U.S. DEPARTMENT OF VETERANS AFFAIRS
FINDING OF NO SIGNIFICANT IMPACT:
PROPOSED NEW SURGICAL AND CLINICAL TOWER
AND BUILDING DEMOLITION AT THE
WEST HAVEN VA MEDICAL CENTER
WEST HAVEN, CONNECTICUT

Introduction

A Final Environmental Assessment (EA) was prepared to identify, analyze, and document the physical, environmental, cultural, and socioeconomic impacts associated with the U.S. Department of Veterans Affairs' (VA's) Proposed Action to construct a new surgical and clinical tower and demolish selected buildings at the West Haven Veterans Affairs Medical Center (WHVAMC) in West Haven, Connecticut. The VA prepared the Final EA in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S. Code §§ 4321-4370h), as implemented by the Council on Environmental Quality regulations (40 Code of Federal Regulations [CFR] §§ 1500-1508); Environmental Effects of the Department of Veterans Affairs Actions (38 CFR Part 26); and VA's NEPA Interim Guidance for Projects (VA 2010).

Purpose and Need

The **purpose** of the Proposed Action is to address space deficiencies and continuity of healthcare services via the proposed construction of a new surgical and clinical tower at the WHVAMC. Medical support services of the proposed new facility would include inpatient surgical/endovascular, ambulatory, intensive care nursing, information & technology, pathology, laboratory medicine, sterile processing, engineering, pharmacy, environmental management, and logistics. The Proposed Action is **needed** to meet VA Standards for space and patient population Departmental Gross Square Feet (DGSF), ensure continuity of healthcare services, improve workflow inefficiencies, reduce the potential for increased infection control issues, and improve life safety egress issues located within Building #1 which houses the existing Surgery Department Operating Suite. Construction and operation of a new surgical and clinical building at WHVAMC would also address the existing critical deficiencies related to utility failures, infection prevention issues, and patient and staff safety.

Proposed Action

Under the Proposed Action, the US Army Corps of Engineers, on behalf of VA, would design and construct a new surgical and clinical tower at the WHVAMC. The new tower would be classified as Mission Critical because inpatient beds and hospital functions would be located inside. The new tower is proposed to be three to four stories or more.

Three conceptual alternatives (e.g. physical layout and alignment of the new tower) within a portion of the WHVAMC property boundary have been considered for the Proposed Action.

Regardless of the alternative selected, the Proposed Action would include the following project components:

- Design and construction of a Mission Critical approximate 161,000-building-gross-square-foot new surgical and clinical tower located within the central portion of the WHVAMC and in close

proximity to the existing General Medical and Surgical Building (Building #1).

- Demolition of at least two and no more than five historic buildings that have been identified as contributing elements to the WHVAMC historic district.
- Design and construction of a mechanical/electrical/plumbing penthouse on top of the new tower.
- Design and construction of subterranean tunnels for access to utilities with connection to existing buildings.
- Design and construction to upgrade utility infrastructure, such as piping, tunnels, corridors, and capacities, to supply the new tower.
- Design and construction of aboveground passageways from the new tower to Building #1 to facilitate movement of visitors, patients, staff, and materials/equipment.
- Renovation of interior spaces in Building #1 for services that have been relocated to the new tower.
- Potential design and construction of a new above-ground potable water tank or tower with an approximate 1-million-gallon capacity to ensure there is sufficient potable water supply available to the new tower and other facilities.

The Proposed Action would incorporate the following Medical Support Features:

- Inpatient Surgical/Endovascular Services and Ambulatory Surgical Service: Programmed space for 8 operating rooms, 23 patient pre-operative holding/phase II recovery bays, and 14 patient post-anesthesia care unit (PACU)/phase I recovery bays. Operating rooms include rooms for General, Urology/Cystoscopy, Hybrid, Biplane, Orthopedic, and Robotics. Additional needed space for waiting/reception, pre-operative assessment, pre-operative holding, recovery, anesthesia procedure and support, surgical service, PACU and recovery, as well as general support, administration, and education areas.
- Intensive Care Nursing Units: Programmed space for one 15-bed intensive care unit and a step-down unit for patients needing an intermediate level of care between that of the general ward and the intensive care unit. Additional programmed space for waiting, patient area needs, support areas, as well as staff and administration requirements.
- Office of Information & Technology: Programmed space for distributed Telecom rooms.
- Pathology and Laboratory Medicine Service: Programmed space for patient specimen collection, core and clinical pathology work areas, molecular testing pathology suite, anatomical pathology workspace, required support areas, and staff and administration work areas.
- Lobby: Programmed space for an entrance lobby with a police presence and screening area.
- Sterile Processing Service: Programmed space for a biohazard soiled/dirty storage room.
- Engineering Service: Programmed basic and limited receiving area, storage, and engineering workstations/repair shops.
- Pharmacy Service: Programmed space for inpatient pharmacy work, storage, and support areas for Operating Rooms' compounding.
- Environmental Management Service: Programmed space for required lockers, lounges, restrooms with showers, administration, linen and laundry, storage, collection, and staging.
- Logistics Service: Programmed receiving and issuing areas, storage, equipment staging, as well as staff and administration requirements.

