



September 6, 2001

Mr. Charles F. Gill
Senior Health Physicist
United States Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

Dear Mr. Gill:

Please find enclosed the Final Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the demolition of the Allen Park Department of Veterans Affairs Medical Center, Allen Park, Michigan. These documents were prepared pursuant to the National Environmental Policy Act, the Council on Environmental Quality, and VA Implementing Regulations.

On November 1, 2000, President Clinton signed the Veterans Benefits and Health Care Improvement Act of 2000 (PL 106-419) into law. Section 243 of this act requires the Secretary of Veterans Affairs, via contract with the Ford Motor Land Development Corporation (FMLDC), to:


Demolish the buildings and auxiliary structures comprising the Department of Veterans Affairs (VA) Medical Center, Allen Park; and remediate the site of all hazardous material and environmental contaminants found on the site.

Furthermore, Section 243 requires that upon completion of the demolition and remediation project, the Secretary of VA shall abandon the Allen Park property and ownership revert back to the Ford family, (now under FMLDC), under the terms of the 1937 deed.

Copies of the Final EA and FONSI are provided as a courtesy. No additional comments can be accepted at this time. However, if you have any questions or concerns please contact Robert Frazier with the Department of Veterans Affairs at 202-565-9216.

Sincerely,

URS Corporation



Stephen Carruth,
Senior Environmental Scientist

Enclosures

cc: Robert Frazier, VA
John Paglione, VA
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SEP 11 2001

FINDING OF NO SIGNIFICANT IMPACT

DEPARTMENT OF VETERANS AFFAIRS

Demolition of the Allen Park Veterans Affairs Medical Center in Allen Park, Michigan

The Department of Veterans Affairs (VA) has prepared an Environmental Assessment (EA) which analyzed the environmental impacts of the demolition of the Allen Park Veterans Affairs Medical Center (VAMC) in Allen Park, Michigan, and the subsequent return of the land on which it is located to the Ford family, now under the Ford Motor Land Development Corporation (FMLDC).

BACKGROUND

The Allen Park VAMC is situated in southeastern Michigan, 11 miles from the center of the City of Detroit. Henry and Clara Ford donated the 36 acres of property on which the Allen Park facility is located to the federal government in 1937 for the sole purpose of constructing, operating, and maintaining a "Veterans Administration facility". Included in the deed is a reversionary clause stating that once the property is no longer used for these purposes, it shall revert to the Ford family, now under the FMLDC. On November 1, 2000, President Clinton signed the Veterans Benefits and Health Care Act of 2000 (PL 106-419) into law. Section 243 of this act mandates the demolition of all structures at the Allen Park VAMC and the environmental restoration of the site. This section further mandates that following demolition and environmental restoration VA will abandon the Allen Park property and ownership will revert back to the FMLDC.

Some of the 26 buildings that comprise the Allen Park VAMC, including the main hospital building, were originally constructed in 1938. In 1996, after the construction of the John D. Dingell VAMC in downtown Detroit, the Allen Park VAMC was closed due to obsolescence and deficiencies in the aging facility that hindered the delivery of high quality health care services to eligible veterans. Although a small outpatient clinic continues to operate on the site, a proposal to outsource the clientele to local care providers has been initiated by the John D. Dingell VA staff.

The mandate of P.L. 106-419, that the structures on the Allen Park site be demolished, the site remediated of contaminants, and the property returned to the ownership of FMLDC, is consistent with VA's mission of providing quality health care to veterans. This is because the function of the Allen Park VAMC has been replaced with the more modern John D. Dingell VAMC.

DECISION

The decision to issue a Finding of No Significant Impact is based on the following factors:

- No significant environmental impact is anticipated as a result of the implementation of the proposed demolition and environmental restoration of the property.
- All requirements of the National Historic Preservation Act of 1966 will be met in ensuring that any potential adverse effects to the historic resources on the Allen Park VAMC will be minimized.

FINDING OF NO SIGNIFICANT IMPACT

After reviewing the EA for the demolition of the Allen Park VAMC, the implementation of the proposed action as described would not constitute a major Federal action that would have significant impact upon the quality of the human environment within the meaning of Section 102(2c) of the National Environmental Policy Act of 1969. Accordingly, the preparation of an Environmental Impact Statement is not required.

FINAL ENVIRONMENTAL ASSESSMENT

Demolition of the Allen Park Department of Veterans Affairs Medical Center, City of Allen Park, Michigan



Prepared for

Department of Veterans Affairs
Office of Facilities Management
810 Vermont Avenue, NW
Washington, DC 24020

September 2001

Prepared by

URS

URS Group, Inc.
200 Orchard Ridge Drive, Suite 101
Gaithersburg, Maryland 20878
89-F2001005.00

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List of Acronyms

ACHP	Advisory Council on Historic Preservation
ACM	asbestos-containing material
AMSL	above mean sea level
APE	Area of Potential Effect
AST	above ground storage tanks
ASTM	American Society for Testing and Materials
BG	below grade
BMPs	best management practices
C-1	Neighborhood Business District
C-2	General Business District
CEQ	Council on Environmental Quality
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
DDOT	Detroit Department of Transportation
EA	Environmental Assessment
EIS	Environmental Impact Statement
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FMLDC	Ford Motor Land Development Corporation
LBP	lead-based paint
LES	Lakeshore Engineering Service
M-2	Medium Industrial District
MDEQ	Michigan Department of Environmental Quality
MDNR	Michigan Department of Natural Resources
MDOT	Michigan Department of Transportation
mg/L	milligrams per liter
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NRC	Nuclear Regulatory Commission

List of Acronyms

NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated biphenyls
PM	particulate matter
psi	pounds per square inch
R-1A	Single Family Residential District
R-1B	Single Family Residential District
R-2	Two Family Residential District
R-A	One Family Residential District
RACM	regulated asbestos-containing material
R-B	One Family Residential District
RCRA	Resource Conservation and Recovery Act
RM	Multiple Family Residential District
RMA	Multiple Family Residential
RO-1	Restricted Office District
SHPO	State Historic Preservation Office/Officer
SMART	Suburban Mobility Authority for Regional Transportation
SO _x	sulfur oxides
URS	URS Group, Inc.
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VA	Department of Veterans Affairs
VAMC	Veterans Affairs Medical Center

1.1 PROJECT BACKGROUND

The Allen Park Department of Veterans Affairs Medical Center (VAMC) is located in the City of Allen Park, Michigan. The City of Allen Park, located within the Detroit metropolitan area, is approximately 11 miles from the center of Detroit (Exhibit 1). The property on which the Allen Park facility sits was donated to the federal government by Henry and Clara Ford in 1937. The deed that transferred the land to the federal government stated that the land was to be used solely for construction, operating, and maintaining a "Veterans Administration facility". The deed also stated that when the property is no longer used for these purposes, it will revert to the Ford family. On March 24, 1937, the United States Congress authorized the Veterans Administration to accept title to the property in Allen Park subject to the reversionary clause of the deed. The Allen Park VAMC opened in 1939 and remained in full operation as a hospital until June 1996. At that time, the function of the facility was replaced with the new John D. Dingell VAMC, located in downtown Detroit. The Allen Park VAMC was closed, except for the operation of a small outpatient clinic. The clinic operates two days a week and serves approximately 700 veterans. The Allen Park VAMC was closed (except for the outpatient clinic) due to obsolescence and deficiencies in the facility that hindered the delivery of high quality health care services to eligible veterans. These deficiencies included narrow halls, small rooms, an inadequate internal transportation system, lack of air conditioning, and an internal utility system that is inadequate to support modern medicinal technology.

