

FINDING OF NO SIGNIFICANT IMPACT

RESPONSIBLE ENTITY: The City of New Orleans, assuming the environmental responsibility of the United States Department of Housing and Urban Development (“HUD”)

ACTION: Finding of No Significant Impact

INTRODUCTION/SUMMARY: The City is responsible, pursuant to federal statute 42 U.S.C. § 5304(g) as recipient of HUD Community Development Block Grant (“CDBG”) funds, for conducting environmental review of projects receiving HUD funds in accordance with 24 C.F.R. Part 58, as well as other laws and regulations. The City served as a cooperating agency in the environmental review process for the site selection for development of a new Veterans Affairs Medical Center (“VAMC”) in the New Orleans metropolitan area. As required by the National Environmental Policy Act (“NEPA”) and its implementing regulations, the Department of Veterans Affairs (“VA”) evaluated the potential environmental impacts for selection of a site for a new VAMC. A programmatic environmental assessment (“PEA”) was prepared and is incorporated by reference into this document. Based upon the PEA analysis, the City has determined that the Proposed Action does not significantly affect the quality of the human environment and that the City will not prepare an environmental impact statement for the Proposed Action. This document provides the bases for the City’s determination.

PURPOSE AND NEED FOR PROPOSED ACTION: The Proposed Action is to select a site for the design and development of a new VAMC within the New Orleans Metropolitan Area. The purpose of the Proposed Action is to identify an appropriate and feasible site to reestablish the healthcare system and medical facilities in the area to service the City’s veterans and those veterans from surrounding communities. The Proposed Action must provide sufficient acreage to meet current and future medical services needs, offer ease of access to and from major transportation outlets, meet security and emergency standards for modern facilities, allow for operational synergies with other major healthcare facilities, and restore such infrastructure on an expedited basis.

BACKGROUND/PROCEDURAL HISTORY: In August 2005, Hurricanes Katrina and Rita caused extensive damage to the healthcare infrastructure of New Orleans, Louisiana, including the VAMC of the Southeast Louisiana Veterans Health Care System (“SLVHCS”). Before Katrina, the VAMC consisted of a 206-bed facility treating over 39,000 patients in a given year, a staff of 1,700, and more than 600 volunteers. Since August 2005, the VAMC has not been operational. In its place, the SLVHCS was reorganized through six community-based clinics. However, these interim facilities do not provide the region's veterans and other citizens with adequate or sufficient resources to meet medical services demands.

In 2007, motivated to reestablish a centralized and comprehensive medical facility for its veterans, the VA issued a request for expressions of interest for the acquisition of land for construction of a new medical center in New Orleans. Three offers were received in response to the VA’s advertisement. The VA subsequently prepared a draft environmental assessment for the project. Comments on the document revealed, however, that the local community viewed the proposed VAMC and the State of Louisiana’s proposed Louisiana State University medical

facility as closely related projects. The VA then joined with the Federal Emergency Management Agency (“FEMA”), as the lead federal agencies to conduct a joint environmental assessment of their two related projects. The PEA incorporated by reference to this FONSI was prepared between June and November 2008, and is the final product of the lead agencies’ analysis.

A third potential site was offered during the joint VA and FEMA environmental review process. During that process, the VA indicated it would consider additional sites that met the requirements published in the VA’s original advertisement. As a result, the final PEA assessed in detail three potential site locations for the new VAMC – Tulane/Gravier, Ochsner, and Lindy Boggs.

ALTERNATIVES: The three sites identified above satisfied most completely the criteria for the proposed design, development and eventual construction of a new VAMC. These three alternative sites, in addition to the no action alternative, were fully evaluated in the PEA.

Preferred Alternative: Tulane/Gravier Site

Based upon analysis of all three sites assessed against the site selection criteria for meeting the project’s identified purpose and need, the City has identified the Tulane/Gravier site as the most favorable site for the new VAMC. As such, the City has selected the Tulane/Gravier site for implementation of the Proposed Action. The VAMC portion of the Tulane/Gravier site encompasses approximately 30 acres. It is adjacent to another 37 acres referenced in the PEA for the proposed LSU medical facility. Combined, the entire approximately 67 acre site is located in downtown New Orleans, bounded by Canal Street to the northeast, Claiborne Avenue to the southeast, Tulane Avenue to the southwest, and South Rocheblave Street to the northwest.

No Action Alternative

Under the No Action Alternative, the existing VAMC, which was severely damaged as a result of Hurricane Katrina, would not be rehabilitated or replaced. There would be no construction of new facilities or modification of the existing structures. Medical services would continue to be provided using the interim arrangements currently in use. The VAMC would continue to operate at a reduced capacity without centralized ambulatory, inpatient or surgical care.

