.25 miles of the CLC Building.

Table 12. Common Household, Industrial, and Construction Sound Levels

Sound Level (dBA)	Common Sounds	Effect
140	Jet engine	Painful
130	Near air-raid siren	Painful
120	Jet plane takeoff, siren	Painful
110	Chain saw, thunder, garbage truck	Extremely Loud
100	Hand drill	Extremely Loud
90	Subway, passing motorcycle	Extremely Loud
85	Excavator, backhoe, paver	Very Loud
80	Blow-dryer, kitchen blender, food processor, cement mixer, power saw	Very Loud
70	Busy traffic, vacuum cleaner, alarm clock	Loud
60	Typical conversation, dishwasher, clothes dryer	Moderate
50	Moderate rainfall	Moderate
40	Quiet room	Moderate
30	Whisper, quiet library	Faint

3.8.2 Existing Environment

The Atlanta VAMC is characterized as a suburban area, primarily surrounded by wooded land and residential communities, with a soundscape typical of a suburban area. The predominant ambient sounds audible within the Atlanta VAMC are from vehicular traffic on Clairmont Road. No other notable noise-generating sources are present within the immediate vicinity of the site.

When outdoors, sources of noise within the Atlanta VAMC campus include staff and visitor traffic and approaching ambulance sirens. While ambulance siren noise levels range from approximately 110 dBA to 130 dBA, ambulances typically shut off their lights and sirens when entering the hospital grounds as to not disturb patients.

3.8.3 Thresholds of Significance

Impacts would be considered significant if noise from VA’s actions significantly increased ambient noise levels at sensitive receptors locations or exceeded any applicable environmental noise limit guidelines.

3.8.4 Environmental Consequences

3.8.4.1 Proposed Action

The Proposed Action would generate noise from mobilizing equipment to and from the Proposed Action site. Once mobilized to the site, the majority of construction equipment would remain within the construction area until demolition was complete. This approach would minimize the need for multiple mobilizations of equipment, thereby decreasing the amount of noise associated with equipment travel to and from the Atlanta VAMC. The primary noise associated with the Proposed Action would then be generated from the operation of the heavy machinery involved with demolishing the CLC Building.

Noise from demolition activities would vary depending on the type of equipment being used at the time. The impact from this noise on a receptor depends on the distance between the noise source and receptor. Anticipated cumulative construction sound levels generated during daytime hours at specified distances are shown in Table 13.

Table 13. Estimated Noise Levels from Construction Activities

Distance from Noise Source, feet (meters)	Estimated Sound Level in dBA
50 (15.2)	90–94
100 (30.5)	84–88
150 (45.7)	81–85
200 (61.0)	78–82
400 (121.9)	72–76
800 (243.8)	66–70
1,200 (365.8)	< 64

The nearest sensitive noise receptors to the Proposed Action site would be patients at the main hospital building. Off-site, the nearest receptors would be residents at the two residential communities located approximately 500-feet east of the CLC Building along Clairmont Road. Noise from construction equipment would likely be attenuated to levels at or below 70 dBA at these receptor locations. Further sound level reductions would occur inside any buildings or structures. Additionally, regular vehicle traffic on Clairmont Road would continue to dominate the soundscape in the area.

Construction workers would be working in close proximity to construction equipment and could be exposed to noise levels above 90 dBA. This noise level is above the permissible noise exposure level defined by the Occupational Safety and Health Administration (OSHA). These levels would be reduced to permissible levels through feasible administrative or engineering controls, such as equipment mufflers and sound shields, and/or the use of BMPs including the use of hearing protection equipment to ensure compliance with applicable OSHA standards.

Noise impacts would be further minimized by equipping construction equipment with appropriate sound-muffling devices (i.e. from the original equipment manufacturer or better), and limiting construction-equipment engine idling to less than three minutes. Additionally, construction activities would take place during daylight hours and during weekdays, unless there is a specific activity that needed to be completed outside of this schedule to avoid impacting the staff, visitors, and patients at the Atlanta VAMC.

Therefore, construction and operation of the Proposed Action would result in short-term, less-than-significant adverse impacts to noise receptors, including visitors and staff at the hospital, off-site

receptors, and construction workers. When considered on a cumulative basis with other current and future developments in the area, the impacts from the Proposed Action would not increase to a significant adverse level.

3.8.4.2 No Action

Under the No Action Alternative, demolition of the CLC Building would not occur. No new noise-generating sources would be present at the CLC Building site, and no additional noise impacts would occur.

3.9 Solid Waste 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. Generally, hazardous wastes are discarded materials (e.g., solids or liquids) not otherwise excluded by 40 CFR 261.4 that exhibit a hazardous characteristic (i.e. ignitable, corrosive, reactive, or toxic), or are specifically identified within 40 CFR 261.

3.9.1 Existing Environment

The Atlanta VAMC conducted a survey of the CLC Building to determine if regulated building materials, including asbestos, lead, and/or polychlorinated biphenyls (PCBs), were present. The survey found that asbestos-containing materials (ACM) were present in at least 24 sample locations throughout the CLC Building. The ACM present included mudded pipe fitting insulation, floor tiles, fireproofing materials, pipe insulation with fiberglass, and floor linoleum. The Atlanta VAMC Engineering Services staff noted that a second and more comprehensive regulated building material pre-demolition survey would be conducted by the construction contractor's licensed staff prior to demolition of the CLC Building.

3.9.2 Thresholds of Significance

Impacts to solid waste hazardous materials, or hazardous waste, would be considered significant if the Proposed Action were to create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or wastes from reasonably foreseeable accident events; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

3.9.3 Environmental Consequences

3.9.3.1 Proposed Action

Prior to demolition of the CLC Building and following completion of the pre-demolition survey, all regulated building materials (including ACM) would be abated (removal or encapsulation) by licensed workers according to all applicable federal and state regulations, e.g. Georgia asbestos abatement regulations outlined in *Rule 391-3-14-.02 Provisions* (State of Georgia, 2021), and transported off-site in appropriate containers (i.e. double-lined containers) and under manifest for proper disposal at a USEPA-approved disposal facility. Following abatement, the CLC Building demolition debris would not contain hazardous materials. Approximately 3,815 cy of this debris is anticipated to be generated. As previously described, debris would be recycled and/or reused to the maximum extent practicable. All other debris would be landfilled off-site as construction debris. The nearest Georgia-licensed landfill is the Seminole Road Landfill at 4203 CleveMont Road, Ellenwood, GA, and operated by the DeKalb County Sanitation Department, though other licensed landfills may also be used.

Accordingly, the nature of the solid wastes generated during construction of the Proposed Action would be similar to a typical demolition project and the volumes generated would not be

anticipated to make a major contribution to the overall solid waste volume generated and disposed of in DeKalb County or northwestern Georgia.

These management measures would ensure that potential impacts from construction of the Proposed Action on solid waste and hazardous materials conditions would remain at short-term, negligible adverse levels. Additionally, the removal of ACM and any other regulated building materials would be considered a long-term beneficial outcome associated with the Proposed Action. When considered on a cumulative basis with other current and future developments in the area, the negligible adverse impacts from the Proposed Action would not increase to significant levels.

3.9.3.2 No Action

Under the No Action alternative, the Proposed Action would not be implemented. The ACM present in the CLC Building would remain, but would continue to require management to ensure it does not deteriorate and pose a hazard to patients, visitors, and staff. No other changes to solid waste and hazardous material volumes or management procedures would occur, and baseline conditions would remain, as described above.

3.10 Transportation and Parking

3.10.1 Existing Environment

The Atlanta VAMC is accessible to visitors and staff from the South or North entrances located along Clairmont Road (Figure 6). Traffic signals are present at each entrance and timed to allow for adequate traffic flow to and from the campus and Clairmont Road. Additionally, a separate exit lane for vehicles traveling south on Clairmont Road is present at the South entrance.

According to the Georgia Department of Transportation (GDOT), Clairmont Road has an Annual Average Daily Traffic (AADT) volume of 24,600 vehicles (GDOT, 2021). The Metropolitan Atlanta Rapid Transit Authority (MARTA) is the principal public transportation service available in DeKalb County. The Atlanta VAMC can be reached by MARTA route 19.

Currently, the Atlanta VAMC parking demand is not at full capacity. The Atlanta VAMC has six parking decks (A, D, E, F, K, and L) and numerous parking lots throughout the campus. Approximately 50 ground-level parking spaces associated with parking lots J, I, and G, are located immediately adjacent to the CLC Building. Parking lot J also provides a drop-off lane and access to the CLC Building entrance.

Figure 6. Atlanta VAMC Entrances and Roadways



3.10.2 Thresholds of Significance

An action would be considered to have a significant impact when it would cause a reduction by more than two levels of service at roads and intersections within the Region of Influence (ROI), or an increase in daily traffic of more than 20% above pre-action levels, or when parking demand exceeds parking supply at the facility.

3.10.3 Environmental Consequences

3.10.3.1 Proposed Action

During the demolition phase of the Proposed Action, there would be a temporary increase in the number of vehicles (including both construction vehicles and worker vehicles) traveling on Clairmont Road. No more than 50 vehicles per day associated with the construction phase are anticipated. This amount of traffic represents an approximately 1% increase in the current AADT on Clairmont Road. Clairmont Road can adequately support the temporary construction traffic increase and would not require physical alterations or traffic pattern modifications to support the Proposed Action.

Construction vehicles would access the CLC Building site from the South entrance on Clairmont Road. This entrance is equipped with traffic lights as well as multiple lanes to enter or exit the Atlanta VAMC. Therefore, the temporary presence of construction vehicles would not create congestion at the South entrance or on Clairmont Road.

During the demolition phase, the parking lots J, I, and G, located adjacent to the CLC Building would be closed. However, as previously described, the Atlanta VAMC has excess parking capacity elsewhere on the campus, and this capacity would be available for use by visitors or staff who would otherwise park adjacent to the CLC Building.

Following demolition and site restoration, VA would reopen the parking areas that were temporarily closed. Therefore, the Proposed Action would have a short-term, negligible adverse impact on transportation and parking within or in the vicinity of the Atlanta VAMC. Additionally, when considered on a cumulative basis with other current and future developments in the area, the impacts from the Proposed Action would not increase to a significant adverse level.

However, the staff and patients of the CLC Building would be relocated to other facilities within the Atlanta VAMC until permanent facilities are developed in place of the CLC Building. This could generate a minor increase in traffic and parking congestion in other locations of the Atlanta VAMC.

Therefore, operation of the Proposed Action would have a short-term, direct, negligible adverse impact on transportation and parking within the Atlanta VAMC. When considered on a cumulative basis with other current and future developments in the area, this resource would not rise to a level of significant adverse effect.

3.10.3.2 No Action

No changes to transportation or parking at the Atlanta VAMC would occur under the No Action alternative; therefore, no impacts would occur. Baseline conditions would remain, as described above.

3.11 Utilities

3.11.1 Existing Environment

The Atlanta VAMC currently receives utility services from the following providers:

- Electric: Georgia Power
- Potable Water: The DeKalb County Department of Watershed Management
- Gas: Gas South
- Sanitary Sewer: The DeKalb County Department of Watershed Management

Utility lines generally enter the Atlanta VAMC property from Clairmont Road and then are distributed to individual buildings, depending on need and function. The CLC Building utilizes all of the above utilities. Additionally, utility lines for telecommunication, roof drains, and selected sanitary sewerage are connected between the CLC Building and CHP.

Stormwater runoff in urban areas is one of the leading sources of water pollution in the United States. As previously described, the Atlanta VAMC maintains a stormwater management system, which includes engineering controls to avoid water pollution and to capture, manage, and control the discharge of stormwater from overland run-off generated within the campus boundary. There are a number of storm drains and catch basins located throughout the campus, including around the CLC Building site.

3.11.2 Thresholds of Significance

Impacts to facilities, energy demand and generations, and utilities would be considered significant if the Proposed Action were to cause an impairment of utility service elsewhere at the Atlanta VAMC, to local communities, homes, or businesses.

The Proposed Action would result in significant adverse impacts to stormwater conditions if it:

- Increases runoff beyond water quantity or quality capacity of existing stormwater management infrastructure; or
- Results in noncompliance with the existing Atlanta VAMC stormwater management plan.

3.11.3 Environmental Consequences

3.11.3.1 Proposed Action

Prior to demolition, the construction contractor would coordinate with each utility provider to identify shut-off valves or locations to disconnect and cap utility lines serving the CLC Building. This would ensure that demolition activities do not interrupt utility services elsewhere on campus or within the surrounding community. Additionally, utilities interconnected between the CLC Building and the CHP would be rerouted prior to disconnecting that service from the CLC Building.

Therefore, VA does not anticipate that the Proposed Action would cause a deterioration or disruption in utility services supplied to other locations within the Atlanta VAMC or to existing customers in the community.

Construction activities that disturb topsoil can lead to sedimentation of stormwater runoff. To minimize sediment-laden run-off from the Proposed Action site, the construction contractor would implement and maintain the BMPs required as part of the ES&PC Plan. Additionally, prior to construction, catch basins within the Proposed Action site would be covered with a filter fabric to trap sediment and other particles prior to entering the catch basins. No further changes to stormwater management systems are anticipated under the Proposed Action.

The Proposed Action would comply with the *Energy Independence and Security Act* (EISA) Section 438 Stormwater Management for Federal Facilities (USEPA, 2009) to the maximum extent technically feasible through engineering and design controls, such as minimizing the area of new impervious surfaces, directing stormwater run-off to designated storage basins, and allowing precipitation to infiltrate into the ground surface to the maximum extent possible. Under the Proposed Action, the impervious surface area associated with the former CLC Building would be converted to grass-covered pervious ground. Additionally, ES&PC Plan BMPs and existing stormwater management controls would function to ensure stormwater run-off from the Proposed Action site is properly managed.

Therefore, the Proposed Action would have a short-term, less-than-significant adverse impact on stormwater conditions. When considered on a cumulative basis with other current and future developments in the area, the impacts from the Proposed Action on stormwater conditions would not increase to a significant level.

3.11.3.2 No Action

Under the No Action alternative, no changes to any of the utility services would occur. Because the CLC Building would remain in place, there would not be a decrease in impervious surface area at the site. Baseline conditions would remain, as described above.

3.12 Community Services

3.12.1 Existing Environment

Community services provided by DeKalb County and the City of Decatur include police and fire protection, ambulatory services, schools, private health care, and parks and recreation. Because no additional load would be placed on these services as a result of the Proposed Action, impacts to community services other than Veterans' medical services are not analyzed in this EA.

3.12.2 Thresholds of Significance

Impacts to community services would be considered significant if the Proposed Action were to cause an impairment of, make inaccessible, or place undue strain on these services within the local community.

3.12.3 Environmental Consequences

3.12.3.1 Proposed Action

The Proposed Action would remove the CLC Building from the Atlanta VAMC until such time that a replacement facility is placed in service. Thus, the Proposed Action would have a short-term, moderate adverse impact on Veterans seeking access to a VA Nursing Home in northern Georgia.

3.12.3.2 No Action

Under the No Action alternative, demolition of the CLC Building would not occur and the campus would remain in its present condition for the foreseeable future. The CLC Building would remain available to serve Veterans seeking access to a VA Nursing Home in northwest Georgia. However, the existing CLC Building layout would remain unchanged and not in compliance with current VA building standards or modes for care. Thus, the No Action alternative would have short-term beneficial impacts by retaining the CLC function, but adverse impacts over the long-term due to the inadequate design of the building for this community service.

3.13 Socioeconomics

3.13.1 Existing Environment

The Atlanta VAMC is located within a suburban, medium-density area in DeKalb County, Georgia. The socioeconomic conditions are influenced by the employment opportunities in the region, which are predominantly associated with health care and social assistance, professional, scientific, and technical services, retail trade, mining, quarrying, and oil and gas extraction, and utility services (Data USA, 2021). The median annual income in DeKalb County is \$62,399, which is slightly more than the median annual income of \$58,700 for Georgia and slightly less than the United States median annual income of \$62,843 (USCB, 2020). DeKalb County is the 4th most populated county of the 159 counties in Georgia. The population in DeKalb County has increased by 9.7% to approximately 764,382 individuals from 2010 to 2020 (the year the most recent data was reported) (USCB, 2020).