On November 1, 2000, President Clinton signed the Veterans Benefits and Health Care Act of 2000 (PL 106-419) into law. Section 243 of this act requires the Secretary of Veterans Affairs, via contract with the Ford Motor Land Development Corporation, to:

Demolish the buildings and auxiliary structures comprising the Department of Veterans Affairs (VA) Medical Center, Allen Park; and remediate the site of all hazardous material and environmental contaminants found on the site.

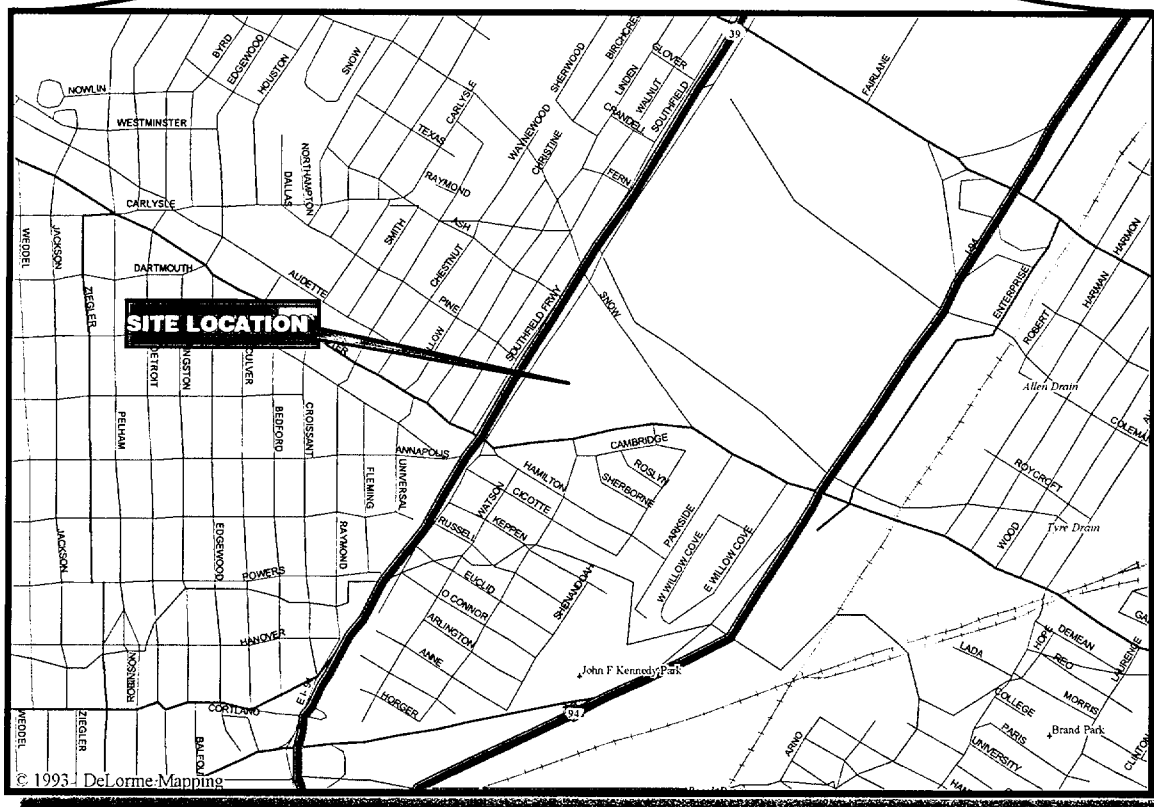
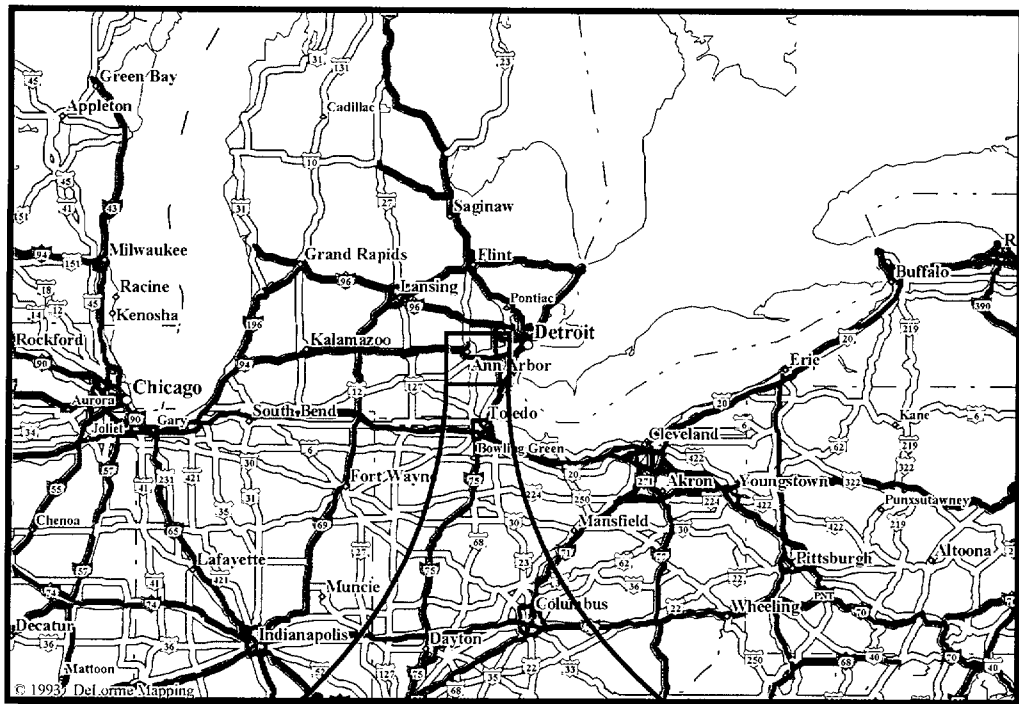
Furthermore, Section 243 requires that upon completion of the demolition and remediation project, the Secretary of Veterans Affairs shall abandon the Allen Park property and ownership revert back to the Ford family, now under the Ford Motor Land Development Corporation (FMLDC), under the terms of the 1937 deed.

1.2 PROJECT SETTING

The Allen Park VAMC is situated on an approximately 36-acre triangular lot located in the northern portion of the City of Allen Park, Wayne County, Michigan. The Medical Center is made up of 26 buildings, which encompass an estimated 750,000 square feet of space (Exhibit 2). Land use in the community surrounding the VAMC is predominantly residential with limited commercial and industrial properties along Outer Drive and the Southfield Freeway, which border the VAMC. The Ford Motor Corporation's Allen Park Clay Mine Landfill, an industrial site, is located northeast of the Center.

