
**FINDING OF NO SIGNIFICANT IMPACT
U.S. DEPARTMENT OF VETERANS AFFAIRS
PROPOSED DEMOLITION OF QUARTERS AND GARAGES
EDWARD HINES JR. VA HOSPITAL
5000 SOUTH 5TH AVENUE
HINES, COOK COUNTY, ILLINOIS**

Introduction

A Final Environmental Assessment (EA), included herein by reference, was prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the U.S. Department of Veterans Affairs' (VA's) Proposed Action to demolish nine vacant/underutilized buildings within an approximately 5-acre area (site) in the east-central portion of the Edward Hines Jr. VA Hospital (EHVAH) campus, located at 5000 South 5th Avenue, in Hines, Cook County, Illinois. The EA was prepared in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code 4321 *et seq.*), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26).

The purpose of the Proposed Action is to reduce the number of vacant and unusable buildings on the EHVAH campus and to reduce the capital expenditures required to maintain these deteriorating buildings. The Proposed Action would also create additional space on the space-constrained campus for future development to support the current and growing health care needs of regional Veterans, although no redevelopment of the 5-acre site area is planned at this time.

The Proposed Action is needed because the existing site buildings have been vacant/underutilized for many years, are in poor condition, and no longer serve a useful purpose for the EHVAH campus. Their sizes, shapes, spacing, configuration, and locations on the EHVAH campus do not lend themselves to adaptive reuse to provide the modern delivery of health care services needed by area Veterans. The Proposed Action is needed to assist VA in meeting the requirements of the 2018 VA Mission Act, which directs VA to identify vacant or underutilized infrastructure and costs for capital needs, and to pursue asset realignment for the identified infrastructure, and VA Handbook 7633, which requires VA to remove underutilized real estate assets from its portfolio that are not feasibly reusable via transfer or demolition.

1. Description of the Proposed Action and Alternatives

Alternatives Considered

The Final EA examined in-depth two alternatives, the Proposed Action and the No Action Alternative.

Proposed Action

VA proposes to demolish nine vacant buildings located on the approximately 5-acre site, including Quarters Buildings 23-29 and their associated garages (Buildings 31 and 32). Building demolition would occur under controlled conditions to minimize the impact on the remainder of the EHVAH

campus. The buildings would be completely demolished, including the removal of the structures, their below grade foundations/basements, and surrounding pavements. Demolition debris would be placed into trucks and transported to a permitted construction and demolition debris landfill for disposal. Demolition materials would be recycled, where possible. Underground utilities outside of the building footprints would be capped and left in place. Areas excavated during demolition activities would be backfilled with engineered fill. Following the demolition activities, the site area would become grassy, undeveloped land. No redevelopment of the site is planned at this time.

No Action Alternative

Under the No Action Alternative, the Proposed Action would not be implemented and operations at the EHVAH campus would continue as currently conducted. The existing site buildings would remain vacant/underutilized and would continue to deteriorate. The No Action Alternative would not allow VA to meet the requirements of the 2018 VA Mission Act or VA Handbook 7633, which require VA to remove underutilized real estate assets from its portfolio.

While the No Action Alternative would not meet the purpose of or need for the Proposed Action, this alternative was analyzed within the Final EA to provide a comparative baseline against which to analyze the effects of the Proposed Action, as required under CEQ Regulations.

2. Environmental Analysis

Environmental Consequences

Proposed Action

The Final EA concluded that the Proposed Action would result in short-term and/or long-term potential adverse impacts to aesthetics, air quality, cultural resources, soils, hydrology and water quality, wildlife, noise, solid waste and hazardous materials, and transportation. All of these potential impacts would be less than significant and would be further reduced through careful implementation of general best management practices (BMPs), management and minimization measures, and compliance with regulatory requirements, as identified in the Final EA.