Project Components Unique to Each Alternative

Alternative 1-Courtyard would locate the new tower in the courtyard between Buildings #1 and #2, and adjacent to Buildings #4 and #5. Alternative 1 would require:

- Demolition of Buildings #6, #6A, and #7. Buildings #6 and #7 have been identified as contributing resources to the National Register of Historic Places (NRHP)-listed historic district. Building #6A is a non-contributing resource.
- Demolition of loading docks in Building #2.
- Elimination of the courtyard.

Alternative 2-Parking Lot 7 would locate the new surgical and clinical tower in Parking Lot 7. Alternative 2 would require:

- Demolition of Buildings #6, #7, #8, #9, and #10, all of which have been identified as contributing resources to the NRHP-listed historic district.
- Demolition of Buildings #8½ and #6A, both of which are non-contributing resources.
- Elimination of Parking Lot 7.

Alternative 3-Loading Dock would locate the new surgical and clinical tower east of Parking Lot 7. Alternative 3 would require:

- Demolition of Buildings #7, #8, #9, and #10, all of which have been identified as contributing resources to the NRHP-listed historic district.
- Demolition of Buildings #6A and #8½, both of which are non-contributing resources.
- Elimination of the Building #1 loading dock.

VA also considered a **No Action Alternative**, which serves as the baseline for which the effects of the Proposed Action can be evaluated, as required by NEPA regulations (38 CFR Part 26). Under the No Action Alternative, the proposed surgical and clinical tower would not be constructed. None of the historic nor non-historic buildings would be demolished. However, the No Action Alternative does not meet the purpose and need for action and would diminish the level of care that VA is able to provide at the WHVAMC to Veterans throughout Connecticut and southern New England. Deficiencies in medical and utility infrastructure, patient care, and safety would remain unresolved.

Potential Environmental Effects

Table 1 summarizes the findings of the Final EA impact analysis by resource area.

Table 1. Summary of Impact Analysis

Resource Area	Proposed Action	No Action
Aesthetics		
Construction	All alternatives under the Proposed Action would have a direct, short-term (though lasting up to four years), less-than-significant adverse impact on aesthetics.	No impact
Operation	Alternative 1 would have a direct, long-term, moderate adverse impact on aesthetics.	No impact
	Alternative 2 would have a direct, long-term, negligible adverse impact on aesthetics.	

Resource Area	Proposed Action	No Action
	Alternative 3 would have a direct, long-term, minor adverse impact on aesthetics.	
Air Quality		
Construction	All alternatives under the Proposed Action would have a direct, short-term, less-than-significant adverse impact on air quality.	No impact
Operation	All alternatives under the Proposed Action would have a direct, long-term, less-than-significant adverse impact on air quality.	No impact
Cultural and Historic Resources		
Construction and Operation	All alternatives under the Proposed Action would have an adverse impact on historic properties due to the demolition of buildings identified as historic resources. There would be no impact to below-ground historic properties. VA and the CT State Historic Preservation Office (SHPO) have signed a Programmatic Agreement (PA) for continued consultation and resolution of potential adverse effects under the Proposed Action.	No impact
Geology, Topography, and Soils		
Construction	All alternatives under the Proposed Action would have a direct, long-term, negligible adverse impact on geologic resources including on seismic hazards, mineral resources, and prime agricultural land. All alternatives would have a direct, short-term, negligible adverse impact on soil quality.	No impact
	Alternative 1 would have a negligible impact on topographic conditions.	
	Alternatives 2 and 3 would have direct, long-term, negligible adverse impacts on topographic conditions.	
Operation	All alternatives under the Proposed Action would have direct, long-term, negligible impacts on geology, topography, and soil quality.	No impact
Hydrology and Water Quality		
Construction	All alternatives under the Proposed Action would have a direct, short-term, negligible adverse impact on groundwater quality and a direct, short-term, minor adverse impact on hydrology/ stormwater.	No impact
Operation	All alternatives under the Proposed Action would have a negligible impact on groundwater quality and a direct, long-term, less-than-significant beneficial impact on hydrology/stormwater.	No impact
Noise and Vibration		
Construction	All alternatives under the Proposed Action would have a negligible impact on noise-sensitive receptors and the surrounding community. All alternatives would have a direct, short-term, negligible adverse impact on vibration-sensitive receptors.	No impact