1.3 PURPOSE AND NEED

The purpose of and need for this action is the demolition and environmental restoration of the Allen Park VAMC in accordance with the 1937 deed and Federal law. Section 243 of the



CLIENT DEPT. OF VETERANS AFFAIR

PROJ ALLEN PARK VAMC DEMOLITION EA

REVISION NO

SCALE

FILE

DES BY

OR BY

CHK BY

JEB

TH

2/8/01

2/8/01

TITLE

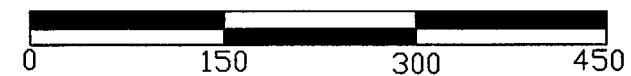
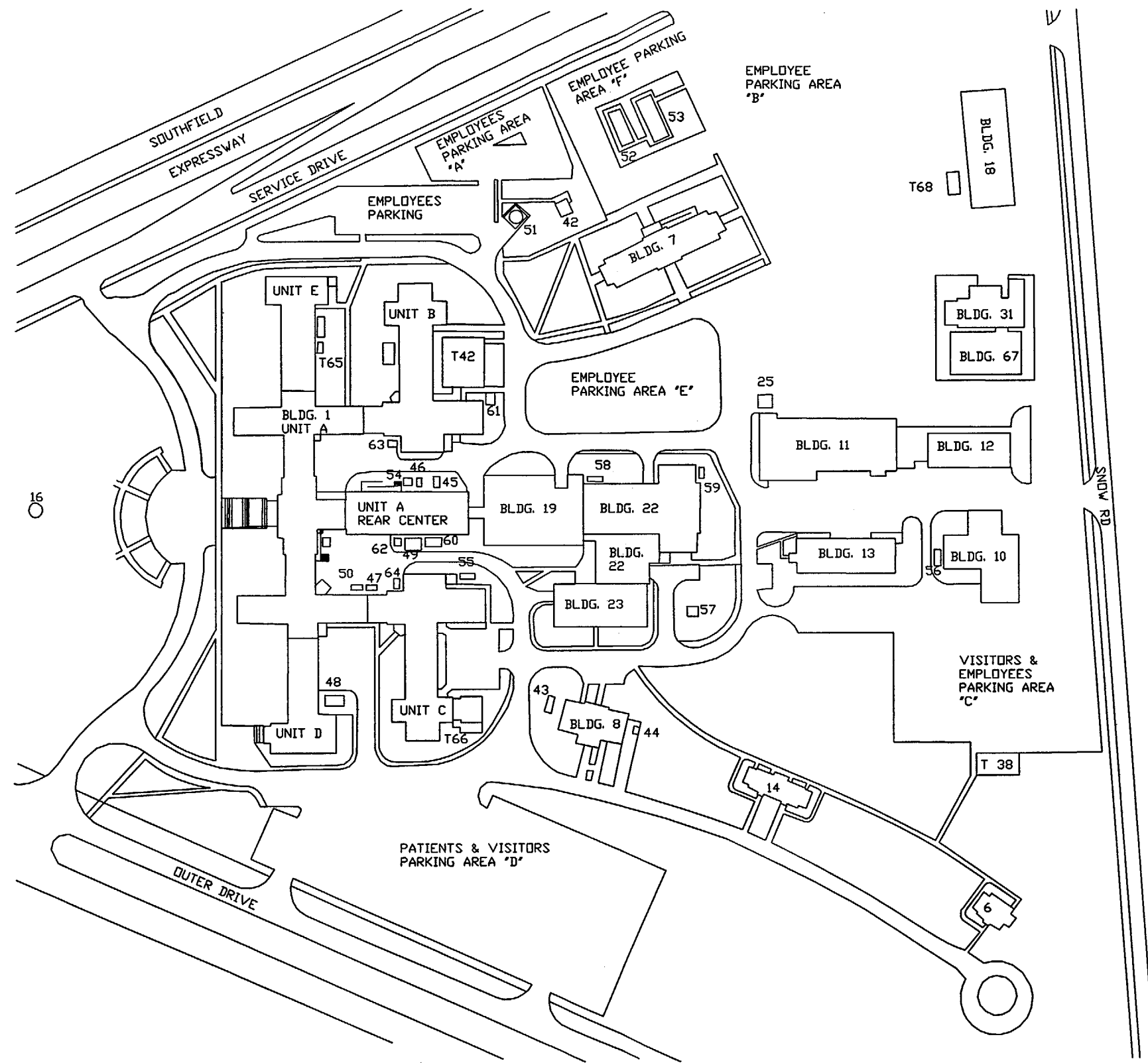
VICINITY MAP

URS

PROJ NO 89-F2001005.00

EXHIBIT

1



CLIENT DEPT. OF VETERANS AFFAIR			
PROJ ALLEN PARK VAMC DEMOLITION EA			
REVISION NO	DES BY	TH	2/19/01
SCALE 1"=150'	DR BY	TH	2/19/01
FILE SITE PLAN.DWG	CHK BY	TH	2/19/01

TITLE EXISTING CONDITIONS SITE PLAN	
URS	PROJ N89-F2001005.00
	EXHIBIT 2

Veterans Benefits and Health Care Act of 2000 (PL 106-419) requires the VA to demolish and environmentally restore the Allen Park site, returning the property to the Ford Motor Land Development Corporation under the terms of the 1937 deed.

The President's Council on Environmental Quality (CEQ) has developed regulations for implementing the National Environmental Policy Act (NEPA). These Federal regulations, set forth in Title 40, Code of Federal Regulations (CFR) Parts 1500-1508, require an evaluation of alternatives, and a discussion of the potential environmental impacts of a proposed Federal action, as part of the Environmental Assessment (EA) process. The VA regulations, which established the VA's process for implementing NEPA, are set forth in Title 38 of the CFR, Section 26.4 (a). This EA was conducted in accordance with both CEQ and VA regulations for implementing NEPA.

2.1 ALTERNATIVES DISCUSSION

The VA is required by Section 243 of the Veterans Benefits and Health Care Act of 2000 (PL 106-419) to demolish the Allen Park VAMC, remediate the site of hazardous materials and environmental contaminants, and return the property to the Ford Motor Land Development Corporation pursuant to the terms of the 1937 deed. Due to this legal requirement, the VA is restricted in the alternatives that may be considered for this project. Therefore, this Environmental Assessment will consider the demolition of the buildings, removal of the property's infrastructure, environmental restoration of the property, and return of the property to FMLDC as the Proposed Action. Under this action, alternative methods for demolition of the main hospital building will be evaluated.

In addition to the Proposed Action, this Environmental Assessment considers the impact of No Action as required by the National Environmental Policy Act and the CEQ implementing regulations.

No Action

The Department of Veterans Affairs is required to consider the environmental impact of taking No Action pursuant to NEPA and CEQ implementing regulations. Because legislation has been enacted which mandates the closure and demolition of the Allen Park VAMC, due to obsolescence and deficiencies in the facility, the No Action Alternative is not considered to be feasible under NEPA and CEQ regulations. However, NEPA requires the No Action Alternative to be addressed in an EA because it is the basis for determining the purpose and need for the project. Also, the No Action Alternative needs to be studied in detail in the EA because it is the baseline against which the other alternatives are compared. For the purposes of this document, it is assumed that under the No Action Alternative the VA would close the outpatient clinic and outsource those patients to local care providers, a process that has already been initiated. All service activities at the site would be discontinued. The Medical Center would be inventoried for hazardous conditions, secured, gated, and closed to all visitors. All buildings would be vacated and non-essential utility systems suspended. The facility would be maintained in a "mothballed" condition. In addition, the Department of Veterans Affairs would be responsible for providing security at the facility and varying degrees of maintenance for the vacant buildings on site, the utility infrastructure, and grounds maintenance to ensure the health and safety of security and maintenance personnel.