The original EHVAH campus was constructed in 1921. Approximately 45 acres of the EHVAH campus are listed on National Register of Historic Places (NRHP) as the EHVAH Historic District (Historic District). The Historic District includes 35 contributing resources, resources that retain their historic integrity and were constructed/utilized with the Historic District's period of significance (1918-1950). All nine site buildings, constructed between 1929 and 1932, are considered contributing resources to the Historic District. Through National Historic Preservation Act (NHPA) Section 106 compliance investigations and consultation, VA determined that the Proposed Action would have an adverse effect on the Historic District. Consequently, VA developed a Section 106 Memorandum of Agreement (MOA) in consultation with the Illinois State Historic Preservation Office (IL SHPO) to mitigate the identified adverse effects. The MOA was executed in September 2022. Mitigation measures specified in the MOA include: development of a NHPA training program and training of key EHVAH personnel who have decision-making responsibilities for projects that may affect the Historic District; and creation of a permanent exhibit placed at the EHVAH campus that documents the history of the site buildings. With the implementation of the NHPA mitigation measures stipulated within the MOA, Proposed Action cultural resources impacts would be less than significant.

The Proposed Action would result in beneficial short-term and long-term impacts to the local socioeconomic environment. Notably, the Proposed Action would enable EHVAH to reallocate resources required to maintain the vacant site buildings for needed Veteran services.

No Action Alternative

Under the No Action Alternative, the site buildings would remain vacant with no useful purpose for the EHVAH and would continue to deteriorate. EHVAH resources would be spent to maintain the vacant buildings. No beneficial impacts attributable to the Proposed Action would occur.

Cumulative Impacts

The EA also examined potential cumulative effects of implementing each of the considered alternatives. This analysis found that the Proposed Action, with the implementation of general BMPs, management and minimization measures, and compliance with regulatory requirements specified in this EA, would not result in significant adverse cumulative impacts to the human environment.

Management and Minimization Measures

The BMPs, management and minimization measures, and regulatory compliance measures summarized in Table 6 of the Final EA (attached herein as Appendix A) will be included by VA in the Proposed Action to minimize and maintain adverse effects at less-than-significant levels.

3. Regulations

The Proposed Action will be consistent with federal, state, and local environmental regulations, including those listed in Section 10.0 of the Final EA.

4. Commitment to Implementation

VA affirms its commitment to implement the BMPs, management and minimization measures, and regulatory compliance measures identified in the Final EA and this Finding of No Significant Impact (FONSI).

5. Agency and Public Involvement

VA has consulted with appropriate federal, state, and local regulatory agencies, and federally recognized Native American Tribes identified as having possible ancestral ties to the EHVAH campus area. This consultation is documented in the Final EA. Comments and input submitted by regulatory agencies and Tribes have been addressed in the Final EA.

VA published and distributed the Draft EA for a 30-day public comment period, as announced by a Notice of Availability (NOA) published in the Daily Herald newspaper on January 13-15, 2023. A copy of the Draft EA was made available for public review on the EHVAH website (<https://www.va.gov/hines-health-care/>). VA received no public comments regarding the Draft EA.

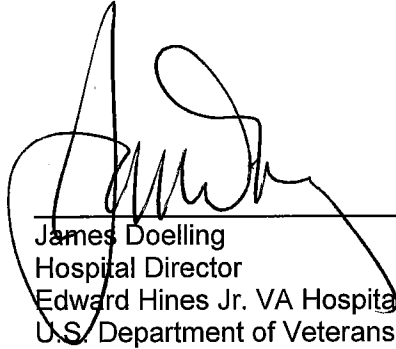
6. Finding of No Significant Impact

After careful review of the Final EA, VA has concluded that implementing the Proposed Action would not generate significant controversy or have a significant impact on the quality of the human environment, provided VA implements the BMPs, management and minimization measures, and regulatory compliance measures identified in Appendix A to this FONSI. VA will implement these measures.

This analysis fulfills the requirements of the NEPA and is consistent with the VA and CEQ regulations implementing the Act. An Environmental Impact Statement is not required.