Lindy Boggs Site Alternative

Under the Lindy Boggs site alternative, the VAMC would be replaced with a new facility at the Lindy Boggs site. This site encompasses 39.8 acres, bordered by North Carrollton Avenue to the northwest, Jefferson Davis Parkway to the southeast, Bienville Street to the southwest, and Toulouse Street to the northeast. The VA would acquire land, demolish existing structures, and construct a new VAMC to provide full medical services to veterans that met or exceeded the services provided by the New Orleans VAMC prior to Hurricane Katrina. The proposed VAMC at the Lindy Boggs location would include the same facilities and provide the same level of services as the Tulane/Gravier site alternative.

Ochsner Site Alternative

Under the Ochsner site alternative, the VAMC would be replaced with a new facility at the Ochsner site. The Ochsner Site includes a 28-acre parcel located in Jefferson Parish approximately 3.5 miles west of the downtown New Orleans area, adjacent to the Ochsner Medical Center Main Campus on Jefferson Highway. The site is currently occupied by three warehouses, two helipads, a parking lot, and a railroad spur.

POTENTIAL ENVIRONMENTAL IMPACTS: The PEA evaluated the potential environmental effects associated with implementation of the Proposed Action at the Tulane/Gravier site. Of the eleven environmental resources analyzed, all rendered no or minimal direct and indirect impacts, except for three – land use, cultural resources, and socioeconomics.

Physical Environment: Minimal impacts are expected to geology and soils at the Tulane/Gravier site. Demolition and construction activities may cause minor temporary adverse impacts, including soil erosion, the transport of sediment via storm water, and spills and/or leaks of fuels from on-site vehicles/equipment. The City will obtain all required permits, such as a National Pollutant Discharge Elimination System (NPDES) permit. The Tulane/Gravier site is located within the FEMA-designated 100-year floodplain, but its' floodplain designation is outweighed by the purpose, need, and objectives of the project.

Water and Coastal Resources: No long-term direct or indirect impacts are anticipated from the Proposed Action at the Tulane/Gravier site to water or coastal resources.

Land Use: The Proposed Action would have a direct and indirect impact on the current land use of the Tulane/Gravier site. The currently vacant, residential, and commercial area would be converted to a medical-related area. Current structures would be removed and some residents will be displaced. The redevelopment will indirectly affect adjacent land uses. The land use changes, however, are consistent with long-term and regional recovery planning efforts.

Infrastructure/Utilities: The Proposed Action will substantially increase the demands on infrastructures and utility systems, such as electricity, potable water, and sewer service. However, the existing services are adequate to support the proposed facilities and no adverse impacts to utilities will occur as a result of the Proposed Action at the Tulane/Gravier site.

Cultural Resources: The Proposed Action would adversely impact the Mid-City National Register Historic District as a result of demolition of historic properties. No known archaeological sites are located within the proposed project footprint. Site specific analysis will be conducted to confirm the existence or non-existence of archaeological sites. The Proposed Action would result in a change of land use in the Mid-City Historic District, as well. It would potentially bring an influx of health-related businesses and residents to the historic districts. Beneficial impacts to cultural resources include the creation of the Mid-City Historic Preservation Mitigation Program – an effort

to promote the preservation and rehabilitation of contributing elements within the Mid-City Historic District.

Socioeconomics: The Proposed Action at the Tulane/Gravier site would have varying impacts on socioeconomic issues. On population and housing, the Proposed Action would have direct and indirect impacts. Individuals residing within the proposed area would be displaced and required to move elsewhere. Community facilities and services would be beneficially impacted as a result of the Proposed Action due to improved and expanded healthcare facilities. With regard to environmental justice, minority and low-income communities of concern would be displaced as a result of the Proposed Action, and therefore directly and/or indirectly impacted. Such displacements would be mitigated by government relocation assistance. Beneficial impacts would result from the improved access to healthcare and increased opportunities for employment. Cumulative adverse impacts, therefore, would not be placed on communities of concern for environmental justice purposes.

Transportation: The Proposed Action will generate traffic similar to the traffic patterns before Hurricane Katrina. The existing roadway network has sufficient capacity to accommodate the traffic patterns that existed prior to Hurricane Katrina, and will be studied to confirm the traffic capacity as the Proposed Action moves forward. The increase in traffic associated with the Proposed Action will not result in significant impact on surrounding roadways.

Human Health and Safety: Minimal impacts are expected to Human Health and Safety at the Tulane/Gravier site. With underground and aboveground storage tanks in close proximity, there remains a potential risk of exposure to hazardous materials and other occupational hazards. However, substantial positive impacts to the health and well being of the community will result from the construction of the Proposed Action.

Biological Resources: Marginal habitat areas currently supporting plant and animal communities of minimal diversity and abundance would be temporarily impacted by construction, but such communities would be restored as future design plans incorporate landscape elements into all facility grounds. No adverse impacts to biological resources are anticipated.

Air Quality: Temporary air quality impacts are anticipated by the Proposed Action as a result of the non-road vehicles and machinery in the work area, as well as increased traffic on the surface streets. Such impacts are similar to those of other construction activities in and around New Orleans since Hurricane Katrina. Impacts to air quality are minimal and temporary.

