

U.S. DEPARTMENT OF VETERANS AFFAIRS
SITE-SPECIFIC ENVIRONMENTAL ASSESSMENT
FOR BUILDING # 2
VETERANS AFFAIRS MEDICAL CENTER
NEW ORLEANS, LOUISIANA

FINDING OF NO SIGNIFICANT IMPACT

The U.S. Department of Veterans Affairs (VA) assessed the potential environmental impacts that may result from demolition of the existing Building # 2 structure, located on the VA Medical Center (VAMC) campus, at 1601 Perdido Street in downtown New Orleans, Orleans Parish, Louisiana, and subsequent installation of temporary medical support units. A site-specific environmental assessment (SEA) was prepared in accordance with the regulations set forth by the Council on Environmental Quality (40 CFR 1500-1508) for implementing the provisions of the National Environmental Policy Act (NEPA), as well as VA guidance for implementing NEPA (Environmental Effects of VA Actions [38 CFR Part 26]). The SEA is incorporated into this Finding of No Significant Impact (FONSI) by reference.

Background

Before Hurricane Katrina hit New Orleans in August 2005, the VAMC consisted of a 206-bed facility located in downtown New Orleans. Over 39,000 patients were treated at the VAMC in fiscal year 2005, and pre-Katrina staffing included over 1,700 employees and more than 600 volunteers. The VAMC is the main New Orleans campus of the Southeast Louisiana Veterans Health Care System (SLVHCS). Following Hurricane Katrina, the New Orleans VAMC was no longer operational, and the SLVHCS was reorganized to meet the needs of southern Louisiana veterans. The SLVHCS currently functions with about 50 percent of its pre-Katrina staff system-wide and is operating through six community-based clinics located in New Orleans, Slidell, Hammond, St. John the Baptist Parish, Houma, and Baton Rouge. At the existing VAMC campus in New Orleans, the SLVHCS is currently operating only an outpatient clinic and is unable to provide complex care, including ambulatory surgery and procedures or inpatient services. Complex care is provided at other VA facilities or purchased in the community through non-VA vendors. Veterans are often required to travel substantial distances to receive health care.

Multiple alternatives were examined to determine the best option to restore complete, quality healthcare for veterans in New Orleans. Because the process of siting and constructing a new VAMC involves multiple actions, the site selection alternatives were evaluated programmatically through the Programmatic Environmental Assessment (PEA) in the first tier of this assessment process. Subsequent tiers will evaluate the environmental impacts of (1) the design, construction, and operation of the specific facility to be constructed at the site selected and (2) the final disposition of the existing

VAMC campus through more focused Environmental Assessments (EAs). The focused EAs, including the Site-Specific EA for VAMC Building # 2, will and are being tiered from the PEA, allowing more detailed analysis of project-specific impacts within the context provided by the PEA.

Description of Proposed Action

Reestablishing centralized and comprehensive health care for veterans is the principal purpose for the larger Proposed Actions. These actions are needed to rebuild on an expedited basis the healthcare system for veterans throughout the Gulf Coast region, address current and future healthcare capacity requirements for veterans, and meet security and emergency standards for modern, mission-critical VA facilities.

The purpose of the Proposed Action associated with the SEA is to provide temporary medical support service facilities for supply, processing and distribution (SPD) functions at the existing VAMC campus to expedite quality healthcare for veterans in Southeast Louisiana during construction of the replacement VAMC. The SEA addresses the environmental impacts associated with the no action alternative and with the proposed action alternative, which includes demolition of the existing Building # 2 and replacement with temporary mobile support units.

The rationale for identifying the Proposed Action as the preferred alternative was based on consideration of the degree to which each alternative satisfied multiple objectives related to the purpose and need for the project and the ability to meet environmental standards. The principal project objectives include: a) providing a minimum of 3,500 square feet of space suitable to house medical support service facilities for SPD functions; b) allowing ease of access from the outpatient clinic, interstate highways, other major thoroughfares, and public transportation; c) achievement of project completion in a timely and cost-effective manner to allow utilization of nonrecurring maintenance (NRM) project funds; and d) providing a potential long-term asset to VA in support of other construction activities throughout the country.

The Proposed Action consists of the demolition of Building # 2 on the existing VAMC campus and mobilization, installation, and set-up of temporary mobile support units in the same location. These units would remain in place providing medical support services until completion of the replacement VAMC at the Tulane/Gravier location.