3/21/23

Date



James Doelling
Hospital Director
Edward Hines Jr. VA Hospital
U.S. Department of Veterans Affairs

**Best Management Practices, Management and Minimization Measures, and Regulatory Compliance Measures
 Incorporated into the Proposed Action**

| Technical Resource Area | Management/Minimization Measure |
|-----------------------------|---|
| Aesthetics | None required. |
| Air Quality | Use appropriate dust suppression methods (such as the use of water, dust palliative, covers, suspension of earth moving in high wind conditions) during onsite demolition/construction activities. |
| | Stabilize disturbed areas through re-vegetation or mulching if the area would be inactive for several weeks or longer. |
| | Implement measures to reduce diesel particulate matter emissions from construction equipment, such as reducing idling time and using newer equipment with emissions controls. |
| Cultural Resources | Comply with the terms of the September 2022 Memorandum of Agreement with the Illinois State Historic Preservation Office (SHPO) to mitigate historic property effects. |
| Geology and Soils | Control soil erosion and sedimentation impacts during construction by implementing erosion prevention measures and complying with the Illinois Environmental Protection Agency (IEPA) National Pollutant Discharge Elimination System (NPDES) stormwater permit, including the development and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP). The NPDES permit would require stormwater runoff and erosion management using BMPs, such as earth berms, vegetative buffers and filter strips, and spill prevention and management techniques. |
| Hydrology and Water Quality | Control soil erosion and sedimentation impacts during construction by complying with the IEPA NPDES stormwater permit requirements. |
| | Ensure the design of the Proposed Action includes sufficient on-site stormwater management so as not to adversely affect the water quantity/quality in receiving waters and/or offsite areas. |
| | Design improvements in accordance with the requirements of Energy Independence and Security Act Section 438 with respect to stormwater runoff quantity and characteristics. |
| Wildlife and Habitat | Use native species to the extent practicable when re-vegetating land disturbed during construction to avoid the potential introduction of non-native or invasive species. |
| | Demolish site buildings outside the chimney swift nesting season (March 15 to August 20). If seasonally-timed demolition is not possible, a qualified biologist would survey the buildings to ensure no active chimney swift nests are present prior to demolition. |

| Technical Resource Area | Management/Minimization Measure |
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| Noise | Limit, to the extent possible, demolition and associated heavy truck traffic to occur between 7:00 a.m. and 7:00 p.m. on Monday through Friday. |
| | Locate stationary operating equipment as far away from sensitive receptors as possible. |
| | Shut down noise-generating heavy equipment when it is not needed. |
| | Maintain equipment per manufacturer's recommendations to minimize noise generation. |
| | Encourage construction personnel to operate equipment in the quietest manner practicable (e.g., speed restrictions, retarder brake restrictions, engine speed restrictions, etc.). |
| Land Use | None required. |
| Wetlands, Floodplains, and Coastal Zone Management | None required. |
| Socioeconomics | Secure construction areas to prevent unauthorized access by children from residential areas. |
| Community Services | None required. |
| Solid and Hazardous Materials | Comply with applicable federal and state laws governing the use, generation, storage, and transportation of solid waste and hazardous materials. |
| | Remove identified asbestos-containing building materials (ACM) from site buildings using licensed asbestos abatement contractors and following National Emission Standards for Hazardous Air Pollutants (NESHAP) and State of Illinois requirements prior to demolition. |
| | Implement dust control measures, such as the use of water, during building demolition to control potential lead-based paint emissions. |
| | Sample and test site building caulk for polychlorinated biphenyls (PCBs). Properly remove and dispose of PCB-containing caulk prior to building demolition. |
| | Characterize and properly dispose of soils removed from the site. |
| Transportation and Parking | Ensure construction traffic does not adversely affect traffic flow on local roadways. Time construction traffic and select transportation routes to minimize transportation impacts. |
| | Ensure debris and/or soil is not deposited on local roadways during the demolition and construction activities. |
| Utilities | None required. |
| Environmental Justice | None required. |