Proposed Action

Under this action, all structures and infrastructure that comprise the Allen Park VAMC would be demolished and hazardous materials and environmental contamination would be mitigated pursuant to state and Federal laws and regulations. Prior to demolition, Category II asbestos-containing material (ACM) and regulated asbestos-containing material (RACM) would be removed from each building and disposed of in an appropriate land fill. All remaining hazardous materials and environmental contaminants would be removed from the buildings and disposed of in appropriate landfills. All buildings except for the main hospital building would be razed by mechanical means. All infrastructure, including roads and utilities, would be removed from the site. Construction and demolition debris and asbestos-containing material would be disposed of

SECTION TWO

Description of Alternatives

in Ford Motor Corporation's licensed, Type II landfill located adjacent to the site. All other hazardous materials would either be recycled or be disposed of in a Type III landfill, licensed to receive such material. Vegetation will be removed only to the extent necessary for demolition and site preparation. Trees, shrubs, and other vegetation not directly affected by the demolition activities will be maintained. The property would be returned to the condition at the time of the original 1937 deed—open space, prior to the formal transfer to the Ford Motor Land Development Corporation.

Demolition Alternative 1 – Building Implosion

Under this alternative, the main hospital building would be demolished by using strategically placed explosive charges to cause catastrophic failure of the major structural systems in the building. Following detonation of the explosive charges, the building collapses in on itself. Demolition is immediate to the time of detonation. However, cleanup and removal of debris may take several months following the implosion.

Demolition Alternative 2 – Mechanical Demolition

Under this alternative, the main hospital building would be razed using mechanical demolition. This is usually accomplished through the use of heavy construction equipment, most notably a crane and wrecking ball. Under this alternative, demolition and debris removal would occur concurrently until complete. The demolition and removal of debris may take several months more than Demolition Alternative 1.

SECTION THREE **Affected Environment and Environmental Consequences**

3.1 PHYSICAL ENVIRONMENT

3.1.1 Topography and Geology

Affected Environment

The Allen Park VAMC lies within the Central Lowland physiographic region east of the Mississippi, in the middle of the Great Lakes section. The distinguishing characteristic of this area is the dominance and variety of features of recent glacial origin. Bedrock formations typically found in this area are Silurian-aged limestone-dolomite bedded plains. The bedrock formation closest to the subject property is classified as Dundee Limestone, which is approximately 170 feet below grade (Fenneman, 1938). No exposed bedrock formations or unique geologic or topographic features are known to exist on the site.

The Allen Park VAMC is on a nearly level site, ranging from 595.6 feet to 600 feet above mean sea level (AMSL) (Exhibit 3). Most of the area is between 596.5 feet and 598.5 feet AMSL (VA, 1986).

The area of Michigan where the project site is located is classified as Zone 1 for seismic risk hazard (USGS, 2001). This designation means there has been some history of seismic activity, but there is a low-risk of damage from a seismic event.

Environmental Consequences and Mitigative Actions

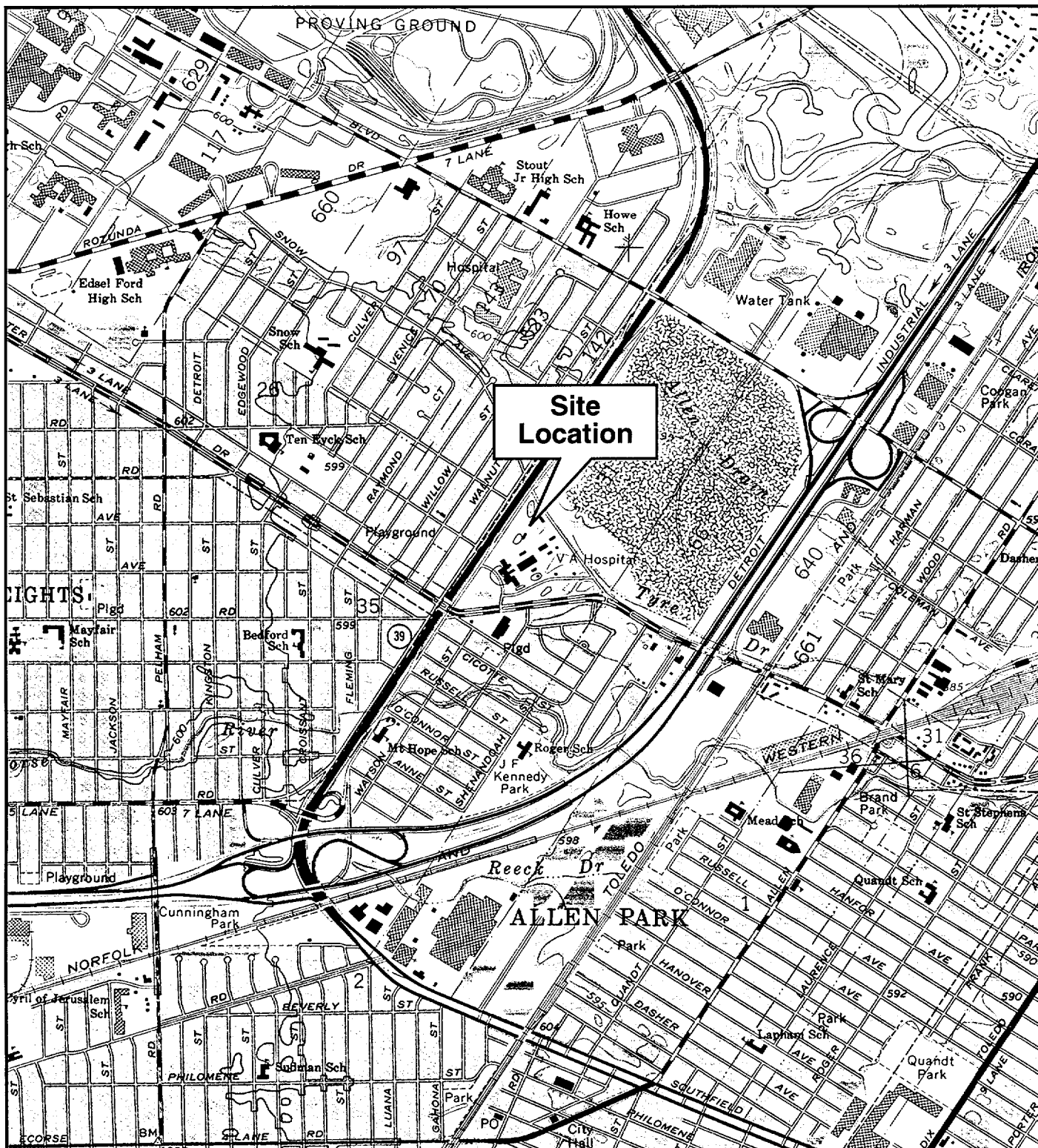
No Action

Under the No Action Alternative, no physical changes to the property would occur and there would be no effect to the topography or geology of the property.