Final disposition of the other buildings on the existing VAMC campus has not yet been determined by VA. The main facility will continue to be ventilated to control moisture and secured against further deterioration. Additional initiatives related to preserving building structure, such as renovations to the building envelope (including window and roof repairs) and fire protection systems have been implemented.

Description of Alternatives

Identifying and analyzing alternatives is an important part of the NEPA decision making process. As part of the alternatives analysis, a range of preliminary alternatives are identified. These alternatives are then screened against the project purpose and need as well as other screening criteria. Through this process, some alternatives are eliminated from further consideration and the remaining alternatives are studied in detail as part of the NEPA review process. All of the preliminary alternatives were assessed against the criteria for meeting the identified purpose and need. In addition to the proposed action described above, the following alternative was retained for detailed analysis.

No Action Alternative

Under the No Action alternative, the existing Building # 2, which was severely damaged as a result of Hurricane Katrina, would remain in its current condition. The VA would continue to provide security and ventilation of the existing facilities pending final disposition. There would be no addition of temporary medical support facilities. Support services would continue to be provided on- and off-site through interim facilities and would remain out of compliance with VA requirements. The existing VAMC would continue to provide only outpatient services at its current capacity.

Summary of Environmental Consequences

The SEA evaluated 11 environmental resources potentially affected by the Proposed Action and the No Action alternative. This section summarizes the overall conclusions regarding possible direct, indirect, and cumulative impacts of the Proposed Action on the existing environment and the potential for these impacts to be significant. Impacts on resources may be adverse, beneficial, or both. Resources for which potential adverse impacts were concluded to be no more than negligible to minimal were the physical and biological environment, water and coastal resources, land use, infrastructure/utilities, hazardous waste and human health and safety, air quality, noise and vibration, and socioeconomics and environmental justice. Resources for which potential adverse impacts were determined to be more substantial were aesthetics, transportation, and cultural resources. The impacts associated with these three resources are discussed below.

Cumulative impacts of the Proposed Action were considered in conjunction with other past, present, and reasonably foreseeable future actions in the New Orleans Medical Historic District (NOMHD), the Central Business District, and those areas immediately surrounding the project site within the New Orleans metropolitan. The Proposed Action for Building # 2 would not substantially contribute, in conjunction with effects from other projects or activities in the project area, to significant cumulative impacts on most resources of the potentially affected environment. The Proposed Action would reduce the cumulative adverse impact from the hurricane-related loss of medical facilities and services in the community. The only adverse cumulative impacts to which the Proposed Action could substantially contribute would be impacts on aesthetics, transportation, and

cultural resources that may result from other redevelopment activities in the community. Adverse impacts on aesthetics and transportation would be temporary while those impacts on cultural resources from the proposed activities on the site would be mitigated such that they would not be significant.

Aesthetics

Implementation of the Proposed Action, including demolition of Building # 2 and mobilization, installation, and set-up of temporary mobile support units, would potentially create an adverse cumulative impact on aesthetic resources in the NOMHD and the adjacent Louisiana Cancer Center.

As a contributing element to the NOMHD and as a neighbor to the Cancer Center, the demolition of Building # 2 would change the viewscape in the area. Installation of the mobile support units could create a temporary adverse impact to aesthetics due to the design of the structures in contrast to the surrounding buildings. Demolition of the building and installation of the temporary units could negatively impact the visual character of the NOMHD.

The VAMC campus is partially visible from the Louisiana Cancer Center location, though the view is obstructed by the raised section of I-10 that passes above Claiborne Avenue. There could be minor aesthetic impacts on the Cancer Center if the temporary mobile support units would still be in place when the facility opens. This impact would be of short duration because the replacement VAMC is anticipated to open in early 2013, and the mobile units would be removed shortly thereafter. There would also be short-term aesthetic impacts during the construction period.

Transportation

The road closures required for the Building # 2 demolition and mobilization, installation, and set-up of the temporary mobile support units with the Proposed Action would potentially create minor adverse cumulative impacts on transportation in relation to the adjacent Louisiana Cancer Center and nearby City of New Orleans capital improvement projects. Temporary transportation impacts could occur should road closures be required as part of the proposed action relating to Building # 2 and should they occur at the same time as any road closures associated with the construction of the Cancer Center or renovations/construction associated with the capital improvement projects. Pedestrian access would be temporarily rerouted across Gravier Street during construction. Given the nature of vehicle and foot traffic circulation and the location of the projects in relation to Building # 2, these impacts would be expected to be minor and temporary.