Relevant demographic data for DeKalb County and for Georgia are presented in Table 14 and economic data are presented in Table 15. The data presented are from the U.S. Census Bureau 2010-2020 Quick Facts dataset (USCB, 2020).

Table 14. Demographic Data for DeKalb County and Georgia

Location	Total Population	Median Age	% Population under age 18	% Minority Population ⁽¹⁾	% High School Graduates	Veterans
DeKalb County	764,382	36.3	23.0%	45.2%	89.3%	36,189
Georgia	10,711,908	36.7	23.6%	39.8%	87.1%	629,302

Notes:

1 – Data include all race/ethnicity categories except non-Hispanic White persons

Table 15. Economic Data for DeKalb County and Georgia

Location	Number of Households	% Population in Poverty	Total Employment
DeKalb County	317,646	12.9%	289,015
Georgia	4,378,391	13.3%	4,040,559

3.13.2 Thresholds of Significance

Impacts to socioeconomics would be considered significant if the action caused substantial change to the sales volume, income, employment, or population of the surrounding ROI.

3.13.3 Environmental Consequences

3.13.3.1 Proposed Action

The Proposed Action would require the employment by the construction contractor of skilled laborers, and the use of construction vehicles, supplies, and support facilities (office trailer, safety equipment, erosion-control materials). Additionally, workers from outside of the region would utilize area lodging and other services during the demolition phase. The temporary increase in employment and spending on equipment, supplies, and local services would have a short-term, less-than-significant beneficial impact on the local economy. However, on a regional scale, the Proposed Action would not be considered to result in a long-term significant beneficial or adverse impact on socioeconomic conditions because the spending levels and short-term duration of the Proposed Action would not be significant in context to regional levels.

3.13.3.2 No Action

Under the No Action alternative, the Proposed Action would not be implemented. There would be no increase in expenditures on local services. Baseline expenditures on local services would continue for the foreseeable future.

3.14 Environmental Justice

3.14.1 Existing Environment

Executive Order (EO) 12898 “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations” was enacted in 1994 to focus federal agencies attention on the environmental and human health conditions in minority communities and low-income communities with the goal of achieving environmental justice. Under this EO, federal agencies must identify and address the human health or environmental effects of its actions on minority and low-income populations.

For this analysis, data for minority and low-income population were obtained for the area within a 2.5-mile radius of the Atlanta VAMC, DeKalb County, and Georgia (USCB, 2020) (Table 16). According to this data, the area within a 2.5-mile radius of the Atlanta VAMC has a slightly smaller minority population than DeKalb County or state-wide, but a slightly higher percentage of low-income populations (household income less than \$25,000/year) than either the county or state.

Table 16. Minority and Low-Income Populations

Location	Total Population	% Minority Population ⁽¹⁾	Percentage of Population Below Poverty Level
2.5-mile radius of the Atlanta VAMC	76,467	34.0%	16%
DeKalb County	764,382	45.2%	12.9%
Georgia	10,711,908	39.8%	13.3%

Notes:

1 – Includes all race/ethnicity categories except non-Hispanic White persons

3.14.2 Thresholds of Significance

Impacts to environmental justice would be considered significant if the action caused substantial change to the economic conditions and demographics of the population of the surrounding ROI,

or measurably and disproportionately impacted environmental quality and conditions within environmental justice communities.

3.14.3 Environmental Consequences

3.14.3.1 Proposed Action

The Proposed Action would not have a disproportionate impact on low-income or minority groups, as these populations are not present within the local community at dissimilar rates compared with levels within DeKalb County or state-wide. The Proposed Action has no reasonable mechanisms to cause environmental impacts on the community, nor change the underlying demographic or socioeconomic profile of the community through changes in population, income levels, housing, local tax revenues, or associated community services. However, the Proposed Action may provide a temporary increase in local employment if the contractor selected to perform construction activities hires local workers, which could result in a minor short-term positive socioeconomic impact on the community.

3.14.3.2 No Action

No changes at Atlanta VAMC would occur under the No Action alternative. No impacts to environmental justice conditions would occur.

4 Agency Coordination and 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 Environmental Compliance Management Directive (VA, 2012) and VA's NEPA Interim Guidance for Projects (VA, 2010). Consideration of the views and information of all interested persons promotes open communication and enables better decision-making. Agencies, organizations, and members of the public with interest in the Proposed Action are encouraged to participate.

4.1 Draft EA

4.1.1 Early Input from Native American Tribes, and Federal, State, and Local Agencies

During preparation of the Draft EA, VA solicited input from selected federal, state, and local agencies, and Native American Tribes, for early input on the Proposed Action and environmental concerns to be addressed in the EA. As previously indicated, no comments were received.

4.1.2 Public Review

The Draft EA was published and released for a 30-day review and comment period, as announced by a Notice of Availability (NOA) published in the *Atlanta Journal-Constitution*, a daily newspaper of general circulation. The NOA was also mailed to selected federal, state, and local agencies, and Native American Tribes, to inform them of the 30-day review and comment period. A copy of the Draft EA NOA is provided in Appendix B.

As stated in the NOA, the Draft EA was available for review in print in the reference section of the DeKalb County Public Library Decatur Branch at 215 Sycamore Street, Decatur, GA 30030; and available for electronic download from the VA website: <https://www.atlanta.va.gov/news/index.asp>.

No comments were received from the public, regulatory agencies, or Native American Tribes.

4.1.3 Final EA

VA has completed this Final EA without requiring substantive changes relative to the Draft EA. As previously concluded in the Draft EA and reiterated in this Final EA, the Proposed Action would not cause significant adverse impacts on the environmental resources presented herein.

Additional information about the Final EA may be requested by writing to: Mr. Lorn L. Whittaker, Design and Construction Engineering Service (138), Atlanta VA Health Care System, 1670 Clairmont Road, Decatur, GA 30033. Reference "EA for CLC Atlanta VA Medical Center" in all correspondence.

5 Environmental Management Measures

This chapter summarizes the avoidance, minimization, and management measures incorporated into the Proposed Action to ensure that adverse impacts remain at or below less-than-significant levels. “Management measures” are defined as routine BMPs and/or regulatory environmental compliance and protection measures that are regularly implemented as part of proposed activities, as appropriate, in Georgia. Per established protocols, procedures, and requirements, VA (and VA’s design and construction contractors) would implement these management measures and satisfy all applicable regulatory requirements associated with the design, construction, and operation of the Proposed Action. These management measures are summarized in Table 17. Additionally, environmental permits and approvals potentially required to implement the Proposed Action are summarized in Table 18.

Table 17. Environmental Protection Measures and Monitoring Incorporated into the Proposed Action

AESTHETICS
<ul style="list-style-type: none"> ▪ Construct according to the design presented in VA’s approved Proposed Action plan.
<ul style="list-style-type: none"> ▪ Control fugitive dust emissions by implementing industry-standard construction BMPs, including water trucks for dust suppression, brushing loose soil off construction vehicle tires before leaving the construction site, and installing and maintaining gravel pads at construction exits to prevent tracking loose soil onto roadways.
<ul style="list-style-type: none"> ▪ Install construction privacy fencing between the construction area and the existing hospital grounds to reduce visual impacts to visitors and staff.
<ul style="list-style-type: none"> ▪ Plant native, non-invasive, drought-resistant vegetation following grading to stabilize soils and minimize dust generation.
<ul style="list-style-type: none"> ▪ Professionally maintain the landscaped areas consistent with existing Atlanta VAMC operations.
AIR QUALITY
<ul style="list-style-type: none"> ▪ Implement the dust control BMPs described for aesthetics.
<ul style="list-style-type: none"> ▪ Utilize appropriate construction scheduling (avoid demolition during extremely windy periods).
<ul style="list-style-type: none"> ▪ Utilize Tier-4 compliant engines.
<ul style="list-style-type: none"> ▪ Limit engine idling to no more than three minutes.
<ul style="list-style-type: none"> ▪ Construction vehicles traveling on paved roads within and outside of Atlanta VAMC would follow posted speed limits. This would minimize dust generated by vehicles and equipment on paved surfaces. On unpaved surfaces at the site, maintain vehicle speeds below 5 miles per hour to prevent dust generation of exposed soils.
<ul style="list-style-type: none"> ▪ Cover dump trucks and trailers holding soil or loose material with haul tarps to prevent fugitive dust generation.
<ul style="list-style-type: none"> ▪ On a daily basis visually monitor construction activities. During extended periods of dry weather or sustained high winds, implement additional dust control measures, as needed.
<ul style="list-style-type: none"> ▪ Maintain equipment in good working order according to manufacturer’s instruction.
CULTURAL RESOURCES
<ul style="list-style-type: none"> ▪ Implement the “Inadvertent Discovery” plan as follows; should human remains or other cultural items as defined by the NAGPRA be discovered during project construction, the construction contractor shall immediately cease work and notify VA, a qualified archaeologist, the SHPO, and the selected federally-recognized Tribes.

<p>Tribes are contacted to properly identify and appropriately treat discovered items in accordance with applicable federal and state regulations.</p>
<p><i>GEOLOGY, TOPOGRAPHY, AND SOILS</i></p>
<ul style="list-style-type: none"> ▪ Prepare, obtain, and implement NPDES-required BMPs specified in an ES&PC Plan. Maintain throughout the duration of the demolition phase and until exposed soils are revegetated and restabilized.
<ul style="list-style-type: none"> ▪ Quickly revegetate disturbed areas following completion of construction activities to minimize the length of time that soils are exposed.
<ul style="list-style-type: none"> ▪ Implement spill and leak prevention and response procedures for construction equipment, including maintaining a complete spill kit at the project area, to minimize the potential impact from an accidental fuel release on soil quality. Refuel equipment in designated impervious areas. Ensure construction staff are trained in proper use of spill kits and notification procedures.
<p><i>WATER RESOURCES AND FLOODPLAINS</i></p>
<ul style="list-style-type: none"> ▪ Prepare and implement the ES&PC Plan described for soils to include stormwater management. Implement the specified BMPs.
<ul style="list-style-type: none"> ▪ Comply with the EISA Section 438 Stormwater Management for Federal Facilities, to the maximum extent technically feasible.
<p><i>NOISE</i></p>
<ul style="list-style-type: none"> ▪ Schedule construction activities for daylight hours during the weekday to minimize potential impacts to nearby residential areas.
<ul style="list-style-type: none"> ▪ Maintain mufflers and sound shielding on construction equipment and shut down construction equipment not in use for more than 5 minutes.
<ul style="list-style-type: none"> ▪ Provide hearing protection to workers for activities exceeding the OSHA permissible noise exposure level.
<p><i>SOLID WASTE AND HAZARDOUS MATERIALS</i></p>
<ul style="list-style-type: none"> ▪ Complete a pre-demolition survey for regulated building materials. Remove/abate all regulated building materials from the CLC Building prior to demolition. Transport and dispose of regulated building materials according to all applicable federal, state, and local regulations.
<ul style="list-style-type: none"> ▪ Recycle or reuse construction debris to the maximum extent practicable. Dispose of remaining construction debris in a state-licensed landfill.
<p><i>TRANSPORTATION AND PARKING</i></p>
<ul style="list-style-type: none"> ▪ Temporarily close parking areas adjacent to the CLC Building to ensure vehicles are not damaged during the building demolition phase.
<p><i>UTILITIES</i></p>
<ul style="list-style-type: none"> ▪ Coordinate with utility service providers to confirm disconnection points are isolated to the CLC Building.
<ul style="list-style-type: none"> ▪ Reroute any utilities shared by the CLC Building and the CHP.

Table 18. Potential List of Environmental Permits Required

Permit, Approval, or Certification	Responsible Agency	Applicable Criteria	Required Actions	Permitting Schedule	Comments
<i>Permits/Approvals</i>					
Section 106 of the National Historic Preservation Act (NHPA): Consultation and Coordination with Indian Tribal Governments (EO 13175) and Native American Graves Protection and Repatriation Act (NAGPRA) (EO 13007) https://www.epa.gov/laws-regulations/summary-executive-order-13175-consultation-and-coordination-indian-tribal https://www.nps.gov/history/local-law/eo13007.htm	Georgia Department of Community Affairs, Historic Preservation Division	Required when a federal agency project or effort may affect historic properties located on tribal lands, or land that has cultural/historic significance regardless of location.	Consultation with federally recognized Native American Tribes.	Correspondence would be ongoing and would continue until the completion of the project.	VA initiated preliminary consultation with representatives of 3 federally recognized Native American tribes with ancestral ties to DeKalb County, GA.
Section 106 of the National Historic Preservation Act (NHPA) https://www.dca.ga.gov/georgia-historic-preservation-division	GA State Historic Preservation Office (SHPO)	Required when a federal agency project or effort may affect sites that have yielded or may be likely to yield information important in prehistory or history.	Consultation with the GA SHPO was initiated to receive Section 106 concurrence.	Initiation was conducted on September 13, 2021. Agency review takes approximately 1 month.	Due to the fact that the Atlanta VAMC does not possess significant architectural features and is not known to have been associated with any important events in VA's history or medical history, and the CLC building is less than 50 years of age, VA requested concurrence on a determination of no adverse effect to historic properties. The SHPO did not provide a response during the review period. VA would also implement an "Inadvertent Discovery" plan, stating that VA would cease all disturbance activities upon the discovery of an artifact.
Regulated Building Materials Abatement	Georgia EPD	Required prior to asbestos abatement	10 Day Notification - Filed with the State of Georgia EPD, the notification will be revised and resubmitted as necessary to reflect changes in project dates, times of inactivity, or changes in discovered quantities of ACM.	10 Day Notification (prior to abatement)	Surveys and abatement must be performed by licensed workers.
National Pollutant Discharge Elimination System (NPDES) permit.	Georgia EPD	Required prior to ground disturbance	Construction contractor to apply for and obtain NPDES permit.	Permit coverage must be obtained by submitting a fully completed Notice of Intent (NOI). The NOI will include basic information about the construction site and the receiving waters where the discharges occur. Upon issuance of the permit, all NOIs for coverage under the General Construction Permits must be submitted through EPD's electronic submittal portal.	Construction contractor to implement and maintain all NPDES-required BMPs.

***Assumptions:** *Local environmental permits would not be obtained.*

6 List of Preparers

U.S. Department of Veterans Affairs, Atlanta VA Health Care System

Mr. Lorn L. Whittaker, MSc, PMP
General Engineer

Mabbett & Associates, Inc. (Contractor)

Name	Role	Years of Experience
A. Glucksman, BS, MS, LEED AP	Project Manager, Subject-Matter Expert, Document Review	19
E. Fernandes, BS	Junior Staff Scientist, Document Preparation	1

7 Agencies and Individuals Consulted

Federal Agencies

U.S. Army Corps of Engineers, Savannah District

Regulatory Branch
100 W. Oglethorpe Avenue
Savannah, GA 31401

U.S. Department of Fish & Wildlife

Southeast Region
1875 Century Boulevard NE
Atlanta, GA 30345

State Agencies

Georgia Department of Natural Resources

Environmental Protection Division
3 Martin Luther King, Jr. Drive
Suite 1456, East Tower
Atlanta, GA 30334

Georgia Department of Community Affairs

Georgia Historic Preservation Division

60 Executive Park South, NE
Atlanta, GA 30329

Georgia Department of Natural Resources

Coastal Resources Division
One Conservation Way
Suite 300
Brunswick, GA 31520-8687

Georgia Department of Natural Resources

Wildlife Resources Division State
Headquarters
2067 US Highway 278 SE
Social Circle, GA 30025

Georgia Department of City Planning

Office of the Commissioner
55 Trinity Avenue, Suite 1450
Atlanta, GA 30303

County Agencies

DeKalb County Georgia

Mr. Michael L. Thurmond
Chief Executive Officer
1300 Commerce Drive
Decatur, GA 30030

Native American Tribes

Alabama-Quassarte Tribal Town

Ms. Samantha Robinson, THPO
PO Box 188
Wetumka, OK 74884

Coushatta Tribe of Louisiana

Ms. Linda Langley, THPO
PO Box 10
Elton, LA 70532

Muscogee (Creek) Nation

Ms. Corain Lowe-Zepeda, THPO
PO Box 581
Okmulgee, OK 74448

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9 Glossary

Sources:

- Army NEPA Glossary, <http://aec.army.mil/portals/3/nepa/glossary00.pdf>
- Glossary of Terms Used in Department of Energy NEPA Documents, http://energy.gov/sites/prod/files/NEPA_Glossary%2008_2011.pdf
- NEPA Glossary, U.S. Fish and Wildlife Service, <http://www.fws.gov/r9esnepa/Intro/Glossary.PDF>

Aesthetic resources: The components of the environment as perceived through the visual sense only. Aesthetic specifically refers to beauty in both form and appearance.