Proposed Action

Although the Allen Park VAMC is not located in a zone prone to seismic activity, implosion of the structure may convey seismic forces through the ground to adjacent buildings or structures. The demolition contractor will be required to demonstrate that any seismic force created by the demolition will not adversely effect the roads and properties surrounding the project area. Coordination with the Michigan Department of Transportation (MDOT) will be required to monitor any effects that may occur during demolition (Grazioli, pers. comm.). Accelerometer recordings taken during demolition will be used to measure loads distributed through the ground to these structures.

Under the Proposed Action and both Demolition Alternatives, minor grading would not have a noticeable effect to the relatively flat topography. There would be no effect to the geology of the property as bedrock lies at such a depth from the surface. Therefore, the Proposed Action would not adversely effect the topography or geology of the site or surrounding area.



SOURCE: USGS 7.5 minute topographic quadrangle - Dearborn, Michigan, 1968, photorevised 1983.

CLIENT Department of Veteran Affairs				TITLE PROJECT LOCATION	
PROJ Allen Park VAMC Demolition Environmental Assessment					
REVISION NO	DES BY				
SCALE 1" = 2000'	DR BY	BR	2-9-01		
J:/Veterans Hospital/Vets Hospital.AI	CHK BY	JF	2-9-01		
				PROJ NO 89-F200100500	
				EXHIBIT 3	

SECTION THREE

Affected Environment and Environmental Consequences

3.1.2 Soils

Affected Environment

The Soil Survey of Wayne County area, Michigan, published by the United States Department of Agriculture Natural Resources Conservation Service (NRCS), does not contain a detailed soil map of the Allen Park VAMC area. However, a general soil map of the County in the Soil Survey indicates that the soils at the Allen Park VAMC are classified as a member of the Hoytville-Nappanee soil association. This association is described as nearly level to gently sloping with very poorly to somewhat poorly drained soils that have fine to moderately coarse textured subsoils (SCS, 1977). Three separate sub-surface investigations (Soil and Material Engineers, Inc, 1978; McDowell & Associates, 1982; URS Consultants, 1994) describe the soils similarly. From 0 to 2 feet below grade (BG), the soil is loam, clayey topsoil, or 3-inch thick asphalt that is underlain by fill or possible fill. From 2 to 5 feet BG, the soil is soft clay or fill described as: generally hard silty clay to mixed silty clay and sand in texture. From 5 to 12 feet BG, the soil is soft clay or hard to tough natural mottled brown and gray silty clay. Soft gray-blue clay or generally stiff moist soft blue to gray clay with trace sand and pebbles extend from approximately 12 feet to 78 feet BG, with refusal (rock) at an approximate depth of 86 feet BG.

The project is located within the Allen Park City limits, which precludes evaluation under the Farmland Protection Policy Act.

Environmental Consequences and Mitigative Actions

No Action

Under the No Action Alternative, there would be no effect to soils on the property because no ground disturbance would occur.

Proposed Action

Although some of the vegetation on site will be removed during the demolition process, it is not likely that soils would be negatively impacted from soil erosion due to the flat topography of the property. However, because the demolition operation would encompass an area greater than 5 acres, a National Pollution Discharge Elimination System (NPDES) General Construction Permit, issued by the Michigan Department of Environmental Quality (MDEQ) and a Soil Erosion and Sedimentation Control Permit, issued by the City of Allen Park Engineering Department would be required. The Soil Erosion and Sedimentation Control Permit requires that a Soil Erosion and Sedimentation Control Plan for construction activities on the property be developed and approved by the City of Allen Park Engineering Department. Under such a plan, best management practices (BMPs) would be employed to prevent erosion of soils from the property.

Under the Proposed Action, the site soils would be compacted by equipment used for structure demolition and debris hauling. During the demolition of structures and infrastructure, there would be some mixing of the soil horizons and possible loss of the organic soil horizon. Due to the urban nature of this site, a negative environmental effect is not anticipated due to soil mixing. There would be no additional effect to soils from either Demolition Alternative. Although the

SECTION THREE

Affected Environment and Environmental Consequences

Proposed Action may temporarily change the composition of the upper most soil horizons, it would not adversely effect the soils of the site or surrounding area.

3.1.3 Water Resources and Water Quality

Affected Environment

The Allen Park VAMC is located in the Detroit River watershed. The watershed is comprised of 17,350 acres, and the United States Environmental Protection Agency (USEPA) has rated the overall watershed characterization as more serious water quality problems, low vulnerability to potential impacts (USEPA, 2001a). The property is drained by the Tyre Drain, an intermittent stream as identified on the Dearborn Quadrangle USGS 7.5-minute topographic map (USGS, 1968). Tyre Drain is located northeast of the property, approximately 100 feet inside the adjacent Ford Motor Corporation Allen Park Clay Mine Landfill. It drains southeast 1,000 feet parallel to Snow Road, then for several thousand feet more east and parallel to Outer Drive. Approximately one mile east of the Center, Tyre Drain enters the North Branch Ecorse Creek (FEMA, 1974), also known as the Ecorse River (USGS, 1968). The Ecorse River empties into the Detroit River.

Surface waters from the property are drained into either a combined sewer system or overland, through natural drainage features. On the developed area of the property, storm water runoff from buildings, parking lots, and roadways is collected through a combined storm and sanitary sewage system and discharged via a 24-inch pipe on the north side of the property to the City of Dearborn combined sewer system. The effluent is ultimately treated at the Detroit Waste Water Treatment Plant and then discharged to the Detroit River. Storm water runoff from undeveloped areas that are not collected by the sewer enter the Tyre Drain, which enters the Ecorse River more than 1 mile east of the Center. According to the USEPA, the macroinvertebrate community in the Ecorse River is rated poor due to pathogens (USEPA, 2001b). Macroinvertebrate communities are typical indicators of the overall health of streams and the surrounding watershed.

The soils on the property exhibit very slow to slow permeability to infiltration as evident from ponded runoff that has been observed on the lawn areas after heavy rains (VA, 1986). Perched water tables have been observed in the subsurface (LES, 2000), which is another indicator of poor drainage and groundwater movement. The clayey nature of the subsoil (see Section 3.1.2) causes resistance to vertical and horizontal groundwater flow.

Environmental Consequences and Mitigative Actions

No Action

Under the No Action Alternative, stormwater would continue to be collected in the municipal combined sewer system, treated at the Detroit Wastewater Treatment Plant and discharged into the Detroit River. There would be no adverse effect to water resources and water quality from this action.

SECTION THREE Affected Environment and Environmental Consequences

Proposed Action

Under the Proposed Action Alternative, the combined sewer system will be removed except where necessary for stormwater control (Golder Associates Inc, 2001). Stormwater from the site that would escape the Dearborn municipal combined sewer system would drain via natural drainage features. The runoff would enter the Tyre Drain and ultimately into the Ecorse River.