Noise and Vibrations: Minimal and temporary impacts will occur to existing noise conditions as a result of construction. Developers will incorporate noise attenuation features and abide by the New Orleans noise ordinance.

SECTION 106 PROCESS AND PROGRAMMATIC AGREEMENT: As required by Section 106 of the National Historic Preservation Act (“NHPA”), and its implementing regulations, VA and FEMA evaluated the potential historic preservation impacts of the Proposed Action. In this historic review process, the federal agencies determined and documented the area of potential effects (“APE”), identified historic properties within the APE, and evaluated the impact of the Proposed Action on such properties. As a result, and pursuant to 36 C.F.R. § 800.14, the federal agencies negotiated and executed a Programmatic Agreement (“PA”). Indian tribes, local government agencies, and other organizations participated as Concurring or Consulting Parties throughout the process. Public participation was also encouraged and solicited by the use of public meetings and various media outlets.

Throughout, the City served as a Consulting Party. In the event that the VA selected the Tulane/Gravier site for the design and development of the new VAMC, the City agreed to assist with various actions including, but not limited to, acquisition, demolition, site preparation, and mitigation. In addition, as the Responsible Entity, the City assumed responsibility for historic preservation requirements on behalf of HUD. At the conclusion of the consultation process, the City adopted the findings of the final PA and executed such as a Signatory.

To avoid, minimize, and/or mitigate any adverse impacts on the historic properties that exist in the Tulane/Gravier footprint, the City of New Orleans, in conjunction with the VA will take the following measures including, but not limited to:

- Provide a 30-day stay on demolition of historic properties within the historic district following site selection for comments on the integration and/or incorporation of historic properties in the design on the new VAMC;
- Ensure adequate site security prohibiting, to the extent possible, looting and vandalism to historic properties contained on the site;
- Secure and ventilate the former VAMC to prevent further deterioration;
- Retain, rehabilitate, and to the extent possible, integrate into the design of, the Pan American Insurance Building and Dixie Brewery building;
- Providing assistance to historic property owners by reimbursing up to \$200,000 for moving one-story residential buildings of exceptional architectural importance to new sites within the Mid-City National Register Historic District, with additional funds available through federal agencies;
- Secure and ventilate the Dixie Brewery and Pan-American Life Insurance Company Building to minimize deterioration of the resources until the transfer of ownership to the VA;
- Establish a Vibration Tolerance and Monitoring Program to safeguard historic properties from inadvertent damage from vibration due to ground-disturbing activities;

- Phase demolition and construction to avoid concentrated indirect adverse effects;
- Support the State Historic Preservation Officer in the development and implementation of a program to promote the preservation and rehabilitation of contributing elements within the Mid-City alternatives.

MITIGATION MEASURES: In addition to the abovementioned mitigation measures, the following mitigation measures will be implemented to address resources with potentially significant cumulative adverse impacts.

Environmental Justice Mitigation Measures: To avoid, minimize, and mitigate adverse impacts on minority, low-income, and/or other environmental justice communities of concern, the City of New Orleans, in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and the Louisiana Expropriation Provisions, would assist the VA in taking the following measures including, but not limited to:


- Reimburse at fair market value any owner whose nonresidential property is acquired as a result of implementing the project;
- Compensate for any direct loss of real property;
- Reimburse moving expenses for all eligible businesses displaced by the project;
- Reimburse at fair market value any owner whose residential property is acquired as a result of implementing the project;
- Compensate for any direct loss of real property;
- Reimburse moving expenses for eligible displaced persons.

Floodplain Mitigation Measures: To avoid, minimize, and mitigate adverse impacts on the floodplain, the City of New Orleans would assist the VA in taking the following measures including, but not limited to:

- Ensure project planners coordinate with FEMA as well as the local floodplain administrator in minimizing impacts due to construction within the regulated floodplain;
- Include site design measures, including properly sized drain inlets to allow for adequate drainage of storm water runoff and non-storm water discharges;
- Coordinate with the New Orleans Sewerage and Water Board in determining the best way to tie into the existing drainage system;
- Elevate all new construction above the Advisory Base Flood Elevation of 0 feet above mean sea level (or 3 feet above the highest existing adjacent grade), and all occupied structures at least 2 feet about the 100-year flood zone.

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After reviewing the Programmatic Environmental Assessment for the selection of a site for the design, construction and operation of a new Veterans Affairs Medical Center, the City of New Orleans finds that the proposed mitigation measures adequately address the environmental resources of concern, and concludes that a finding of no significant impact is sufficiently supported. Accordingly, preparation of an Environmental Impact Statement for the selection of the Tulane/Gravier site for the proposed VAMC is not required.



Anthony Faciane
Certifying Officer-Director of Neighborhood Stabilization

12-29-08
Date

In compliance with NEPA, the National Historic Preservation Act (“NHPA”), and all relevant implementing regulations, the City has prepared and/or contributed to several analysis documents. Copies of the PEA, Section 106 Programmatic Agreement, and all other relevant environmental and historic preservation analysis documents can be found on the project website at www.valsumedcenters.org.