Affected environment: A portion of the NEPA document that succinctly describes the environment of the area(s) to be affected or created by the alternatives under consideration. Includes the environmental and regulatory setting of the proposed action.

Alternative: A reasonable way to fix the identified problem or satisfy the stated need.

Attainment area: An area that the Environmental Protection Agency has designated as being in compliance with one or more of the National Ambient Air Quality Standards (NAAQS) for sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, lead, and particulate matter. An area may be in attainment for some pollutants but not for others.

Conformity analysis: The *Clean Air Act* requires the Environmental Protection Agency to promulgate rules to ensure that federal actions conform to the appropriate state implementation plans (SIP) for air quality. Two sets of rules (one for transportation and one for all other actions) developed by USEPA establish the criteria and procedures governing the determination of this conformity. A conformity analysis follows these criteria and procedures to quantitatively assess whether a proposed federal action conforms with the SIP.

Council on Environmental Quality (CEQ): Established by Congress within the Executive Office of the President as part of the *National Environmental Policy Act of 1969*, CEQ coordinates federal environmental efforts and works closely with agencies and other White House offices in the development of environmental policies and initiatives. The Council's Chair, who is appointed by the President with the advice and consent of the Senate, serves as the principal environmental policy adviser to the President. The CEQ reports annually to the President on the state of the environment, oversees federal agency implementation of the environmental impact assessment process, and acts as a referee when agencies disagree over the adequacy of such assessments.

Criteria pollutant: An air pollutant that is regulated by National Ambient Air Quality Standards (NAAQS). Criteria pollutants include sulfur dioxide, nitrogen dioxide, carbon monoxide, ozone, lead, and two size classes of particulate matter, PM10 and PM2.5. New pollutants may be added to, or removed from, the list of criteria pollutants as more information becomes available.

Cumulative effect (cumulative impact): The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably 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.

Decibel (dB): A unit for expressing the relative intensity of sounds on a logarithmic scale from zero for the average least perceptible sound to about 130 for the average level at which sound causes pain to humans. For traffic and industrial noise measurements, the A-weighted decibel (dBA), a frequency-weighted noise unit, is widely used. The A-weighted decibel scale corresponds approximately to the frequency response of the human ear and thus correlates well with the loudness perceived by people.

Effects: Effects and impacts, as used in NEPA, are synonymous. Effects include ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions that may have both beneficial and detrimental effects, even if on balance the agency believes that the effect would be beneficial. There are direct effects and indirect effects. Direct effects are caused by the action and occur at the same time and place. Indirect effects are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Endangered species: Plants or animals that are in danger of extinction through all or a significant portion of their ranges and that have been listed as endangered by the U.S. Fish and Wildlife Service or the National Marine Fisheries Service following the procedures outlined in the *Endangered Species Act* and its implementing regulations.

Environmental assessment (EA): A concise public document for which a federal agency is responsible that serves to briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement (EIS) or a finding of no significant impact; aid an agency's compliance with NEPA when no environmental impact statement is necessary; or facilitate preparation of an EIS when one is necessary. Includes brief discussions of the need for the proposal, of alternatives, of the environmental impacts of the proposed action and alternatives, and a listing of agencies and persons consulted.

Environmental impact statement (EIS): A detailed written statement required by Section 102(2)(C) of NEPA, analyzing the environmental impacts of a proposed action, adverse effects of the project that cannot be avoided, alternative courses of action, short-term uses of the environment versus the maintenance and enhancement of long-term productivity, and any irreversible and irretrievable commitment of resources.

Environmental justice: The fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic groups, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. Executive Order 12898 directs federal agencies to make achieving environmental justice part of their missions by identifying and addressing disproportionately high and adverse effects of agency programs, policies, and activities on minority and low-income populations.

Finding of no significant impact (FONSI): A public document issued by a federal agency briefly presenting the reasons why an action for which the agency has prepared an environmental

assessment has no potential to have a significant effect on the human environment and, thus, would not require preparation of an environmental impact statement.

Floodplain: The lowland and relatively flat areas adjoining inland and coastal waters including flood-prone areas of offshore islands, including at a minimum, that area subject to a one percent or greater chance of flooding in any given year.

Fugitive emissions: Emissions that do not pass through a stack, vent, chimney, or similar opening where they could be captured by a control device. Any air pollutant emitted to the atmosphere other than from a stack. Sources of fugitive emissions include pumps; valves; flanges; seals; area sources such as ponds, lagoons, landfills, and piles of stored material (such as coal); and road construction areas or other areas where earthwork is occurring.

Hazardous material: Any material that poses a threat to human health and/or the environment. Hazardous materials are typically toxic, corrosive, ignitable, explosive, or chemically reactive.

Historic property: Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

Impacts: see Effects.

Impervious surface: A hard surface area that either prevents or retards the entry of water into the soil or causes water to run off the surface in greater quantities or at an increased rate of flow. Common impervious surfaces include, but are not limited to, rooftops, walkways, patios, driveways, parking lots, storage areas, concrete or asphalt paving, and gravel roads.

National Ambient Air Quality Standards (NAAQS): Standards defining the highest allowable levels of certain pollutants in the ambient air (i.e., the outdoor air to which the public has access). Primary standards are established to protect public health; secondary standards are established to protect public welfare (for example, visibility, crops, animals, buildings).

National Pollutant Discharge Elimination System (NPDES): A provision of the *Clean Water Act* that prohibits discharge of pollutants into waters of the United States unless a special permit is issued by the Environmental Protection Agency, a state, or, where delegated, a tribal government on an Indian reservation.

National Register of Historic Places: The nation's inventory of known historic properties that have been formally listed by the National Park Service (NPS). The National Register of Historic Places is administered by the NPS on the behalf of the Secretary of the Interior. National Register listings include districts, landscapes, sites, buildings, structures, and objects that meet the set of criteria found in 36 CFR 60.4.

No action alternative: The alternative where current conditions and trends are projected into the future without another proposed action.

Particulate matter (PM), PM10, PM2.5: Any finely divided solid or liquid material, other than uncombined (that is, pure) water. A subscript denotes the upper limit of the diameter of particles included. Thus, PM10 includes only those particles equal to or less than 10 micrometers (0.0004

inch) in diameter; PM2.5 includes only those particles equal to or less than 2.5 micrometers (0.0001 inch) in diameter.

Proposed action: In a NEPA document, this is the primary action being considered. Its impacts are analyzed together with the impacts from alternative ways to achieve the same objective and the required no action alternative, which means continuing with the status quo.

Runoff: The portion of rainfall, melted snow, or irrigation water that flows across ground surface and is eventually returned to streams. Runoff can pick up pollutants from the air or the land and carry them to streams, lakes, and oceans.

Scope: Consists of the range of actions, alternatives, and impacts to be considered in an environmental analysis. The scope of an individual statement may depend on its relationships to other statements (also see tiering).

Scoping: An early and open process for determining the extent and variety of issues to be addressed and for identifying the significant issues related to a proposed action (40 CFR §1501.7). The scoping process helps not only to identify significant environmental issues deserving of study, but also to deemphasize insignificant issues, narrowing the scope of the NEPA process accordingly, and for early identification of what are and what are not the real issues (40CFR §1500.5(d)). The scoping process identifies relevant issues related to a proposed action through the involvement of all potentially interested or affected parties (affected federal, state, and local agencies; recognized Indian tribes; interest groups, and other interested persons) in the environmental analysis and documentation.

Significantly: As used in NEPA, requires considerations of both context and intensity.

Context—significance of an action must be analyzed in its current and proposed short- and long-term effects on the whole of a given resource (for example, affected region).

Intensity—refers to the severity of the effect.

Solid waste: Non-liquid, non-soluble materials ranging from municipal garbage to industrial wastes that contain complex and sometimes hazardous substances. Solid wastes also include sewage sludge, agricultural refuse, demolition wastes, and mining residues. Technically, solid waste also refers to liquids and gases in containers.

Wetlands: Those areas that are inundated by surface water or groundwater with a frequency sufficient to support, and under normal circumstances do, or would support, a prevalence of vegetative or aquatic life that requires saturated or seasonally saturated soil conditions for growth and reproduction. Wetlands generally include swamps, marshes, bogs, and similar areas.

Jurisdictional wetlands are those wetlands protected by the *Clean Water Act*. They must have a minimum of one positive wetland indicator from each parameter (vegetation, soil, and hydrology). The U.S. Army Corps of Engineers requires a permit to fill or dredge jurisdictional wetlands.

APPENDICES

Appendix A – Regulatory Communications

Appendix B – Public Involvement

Appendix A – Regulatory Communications



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Georgia Ecological Services Field Office
355 East Hancock Avenue
Room 320
Athens, GA 30601
Phone: (706) 613-9493 Fax: (706) 613-6059

In Reply Refer To:
Consultation Code: 04EG1000-2021-SLI-2598
Event Code: 04EG1000-2021-E-04883
Project Name: Decatur, Georgia VAMC

June 22, 2021

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

Thank you for your recent request for information on federally listed species and important wildlife habitats that may occur in your project area. The U.S. Fish and Wildlife Service (Service) has responsibility for certain species of wildlife under the Endangered Species Act (ESA) of 1973 as amended (16 USC 1531 et seq.), the Migratory Bird Treaty Act (MBTA) as amended (16 USC 701-715), and the Bald and Golden Eagle Protection Act (BGEPA) as amended (16 USC 668-668c). We are providing the following guidance to assist you in determining which federally imperiled species may or may not occur within your project area and to recommend some conservation measures that can be included in your project design if you determine those species or designated critical habitat may be affected by your proposed project.

FEDERALLY-LISTED SPECIES AND DESIGNATED CRITICAL HABITAT

Attached is a list of endangered, threatened, and proposed species that may occur in your project area. Your project area may not necessarily include all or any of these species. Under the ESA, it is the responsibility of the Federal action agency or its designated representative to determine if a proposed action "may affect" endangered, threatened, or proposed species, or designated critical habitat, and if so, to consult with the Service further. Similarly, it is the responsibility of the Federal action agency or project proponent, not the Service, to make "no effect" determinations. If you determine that your proposed action will have "no effect" on threatened or endangered species or their respective critical habitat, you do not need to seek concurrence with the Service. Nevertheless, it is a violation of Federal law to harm or harass any federally-listed threatened or endangered fish or wildlife species without the appropriate permit.

If you determine that your proposed action may affect federally listed species, please consult with the Service. Through the consultation process, we will analyze information contained in a biological assessment or equivalent document that you provide. If your proposed action is associated with Federal funding or permitting, consultation will occur with the Federal agency under section 7(a)(2) of the ESA. Otherwise, an incidental take permit pursuant to section 10(a)(1)(B) of the ESA (also known as a Habitat Conservation Plan) may be necessary to exempt harm or harass federally listed threatened or endangered fish or wildlife species. For more information regarding formal consultation and HCPs, please see the Service's Consultation Handbook and Habitat Conservation Plans at www.fws.gov/endangered/esa-library/index.html#consultations.

Action Area. The scope of federally listed species compliance not only includes direct effects, but also any indirect effects of project activities (e.g., equipment staging areas, offsite borrow material areas, or utility relocations). The action area is the spatial extent of an action's direct and indirect modifications to the land, water, or air (50 CFR 402.02). Large projects may have effects to land, water, or air outside the immediate footprint of the project, and these areas should be included as part of the action area. Effects to land, water, or air outside of a project footprint could include things like lighting, dust, smoke, and noise. To obtain a complete list of species, the action area should be uploaded or drawn in IPaC rather than just the project footprint.

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

If you determine that your action may affect any federally listed species and would like technical assistance from our office please provide the following information (reference to these items can be found in 50 CFR§402.13 and 402.14):

A description of the proposed action, including any measures intended to avoid, minimize, or offset effects of the action. Consistent with the nature and scope of the proposed action, the description shall provide sufficient detail to assess the effects of the action on listed species and critical habitat, including:

1. The purpose of the action;
 2. The duration and timing of the action;
 3. The location of the action;
 4. The specific components of the action and how they will be carried out;
 5. Description of areas to be affected directly or indirectly by the action;
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6. Information on the presence of listed species in the action area;
7. Description of effects of the action on species in the action area;
8. Maps, drawings, blueprints, or similar schematics of the action; and
9. Any other available information related to the nature and scope of the proposed action relevant to its effects on listed species or designated critical habitat (examples include: stormwater plans, management plans, erosion and sediment plans).

Please submit all consultation documents via email to gaes_assistance@fws.gov or by using IPaC, uploaded documents, and sharing the project with a specific Georgia Ecological Services staff member. If the project is on-going, documents can also be sent to the Georgia ES staff member currently working with you on your project. For Georgia Department of Transportation-related projects, please work with the Office of Environmental Services ecologist to determine the appropriate USFWS transportation liaison.

WETLANDS AND FLOODPLAINS

Under Executive Orders 11988 and 11990, Federal agencies are required to minimize the destruction, loss, or degradation of wetlands and floodplains, and preserve and enhance their natural and beneficial values. These habitats should be conserved through avoidance, or mitigated to ensure that there would be no net loss of wetlands function and value.

We encourage you to use the National Wetland Inventory (NWI) maps in conjunction with ground-truthing to identify wetlands occurring in your project area. The Service's NWI program website, www.fws.gov/wetlands/Data/Mapper.html integrates digital map data with other resource information. We also recommend you contact the U.S. Army Corps of Engineers for permitting requirements under section 404 of the Clean Water Act if your proposed action could impact floodplains or wetlands.

MIGRATORY BIRDS

The MBTA prohibits the taking of migratory birds, nests, and eggs, except as permitted by the Service's Migratory Bird Office. To minimize the likelihood of adverse impacts to migratory birds, we recommend construction activities occur outside the general bird nesting season from March through August, or that areas proposed for construction during the nesting season be surveyed, and when occupied, avoided until the young have fledged.

We recommend review of Birds of Conservation Concern at website www.fws.gov/migratorybirds/CurrentBirdIssues/Management/BCC.html to fully evaluate the effects to the birds at your site. This list identifies birds that are potentially threatened by disturbance and construction.

Information related to wind energy development and migratory birds can be found at this location: <https://www.fws.gov/birds/management/project-assessment-tools-and-guidance/guidance-documents/wind-energy.php>.

BALD AND GOLDEN EAGLES

The bald eagle (*Haliaeetus leucocephalus*) was delisted under the ESA on August 9, 2007. Both the bald eagle and golden eagle (*Aquila chrysaetos*) are still protected under the MBTA and BGEPA. The BGEPA affords both eagles protection in addition to that provided by the MBTA, in particular, by making it unlawful to “disturb” eagles. Under the BGEPA, the Service may issue limited permits to incidentally “take” eagles (e.g., injury, interfering with normal breeding, feeding, or sheltering behavior nest abandonment). For information on bald and golden eagle management guidelines, we recommend you review information provided at <https://www.fws.gov/birds/management/managed-species/bald-and-golden-eagle-information.php> and <https://www.fws.gov/birds/management/managed-species/eagle-management.php>. Additionally the following site will help you determine if your activity is likely to take or disturb bald eagles in the southeast (<https://www.fws.gov/southeast/our-services/eagle-technical-assistance>).

NATIVE BAT COMMENTS

If your species list includes Indiana bat or northern long-eared bat and the project is expected to impact forested habitat that is appropriate for maternity colonies of these species, forest clearing during the winter. Federally listed bats could be actively present in forested landscapes from April 1 to October 15 of any year and have non-volant pups from May 15 to July 31 in any year. Non-volant pups are incapable of flight and are vulnerable to disturbance during that time.