Impervious surfaces, which comprise 49 percent of the site (Section 3.4.1), would be replaced with fill, overlain with top soil, and seeded with grasses (Golder Associates Inc, 2001). The potential for rainfall infiltration and the water holding capacity of the site would increase as impervious surfaces are replaced by clean fill. After the site is seeded and vegetation sprouts, uptake and transpiration potential of the site would increase, further alleviating saturation stress. The net effect for most storm events would be no additional overland flow to the Tyre Drain or the stormwater control utility. During extreme events, additional stormwater would be accommodated by the stormwater controls.

As previously mentioned, an NPDES General Construction Permit and an Erosion Control and Sedimentation Permit and Plan would be required. BMPs, administered as part of this plan, would mitigate potential sedimentation impacts to receiving waters.

The Proposed Action under both Demolition Alternatives would have no adverse effects on water resources and water quality due to the increased water capacity of the site and continued utilization of stormwater controls already in place.

3.1.4 Floodplains

Affected Environment

The proximity of the site to local floodplains was determined by referencing a Flood Insurance Rate Map (FIRM) (FEMA, 1974). According to this source, the Allen Park VAMC is located within Zone X, an area determined to be outside the 500-year floodplain. The closest surveyed floodplain is associated with the North Branch Ecorse Creek and lies 500 feet south of the Medical Center boundary, across Outer Drive. Tyre Drain does not have any delineated floodways until it reaches the Ecorse Creek, more than 1 mile east of the site.

Environmental Consequences and Mitigative Actions

No Action

Under No Action, overflow stormwater would continue to be collected by the combined sewer system and there would be no adverse effects to floodplains.

Proposed Action

Under the Proposed Action Alternative, the buildings, structures, and paved surfaces will be removed. Impervious surfaces, which comprise 49 percent of the site, would be replaced with fill and topsoil, alleviating some soil saturation stress. Overflow capabilities provided by the stormwater drainage utility would be maintained where necessary. The net effect for most storm events would be no additional overland flow to the Tyre Drain or the stormwater control utility. During extreme events, additional stormwater would be accommodated by the stormwater

SECTION THREE

Affected Environment and Environmental Consequences

controls. There will be no adverse effect to the floodways closest to the Center or down gradient of the Center.

There would be no additional adverse effect to floodplains from either Demolition Alternative.

3.1.5 Air Quality

Affected Environment

The Allen Park VAMC is located in the Metropolitan Detroit-Port Huron Interstate Air Quality Control Region. The USEPA classifies Wayne County as being in attainment for all six priority pollutants: nitrogen oxides (NO_x), sulfur oxides (SO_x), particulate matter less than 2.5 microns (PM_{2.5}), carbon monoxide (CO), ozone (O₃), and lead (Pb) (USEPA, 2001c). Although the County is in attainment for ozone under the current 1-hour standard, it is in nonattainment for the proposed 8-hour standard that has not been officially promulgated due to legal challenges.

At the time of closure, the Allen Park VAMC was not required to have air quality permits for stationary sources. However the facility did have a permit through Wayne County to operate an incinerator from 1985 to 1993 (Paglione, pers. comm.)

The Allen Park VAMC buildings contain large amounts of asbestos-containing materials (ACMs) and lead-based paints (LBPs). An asbestos survey of the Allen Park VAMC buildings was conducted in November 2000, by the Lakeshore Engineering Group and Apex, Inc. The resulting report documents the presence of nonfriable and friable regulated asbestos in the buildings. Presently the Allen Park VAMC is under an operation and maintenance program to manage asbestos-containing materials (D'Alessandro, pers. comm.).

Environmental Consequences and Mitigative Actions

No Action

Under the No Action Alternative, all buildings would remain intact. There would be no emissions from demolition and there would be no adverse effect to air quality.

Proposed Action

Under the Proposed Action, there would be additional regional mobile source air emissions from trucks and heavy equipment. However, the additional amounts would be temporary and not great enough to affect the attainment status of the six priority pollutants.

The use of water and other engineering controls would be required to control dust emissions in order to comply with local and regional air quality regulations. These controls would be utilized under both demolition alternatives. In addition, air-monitoring devices would be utilized throughout the demolition process to ensure that dust emanating from demolition operations would not pose a health risk to workers or the public.

Under the Implosion Demolition Alternative, there would be an immediate increase in particulate emissions resulting from the dust cloud associated with the implosion. The building would be prepared for demolition in accordance with 40 CFR 61 Subpart M – National Emission Standard for Asbestos, Standard for Demolition and renovation. In addition, monitoring equipment would be installed to monitor lead, asbestos, and particle dust in fallout during the implosion. Public

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notice would be given prior to implosion. The notice would stress the importance to those suffering asthma or other respiratory illnesses to remain indoors until the dust cloud has dissipated.

Under the Mechanical Demolition Alternative, there would not be as large a dust cloud created by implosion. However, there would be dust emissions associated with this method. As stated for the implosion alternative, the requirements of 40 CFR 61 subpart M would be followed in preparing the building for demolition.

Therefore, the Proposed Action would result in a temporary increase in airborne particulate matter and mobile source air emissions from trucks and heavy equipment. However, the demolition activity is not anticipated to have any long-term adverse effect to the air quality of the region or surrounding area.

3.2 BIOLOGICAL ENVIRONMENT

3.2.1 Terrestrial Environment

Affected Environment

The land on which the Allen Park VAMC is situated was originally acquired and developed in 1937. Since that time, most of the native vegetation has been removed and replaced with ornamental grasses, shrubs, and trees. A small stand of cottonwood (*Populus deltoides*) is located on the front lawn close to the flagpole. The urban setting of the Medical Center is similar to that of the surrounding industrial, commercial, and residential areas. Urban setting habitats in this part of the country often support wildlife such as gray squirrel and eastern chipmunk. Bird species such as pigeon, dove, cardinal, and jay also share urban habitats. Presently, a large population of pigeons inhabits the vacant hospital buildings.

Environmental Consequences and Mitigative Actions

No Action

Under the No Action Alternative, the terrestrial environment would remain unchanged and there would be no adverse effect to terrestrial resources. The pigeon population in and around the vacant structures would remain. Pigeon guano associated with the population would continue to pose potential health risks.

Proposed Action

Under the Proposed Action, all vegetation that interferes with demolition and site preparation will be removed during demolition operations. Some lawns and clusters of trees and shrubs, especially on the fringe of the property, will be preserved (Tomy, pers. comm.). Pigeon habitat in the vacant buildings will be lost. Wildlife inhabiting the areas of the site that will be demolished or destroyed will be lost. However, after the demolition activities the site will revert back to open space, as specified in the 1937 deed, and will eventually provide for wildlife habitat again. Therefore, effects to the terrestrial environment under the Proposed Action Alternative are temporary and not considered to be significant. There would be no additional effect to the terrestrial environment from either Demolition Alternative.

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3.2.2 Wetlands

Affected Environment

Wetland Resources are protected by Section 404 of the Clean Water Act and are under the jurisdiction of the U.S. Army Corps of Engineers (USACE). Although intermittent ponding has been known to occur in certain areas of the lawn, no existing or potential wetlands were identified during a site visit on January 17, 2001. Correspondence with the USACE has been initiated to confirm that no wetlands exist on the site.

Environmental Consequences and Mitigative Actions

No Action

Because no wetlands have been identified at the Allen Park VAMC site and no physical changes to the site would occur under this Alternative, no adverse effects to wetlands are anticipated under the No Action Alternative.