Resource Area	Proposed Action	No Action
Operation	All alternatives under the Proposed Action would have a negligible impact on noise-sensitive and vibration-sensitive receptors and the surrounding community.	No impact
Solid Waste and Hazardous Materials		
Construction	All alternatives under the Proposed Action would have a direct, long-term, less-than-significant beneficial impact on regulated building materials and radiological waste, but a direct, short-term, less-than-significant adverse impact by increasing the volume of waste disposed of at an off-site landfill.	Long-term, negligible adverse impact on hazardous materials, and no impact on solid waste.
Operation	All alternatives under the Proposed Action would have a direct, long-term, negligible adverse impact on solid wastes and hazardous materials.	Long-term, negligible adverse impact on hazardous materials, and no impact on solid waste.
Transportation and Parking		
Construction	All alternatives under the Proposed Action would have a direct, short-term, minor adverse impact on transportation and parking.	No impact
Operation	All alternatives under the Proposed Action would have a direct, long-term, negligible adverse impact on transportation and parking.	No impact
Utilities		
Construction	All alternatives under the Proposed Action would have a direct, short-term, negligible adverse impact on utilities.	No impact
Operation	All alternatives under the Proposed Action would have a direct, long-term, negligible adverse impact on utilities due to a negligible increase in utility consumption. Improvements to WHVAMC utility distribution infrastructure would have a long-term, direct, moderate beneficial impact on utility operations at the WHVAMC.	Utility distribution infrastructure improvements would have a long-term, direct, moderate beneficial impact on utility operations at the WHVAMC.
Community Services		
Construction	All alternatives under the Proposed Action would have a direct, short-term, minor adverse impact on administrative and medical services.	No impact
Operation	All alternatives under the Proposed Action would have a direct, long-term, significant beneficial impact on administrative and medical services.	Long-term, significant adverse impact
Socioeconomics/ Demographics		
Construction	All alternatives under the Proposed Action would have direct, short-term, minor beneficial impacts on local socioeconomic conditions.	No impact
Operation	All alternatives under the Proposed Action would have direct and indirect, long-term, negligible beneficial impacts on socioeconomic conditions.	No impact
Environmental Justice		

Resource Area	Proposed Action	No Action
Construction and operation	All alternatives under the Proposed Action would have a negligible impact on Environmental Justice conditions.	No impact
Cumulative Impacts		
Construction and Operation	Depending on the Proposed Action alternative selected, there would be potential short-term and/or long-term adverse cumulative impacts on aesthetics, air quality, historic aboveground properties, soil, stormwater, noise, solid waste, transportation, and utilities. None of the adverse impacts would increase to a significant level. All Proposed Action alternatives would have a potential long-term, beneficial cumulative impact on community services and socioeconomics.	Long-term, significant, adverse cumulative impact on community services.
Potential for Generating Substantial Controversy		
Construction and Operation	All alternatives under the Proposed Action are not anticipated to generate substantial controversy. The loss of historic buildings may be controversial to community members focused on preserving cultural resources. However, mitigation of this controversy and mitigation of the potential loss of historic buildings have been incorporated into the PA with the SHPO.	Significant public controversy due to not meeting VA Standards.
	Under Alternative 1, the loss of the courtyard may be perceived negatively by VA staff.	

The project-specific protection, mitigation, and compliance measures listed in Attachment A would be incorporated into the Proposed Action, to the extent practicable, and ensure the impacts addressed would be less than significant.

Agency and Public Comment

VA published a notice of scoping on March 17 and 20, 2022, in the *New Haven Register*. The notice described the Proposed Action and solicited public comments with a deadline of April 18, 2022. VA mailed scoping letters to federal, state, and local agencies; elected officials; federally recognized Native American tribes; and special interest groups. The letters included information on the Proposed Action, the comment period, and instructions on submitting comments. The US Environmental Protection Agency provided information about EISA Section 438 and MS4 permit requirements; CT Department of Energy & Environmental Protection provided information about construction and special waste management, stormwater management, air quality, and wetlands and wildlife management. The SHPO requested continued consultation under Section 106. No other input was received from stakeholders.