Additional information on bat avoidance and minimization can be found at the following link: https://www.fws.gov/athens/transportation/pdfs/Bat_AMMs.pdf.

Additional information that addresses at-risk or high priority natural resources can be found in the State Wildlife Action Plan (<https://georgiawildlife.com/WildlifeActionPlan>), at Georgia Department of Natural Resources, Wildlife Resources Division Rare Species and Natural Community Portal (<https://georgiawildlife.com/conservation/species-of-concern>), Georgia's Natural, Archaeological, and Historic Resources GIS portal (<https://www.gnahrgis.org/gnahrgis/index.do>), and Georgia Ecological Services Watershed Guidance portal (<https://www.fws.gov/athens/transportation/coordination.html>).

Thank you for your concern for endangered and threatened species. We appreciate your efforts to identify and avoid impacts to listed and sensitive species in your project area. For further consultation on your proposed activity, please email gaes_assistance@fws.gov and reference your Service Consultation Tracking Number (Consultation Code).

This letter constitutes Georgia Ecological Services' general comments under the authority of the Endangered Species Act.

Attachment(s):

- Official Species List
 - Migratory Birds
-

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

Georgia Ecological Services Field Office

355 East Hancock Avenue

Room 320

Athens, GA 30601

(706) 613-9493

Project Summary

Consultation Code: 04EG1000-2021-SLI-2598

Event Code: 04EG1000-2021-E-04883

Project Name: Decatur, Georgia VAMC

Project Type: DEVELOPMENT

Project Description: building d

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@33.80078135,-84.31085080574019,14z>



Counties: DeKalb County, Georgia

Endangered Species Act Species

There is a total of 1 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

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1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Flowering Plants

NAME	STATUS
Michaux's Sumac <i>Rhus michauxii</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/5217	Endangered

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

Migratory Birds

Certain birds are protected under the Migratory Bird Treaty Act¹ and the Bald and Golden Eagle Protection Act².

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

-
1. The [Migratory Birds Treaty Act](#) of 1918.
 2. The [Bald and Golden Eagle Protection Act](#) of 1940.
 3. 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ [below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Blue-winged Warbler <i>Vermivora pinus</i> This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds May 1 to Jun 30
Cerulean Warbler <i>Dendroica cerulea</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/2974	Breeds Apr 28 to Jul 20
Kentucky Warbler <i>Oporornis formosus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 20 to Aug 20

NAME	BREEDING SEASON
Prairie Warbler <i>Dendroica discolor</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 1 to Jul 31
Prothonotary Warbler <i>Protonotaria citrea</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Apr 1 to Jul 31
Red-headed Woodpecker <i>Melanerpes erythrocephalus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Sep 10
Rusty Blackbird <i>Euphagus carolinus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds elsewhere
Wood Thrush <i>Hylocichla mustelina</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 10 to Aug 31

Probability Of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12

BCC Rangewide
(CON)

Rusty Blackbird
BCC Rangewide
(CON)



Wood Thrush
BCC Rangewide
(CON)



Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

Migratory Birds FAQ

Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides

birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.



**DEPARTMENT OF VETERANS AFFAIRS
CENTRAL ALABAMA VETERANS HEALTH CARE
MONTGOMERY, ALABAMA**

August 30, 2021

Georgia Department of Community Affairs
Environmental Review, Historic Preservation Division
Attn: Dr. David Crass, Deputy SHPO
60 Executive Park South, NE
Atlanta, Georgia 30329

Dear Dr. Crass,

The U.S. Department of Veterans Affairs (VA) is initiating consultation with the Georgia Department of Community Affairs Historic Preservation Division (HPD) on an undertaking at the Atlanta VA Medical Center (VAMC) at 1670 Clairmont Road, Decatur, DeKalb County, Georgia. This action is pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR Part 800.

Proposed Undertaking: VA proposes to demolish the 103,000-square foot (SF) Community Living Center (CLC), also known as Building D, at the Atlanta VAMC campus.

Background: Initial construction of the Atlanta VAMC began in 1966 with the construction of a 10-story, 580-bed hospital building. At the time, the area around the 26-acre hospital site was suburban in character with little development nearby. Surface parking lots surrounded the hospital building, and an undeveloped wooded buffer surrounded the campus. Upon its opening, the Atlanta VAMC operated as a general medical and surgical hospital with extensive outpatient services. The Atlanta VAMC also served as a teaching hospital through its affiliation with the Emory University School of Medicine. This affiliation continues today with the addition of the Morehouse School of Medicine.

Over the years, expansions have been added to the main hospital building and new buildings have been constructed, including several free-standing parking decks and the VA Atlanta Regional Office building that is connected to the main hospital via a pedestrian bridge. The CLC building was constructed around 1979 and is located in the southeastern portion of the Atlanta VAMC. At present, the Atlanta VAMC stands in a densely developed commercial corridor along Clairmont Road. The Atlanta VAMC is currently improved with 405 authorized beds and is classified as a Complexity Level 1A tertiary care facility, providing a full range of patient care services complete with state-of-the-art technology, education, and research.

The Atlanta VAMC has not been evaluated for its potential to qualify for the National Register of Historic Places. The main hospital building is the oldest building on campus and is approximately 50 years of age. The main hospital building does not possess significant architectural features and is not known to have been associated with any important events in VA's history or medical history.

Elements of the Undertaking: The undertaking involves the demolition of the non-historic CLC building, which is a three-story, concrete and steel building encompassing 103,000-SF of space. The CLC building stands south of the main hospital and is surrounded by paved parking areas. The project will remove all structures, related pavement, and utilities including all below grade footings, foundations, tunnels, slabs, piping, wiring, and ductwork.

Area of Potential Effects (APE): The APE, as defined in 36 CFR 800.16(d), is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

The APE consists of the area where the proposed project has the potential to cause both direct and indirect effects on historic properties. For this project, the entire Atlanta VAMC campus is included in the APE. The removal of the CLC building will impact the viewshed of the campus and the area may experience temporary, minor indirect effects during the project including noise and traffic congestion.

Supporting Documents and Determination of Effects: VA requests that the HPD review the enclosed documents including: 1) Project Location, 2) APE Map, 3) Schematic Project Plans, and 4) Site Photographs. Since the proposed undertaking will have no direct effect on a historic property, and any indirect effects (noise, visual) will be temporary and minimal in nature, the VA requests that the SHPO review the documentation and concur with the proposed APE and on a determination of **No Adverse Effects** to historic properties.

VA appreciates your consideration of the request for input. If you have any questions, please do not hesitate to contact me at (470) 558-5506 or via email at Lorn.Whittaker@va.gov. Thank you for your attention to this matter.

Sincerely,

Lorn L. Whittaker

Enclosures:

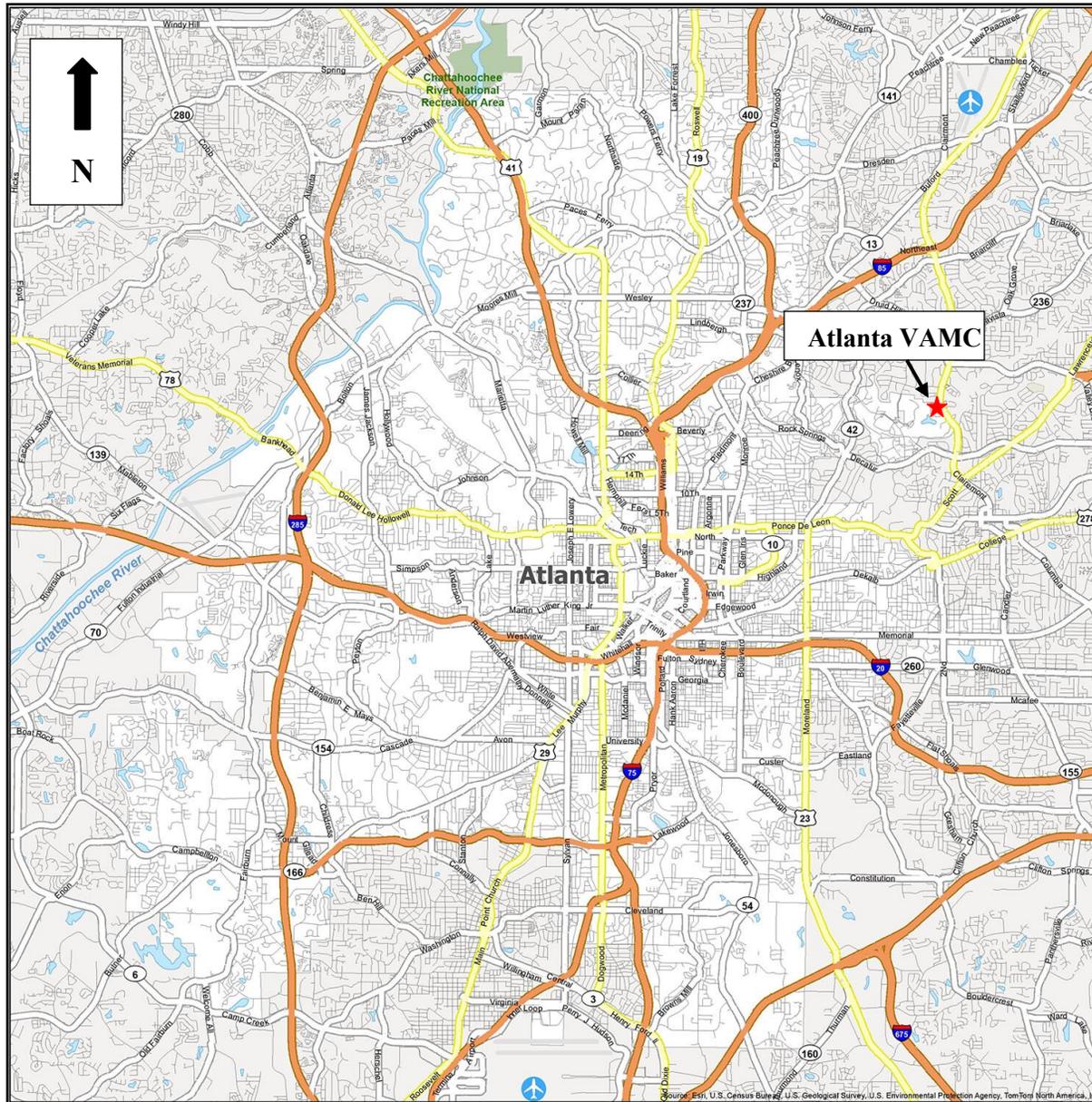
- Attachment 1 – Project Location
- Attachment 2 – Area of Potential Effects Map
- Attachment 3 – Schematic Project Plans
- Attachment 4 – Site Photographs