Proposed Action

Because no wetlands have been identified at the Allen Park VAMC site, no adverse effects to wetlands are anticipated under the Proposed Action or either Demolition Alternative.

3.2.3 Threatened and Endangered Species

Affected Environment

In compliance with the Endangered Species Act of 1973, as amended, the U.S. Fish and Wildlife Service (USFWS) and the Michigan Department of Natural Resources (MDNR) Wildlife Division were contacted to obtain information on any special status species potentially occurring on the VAMC campus. Special status species are defined as taxa that are candidates for, proposed as, or listed as sensitive, threatened, or endangered by the USFWS or the MDNR.

Because the VAMC campus has been significantly disturbed and modified by landscaping and development, the probability of special status species or their habitats occurring is unlikely (Section 3.2.1).

Environmental Consequences and Mitigative Actions

No Action

As indicated in replies from the USFWS and MDNR dated February 7, 2001 and March 7, 2001 respectively, no endangered, threatened, proposed, or candidate species or critical habitats occur within the proposed action area. Therefore, no adverse effects to Federal or state threatened or endangered species are anticipated under the No Action Alternative.

Proposed Action

As indicated in the USFWS and MDNR replies, no endangered, threatened, proposed, or candidate species or critical habitats occur within the proposed action area. However, because

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threatened and endangered species data is continually updated, new information pertaining to this action may become available which may modify the status of the proposed action area. Therefore, it is recommended by the USFWS that the VA annually request updates to the threatened and endangered species list and, should a species become listed or proposed before completion of the project, the VA would be required to reevaluate its responsibility under the Endangered Species Act of 1973.

No adverse effects to Federal or state threatened or endangered species are anticipated under the Proposed Action for either Demolition Alternative.

3.3 SOLID AND HAZARDOUS WASTE

On November 3, 2000, Lakeshore Engineering Services (LES) of Detroit, MI produced a Pre-Demolition Environmental Assessment Report of the Allen Park VAMC for the VA. This assessment is made up of four documents: a Phase I Environmental Site Assessment (ESA), a Phase II ESA, a Facility Assessment, and an Asbestos-Containing Material Identification/Re-Quantification Assessment. The Phase I and II ESAs examined external portions of the property for the presence of hazardous materials and environmental contamination. The Facility Assessment examined the interior of buildings for the presence of hazardous materials and environmental contamination. The Asbestos-Containing Material Identification/Re-Quantification Assessment examined the extent of asbestos-containing materials in the buildings specifically.

3.3.1 Property

Affected Environment

The Phase I and Phase II ESAs were conducted in accordance with the American Society for Testing and Materials (ASTM) Standard for ESAs for Commercial Real Estate (E 1527-97). The Phase II ESA included Geoprobe® drilling at 34 locations throughout the property. Soil and groundwater samples were collected at these locations.

The analytical results of the soil samples indicated ten exceedances of the generic Residential and Commercial I Direct Contact Cleanup Criteria for arsenic and one exceedance of the generic Residential and Commercial I Direct Contact Cleanup Criteria for chloride.

The soil sample exhibiting the exceedance for chloride was collected near the open road salt bin on the eastside of Building 53 at a depth of 6 inches to 1 foot below grade. Soil samples exhibiting exceedances for arsenic were limited to fill material, but widely distributed across the property. LES described the fill as sandy gravel with significant amounts of slag and cinders. The fill was likely placed prior to or during the construction of the VAMC. No known testing of the underlying soils has occurred to date that would allow for a comparison of arsenic levels in the fill to levels endemic in the native soil. However, it has been reported that the underlying clays at the site and in southern Michigan contain elevated levels of arsenic (Slayton, Pers. comm.).

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Environmental Consequences and Mitigative Actions

No Action

Under the No Action Alternative, the chloride and arsenic soil contamination would remain in place, unabated. Given the limited use and access control to the site, there would be little risk to the surrounding community through the normal risk pathways of ingestion and inhalation.

Proposed Action

Under the proposed action, the chloride-contaminated soil located on the eastside of Building 53 would be excavated and disposed of in the adjacent Ford Motor Clay Mine Landfill. Certified clean fill material would be used to replace the material. The area would be machine compacted.

LES recommends the following actions be taken in response to the arsenic contaminated soils:

- Further delineate the areal and vertical extent of the fill material to reduce the amounts of material requiring removal and disposal from the site;
- Gather further information regarding future land use and employ this information in the determination of a site-specific direct contact criterion for arsenic. This approach would result in a more applicable direct contact criteria based on actual exposure assumptions at the site;
- Excavate and dispose of the material associated with the arsenic exceedances;
- A deed restriction could be applied to impacted portions of the site. A deed restriction would require adherence to exposure prevention protocols prior to any subsurface activity conducted at the site; and
- Analytical results for soil samples collected were compared to Residential and Commercial I Direct Contact Cleanup Criteria, which are the most stringent MDEQ cleanup criteria. If future land uses at the site were other than Residential or Commercial I, further remedial action would not be required. Land uses fitting less stringent cleanup criteria at the site would include light industrial operations.

Without further delineation, LES estimates that the quantity of material requiring removal and disposal would be approximately 85,000 cubic yards. This soil would be classified as contaminated non-hazardous material. Further examination and delineation of contaminated fill material could present a significant reduction in the amount of soil requiring removal from the site.

The U.S. EPA Region 5 has indicated that naturally occurring arsenic may be endemic to the soils in the Detroit metropolitan area. Consultation with EPA Region 5 and MDEQ has been initiated to determine additional alternatives to address the concerns of arsenic contamination.

The VA will comply with all Federal and State regulations concerning potential hazardous materials prior to the transfer of property. Chloride contamination that LES found to be present would be identified and disposed of properly. The VA would resolve the issue of arsenic contamination on the site through an agreement with the Ford Motor Land Development Corporation, such as deed restriction or indemnification agreement, or through further study, or removal of arsenic contaminated soils from the site. Neither Demolition Alternative would have an additional effect on chloride and arsenic contamination at the site.

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3.3.2 Facilities

Affected Environment

LES conducted a Facility Assessment of the Allen Park VAMC structures and equipment as part of the Pre-Demolition Environmental Assessment to identify items of environmental interest that would require remediation measures. The items of concern were identified in the Allen Park VAMC buildings included ash, above ground storage tanks (AST), biological and medical wastes, chlorofluorocarbons (CFCs) containing equipment, computer equipment, gas cylinders, extensive mold and pigeon wastes, fluid fill piping, fluorescent light fixtures, LBP and ceramic tiles, medical equipment and products, medical wastes, mercury containing equipment, miscellaneous chemicals and poisons, oil filled machinery, oil stained concrete and floors, self illuminating exit signs, smoke detectors, paint booth, parts washer, pits, sumps and trench drains, and various batteries.

In addition, a chemical hood was found to contain perchlorate residue in excess of the maximum allowable limit for dismantling ventilation systems. PCB in detectable levels was identified in two transformer drains and on two oil stained transformer pads. Mercury spills at two locations were also identified.

Environmental Consequences and Mitigative Actions

No Action

Under the No Action Alternative, the hazardous materials in the facilities would continue to degrade due to lack of attention. Continued deterioration of the facilities would increase the possibility of release of hazardous materials. Therefore, the VA would be required to dedicate extra resources to the continued maintenance of the buildings.

