

U.S. DEPARTMENT OF VETERANS AFFAIRS

**PROGRAMMATIC ENVIRONMENTAL ASSESSMENT
FOR SITE SELECTION:
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 site selection and construction of a new Veterans Affairs Medical Center (VAMC) in the New Orleans metropolitan area. A programmatic environmental assessment (PEA) 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 PEA 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 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.

Because the process of siting and constructing a new VAMC involves multiple actions, it was evaluated programmatically through the PEA. This PEA addresses broad impacts associated with site selection for three alternative locations. Subsequent tiers of the assessment process will evaluate through more focused EAs 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 building. The

focused EAs will be tiered from this PEA, allowing more detailed analysis of project-specific impacts within the context provided by this PEA.

Description of Proposed Action

Reestablishing centralized and comprehensive health care for veterans is the principal purpose for the Proposed Action. This action is needed to rebuild on an expedited basis the healthcare system for veterans from 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 rationale for identifying the Proposed Action as the preferred alternative from among the range of alternatives evaluated was based on consideration of the degree to which each alternative satisfied multiple objectives related to the purpose and need for the project. The principal objectives include adequate space and accessibility; proximity to and potential for operational synergies with other medical affiliates; consistency with local and regional planning efforts considering economic, commercial, and residential needs; maximization of opportunities for economic development and provision of public services; and minimization of adverse environmental and socioeconomic impacts.

The Proposed Action consists of site selection and construction of a new VAMC on a 30-acre site in the Tulane/Gravier area of downtown New Orleans. This PEA focuses on the site selection and preliminary site preparation phase of the construction process. The site is near and northwest of the existing VAMC and Charity Hospital and north of University Hospital within the Mid-City National Register Historic District (NRHD). The site is bounded by Canal Street to the northeast, South Galvez Street to the southeast, Tulane Avenue to the southwest, and South Rocheblave Street to the northwest. Land would be acquired to relocate and construct the VAMC at this location. The site comprises both residences and businesses, many of which were severely damaged by Hurricane Katrina. As of July 2008, vacant residential and commercial lots composed approximately 45 percent of all parcels within the proposed VAMC site boundary. Surrounding land uses are primarily residential and commercial (small businesses).

The proposed VAMC would include approximately 1 million gross square feet, 200 medical/surgical/psychiatric/extended care beds, outpatient capacity to receive 410,000 visits per year, mixed structured and surface parking facilities, and a helipad to accommodate emergency access by air. Enhanced backup systems for power, water, sewer, and heating, ventilation, and air conditioning would provide four days of service in the event of disruption of city infrastructure during a major storm event or other natural disaster.

Final disposition of the existing VAMC facility by VA has not yet been determined. The facility will be ventilated to control moisture and to secure against further deterioration by neglect. 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 site selection criteria for meeting the identified purpose and need. In addition to the proposed action described above, the following alternatives were retained for detailed analysis.

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, and medical services would continue to be provided using the interim arrangements currently in use. The existing VAMC, which is currently providing only outpatient services, would continue to operate at a much reduced capacity. Other services, including ambulatory, inpatient, and surgical care, would continue to be provided outside of the New Orleans area, and veterans would have to travel to locations in southeast Louisiana and beyond.

Lindy Boggs Site Alternative

Under this alternative, the existing VAMC would be replaced with a new facility at the Victory Real Estate Investments, LLC Lindy Boggs location. VA would acquire land and demolish existing commercial and industrial structures, including the inactive Lindy Boggs hospital, and would construct the VAMC, which would provide to veterans in southeast Louisiana full medical services that meet or exceed the services provided by the New Orleans VAMC prior to Hurricane Katrina. The 40-acre Lindy Boggs site is bordered by Toulouse Street to the northeast, Jefferson Davis Parkway to the southeast, Bienville Street to the southwest, and North Carrollton Avenue to the northwest. The proposed VAMC at the Lindy Boggs location would include the same facilities and provide the same level of services as the Proposed Action.

Ochsner Site Alternative

Under this alternative, the New Orleans VAMC would be replaced with a new facility at the Ochsner site, which is a 28-acre parcel owned by Ochsner Health Systems (formerly Alton Ochsner Medical Foundation). The Ochsner site is 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. It is bordered by railroad tracks and the Earhart Expressway to the north, healthcare facilities to the east and south, and residential housing to the west. The site is currently occupied by three

warehouses, two helipads, a parking lot, and a railroad spur. The proposed VAMC at the Ochsner location would include the same facilities and would provide the same level of services as the Proposed Action.