Enclosures



Attachment 1 – Project Location

ATTACHMENT 1 PROJECT LOCATION MAPS

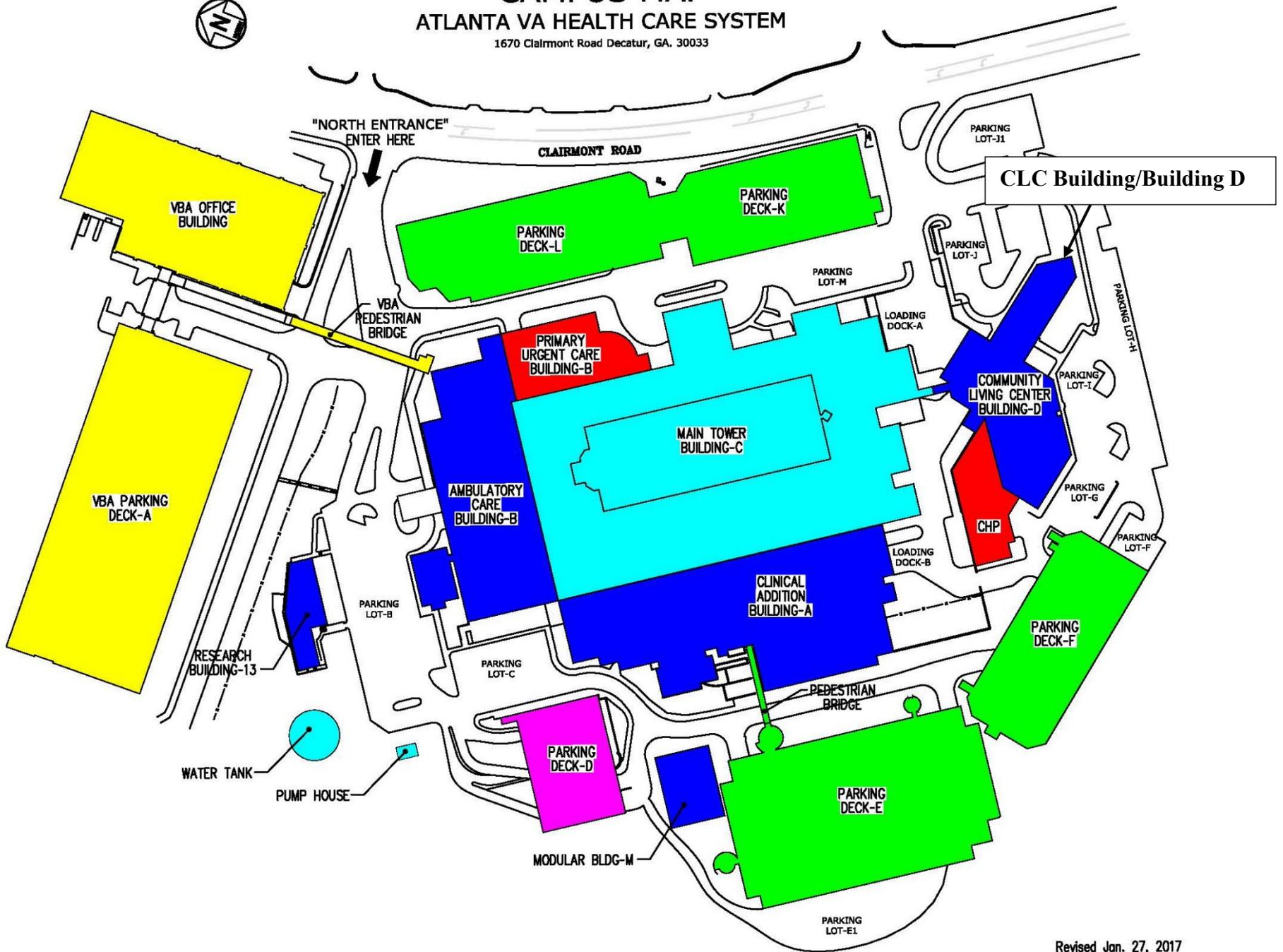




CAMPUS MAP

ATLANTA VA HEALTH CARE SYSTEM

1670 Clairmont Road Decatur, GA. 30033



CLC Building/Building D

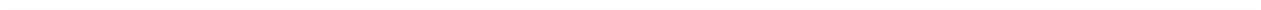


Clairmont Road

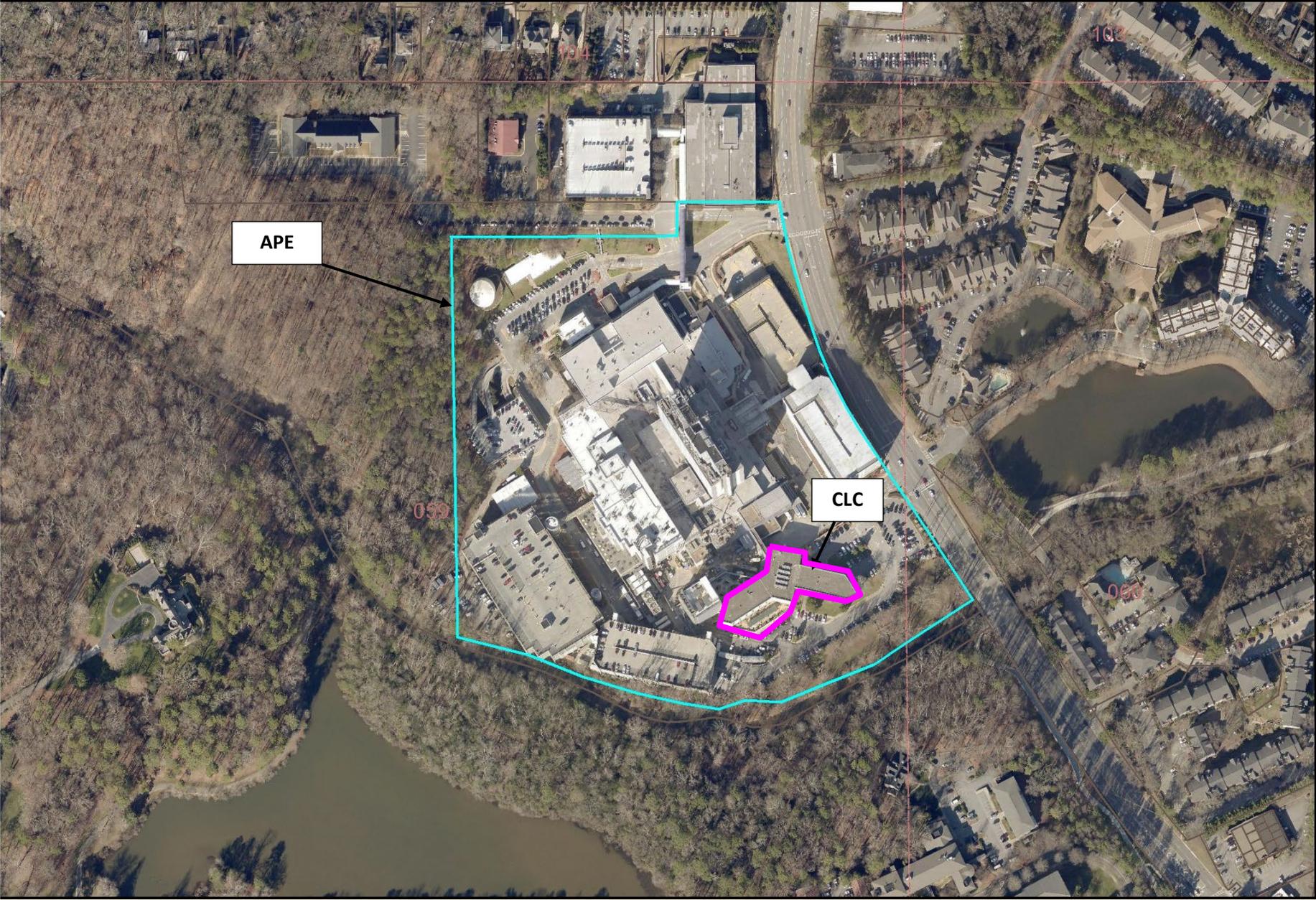
CLC Building/Building D

Google

Attachment 2 – Area of Potential Effects Map



**ATTACHMENT 2
AREA OF POTENTIAL EFFECTS**



 **DeKalb County Parcel Map**

0 0.0175 0.035 0.07 0.105 0.14 mi

Date Printed: 8/13/2021

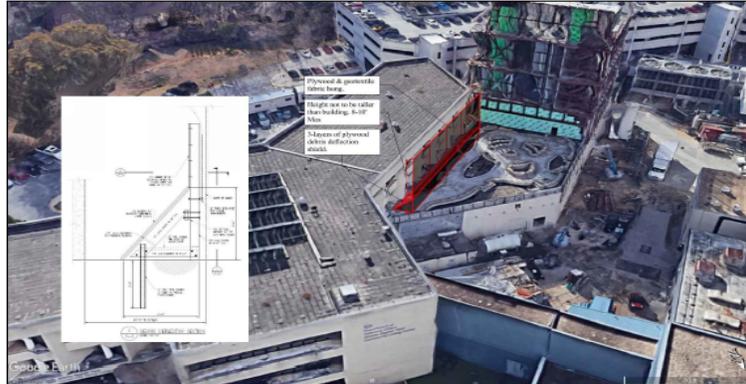
DeKalb County GIS Disclaimer
The maps and data, contained on DeKalb County's Geographic Information System (GIS) are subject to constant change. While DeKalb County strives to provide accurate and up-to-date information, the information is provided "as is" without warranty, representation or guarantee of any kind as to the content, sequence, accuracy, timeliness or completeness of any of the database information provided herein. DeKalb County explicitly disclaims all representations and warranties, including, without limitation, the implied warranties of merchantability and fitness for a particular purpose. In no event shall DeKalb County be liable for any special, indirect, or consequential damages whatsoever resulting from loss of use, data, or profits, whether in an action of contract, negligence, or other actions, arising out of or in connection with the use of the maps and/or data herein provided. The maps and data are for illustration purposes only and should not be relied upon for any reason. The maps and data are not suitable for site-specific decision-making nor should it be construed or used as a legal description. The areas depicted by maps and data are approximate, and are not necessarily accurate to surveying or engineering standards.

Attachment 3 – Schematic Project Plans



SCHEMATIC LAYOUT SUGGESTIONS (2 PAGES)

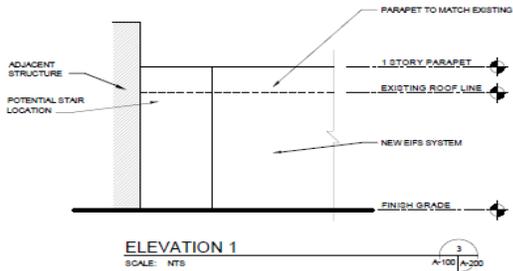
LAST SAVED: 3/1/2021 3:38 PM
PAPER SIZE: ARCHIT PALL BLUES 36 X 48 INCHES



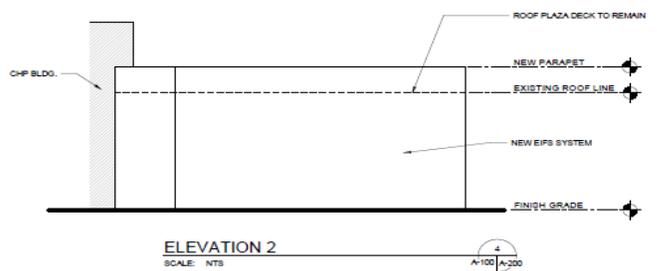
DEMO DETAIL 1
SCALE: NTS



DEMO DETAIL 2
SCALE: NTS



ELEVATION 1
SCALE: NTS



ELEVATION 2
SCALE: NTS



Attachment 4 – Site Photographs



ATTACHMENT 4
SITE PHOTOGRAPHS



Figure 1. Postcard Image of VA Hospital, ca. 1966—Facing southeast.
Source: <http://www.atlantatimemachine.com/misc/aerial15.htm>



Figure 2. Aerial Image of Campus from 2021—Facing west.



Figure 3. Facing southwest.

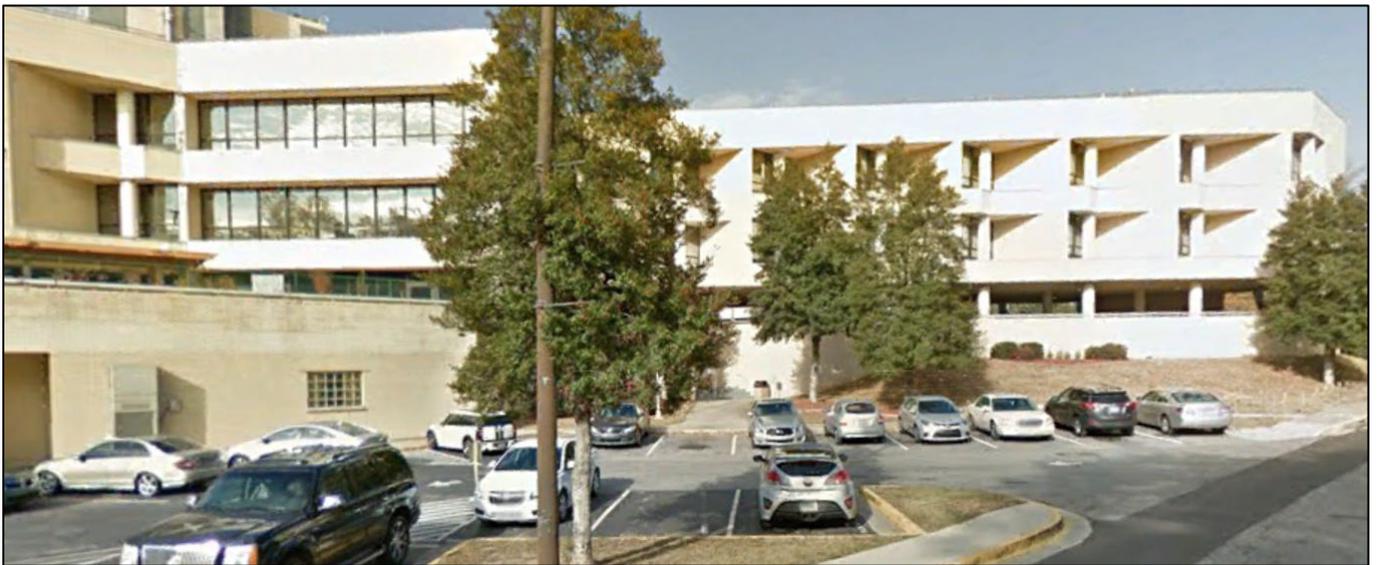


Figure 4. Facing northeast.



**DEPARTMENT OF VETERANS AFFAIRS
CENTRAL ALABAMA VETERANS HEALTH CARE
MONTGOMERY, ALABAMA**

September 3, 2021

Georgia Department of Natural Resources
Environmental Protection Division
NEPA Review/Regulatory Compliance
3 Martin Luther King, Jr. Drive, Suite 1456, East Tower
Atlanta, GA 30334

**Subject: Environmental Assessment – Request for Early Input, Demolition of the
CLC Building
Department of Veterans Affairs, Atlanta VA Medical Center, Decatur,
DeKalb County, Georgia**

To Whom It May Concern:

The U.S. Department of Veterans Affairs (VA) is currently preparing a Draft Environmental Assessment (EA) in accordance with VA policy for compliance with the National Environmental Policy Act (NEPA). The EA will evaluate the potential physical, biological, cultural, and socioeconomic impacts associated with the Proposed Action to demolish the 103,000 square foot (SF) Community Living Center (CLC) building, also known as Building D, at the Atlanta VA Medical Center (VAMC) at 1670 Clairmont Road, Decatur, Georgia. The Atlanta VAMC is located approximately eight miles northeast of Atlanta in DeKalb County in northwestern Georgia. To fully evaluate and consider the potential environmental effects of the project, VA is seeking any information from your organization that should be considered as the assessment is completed.

Background: The Atlanta VAMC covers approximately 26 acres in a densely developed commercial corridor along Clairmont Road. Initial construction of the Atlanta VAMC began in 1966 with the construction of a 10-story, 580-bed hospital building. The Atlanta VAMC is currently improved with 405 authorized beds and provides a full range of patient care services complete with state-of-the-art technology, education, and research. Over the years, expansions have been added to the main hospital building and new buildings have been constructed, including the CLC building which is a three-story, concrete and steel building. The CLC building was constructed circa 1979 and is located in the southeastern portion of the Atlanta VAMC. The CLC building is south of the main hospital and is surrounded by paved parking areas.

Proposed Action: The Proposed Action involves the demolition of the CLC building and will remove the structure, related pavement, and utilities including all below grade footings, foundations, tunnels, slabs, piping, wiring, and ductwork. The newly cleared building footprint would provide VA with a future opportunity to construct a new facility/facilities that would better serve Veterans in Georgia.

The EA will also consider a No Action alternative, under which demolition of the CLC building would not occur and the campus would remain in its present condition for the foreseeable future.

However, this would impede VA's aforementioned ability to better utilize the limited grounds of the Atlanta VAMC for future development.

As we prepare the Draft EA, we would appreciate your input to better assess potential environmental impacts associated with the Proposed Action. VA appreciates your consideration of this request. Please provide comments within 30 days of receipt of this letter. If you have any questions, please do not hesitate to contact me at (470) 558-5506 or via email at Lorn.Whittaker@va.gov. Thank you for your attention to this matter.

Sincerely,

Lorn L. Whittaker

Enclosures:
Attachment 1 – Proposed Action Project Location Maps

Figure 1. Atlanta VAMC General Location Map

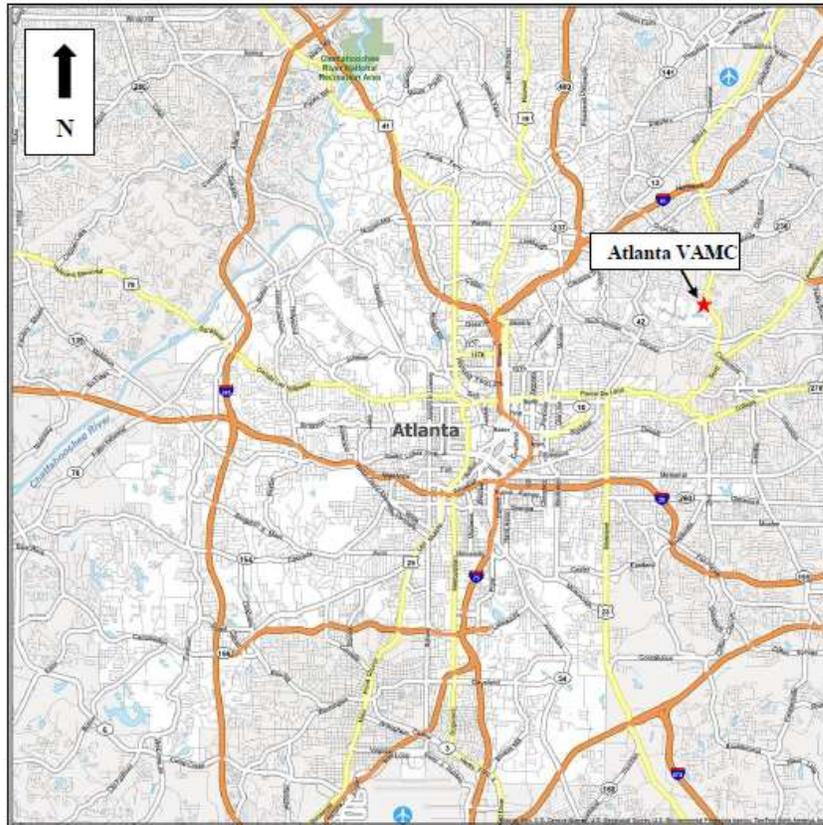


Figure 2. CLC Building - Proposed Action Area





**DEPARTMENT OF VETERANS AFFAIRS
CENTRAL ALABAMA VETERANS HEALTH CARE
MONTGOMERY, ALABAMA**

September 3, 2021

U.S. Army Corps of Engineers
Savannah District
NEPA Review/Regulatory Compliance
100 W. Oglethorpe Ave
Savannah, GA 31401

**Subject: Environmental Assessment – Request for Early Input, Demolition of the
CLC Building
Department of Veterans Affairs, Atlanta VA Medical Center, Decatur,
DeKalb County, Georgia**

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Background: The Atlanta VAMC covers approximately 26 acres in a densely developed commercial corridor along Clairmont Road. Initial construction of the Atlanta VAMC began in 1966 with the construction of a 10-story, 580-bed hospital building. The Atlanta VAMC is currently improved with 405 authorized beds and provides a full range of patient care services complete with state-of-the-art technology, education, and research. Over the years, expansions have been added to the main hospital building and new buildings have been constructed, including the CLC building which is a three-story, concrete and steel building. The CLC building was constructed circa 1979 and is located in the southeastern portion of the Atlanta VAMC. The CLC building is south of the main hospital and is surrounded by paved parking areas.

