
FINDING OF NO SIGNIFICANT IMPACT (FONSI)
DEPARTMENT OF VETERANS AFFAIRS
REPLACE BED TOWER, CLINICAL BUILDING EXPANSION, AND JC PARKING GARAGE
ST. LOUIS HEALTH CARE SYSTEM-JOHN COCHRAN DIVISION
CITY OF ST. LOUIS, MISSOURI
PROJECT NUMBER: 657-309

The US Department of Veterans Affairs (VA) assessed the potential impacts associated with the proposed expansion and seismic upgrade of the Department of Veterans Affairs St. Louis Health Care System – John Cochran Division (VASTLHCS). A Supplemental Environmental Assessment (SEA) to the previously completed 2014 Environmental Assessment was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, the President’s Council on Environmental Quality regulations to implement NEPA (40 CFR Parts 1500-1508), and VA regulations (Title 38 CFR Part 26). The attached SEA is incorporated by reference into this Finding of No Significant Impact (FONSI).

BACKGROUND

The proposed project is situated within the City of St. Louis at 915 North Grand Boulevard. The VASTLHCS is part of the Veteran Affairs Heartland Network - Veteran Integrated Service Networks (VISN 15) that includes the states of Missouri, Kansas, Illinois, and parts of Indiana, Kentucky and Arkansas. This represents approximately 162,000 square miles where about 500,000 Veterans reside. VASTLHCS is also part of a two-division facility, along with Jefferson Barracks VAMC (located approximately 18-miles south of VASTLHCS), that provides inpatient and ambulatory care in medicine, surgery, psychiatry, neurology, and rehabilitation, as well as over 65 subspecialty areas. VASTLHCS has all the St. Louis VAMC’s operative surgical capabilities, an ambulatory care unit, intensive care units, outpatient psychiatry clinics, and an expanded laboratory.

In February 2014, the Department of Veterans Affairs (VA) completed an Environmental Assessment (EA) that analyzed three possible parcel acquisition alternatives for an expansion and renovation project to help identify optimal layouts for new buildings and other components. The EA resulted in a Finding of No Significant Impact (FONSI). The 2014 project was later postponed. Presently, the VA has reinitiated the project planning process and is developing two action alternatives for the new project. When important new information becomes available after an EA is prepared, an agency may satisfy its duty under NEPA with a supplemental analysis. Reasons for performing a supplemental EA include a change in project, a change in the environment where the federal action is located, or the NEPA analysis completed for the project is more than five years old and the proposed action has not yet been implemented.

This SEA has been prepared to supplement information that identified, analyzed, and documented the potential physical, environmental, cultural, and socioeconomic impacts identified in the 2014 EA associated with the VA proposed expansion and seismic upgrade of the John Cochran facility.

VA Directive 7512 establishes policy regarding the seismic safety of VA buildings, and facilities identified as critical and essential must meet additional requirements to remain operational after a seismic event (VA 2017). VASTLHCS is located within a seismically active area classified as “Moderate High.” In recognition of this, the VA commissioned a phase one and two seismic study (Degenkolb Engineers, 1999) (Degenkolb Engineers, 2000) for Building 1 to determine what extent this building meets the current seismic codes. The studies indicated that Building 1 is seismically deficient having both structural and nonstructural deficiencies as well as adjacency hazards due to connections with the eastern portion of the building known as Building A and the western portion known as Building B. A 2006 Degenkolb Seismic Inventory List specifically lists Buildings 1, 6A and 8A as high risk

buildings. The VA performed a Tier 1 Structural Seismic Study of the Clinical Addition. The Clinical Addition constructed in two-stages in 1977 and 1983 is adjacent to and connected to Building 1. The results identified structural and nonstructural seismic deficiencies of the Clinical Addition (part of Building 1) including Insufficient separation joint between the Clinical Addition and Building 1, Smaller, structurally weaker upper floors, Tall, narrow shear walls subject to overturning and a large opening in a mechanical area next to a primary shear wall.

SUMMARY OF PROPOSED ACTION

The proposed action includes construction of care facilities that would meet modern standards, alleviate existing facility space deficiencies, provide veterans with privacy and a better quality of care, and provide for more streamlined facility operations.

Three alternatives were analyzed in the SEA process:

1. Alternative A - acquisition of southern properties

Alternative A would include acquisition of two properties south of the existing medical center and vacation of portions of City of St. Louis streets including Bell and Enright Avenue. As part of this Alternative VA proposes to construct and operate the following core components at the John Cochran Division:

- New Inpatient Medical Tower
- New Substance Abuse Treatment Program Clinic
- New Facilities Support and Information Technology Building
- New Central Utility Plant
- New Parking Facilities
- New Water Storage Structure
- Site improvements including utility infrastructure, roadways, sidewalks and landscaping

2. Alternative B – no property acquisition

Alternative B would limit development to property currently owned by VA and vacation of a portion of Bell Avenue, a City of St. Louis street. As part of this alternative VA proposes to construct and operate the following core components at the John Cochran Division:

- New Inpatient Medical Tower
- New Substance Abuse Treatment Program Clinic
- New Central Utility Plant
- New Facilities Support and Information Technology Building
- New Parking Facilities
- New Water Storage Structure
- General site improvements including utility infrastructure, roadways, sidewalks and landscaping

3. No Action Alternative

Under the No Action Alternative, operations at VASTLHCS would continue under current conditions. This alternative would not address the seismic deficiencies of the existing buildings and would not provide the proper standard of required medical care to veterans living within the St. Louis region.