Summary of Environmental Consequences

The PEA evaluated 11 environmental resources potentially affected by the Proposed Action, the No Action alternative, and other siting alternatives. 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 environment, water and coastal resources, infrastructure, transportation, human health and safety, biological resources, air quality, and noise. Resources for which potential adverse impacts were determined to be more substantial were land use, socioeconomics, 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 City of New Orleans. The Proposed Action for the Tulane/Gravier VAMC site would not substantially contribute, in conjunction with effects from other projects or activities in the City, to significant cumulative impacts on most components 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 cultural resources and environmental justice that may result from other redevelopment activities in the community. However, adverse impacts on cultural resources from the proposed activities on these sites would be avoided if possible and minimized to the extent practicable, and any remaining impacts would be mitigated such that they would not be significant. Similarly, unavoidable adverse environmental justice impacts would be mitigated. However, it is anticipated that all population groups would greatly benefit from the expanded employment opportunities for construction, operation, and maintenance of the improved facilities.

Land Use

Land use on the site would be converted to medical, displacing residential and commercial uses. These changes would be consistent with planning for the site, compatible with adjacent land uses, and would promote the goals of Medical District development and economic redevelopment of surrounding areas. Long-term impacts overall would be beneficial, though short-term loss of residential and commercial uses on the sites may be adverse. Adverse impacts on land use would not be significant.

Cultural Resources

The footprint of the proposed VAMC would adversely impact the Mid-City NRHD. The 123 contributing elements slated for demolition in the VA footprint represent 3 percent of the contributing elements inside the Mid-City NRHD. Also, the existing VAMC building would cease to function as a hospital. This would have an adverse effect on its NRHP eligibility, which is based on its status as a contributing element to the eligible New Orleans Medical Historic District. No known archaeological sites are located within the proposed project footprint. To confirm this, site-specific analyses will be performed during subsequent tiers. Any sites found during the investigations conducted during subsequent tiers will be treated in accordance with the methodology and the stipulations of the Programmatic Agreement (PA).

The Proposed Action would result in a change in land use in the Tulane/Gravier area and the Mid-City NRHD. The increase in institutional land use in the project footprint and the resultant influx of health-related businesses to the area could cause an influx of residents to the Tulane/Gravier area and other portions of the City, potentially including the Mid-City NRHD or other historic districts. Measures to avoid, minimize, and mitigate the potential adverse impacts to cultural resources can be found in the PA (Appendix B of the PEA) and the Summary of Mitigation Measures below.

A beneficial cumulative impact of the Proposed Action is the creation of the Mid-City Historic Preservation Mitigation Program. Should VA select the proposed Tulane/Gravier site, VA will support the State Historic Preservation Office (SHPO) in its effort to develop and implement a program to promote the preservation and rehabilitation of contributing elements within the Mid-City Historic District. The community would be informed about available monies, potentially increasing the number of people who apply and receive historic preservation grants.

Socioeconomics

The Proposed Action would have adverse impacts due to displacement of residents, demolition of existing onsite housing, and reduced community cohesion. Housing demand from employees could have beneficial effects on property values and redevelopment, but could have adverse impacts if adjacent housing is displaced by related development. Overall, adverse impacts on housing would not be significant.

The Proposed Action would provide substantial, beneficial, direct impacts on medical facilities and the delivery of medical services in the City. Local public safety and school services would be adequate to support possible increased demand from development associated with the proposed facilities.

There would be potential adverse impacts on environmental justice communities under the Proposed Action due to displacement of minority and low-income residents from the site. However, these impacts would be mitigated through government relocation assistance (see Summary of Mitigation Measures below) and no disproportionately high

and adverse impacts to minority or low-income populations would be expected. Beneficial impacts would result from improved access to and quality of healthcare, as well as increased opportunities for employment. Any displacement of residents that would occur in conjunction with other rebuilding efforts planned or ongoing in the vicinity of the proposed locations also would be addressed through mitigation measures. Therefore, there would be no cumulative adverse impacts on environmental justice communities of concern under the Proposed Action.

Summary of Mitigation Measures

Cultural Resources Mitigation Measures

Under the Proposed Action, the historic properties that exist on the Tulane/Gravier VAMC site and those in the surrounding Area of Potential Effect would be subject to potential adverse impacts. To mitigate adverse impacts on these historic properties, VA would take three avoidance measures:

- The VA shall ensure reasonable measures to provide adequate site security are accomplished to prevent, to the extent possible, looting and vandalism to historic properties within the site;
- The agency would retain and reuse the Pan-American Life Insurance Company Building and, if feasible, the Dixie Brewery or its significant architectural features; and
- The VA will accept and consider comments from the NHPA Section 106 Consulting Parties as part of their schematic design review planning process.

To minimize adverse effects on the historic properties located within the site footprint and the surrounding APE, the VA would:

- Support the SHPO by reimbursing up to \$600,000 of the cost for moving eligible one-story buildings of exceptional architectural importance to the Mid-City NRHD from their current locations within the site footprint to new sites within the Mid-City NRHD.
- The Dixie Brewery and Pan-American Life Insurance Company Building would be stabilized, secured, and ventilated to minimize deterioration pending the final facility design.
- To safeguard all historic structures within the Area of Potential Effect during demolition and construction, VA would develop a vibration tolerance and monitoring program designed by a structural engineer experienced in traditional materials.

- To minimize concentrated, indirect adverse effects on the surrounding neighborhoods, demolition and construction would be phased to the extent possible.