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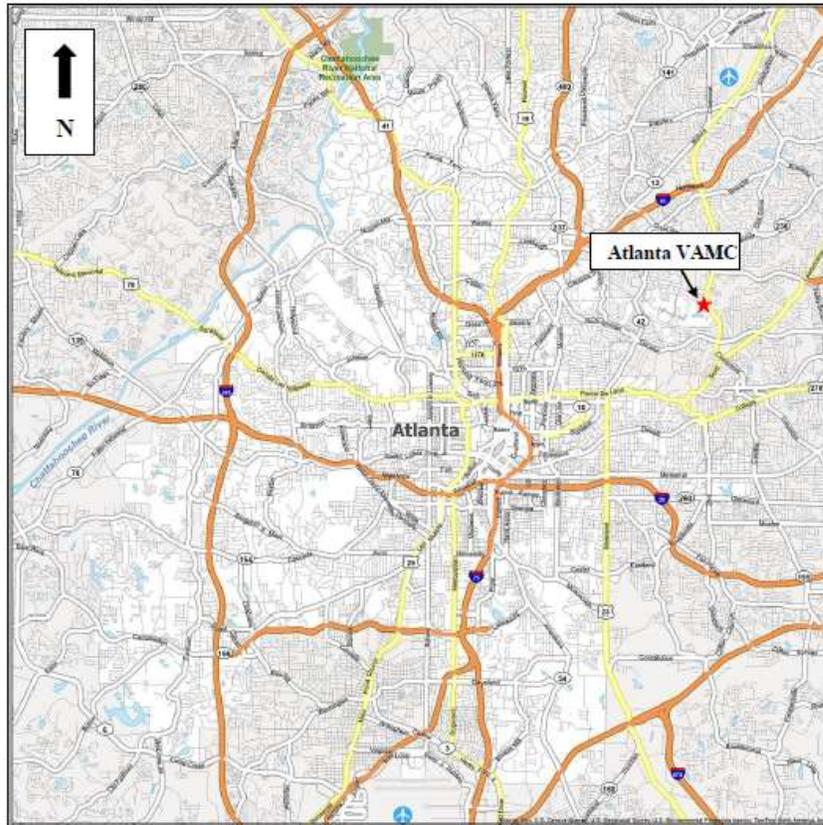


Figure 2. CLC Building - Proposed Action Area





**DEPARTMENT OF VETERANS AFFAIRS
CENTRAL ALABAMA VETERANS HEALTH CARE
MONTGOMERY, ALABAMA**

September 3, 2021

Georgia Department of City Planning
Office of the Commissioner
NEPA Review/Regulatory Compliance
55 Trinity Avenue, Suite 1450
Atlanta, GA 30303

**Subject: Environmental Assessment – Request for Early Input, Demolition of the
CLC Building
Department of Veterans Affairs, Atlanta VA Medical Center, Decatur,
DeKalb County, Georgia**

To Whom It May Concern:

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Background: The Atlanta VAMC covers approximately 26 acres in a densely developed commercial corridor along Clairmont Road. Initial construction of the Atlanta VAMC began in 1966 with the construction of a 10-story, 580-bed hospital building. The Atlanta VAMC is currently improved with 405 authorized beds and provides a full range of patient care services complete with state-of-the-art technology, education, and research. Over the years, expansions have been added to the main hospital building and new buildings have been constructed, including the CLC building which is a three-story, concrete and steel building. The CLC building was constructed circa 1979 and is located in the southeastern portion of the Atlanta VAMC. The CLC building is south of the main hospital and is surrounded by paved parking areas.

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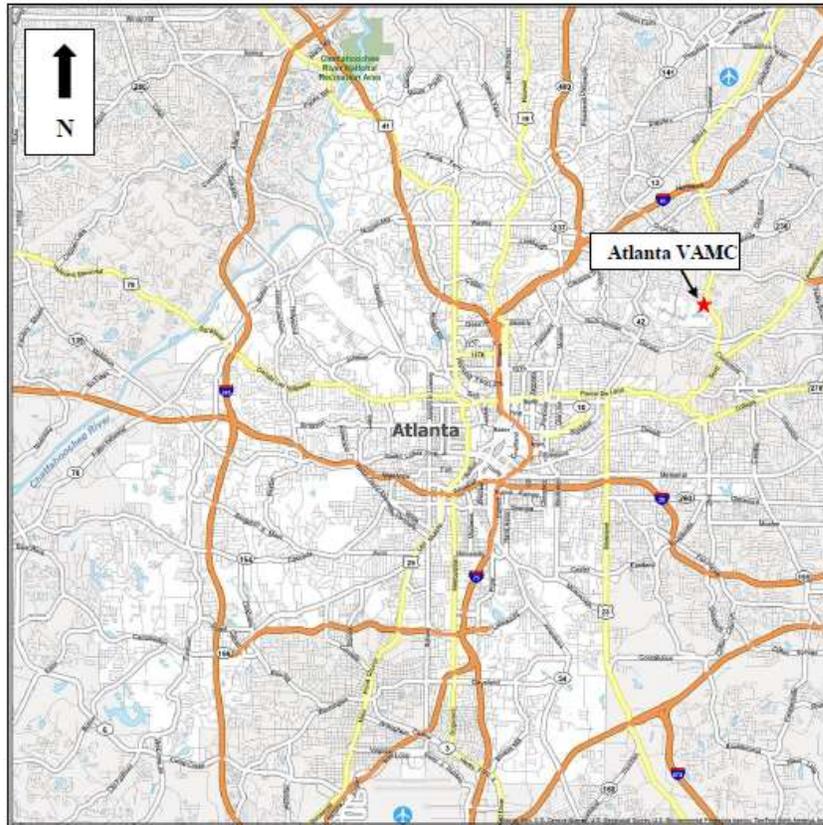


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**DEPARTMENT OF VETERANS AFFAIRS
CENTRAL ALABAMA VETERANS HEALTH CARE
MONTGOMERY, ALABAMA**

September 3, 2021

U.S. Fish and Wildlife Service
Southeast Region
NEPA Review/Regulatory Compliance
1875 Century Boulevard NE
Atlanta, GA 30345

**Subject: Environmental Assessment – Request for Early Input, Demolition of the
CLC Building
Department of Veterans Affairs, Atlanta VA Medical Center, Decatur,
DeKalb County, Georgia**

To Whom It May Concern:

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Background: The Atlanta VAMC covers approximately 26 acres in a densely developed commercial corridor along Clairmont Road. Initial construction of the Atlanta VAMC began in 1966 with the construction of a 10-story, 580-bed hospital building. The Atlanta VAMC is currently improved with 405 authorized beds and provides a full range of patient care services complete with state-of-the-art technology, education, and research. Over the years, expansions have been added to the main hospital building and new buildings have been constructed, including the CLC building which is a three-story, concrete and steel building. The CLC building was constructed circa 1979 and is located in the southeastern portion of the Atlanta VAMC. The CLC building is south of the main hospital and is surrounded by paved parking areas.

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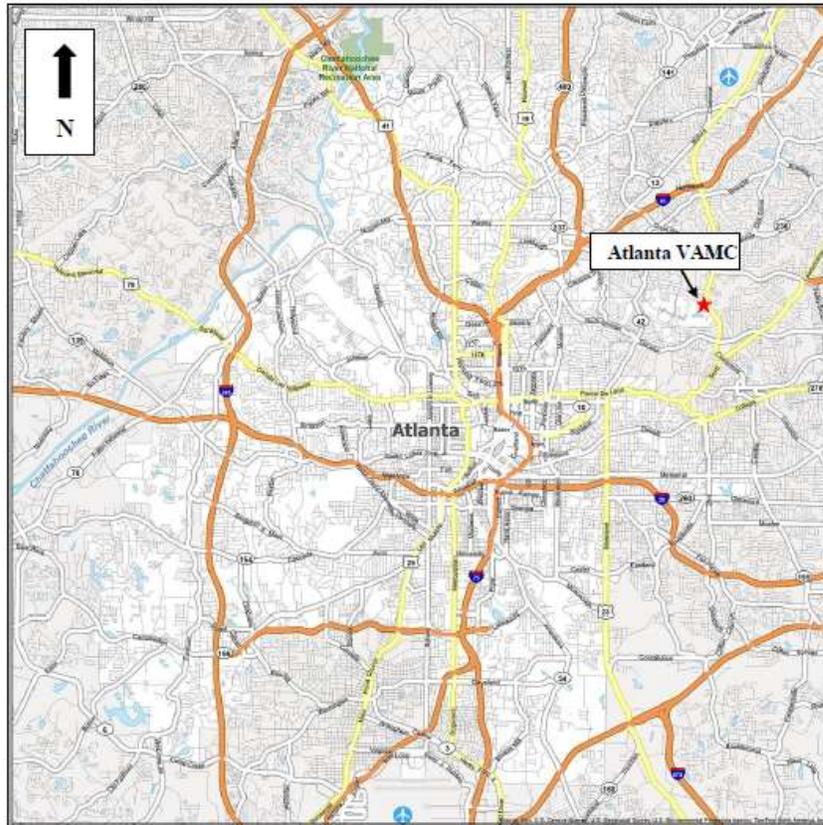


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**DEPARTMENT OF VETERANS AFFAIRS
CENTRAL ALABAMA VETERANS HEALTH CARE
MONTGOMERY, ALABAMA**

September 3, 2021

DeKalb County Georgia
Mr. Michael L. Thurmond, Chief Executive Officer
1300 Commerce Drive
Decatur, GA 30030

**Subject: Environmental Assessment – Request for Early Input, Demolition of the
CLC Building
Department of Veterans Affairs, Atlanta VA Medical Center, Decatur,
DeKalb County, Georgia**

Dear Mr. Thurmond,

The U.S. Department of Veterans Affairs (VA) is currently preparing a Draft Environmental Assessment (EA) in accordance with VA policy for compliance with the National Environmental Policy Act (NEPA). The EA will evaluate the potential physical, biological, cultural, and socioeconomic impacts associated with the Proposed Action to demolish the 103,000 square foot (SF) Community Living Center (CLC) building, also known as Building D, at the Atlanta VA Medical Center (VAMC) at 1670 Clairmont Road, Decatur, Georgia. The Atlanta VAMC is located approximately eight miles northeast of Atlanta in DeKalb County in northwestern Georgia. To fully evaluate and consider the potential environmental effects of the project, VA is seeking any information from your organization that should be considered as the assessment is completed.

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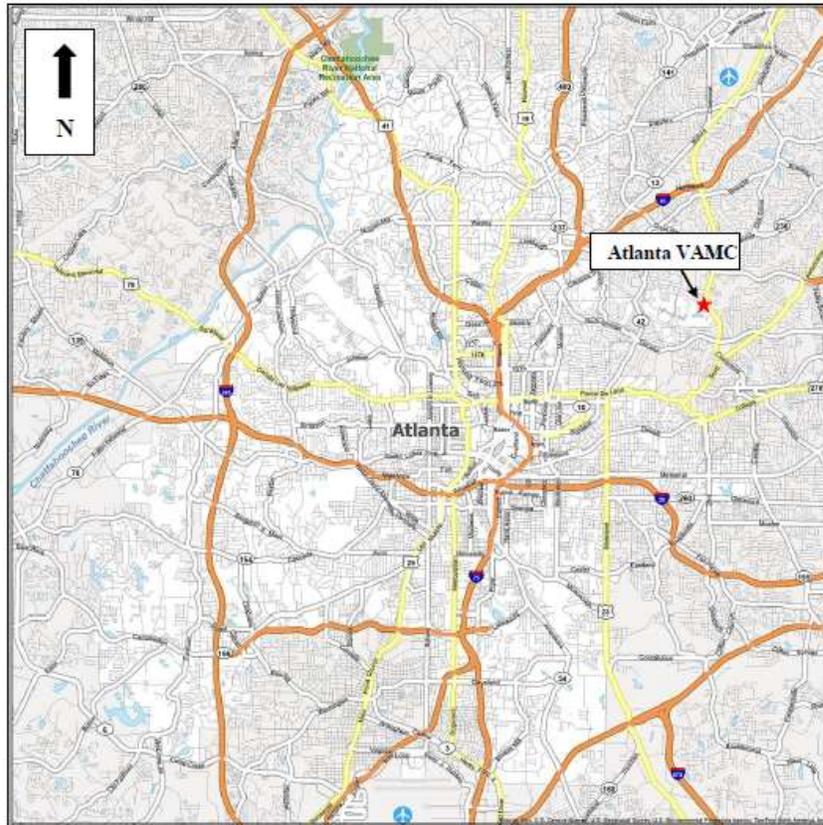


Figure 2. CLC Building - Proposed Action Area





**DEPARTMENT OF VETERANS AFFAIRS
CENTRAL ALABAMA VETERANS HEALTH CARE
MONTGOMERY, ALABAMA**

September 3, 2021

Alabama-Quassarte Tribal Town
Samantha Robinson, THPO
PO Box 188
Wetumka, OK 74884

**Subject: Environmental Assessment – Request for Early Input, Demolition of the
CLC Building
Department of Veterans Affairs, Atlanta VA Medical Center, Decatur,
DeKalb County, Georgia**

Dear Ms. Robinson,

The U.S. Department of Veterans Affairs (VA) is currently preparing a Draft Environmental Assessment (EA) in accordance with VA policy for compliance with the National Environmental Policy Act (NEPA). The EA will evaluate the potential physical, biological, cultural, and socioeconomic impacts associated with the Proposed Action to demolish the 103,000 square foot (SF) Community Living Center (CLC) building, also known as Building D, at the Atlanta VA Medical Center (VAMC) at 1670 Clairmont Road, Decatur, Georgia. The Atlanta VAMC is located approximately eight miles northeast of Atlanta in DeKalb County in northwestern Georgia. To fully evaluate and consider the potential environmental effects of the project, VA is seeking any information from your organization that should be considered as the assessment is completed.

Background: The Atlanta VAMC covers approximately 26 acres in a densely developed commercial corridor along Clairmont Road. Initial construction of the Atlanta VAMC began in 1966 with the construction of a 10-story, 580-bed hospital building. The Atlanta VAMC is currently improved with 405 authorized beds and provides a full range of patient care services complete with state-of-the-art technology, education, and research. Over the years, expansions have been added to the main hospital building and new buildings have been constructed, including the CLC building which is a three-story, concrete and steel building. The CLC building was constructed circa 1979 and is located in the southeastern portion of the Atlanta VAMC. The CLC building is south of the main hospital and is surrounded by paved parking areas.

Proposed Action: The Proposed Action involves the demolition of the CLC building and will remove the structure, related pavement, and utilities including all below grade footings, foundations, tunnels, slabs, piping, wiring, and ductwork. The newly cleared building footprint would provide VA with a future opportunity to construct a new facility/facilities that would better serve Veterans in Georgia.

The EA will also consider a No Action alternative, under which demolition of the CLC building would not occur and the campus would remain in its present condition for the foreseeable future. However, this would impede VA's aforementioned ability to better utilize the limited grounds of

the Atlanta VAMC for future development.

As we prepare the Draft EA, we would appreciate your input to better assess potential environmental impacts associated with the Proposed Action. VA appreciates your consideration of this request. Please provide comments within 30 days of receipt of this letter. If you have any questions, please do not hesitate to contact me at (470) 558-5506 or via email at Lorn.Whittaker@va.gov. Thank you for your attention to this matter.