Mitigation Measures

Mitigation measures that are laid out here were compiled within the SEA. Mitigation measures are to be used to avoid, minimize, rectify, reduce, or compensate for the adverse effects of an impact to the environment.

Resource	Proposed Action Mitigation
Aesthetics	The VASTLHCS campus will acquire all zoning changes and city permits required to maintain aesthetics and follow city ordinance. VASTLHCS will maintain upkeep on landscaping and buildings.
Air Quality	<p>BMPs to be used to mitigate air quality impacts during construction:</p> <ul style="list-style-type: none"> • When applicable, limit the use of heavy construction equipment on orange or red Air Quality Indices (AQI) to limit ozone exceedances. • State ordinance 10 CSR 10-5.385 states that any heavy-duty diesel vehicle with a gross weight greater than 10,000 pounds that operates in the City of St. Louis may not idle more than 5 minutes within any 60-minute period. • Submit and have approved a notice of asbestos abatement and/or demolition to the MDNR at least 10 days prior to the commencement of asbestos abatement and/or demolition activities. • Use appropriate dust suppression methods during onsite demolition/construction activities. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of demolition and earth-moving activities during high wind conditions. • Comply with all local, state, and federal regulations.
Cultural Resources	<p>The VA has initiated consultation with SHPO and consulting parties regarding Alternative A. Through consultation, the VA and the consulting parties will identify measures to avoid and minimize potential adverse effects to historic properties. If the Palladium is still considered eligible following consultation and if Alternative A is chosen to move forward, the VA will need to complete Historic American Buildings Surveys and Historic American Engineering Records documentation prior to demolition. The creation of a programmatic agreement (PA) is under way to resolve adverse effects to historic properties through development and implementation. Other mitigation strategies include design review by SHPO and other parties to identify alternatives that are more sympathetic to historic resources. Minimize indirect (view shed) effects to nearby historic buildings/districts through environmental sensitive/sympathetic design. The VA shall follow guidelines and mitigation measures detailed in the PA.</p> <p>Should human remains or other cultural items as defined by NAGPRA be discovered during project construction, the construction contractor would immediately cease work until the VA, a qualified archaeologist, and the SHPO are contacted to properly identify and appropriately treat discovered items in accordance with applicable State and Federal law(s).</p>

<p>Geology, Topography, and Soils</p>	<p>The campus design will be created with IBC and Department of Veterans Affairs requirements. As well, removal of existing fill and avoiding soft spots within the project area detailed above and in the Geotechnical report will help to provide a stable and long lasting campus that will serve the area and meet project objectives.</p> <p>Implementing BMPs to reduce erosion and sedimentation impacts during construction would further minimize the potential impacts on local soils and water quality. These erosion and sedimentation control BMPs include developing and submitting a NPDES General Permit for Construction Activity to the Metropolitan St. Louis Sewer District and the MDNR Water Protection Program. The NPDES permit would require stormwater runoff and erosion management using BMPs, earth berms, detention basins, vegetative buffers and filter strips, and spill prevention and management techniques. The construction contractor would implement the following as appropriate and necessary to protect surface water quality, as part of NPDES permit:</p> <ul style="list-style-type: none"> • Install and monitor erosion-prevention measures (BMPs), such as silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures; re-spread stockpiled topsoil; and seed/re-vegetate areas temporarily cleared of vegetation. • Retain on-site vegetation to the maximum extent possible. • Plant and maintain soil-stabilizing vegetation on disturbed areas. • Use native vegetation to re-vegetate disturbed soils.
<p>Hydrology and Water Quality</p>	<p>Volume reducing best management practices (BMPs) for stormwater quality are required however and these are identical to the water quality BMPs. The project will need to provide flood detention (2 & 100 year – 24 hour, type 2 Storm event) since the difference in stormwater is over 2 cubic feet per second. Flood protection should be supplemented by volume reducing BMPs. MDC also recommends mitigation measures should be used to prevent erosion and sedimentation/runoff to nearby waterways, as well as proper cleaning of construction equipment via removing mud, soil, trash, plants and animals. When possible, wash and rinse equipment with hard spray or hot water (>140 F) to prevent transferring invasive exotic species. VA will need to obtain all federal, state and local permits before project may begin.</p>
<p>Wildlife and Habitat</p>	<p>Proper site inspection to verify that the nests of migratory birds, peregrine falcons, and eagles will be conducted prior to demolition and construction if Alternative A or B are chosen. The contractor hired will be responsible for hiring a qualified biologist to conduct site inspections for federally protected and state listed species. Per MDC recommendation, work should be avoided within 1500 feet of nests when nest building or active nests (eggs or hatchlings) are present to limit adverse effects to the state listed peregrine falcon. If nest building or active nests of peregrine falcons or any of the protected species mentioned above are found on the campus by the biologist or workers, work shall be avoided within 1500 feet to avoid impacts to protected species.</p>