VA would apply four mitigation measures to reduce the remaining potential adverse impacts under the Proposed Action:

- Provide up to \$700,000 to support the SHPO-sponsored Mid-City Historic Preservation Mitigation Program designed to promote the preservation and rehabilitation of historic properties contributing to the historic significance and characteristics of the Mid-City NRHD, which would be adversely affected by this alternative.
- Prior to any transfer or sale of the existing VAMC, or demolition or architectural salvage within the project footprint, VA would document the former VA Hospital and VA Managers and Nurses Quarters at the existing VAMC site, and Sewerage Pumping Station No. 15 and all historic properties within the project footprint that will not be retained. Document will include digital photography and narrative reports.
- The agencies would develop and implement an architectural salvage plan for the removal and reuse of important architectural elements from these historic properties that will not be maintained within the project footprint.
- The agencies would design and implement a public interpretation program related to the Mid-City NRHD and the existing VAMC. This program would include oral histories, museum quality permanent displays, traveling exhibits, a publicly accessible website, and popular publications.

While historic structures already have been identified at the proposed Tulane/Gravier site and various alternative locations, the nature of any archaeological sites or artifacts is currently undetermined because of existing development in the area. VA has agreed to general treatment strategies to mitigate potential adverse effects on archaeological resources at all site locations pending final site selection. Once NRHP-eligible archaeological resources are identified, VA will develop one or more data recovery plans that may include a sampling strategy, oral histories, public outreach (such as a public archaeology program) and data recovery. VA will curate all archaeological materials from these projects in accordance with the appropriate standards or regulations.

If potential historic properties or unanticipated effects on historic properties are identified after site selection, or if human skeletal remains are discovered during the archaeological survey, demolition, or construction, all work would be suspended and the job site secured pending consultation with all appropriate agencies as stipulated in the PA.

Environmental Justice Mitigation Measures

Mitigation measures include options to avoid, minimize, or mitigate the adverse impacts associated with the Proposed Action. Construction of the new VAMC facility at the

proposed Tulane/Gravier location would result in the displacement of businesses and other non-residential activities currently located on the site. Mitigation measures would be implemented, where feasible, to reduce the adverse effects of displacement on the businesses and employees affected. Similarly, the resident populations that currently occupy the proposed Tulane/Gravier VAMC location would be displaced and required to relocate to housing outside of the project area. The populations residing on the site were determined to be minority and low-income populations and, therefore, were identified as environmental justice communities of concern. The adverse impacts of construction at the proposed location on those populations would be reduced through mitigation measures.

Mitigation measures, in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and the Louisiana Expropriation Provisions (described in Section 5.4 of the PEA), would be implemented to reduce the adverse effects of displacement on the businesses, nonprofit organizations, and residents affected by construction of the new VAMC facilities at the proposed Tulane/Gravier location. Mitigation measures that would be taken to minimize the impacts of business relocation, business activity loss, and employment loss may include the following:

- Reimburse at fair market value any owner whose nonresidential property is acquired as a result of implementing the project;
- Compensate for reasonable expenses associated with reestablishment, including the search for replacement facilities;
- Provide relocation advisory assistance, including determining the relocation needs and preferences of each eligible business or nonprofit organization and explaining available services, eligibility requirements, and procedures for obtaining such assistance;
- Compensate for any direct loss of real property; and
- Reimburse moving expenses for all eligible businesses displaced by the project.

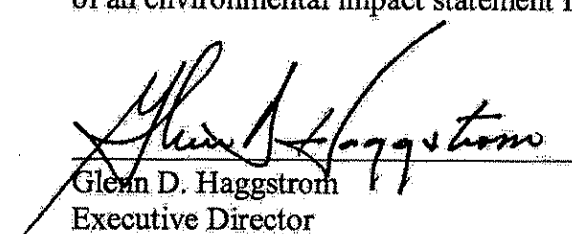
Mitigation measures that would be taken to minimize the adverse impacts of relocation on residents may include the following:

- 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;
- Compensation up to \$40,000 per home (not to exceed a total of \$600,000) for the cost of relocating eligible contributing elements to the Mid-City NRHD from their position in the footprint of the VA Tulane/Gravier location to a new location within the Mid-City NRHD but outside of the footprint;

- Provide relocation advisory services, such as determining the relocation needs and preferences of eligible displaced persons and explaining available services, eligibility requirements, and procedures for obtaining such assistance;
- Assist eligible displaced persons by offering services such as transportation to locate replacement housing, social services or financial referrals, and listings of comparable dwellings;
- Provide replacement housing payments for the increased costs of renting or purchasing a comparable replacement dwelling;
- Coordinate with neighborhood and parish housing organizations to identify programs to address other needs of displaced persons; and
- Provide "housing of last resort" when comparable decent, safe, and sanitary replacement housing within a displaced person's financial means cannot be made available.

Conclusion

As a result of the analysis of impacts in the PEA, 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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 Date