VA published the Draft EA for a 30-day public comment period as announced by the Notice of Availability (NOA) published in the *New Haven Register* on September 22 and 25, 2022, as well as attached to letters mailed to selected federal, state, and local agencies; elected officials; federally recognized Native American tribes; and special interest groups. Review copies of the Draft EA were made available online at https://www.cfm.va.gov/environmental/index.asp and at the West Haven Public Library. No comments were received on the Draft EA.

Following the 30-day review period for the Draft EA, VA completed the Final EA and published an NOA of the Final EA and FONSI in the *New Haven Register*. VA also mailed letters about the availability of the Final EA and FONSI to stakeholders including federal, state, and local agencies; elected officials; federally recognized Native American tribes; and special interest groups. The Final EA and FONSI were made available online at https://www.cfm.va.gov/environmental/index.asp and in print at the West Haven Public Library at 300 Elm St, West Haven, CT 06516.

VA also initiated Section 106 consultation with the SHPO, federally recognized Native American tribes with interests in New Haven County, CT, and potential consulting parties in the vicinity of the WHVAMC. Neither the tribes nor consulting parties responded to the Section 106 consultation letters. The SHPO responded with a request for additional information which VA provided. On September 30, 2022, VA submitted a draft PA to the SHPO for review. On October 20, 2022, VA and SHPO met at the WHVAMC to conduct a site walk and review the draft PA. The final PA was signed by the SHPO on November 18, 2022.

Finding of No Significant Impact

Based on the analyses in the Final EA, which is summarized and incorporated in its entirety by reference herein, VA concludes that implementing the Proposed Action would have no significant adverse impact on the quality of the natural or human environment within the meaning of Section 102(2)(C) of NEPA. Therefore, preparation of an environmental impact statement is not required.

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Patrick Read
Environmental Technical Reviewer
Environmental Program Office
VA Office of Construction & Facilities Management

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Russell Armstead, CGFM
Director, VA Connecticut Healthcare System

Attachment A.

Management, Regulatory Compliance, and Mitigation Measures Incorporated into the Proposed Action

Resource Area	Description	Type
Aesthetics		
Construction	Implement dust suppression methods identified in VA 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 mph with gusts at or above 50 mph).	Best Management Practice (BMP)
	Install gravel pads at the construction site exit to prevent tracking loose soil onto roadways.	BMP
	Designate a central staging area for equipment and materials that is within or close to the construction site.	BMP
	Install construction privacy fencing between the construction area and the existing hospital grounds to reduce visual impacts to visitors and staff.	BMP
	Plant native, non-invasive, drought-resistant vegetation following grading to stabilize soils and minimize dust generation.	BMP
Operation	Professionally maintain newly landscaped areas with native, non-invasive vegetation.	BMP
Air Quality		
Construction	Use Tier 4-compliant engines to reduce emissions of particulate matter and nitrogen oxides to meet emission standards established by the US Environmental Protection Agency (USEPA).	BMP
	Limit the idling of mobile sources to three minutes.	BMP
	Implement dust suppression methods identified under Aesthetics.	BMP
Cultural Resources		
Construction	VA and SHPO have a signed PA for continued consultation and resolution of potential adverse effects to historic properties under the Proposed Action. This may include avoidance or development of a Memorandum of Agreement should adverse effects be unavoidable.	Mitigation
	Conclude Section 106 consultation with the SHPO and federally recognized Native American tribes prior to construction.	Regulatory requirement
	Implement a plan to address unanticipated discoveries in the event construction impacts previously unknown archaeological properties.	BMP
Geology, Soils, and Topography		
Construction	Avoid blasting bedrock due to the proximity to the existing medical buildings at the WHVAMC.	BMP
	Retain on-site vegetation to the maximum extent possible.	BMP
	Implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the site, to reduce the impacts of incidental releases of construction vehicle fluids to soil quality. Report releases of regulated quantities of regulated chemicals to VA and CTDEEP. Perform cleanup according to applicable regulatory requirements.	BMP, Regulatory requirement