<p>Noise</p>	<p>While no specific measures are required, using best management practices during construction if Alternative A or B are chosen will limit noise output increases and limit impacts to sensitive receptors and the community. To minimize the short-term impacts of construction, the contractor shall implement these BMP's when applicable. Any noise issues that arise will be addressed by the onsite construction manager. BMPs include:</p> <ul style="list-style-type: none"> • Comply to all noise ordinances in the St. Louis City Code. • Limit construction activities on the weekend and from sunset to sunrise Monday-Friday when possible to avoid excessive noise output during sensitive times. • Include signage at sight and coordinate with local sensitive receptors where entry and exit points are, construction times and activity to avoid conflict with local stakeholders. <p>Encourage construction personnel to operate equipment in the quietest manner possible and follow BMP's to avoid excessive noise output (limit speeds, shut off non-operating equipment, select entry and exit points far from noise receptors). These BMP's would help to limit the short-term construction noise outputs until normal operation can continue and avoid conflict as much as possible with local sensitive receptors.</p>
<p>Land Use</p>	<p>For any acquired properties that require conditional use permits, VA would obtain and submit the proper permits prior to beginning project construction. VA shall consult with the City of St. Louis Planning and Urban Design Agency (PUDA) to integrate design features, to the extent practicable, so that the expanded John Cochran Division would be designed and constructed in similarity with other developments within the area.</p>
<p>Floodplains and Wetlands</p>	<p>No mitigation or management measures are required for any of the alternatives described for the project. Consultation with the USACE determined since none of the project occurred within waters of the US, no USACE permit is required.</p>
<p>Socioeconomics</p>	<p>VA shall comply with the requirements of the Uniform Relocation Act (URA) to ensure the uniform and equitable treatment of displaced businesses and people from their residences. VA would develop a Relocation Plan specific to the selected Action Alternative to identify potential problems and associated solutions for displaced residents, businesses, tenants, and/or landlords as a result of the implementation of the Proposed Action.</p>
<p>Community Services</p>	<p>VA shall consult with all community services before construction and changes to any streets or services occur.</p>
<p>Solid Waste and Hazardous Materials</p>	<p>Reducing potential future impacts by following the recommended BMP's listed below will help to limit future potential adverse effects and help with compliance to regulatory requirements in the future.</p> <p>The VA will need to complete asbestos and lead surveys of all buildings planned for demolition or renovation by certified Missouri inspectors before work is to begin if alternative A or B are selected. Proper BMP's during construction will need to be followed to limit short term minimal waste impacts; removing waste from site, limiting construction dust and airborne particles and limiting and monitoring for leaks from equipment to avoid ground contamination from diesel and gasoline. As well, care should be</p>

	<p>taken in demolition of facilities to limit asbestos and lead contact and proper disposal of building materials containing them. The proper removal of lead based paint and asbestos will be required to mitigate impacts and contamination to the project site. Further evaluation for impacted soils and removal of underground storage tanks detected in the Phase 2 ESA will need to be completed to limit further contamination and mitigate impacted soils.</p> <p>The VA would need to acquire all necessary permits for the underground storage tanks needed for the generators being constructed on the new facility, if Alternative A is selected. The SPCC Plan will need to be updated to include all new facility tanks and waste.</p>
<p>Transportation and Parking</p>	<p>Coordination with the City of St. Louis is underway and will continue as construction is planned to properly mitigate all changes to city streets and traffic. Parking lots and garages are designed In Alternative A to offer parking for visitors and staff for the proposed campus and into the future with planned growth. Short term impacts during construction will be limited to all extents possible.</p> <p>The signals along Grand Boulevard would be closely coordinated to minimize queues on Grand Boulevard, especially when reduced to one through lane during construction. Emergency vehicle preemption would be in place at the signals along Grand Boulevard throughout all phases of reconstruction along Grand Boulevard. Depending on city consultation, if a roundabout is constructed at Spring Avenue/Delmar Boulevard, the Spring Avenue/Enright Avenue intersection would be converted from a signalized intersection to side-street stop control.</p>
<p>Utilities</p>	<p>During planning of facilities and construction if proceeding forward with Alternative A or B, the VA shall be in communication with utility services to make sure services are not interrupted or altered. Communication with Ameren regarding the substation and any local or state permits required should be completed and obtained before construction of the Campus if Alternative A or B are selected to proceed forward.</p>
<p>Environmental Justice</p>	<p>During construction, if Alternative A or B are chosen, effects on adjacent land uses, such as through noise and dust, would be limited and controlled as discussed in Sections 3.3 and 3.8 of the SEA, thereby minimizing adverse effects to minority and low-income populations.</p> <p>In addition, construction of Alternative A or B is anticipated to result in short-term and long- term, direct, positive socioeconomic impacts to local employment and personal income. Given the ROI is a minority and low-income community, such positive effects would be anticipated to extend to local minority and low-income citizens, a positive environmental justice effect.</p>