Sincerely,

Lorn L. Whittaker

Enclosures:

Attachment 1 – Proposed Action Project Location Maps

Figure 1. Atlanta VAMC General Location Map

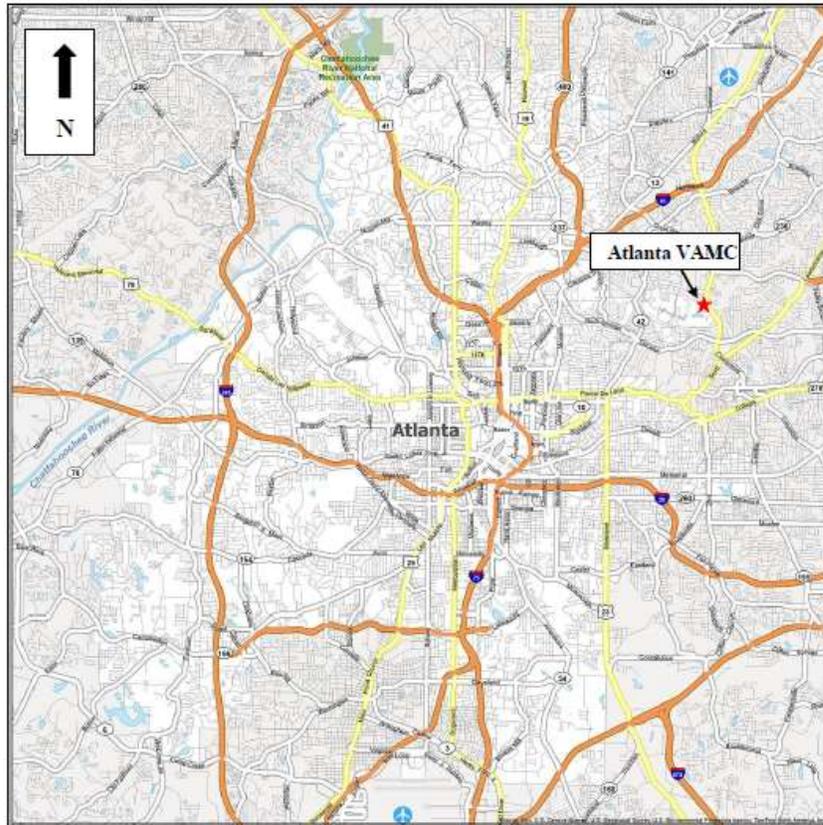
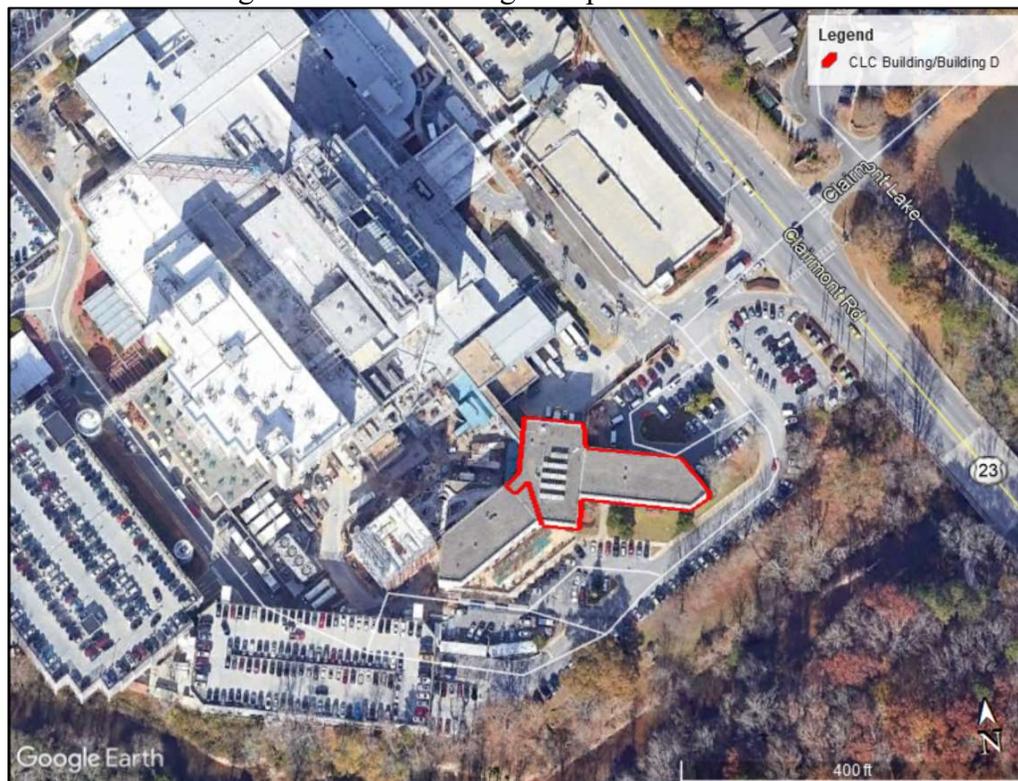


Figure 2. CLC Building - Proposed Action Area





**DEPARTMENT OF VETERANS AFFAIRS
CENTRAL ALABAMA VETERANS HEALTH CARE
MONTGOMERY, ALABAMA**

September 3, 2021

Coushatta Tribe of Louisiana
Linda Langley, THPO
PO Box 10
Elton, LA 70532

**Subject: Environmental Assessment – Request for Early Input, Demolition of the
CLC Building
Department of Veterans Affairs, Atlanta VA Medical Center, Decatur,
DeKalb County, Georgia**

Dear Ms. Langley,

The U.S. Department of Veterans Affairs (VA) is currently preparing a Draft Environmental Assessment (EA) in accordance with VA policy for compliance with the National Environmental Policy Act (NEPA). The EA will evaluate the potential physical, biological, cultural, and socioeconomic impacts associated with the Proposed Action to demolish the 103,000 square foot (SF) Community Living Center (CLC) building, also known as Building D, at the Atlanta VA Medical Center (VAMC) at 1670 Clairmont Road, Decatur, Georgia. The Atlanta VAMC is located approximately eight miles northeast of Atlanta in DeKalb County in northwestern Georgia. To fully evaluate and consider the potential environmental effects of the project, VA is seeking any information from your organization that should be considered as the assessment is completed.

Background: The Atlanta VAMC covers approximately 26 acres in a densely developed commercial corridor along Clairmont Road. Initial construction of the Atlanta VAMC began in 1966 with the construction of a 10-story, 580-bed hospital building. The Atlanta VAMC is currently improved with 405 authorized beds and provides a full range of patient care services complete with state-of-the-art technology, education, and research. Over the years, expansions have been added to the main hospital building and new buildings have been constructed, including the CLC building which is a three-story, concrete and steel building. The CLC building was constructed circa 1979 and is located in the southeastern portion of the Atlanta VAMC. The CLC building is south of the main hospital and is surrounded by paved parking areas.

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Lorn L. Whittaker

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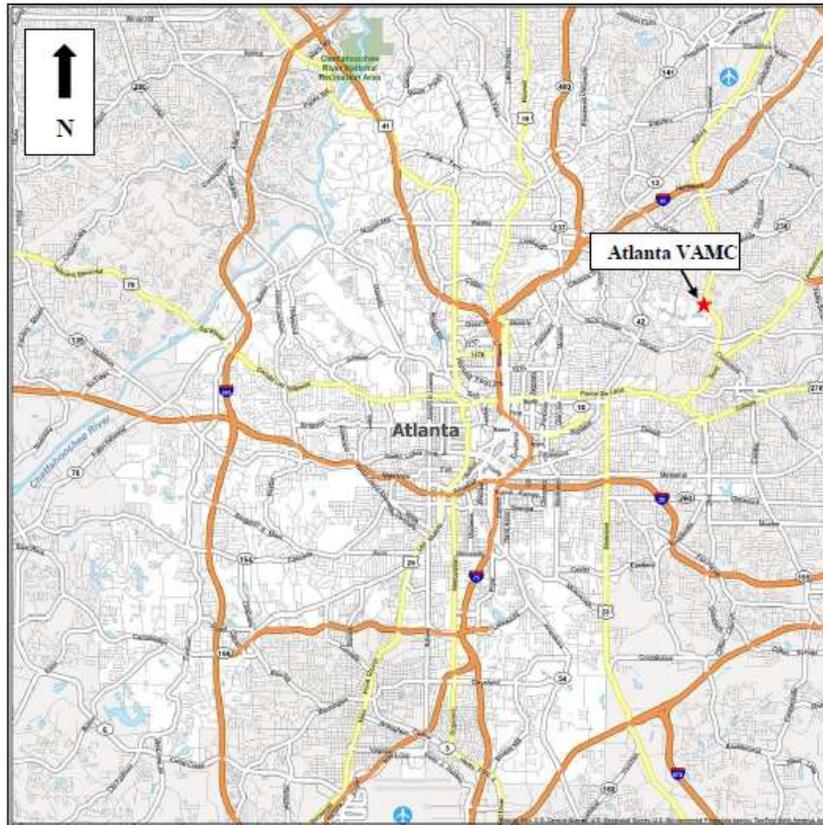


Figure 2. CLC Building - Proposed Action Area





**DEPARTMENT OF VETERANS AFFAIRS
CENTRAL ALABAMA VETERANS HEALTH CARE
MONTGOMERY, ALABAMA**

September 3, 2021

Muscogee (Creek) Nation
Corain Lowe-Zepeda, THPO
PO Box 581
Okmulgee, OK 74448

**Subject: Environmental Assessment – Request for Early Input, Demolition of the
CLC Building
Department of Veterans Affairs, Atlanta VA Medical Center, Decatur,
DeKalb County, Georgia**

Dear Ms. Lowe-Zepeda,

The U.S. Department of Veterans Affairs (VA) is currently preparing a Draft Environmental Assessment (EA) in accordance with VA policy for compliance with the National Environmental Policy Act (NEPA). The EA will evaluate the potential physical, biological, cultural, and socioeconomic impacts associated with the Proposed Action to demolish the 103,000 square foot (SF) Community Living Center (CLC) building, also known as Building D, at the Atlanta VA Medical Center (VAMC) at 1670 Clairmont Road, Decatur, Georgia. The Atlanta VAMC is located approximately eight miles northeast of Atlanta in DeKalb County in northwestern Georgia. To fully evaluate and consider the potential environmental effects of the project, VA is seeking any information from your organization that should be considered as the assessment is completed.

Background: The Atlanta VAMC covers approximately 26 acres in a densely developed commercial corridor along Clairmont Road. Initial construction of the Atlanta VAMC began in 1966 with the construction of a 10-story, 580-bed hospital building. The Atlanta VAMC is currently improved with 405 authorized beds and provides a full range of patient care services complete with state-of-the-art technology, education, and research. Over the years, expansions have been added to the main hospital building and new buildings have been constructed, including the CLC building which is a three-story, concrete and steel building. The CLC building was constructed circa 1979 and is located in the southeastern portion of the Atlanta VAMC. The CLC building is south of the main hospital and is surrounded by paved parking areas.

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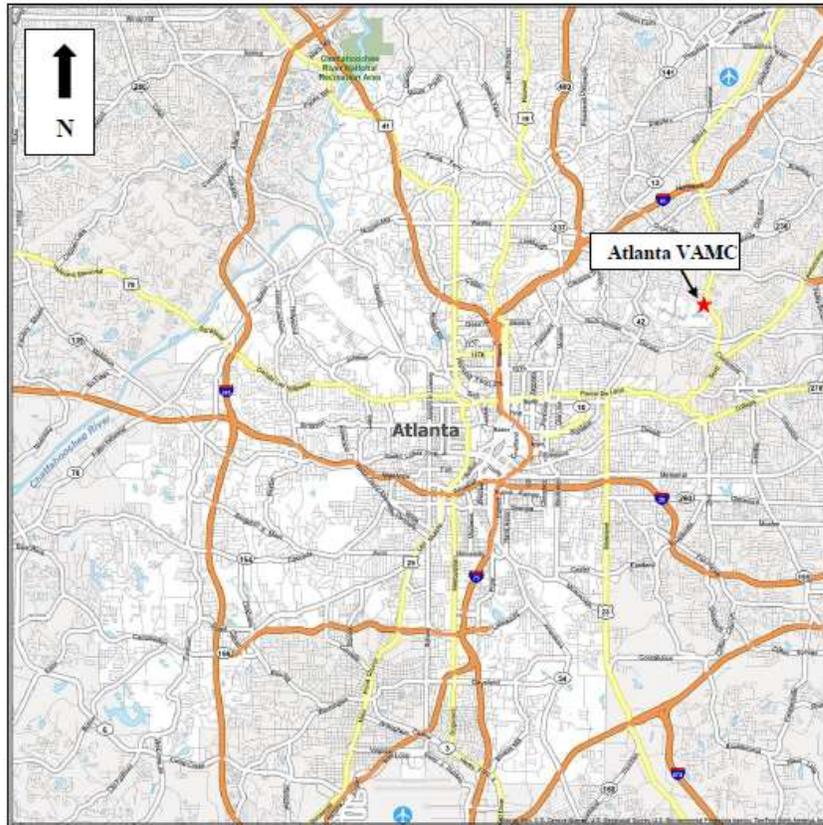


Figure 2. CLC Building - Proposed Action Area



Georgia Historic Preservation Division

Environmental Review Form

At a minimum, the Historic Preservation Division (HPD) requires the following information in order to review projects in accordance with applicable federal or state laws. Please note that the responsibility for preparing documentation, including items listed below, rests with the federal or state agency or its designated applicant. *HPD's ability to complete a timely project review largely depends on the quality and detail of the material submitted. If insufficient information is provided, HPD may need to request additional materials, which will prolong the review process. For complex projects, some applicants may find it advantageous to hire a preservation professional with expertise in history, architectural history, and/or archaeology, who would have access to the Georgia Archaeological Site Files and an understanding of HPD's publicly available files.*

THERE IS A 30-DAY REVIEW PERIOD FROM THE DATE HPD RECEIVES THE SUBMITTAL. SHOULD ADDITIONAL INFORMATION BE REQUESTED, PLEASE NOTE THE 30-DAY PERIOD RESTARTS.

I. General Information

A. **Project Name:** Demolition of Community Living Center (CLC)/Building D

Project Address: Atlanta Veterans Affairs Medical Center, 1670 Clairmont Road, Decatur, GA 30033

City: Decatur County: DeKalb

B. **Federal Agency Involved:** U.S. Department of Veterans Affairs

State Agency (if applicable): N/A

C. Agency's Involvement:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Funding | <input type="checkbox"/> Unknown |
| <input type="checkbox"/> License/Permit | <input type="checkbox"/> Other, please explain: _____ |
| <input type="checkbox"/> Direct/Is performing the action | |

D. Type of Review Requested:

- Section 106 of the National Historic Preservation Act (Federal involvement)
- Section 110 of the National Historic Preservation Act (Federally owned properties)
- Georgia Environmental Policy Act (State involvement)
- State Agency Historic Property Stewardship Program/State Stewardship (State owned properties)
- Technical Assistance (No Federal or State involvement)
- Unknown

E. **Contact Information:** Applicant Consultant

Name/Title/Company: Andrew Glucksman, Project Manager, Mabbett & Associates, Inc.

Address: 40 Old Louisquisset Pike, Suite 200, Box 13

City/State/Zip: North Smithfield, RI 02896

Phone: (781) 275-6050, ext. 401 Email: glucksman@mabbett.com

Agency Contact Info (either State or Federal, according to review type):

Name/Title/Agency: Department of Veterans Affairs Central Alabama Veterans Health Care

Address: 215 Perry Hill Road

City/State/Zip: Montgomery, AL 36109

Phone: (404) 321-6111, ext. 206198 Email: Lorn.Whittaker@va.gov

II. Project Information

The project involves demolition of a community living center building at the Atlanta VA Medical Center. The building is a three-story, concrete and steel structure that was constructed in 1979.

A. Project Type:

- Road/Highway Construction or Improvements
- Demolition
- Rehabilitation
- Addition to Existing Building/Structure
- New Construction
- Relicensing
- Utilities/Infrastructure
- Unknown
- Other: _____

B. Project Description and Plans This should include a *detailed* scope of work, including *any* actions to be taken in relation to the project, such as all aspects of new construction, replacement/repair, demolition, ground disturbance, and all ancillary work (temporary roads, etc.), as applicable. Attach additional pages if necessary. If a detailed scope of work is not available yet, please explain and include all preliminary information: See attached consultation letter.

C. Land Disturbing Activity This should include a detailed description of all horizontal and vertical ground disturbance, such as haul roads, cut or fill areas, excavations, landscaping activities, ditching, utility burial, grading, water tower construction, etc., as applicable:

See attached consultation letter.