Resource Area	Description	Type
	Revegetate disturbed areas as soon as construction is complete. Use native, non-invasive vegetation.	BMP
	Develop and adhere to the terms of the CTDEEP-approved *General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities* (DEEP-WPED-GP-015) and implement and maintain the site-specific BMPs. These BMPs would also be consistent with VA's *Specification 01 57 19: Temporary Environmental Controls.* Install and maintain sedimentation and erosion control measures, including silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, synthetic straw bales, rip-rap, and/or similar physical control structures.	Permit-required regulatory compliance
Operation	Conduct professional routine landscaping to ensure soil remains vegetated and stabilized to prevent erosion.	BMP
Hydrology and Water Quality		
Construction and Operation	Design the stormwater management systems to comply with the WHVAMC National Pollutant Discharge Elimination System and MS4 permits.	Permit-required regulatory compliance
	Design the Proposed Action to comply with EISA Section 438 to the maximum extent technically practicable.	Regulatory requirement
	Should excavations require dewatering, discharge the groundwater to the WHVAMC MS4 system only if the groundwater meets permit requirements for total suspended solids.	Permit-required regulatory compliance
	All construction vehicles would be equipped with spill kits and contractors would be properly trained on their use. Should a release of regulated chemicals occur, the construction contractor would notify WHVAMC and CTDEEP immediately and implement required remedial measures to protect groundwater quality.	BMP, Regulatory requirement
Noise and Vibration		
Construction	Perform construction activities between 7:00 am and 10:00 pm on weekdays unless there is a specific activity that needs to be completed outside of this schedule to avoid impacting the staff, visitors, and patients at the WHVAMC to the extent practicable. Should such activity be necessary, the WHVAMC Public Information Office would notify sensitive receptors in advance of the work taking place.	BMP
	Implement VA's noise control requirements and noise management BMPs.	BMP
	Comply with OSHA requirements to protect hearing of workers around loud construction equipment.	Regulatory requirement
	Should pile driving be required, coordinate with WHVAMC Director in advance and implement precautions to reduce vibration impacts on vibration-sensitive receptors.	BMP
Habitat and Wildlife		
Construction	Minimize clearing or damaging the existing mature vegetation around the existing buildings and elsewhere at the site.	BMP
	Replace any damaged or removed vegetation with native, non-invasive, drought-resistant varieties.	BMP

Resource Area	Description	Type
Solid Waste and Hazardous Materials		
Construction	Complete the abatement of regulated building materials prior to building demolition. Use licensed contractors and follow all applicable federal, state, and local regulations for material handling, transport, and disposal.	Permit-required regulatory compliance
	Prior to demolition of Building #7 or removal of the subsurface sludge trap outside of Building #7, complete a radiological investigation and review data with VACHS RSO to determine the appropriate federal, state, and local requirements for the removal of the tank and its transport off-site for disposal.	Regulatory requirement
	Prior to building demolition, obtain a demolition permit from the City of West Haven per 2012 Connecticut General Statutes: *Title 29 - Public Safety and State Police, Chapter 541 - Building, Fire and Demolition Codes. Fire Marshals and Fire Hazards. Safety of Public and Other Structures.*	Permit-required regulatory compliance
	Recycle or reuse construction debris that does not require landfilling.	BMP
Operation	Follow VA's SOPs and applicable federal and state laws governing the use, generation, storage, or transportation and disposal of solid waste and hazardous materials.	Regulatory requirement
Transportation and Parking		
Construction	Implement housekeeping measures to keep WHVAMC roadways free of debris, as specified under Aesthetics.	BMP
	Utilize flaggers when transporting oversized vehicles to and from the construction site.	BMP
Utilities		
Construction	Incorporate energy efficiency elements in the design of the new tower.	BMP

The following federal, state, and/or local environmental permits and approvals were identified as potentially being required as part of the Proposed Action. This list may not be exhaustive, and the selected construction contractor will be responsible for compliance with any additional environmental regulations, permits, and approvals.

- CTDEEP-approved General Permit for the Discharge of Stormwater and Dewatering Wastewaters Associated with Construction Activities (DEEP-WPED-GP-015)
- Demolition permit from the City of West Haven per 2012 Connecticut General Statutes: *Title 29 - Public Safety and State Police, Chapter 541 - Building, Fire and Demolition Codes., Fire Marshals and Fire Hazards. Safety of Public and Other Structures.*
- Special Waste or Asbestos Disposal Authorization (DEP-WEED-APP-200) to include a CTDEEP-required Construction and Demolition Waste Management Plan
- Stipulations in the Section 106 Programmatic Agreement to mitigate adverse impacts to historic properties
- WHVAMC National Pollutant Discharge Elimination System and MS4 permits