Cultural Resources

Demolition of Building # 2 would remove one of the elements contributing to the NOMHD's eligibility for historic district status. The district's eligibility has already been compromised by the closure of the VAMC and Charity Hospital and the decision to

rebuild these facilities in the Tulane/Gravier area. Given the size and importance of Building # 2 in comparison with the other contributing elements, the loss of this single structure, while an adverse impact, is not considered a significant impact. The VA would mitigate the adverse impact of the loss of the structure through the treatment measures stipulated in the Memorandum of Agreement (MOA) between VA, the Louisiana State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (ACHP). Thus, while there would be a cumulative adverse impact on the cultural resources of the NOMHD under the Proposed Action, the impacts would be mitigated.

Summary of Mitigation Measures

Under the Proposed Action, the historic properties that exist on the VAMC campus and those in the surrounding NOMHD would be subject to potential adverse impacts. To mitigate adverse impacts on these historic properties, VA agreed to three treatment measures as stipulated in the MOA:

- **Recordation Treatment Measure**

To reduce adverse impacts on the historic property resulting from demolition, VA would document the former VA Hospital and the VA Managers and Nurses Quarters (Building # 2) on the existing campus in accordance with Stipulation V.B.4(b) and Appendix 3 of the *Programmatic Agreement Among the US Department of Veterans Affairs, the Federal Emergency Management Agency, the city of New Orleans, the Louisiana State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding the Funding to Repair or Replace Healthcare Facilities Comprising the VA Medical Center and the Medical Center of Louisiana at New Orleans* (PA), dated November 2008. The recordation would include digital photography (to capture all elevations and character-defining architectural features) and narrative histories as described in the MOA found in appendix B of the SEA. The VA would post the resulting recordation data and materials to the website for the VAMC Replacement Project so it can be addressed by the consulting parties.

Additionally, as part of the recordation process per Stipulation V.B.4(b) of the PA, VA will also be documenting the other buildings and structures on the VAMC campus. In one of the stipulations of the MOA, VA would reevaluate the National Register eligibility for these other buildings and structures. VA would reevaluate the contributing/noncontributing status of the various components of VAMC Building #2 and all structures on the VAMC. Depending on the findings, VA may recommend an amended period of significance for the NOMHD. VA would consult with SHPO on these eligibility determinations.

- **Public Interpretation Treatment Measure**

VA, in consultation with SHPO, would design and implement a future public interpretation program related to history of the VAMC including Building # 2, as outlined in Stipulation V.B.4(d) of the PA.. This program could include oral histories, museum quality permanent displays, traveling exhibits, a publicly

accessible website, and popular publications. The public interpretation program plan and resulting materials would be posted to the website for the VAMC Replacement Project for comment by the consulting parties. VAMC would finalize and then implement the public interpretation program after considering the comments.

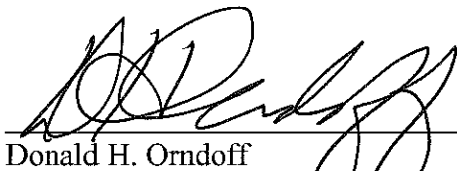
- **Demolition Treatment Measure**

Prior to commencement of any site disturbance, VA would require the contractor to develop a Demolition and Protection Plan (D&P Plan) and establish protocols for vibration monitoring. The D&P Plan would detail specific procedures and measures to be taken to avoid direct or indirect adverse impacts to the neighboring buildings, particularly contributing buildings to the NOMHD such as the Sister Stanislaus Memorial Building, during demolition of Building #2. The consulting parties, SHPO, and ACHP would all be afforded the opportunity to provide comments on the D&P Plan before it is finalized. Additionally, VA would require the contractor to monitor vibrations to limit potential adverse impacts to neighboring buildings. Vibrations at the building closest to the demolition site would be limited to a peak particle velocity of no more than 0.2 inches per second and monitored regularly during vibration-inducing construction activities.

While historic structures already have been identified on the VAMC campus, the nature of any archaeological sites or artifacts is currently undetermined and unlikely because of extensive development in the area. If potential historic properties or unanticipated effects on historic properties are identified during implementation of the proposed action, or if human skeletal remains are discovered during demolition or construction activities, all work would be suspended and the job site secured pending consultation with all appropriate agencies as stipulated in the MOA.

Conclusion

As a result of the analysis of impacts in the SEA, summarized and incorporated by reference herein, it is the conclusion of the Department of Veterans Affairs that, with the implementation of appropriate mitigation measures, the Proposed Action would not have a significant adverse impact on human health or the environment. Therefore, preparation of an environmental impact statement is not required.



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10/1/09
Date