D. Has this identical project or a related project been previously submitted to HPD for review? YES ___ NO X

**If yes, please enclose a copy of HPD's previous response*

E. Is this project also being reviewed under a tax incentive program administered through HPD? YES ___ NO X

F. Is this review request in order to satisfy an application requirement, such as for a grant? YES ___ NO X

**If yes, are project plans/scope of work available yet? YES ___ NO ___*

**If yes, please enclose a copy of the project plans/scope of work as outlined in II.B and II.C above*

III. Site Information

A. In the past this property has been used for:

- 1. Farming YES ___ NO X
- 2. Pasture YES ___ NO X
- 3. Mining YES ___ NO X
- 4. Timbering YES ___ NO X
- 5. Road construction YES ___ NO X
- 6. Housing YES ___ NO X
- 7. Landfill YES ___ NO X
- 8. Commercial YES ___ NO X
- 9. Industrial YES ___ NO X
- 10. Other (explain): _____

B. Describe what currently exists on the property today and give approximate construction dates for existing buildings along with any known history (i.e. buildings, parking lot, outbuildings, woods, grass, garden, etc.) The property is a hospital campus. The main hospital was constructed in 1966 with later additions. The CLC Building was built in 1979. Several parking decks and an office building also were added to the campus in the late twentieth century

IV. Cultural Resources

Background research for previously identified properties within the project area may be undertaken at HPD, including National Register of Historic Places files, county and city surveys, and identified sites files. Additionally, research at the Georgia Archaeological Site Files (GASF) in Athens may be undertaken by a qualified archaeologist or site file staff. To make a research appointment or find contact information for GASF, please visit our website. **Please note that as part of the review process, HPD may request an archaeological survey or resource identification.**

A. To your knowledge, has a cultural resources assessment or a historic resources survey been conducted in the project area? YES _____ NO X DO NOT KNOW _____ (see: [http://www. https://georgiashpo.org/surveys](http://www.georgiashpo.org/surveys))
**If yes, provide the title, author, and date of the report:*

B. Area of Potential Effect (APE)

The APE is the geographic area or areas within which a project may cause changes (or effects). These changes can be direct (physical) or indirect (visual, noise, vibrations) effects. The APE varies with the project type and should factor in topography, vegetation, existing development, physical siting of the project, and existing/planned development. For example:

<i>If your project includes...</i>	<i>Then your APE would be...</i>
Rehabilitation, renovation, and/or demolition of a building or structure, or new construction	the building or property itself and the surrounding properties/setting with a view of the project
Road/Highway construction or improvements, streetscapes, pedestrian or bicycle facilities	the length of the project corridor and the surrounding properties/setting with a view of the project
Above ground utilities, such as siren/radio towers, water towers, pump stations, retention ponds, etc.	the area of ground disturbance and the surrounding properties/setting with a view of the project
Underground utilities	the area of ground disturbance

Based on this information, **identify the APE for your project, similar to above AND describe what exists within it.** Please provide approximate construction dates for existing buildings within the APE (ie. is it modern or historic residential or commercial development, undeveloped, etc.): The project APE will include the entire Atlanta VA Medical Center campus. The demolition of the CLC building has the potential to impact the viewshed of the campus.

C. Is the project located within or adjacent to a National Register of Historic Places (NRHP) listed or eligible historic property or district or a locally designated property or district?
 YES _____ NO X DO NOT KNOW _____
**If yes, please provide names:*

D. Within the project APE as identified in IV.B, are there any other buildings or structures that are 50 years old or older? YES X NO _____ DO NOT KNOW _____
**If yes, provide current photographs of each building or structure and key the photos to a site map.*

E. Are any of the buildings or structures identified in IV.D listed or eligible for listing in the NRHP?

YES _____ NO X DO NOT KNOW _____

**If yes, please identify the properties (by name or photo #).*

F. Effects Information

1. Does the project involve the rehabilitation, renovation, relocation, demolition or addition to any building or structure that is 50 years old or older? YES _____ NO X

2. Will the project take away or change anything within the apparent or existing boundary of any of these historic properties? YES _____ NO X

**If yes, please explain:* _____

3. Will the project change the view from or of any of these properties? YES X NO _____

**If yes, please explain:* The demolition is within a secondary viewshed of the historic hospital building.

4. Will the project introduce any audible or atmospheric elements to the setting of any of these historic properties (such as light, noise, or vibration pollution)? YES X NO _____

**If yes, please explain:* These impacts may occur during demolition, but will be temporary.

5. Will the project result in a change of ownership for any historic properties? YES _____ NO X

**If yes, please explain:* _____

V. Required Materials (Submittal Checklist)

Complete Environmental Review Form

- o Include all contact information as HPD will respond via email to the submitter.

Map indicating:

- o Precise location of the project (USGS topographic map preferred: <http://www.digital-topo-maps.com/>¹).
- o In urban areas, please also include a city map that shows more detail.
- o Boundaries of the APE as noted in section II above.
- o Location of resources indicated in section IV.C through E.

Detailed project plans to supplement section I.F, including (if applicable and available):

- o Site plans (before and after).
- o Project plans.
- o Elevations.

High-resolution current color photographs (2 photos per page) illustrating:

- o The project area, the entire APE as defined in section IV, and resources indicated in section IV.C through E.
- o Any adjacent properties that are within the APE, with clear views of buildings or structures, if applicable.
- o If the project entails the alteration of existing historic structures, please provide *detail* photographs of existing conditions of sites, buildings, and interior areas/materials to be impacted.
- o ****Google Streetview and publicly available Tax Assessor images will not be accepted**

Photograph key (map or project plans can be used) indicating:

- o Location of all photographs by photo number.
- o Direction of view for all photographs.

Any available information concerning known or suspected archaeological resources in the APE.

For questions regarding this form, please contact the Environmental Review Program at ER@dca.ga.gov.

Please note, we are currently accepting digital submittals at the email address above; however, if no automated response is received, a hardcopy may be needed due to technological restrictions.

If necessary, hardcopies may be mailed to:

**Georgia Department of Community Affairs
Attn: Environmental Review, Historic Preservation Division
60 Executive Park South, NE
Atlanta, Georgia 30329**

¹ Please note, this is not a complete list of websites with topographic map information. This website is not controlled by HPD and HPD bears no responsibility for its content.

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Muscogee (Creek) Nation
Corain Lowe-Zepeda, THPO
PO Box 581
Okmulgee, OK 74448

2. Article Number (Transfer from service label)
7018 2290 0000 3156 1207

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X *AW*

B. Received by (Printed Name)
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9-16-21

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

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Coushatta Tribe of Louisiana
Linda Langley, THPO
PO Box 10
Elton, LA 70532

2. Article Number (Transfer from service label)
7018 2290 0000 3156 1221

PS Form 3811, July 2015 PSN 7530-02-000-9053

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B. Received by (Printed Name)
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11-22-21

D. Is delivery address different from item 1? Yes
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- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Georgia Department of City Planning
Office of the Commissioner
NEPA Review/Regulatory Compliance
55 Trinity Avenue, Suite 1450
Atlanta, GA 30303

2. Article Number (Transfer from service label)
7018 2290 0000 3156 1177

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X *[Signature]*

B. Received by (Printed Name)
Kira Laster

C. Date of Delivery
9/12/2021

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

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1. Article Addressed to:

Georgia Department of Natural Resources
Wildlife Resources Division State
Headquarters
2067 US Highway 278 SE
Social Circle, GA 30025

2. Article Number (Transfer from service label)
7020 1290 0001 9639 1068

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X *[Signature]*

B. Received by (Printed Name)
[Signature]

C. Date of Delivery
11/22/21

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
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1. Article Addressed to:

Georgia Department of Community Affairs
Georgia Historic Preservation Division
60 Executive Park South, NE
Atlanta, GA 30329

2. Article Number (Transfer from service label)
7020 1290 0001 9639 1044

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X *[Signature]*

B. Received by (Printed Name)
[Signature]

C. Date of Delivery
11/22/21

D. Is delivery address different from item 1? Yes
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1. Article Addressed to:

U.S. Army Corps of Engineers
Savannah District
NEPA Review/Regulatory Compliance
100 W. Oglethorpe Ave
Savannah, GA 31401

2. Article Number (Transfer from service label)
7018 2290 0000 3155 9976

PS Form 3811, July 2015 PSN 7530-02-000-9053

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X *Covid-19*

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Coushatta Tribe of Louisiana
Ms. Linda Langley, THPO
PO Box 10
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2. Article Number (Transfer from service label)
7020 1290 0001 9639 1099

PS Form 3811, July 2020 PSN 7530-02-000-9053

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Alabama-Quassarte Tribal Town
Ms. Samantha Robinson, THPO
PO Box 188
Wetumka, OK 74884

2. Article Number (Transfer from service label)
7020 1290 0001 9639 1099

PS Form 3811, July 2020 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X *Mary Jun*

B. Received by (Printed Name)
Mary Tiger

C. Date of Delivery
11/22/21

D. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type
 Adult Signature
 Adult Signature Restricted Delivery
 Certified Mail®
 Certified Mail Restricted Delivery
 Collect on Delivery
 Collect on Delivery Restricted Delivery
 Insured Mail
 Registered Mail™
 Registered Mail Restricted Delivery
 Return Receipt for Merchandise
 Signature Confirmation™
 Signature Confirmation Restricted Delivery

2. Article Number (Transfer from service label)
7020 1290 0001 9639 1099

PS Form 3811, July 2020 PSN 7530-02-000-9053

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>A. Brewer</i> C. Date of Delivery <i>11-28-21</i></p>
<p>1. Article Addressed to:</p> <p><i>DeKalb County Georgia Mr. Michael L. Thurmond Chief Executive Officer 1300 Commerce Drive Decatur, GA 30030</i></p>  <p>9590 9402 6714 1060 3144 92</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>2. Article Number (Transfer from service label)</p> <p><i>7020 1290 0001 9639 1082</i></p>	<p>3. Service Type</p> <ul style="list-style-type: none"> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Mail Restricted Delivery (500) <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt</p>	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature <input checked="" type="checkbox"/> <i>[Signature]</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) <i>[Signature]</i> C. Date of Delivery <i>[Signature]</i></p>
<p>1. Article Addressed to:</p> <p><i>U.S. Department of Fish & Wildlife Southeast Region 1875 Century Boulevard NE Atlanta, GA 30345</i></p>  <p>9590 9402 6714 1060 3144 23</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p>
<p>2. Article Number (Transfer from service label)</p> <p><i>7020 1290 0001 9639 1020</i></p>	<p>3. Service Type</p> <ul style="list-style-type: none"> <input type="checkbox"/> Adult Signature <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery <input type="checkbox"/> Collect on Delivery Restricted Delivery <input type="checkbox"/> Insured Mail <input type="checkbox"/> Mail Restricted Delivery (500) <input type="checkbox"/> Priority Mail Express® <input type="checkbox"/> Registered Mail™ <input type="checkbox"/> Registered Mail Restricted Delivery <input type="checkbox"/> Signature Confirmation™ <input type="checkbox"/> Signature Confirmation Restricted Delivery
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053 Domestic Return Receipt</p>	

Appendix B – Public Involvement

NOTICE OF AVAILABILITY
Finding of No Significant Impact and Final Environmental Assessment
U.S. Department of Veterans Affairs
Proposed Demolition of the CLC Building D at the
U.S. Department of Veterans Affairs Atlanta Medical Center
Decatur, DeKalb County, Georgia

The U.S Department of Veterans Affairs (VA) hereby gives Notice of Availability (NOA) of the Finding of No Significant Impact (FONSI) and Final Environmental Assessment (EA) for the VA's Proposed Action to demolish the Community Living Center (CLC) Building D (CLC Building) at the Atlanta VA Medical Center, located at 1670 Clairmont Road, Decatur, DeKalb County, Georgia, 30033. The CLC Building is a 103,000 square-foot three (3) story VA Nursing Home that provides approximately 120 beds to eligible Veterans. Due to its age, the CLC Building no longer meets VA's current building requirements or desired design for providing optimal Veteran care. Demolition of the CLC Building is needed to provide VA with a future opportunity to construct a new facility/facilities in the former building area that would meet modern VA building requirements and better serve Veterans in northern Georgia.

VA completed the Final EA to document the potential environmental impacts associated with implementing the Proposed Action and avoidance and management measures incorporated into the Proposed Action to ensure potential minor adverse impacts would not increase to a significant adverse level during construction. Prior to issuing the Final EA, a Draft EA was made available for review for a 30-day period by the public, regulatory agencies, and Native American Tribes. A Notice of Availability (NOA) announcing the Draft EA 30-day review and comment period published in the *Atlanta Journal-Constitution* on November 14, 15, and 16, 2021. No comments were received.

Upon review of the Final EA, VA concluded that implementing the Proposed Action would not constitute a major federal action that would have a significant adverse impact on the quality of the human environment within the meaning of Section 102(2)(C) of the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code 4321 *et seq.*). Accordingly, VA has signed a FONSI, which incorporates the Final EA by reference in its entirety and concludes that the preparation of an Environmental Impact Statement is not required.

The Final EA and FONSI are available for review in print at the DeKalb County Public Library Decatur Branch at 215 Sycamore Street, Decatur, GA 30030; and may be electronically downloaded at <https://www.atlanta.va.gov/news/index.asp>.

For additional information, contact: Mr. Lorn L. Whittaker, Design and Construction Engineering Service (138), Atlanta VA Health Care System, 1670 Clairmont Road, Decatur, GA 30033. Reference "EA for CLC Atlanta VA Medical Center" in all correspondence.

**NOTICE OF AVAILABILITY
Draft Environmental Assessment
U.S. Department of Veterans Affairs
Proposed Demolition of the CLC Building D at the
U.S. Department of Veterans Affairs Atlanta Medical Center
Decatur, DeKalb County, Georgia**

The U.S Department of Veterans Affairs (VA) hereby gives Notice of Availability (NOA) of the Draft Environmental Assessment (EA) for the VA's Proposed Action to demolish the Community Living Center (CLC) Building D (CLC Building) at the Atlanta VA Medical Center, located at 1670 Clairmont Road, Decatur, DeKalb County, Georgia, 30033.

The CLC Building is a 103,000 square-foot three (3) story VA Nursing Home that provides approximately 120 beds to eligible Veterans. Due to its age, the CLC Building no longer meets VA's current building requirements or desired design for providing optimal Veteran care. Demolition of the CLC Building is needed to provide VA with a future opportunity to construct a new facility/facilities in the former building area that would meet modern VA building requirements and better serve Veterans in northern Georgia.

The Draft EA was prepared according to 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] Parts 1500-1508), and VA's NEPA implementing regulations (38 CFR Part 26).

This NOA starts the 30-day review period for the Draft EA. The Draft EA is available for review in print at the DeKalb County Public Library Decatur Branch at 215 Sycamore Street, Decatur, GA 30030; and available for electronic download from the VA website: <https://www.atlanta.va.gov/news/index.asp>.

Comments or requests for additional information should be sent to: Mr. Lorn L. Whittaker, Design and Construction Engineering Service (138), Atlanta VA Health Care System, 1670 Clairmont Road, Decatur, GA 30033. Reference "EA for CLC Atlanta VA Medical Center" in all correspondence.

NOTICE OF AVAILABILITY
Draft Environmental Assessment
U.S. Department of Veterans Affairs
Proposed Demolition of the CLC Building D at the U.S. Department of Veterans Affairs Atlanta Medical Center Decatur, DeKalb County, Georgia

The U.S. Department of Veterans Affairs (VA) hereby gives Notice of Availability (NOA) of the Draft Environmental Assessment (EA) for the VA's Proposed Action to demolish the Community Living Center (CLC) Building D (CLC Building) at the Atlanta VA Medical Center, located at 1670 Clairmont Road, Decatur, DeKalb County, Georgia, 30033.

The CLC Building is a 103,000 square-foot three (3) story VA Nursing Home that provides approximately 120 beds to eligible Veterans. Due to its age, the CLC Building no longer meets VA's current building requirements or desired design for providing optimal Veteran care. Demolition of the CLC Building is needed to provide VA with a future opportunity to construct a new facility/facilities in the former building area that would meet modern VA building requirements and better serve Veterans in northern Georgia.

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This NOA starts the 30-day review period for the Draft EA. The Draft EA is available for review in print at the DeKalb County Public Library Decatur Branch at 215 Sycamore Street, Decatur, GA 30030; and available for electronic download from the VA website: <https://www.atlanta.va.gov/news/index.asp>. Please provide all comments by December 16, 2021.

Comments or requests for additional information should be sent to: Mr. Lorn L. Whittaker, Design and Construction Engineering Service (138), Atlanta VA Health Care System, 1670 Clairmont Road, Decatur, GA 30033. Reference "EA for CLC Atlanta VA Medical Center" in all correspondence.

11/14/21, 11/15/21, 11/16/21

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