Proposed Action

Under the Proposed Action, prior to demolition activities, regulated items and items of concern would be removed from the buildings and recycled or disposed of in an appropriate manner in accordance with federal, state and local regulations. Sanitary and storm sewer piping, except where needed for stormwater management, would be flushed to remove any accumulated solids and then removed or capped and filled with an inert material. Residual materials present in the sewer structures would be collected for off-site disposal as necessary. Items such as fluid fill pipes and possible PCB contamination would be investigated further to identify the appropriate level of decontamination required before the buildings would be demolished.

Following demolition, debris would be tested for lead. If the content of lead in the debris were to leach from the material at less than 5 milligrams per liter (mg/L), the material would not be considered hazardous and could be disposed of in a construction and demolition material landfill. If the material were to be found to leach at greater than 5 mg/L, then the material would be considered hazardous and would be disposed of in an approved Resource Conservation and Recovery Act (RCRA) landfill. However, due to the large amounts of inert debris, which would dilute the lead-based paint component, it is not expected that the demolition material would be classified as hazardous.

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Building materials that are asbestos-free may be recycled. Asbestos-containing material would be disposed of in a regulated landfill.

Removal of hazardous materials from the buildings and property prior to demolition is required by regulation and would insure that public exposure to these materials would be held to a minimum. Contractors and site worker exposure to hazardous materials would be reduced to a minimum through the development of and adherence to a Site Health and Safety Plan. The Site Health and Safety Plan would be developed in compliance with regulations of the Occupational Safety and Health Administration (OSHA) and should be approved by a certified industrial hygienist.

Engineering controls, such as spraying debris and contaminated materials with water, would be utilized to minimize the emission of lead to the atmosphere from LBP in both Demolition Alternatives. Air monitoring equipment would be installed around the project site to monitor lead and asbestos emissions during the demolition process.

The Proposed Action Alternative would benefit the site and surrounding area in that the hazardous materials that exist on the property would be removed from the site and disposed of properly. Neither Demolition Alternative would have an additional effect on hazardous materials at the site.

3.3.2.1 Asbestos Survey

As part of the Pre-Demolition Environmental Assessment, LES performed a comprehensive asbestos identification/requantification assessment from May through July. LES based its assessment on information from APEX Environmental, which conducted a previous asbestos survey. The survey indicated extensive use of friable and non-friable asbestos-containing materials (ACM) throughout the Allen Park VAMC facilities. However, the survey did not report the condition of the ACMs, which is a key factor in determining whether or not non-friable ACMs need to be removed prior to demolition. LES estimates the removal and abatement costs of all ACM is \$3.6 million. Of this total figure, LES estimates just \$2.2 million would be required for the abatement of friable ACM.

Environmental Consequences and Mitigative Actions

No Action

Under the No Action Alternative, ACM would remain in the Allen Park VAMC facilities. The condition of this material would continue to deteriorate. Currently, respirators are required for entry into most of the Allen Park VAMC facilities due to the condition of the ACM and the presence of other hazardous materials. Access to area of the VAMC with ACM in poor condition will continue to be restricted and the facility structures will continue to provide containment of the ACM, preventing potential health effects to the public.

Proposed Action

Under the Proposed Action, the Allen Park VAMC facilities would be prepared for demolition in accordance with 40 CFR 61 subpart M – National Emission Standard for Asbestos, Standard for demolition and renovation. Friable ACM and non-friable ACM in poor condition would be removed from buildings and disposed of in an approved and appropriate landfill.

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Air monitoring would then be established during demolition to ensure the minimal the amounts of asbestos are released to the environment. This procedure would be followed under both demolition alternatives.

The Proposed Action Alternative would benefit the site and surrounding area in that the ACMs existing on the property would be removed from the site and disposed of properly. Neither Demolition Alternative would have an additional effect on hazardous materials at the site

3.3.3 Radiological Hazards

Affected Environment

When it was fully operational, the Allen Park VAMC contained equipment for radiography and radiomedicine. The facility is licensed by the U.S. Nuclear Regulatory Commission (NRC) under NRC Material License No. 21-04234-01. The NRC has released for unrestricted use all Allen Park VAMC buildings with the exception of Room 18 of Building 31 (NRC, 2000). In order for the NRC to clear this room for unrestricted use, the VA was required to remove all radioactive materials from the room, decontaminate where necessary, and perform a closeout survey of the room. The survey consisted of exposure rate measurements to show that all sources of radioactivity had been removed, and contamination checks of areas where radioactive materials were used or stored. A copy of the survey was submitted to the NRC for review. Radioactive materials and equipment were recycled or disposed of in accordance with NRC regulations at an appropriate facility. As of February 6th, 2001, this room was decommissioned and authorized for unrestricted use by the NRC (NRC, 2001).

Environmental Consequences and Mitigative Actions

Through the decommissioning and release for unrestricted use of all buildings at the Allen Park VAMC, the potential for radiological hazards has been eliminated. There are no environmental consequences under either the No Action or the Proposed Action Alternatives.

3.4 SOCIOECONOMICS

3.4.1 Land Use

Affected Environment

The Allen Park VAMC is located in the northwestern section of the City of Allen Park. To the southwest and directly adjacent to the Center is the City of Dearborn Heights. The City of Dearborn is adjacent to the Center to the northwest (Exhibit 3). The City of Melvindale is approximately 0.7 mile to the east and is separated from the Allen Park VAMC by the Detroit Industrial Expressway (Interstate 96) and the Detroit, Toledo and Ironton railroad line.

The park-like campus of the Allen Park VAMC is approximately 36 acres and is zoned RMA (Multiple Family Residential) (Allen Park City Engineer, 1982). Because the Medical Center has existed since 1937 and the formation of the City of Allen Park did not occur until 1954, the non-conforming land use of the Medical Center has been conditionally allowed by the City of

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Allen Park (Ciotti, pers. comm.). As a government facility, the Allen Park VAMC is exempt from property tax collected by the City of Allen Park.

The majority of the property, approximately 52 percent, is open space in the form of lawn and landscaped trees and shrubs. Buildings occupy only 7.5 percent of the site. The remainder, approximately 41 percent, is comprised of paved surfaces for parking lots, driveways, and sidewalks (VA, 1986).

In Allen Park, within a 1-mile radius of the perimeter of the campus, the city zoning is predominantly Medium Industrial District (M-2). Approximately half of the M-2 zoned area in Allen Park within 1 mile of the campus is a landfill owned by the Ford Motor Company, which is adjacent to the Center on its northeast boundary. East of the Center, across Outer Drive, is approximately 85 acres of Single Family Residential District (R-1A), 10 acres of Neighborhood Business District (C-1), and 20 acres of Multiple Family Residential (RMA)(Allen Park City Engineer, 1982). These buildings are generally one story, ranch or rambler-style, and likely were constructed in the 1970s. Approximately 2,600 feet southwest of the campus is the heart of an 80-acre Single Family Residential District (R-1B) zoned area that is bordered by Russell Street, the Southwest Expressway, and the Detroit Industrial Expressway.

The City of Dearborn Heights is less than 1,200 feet southwest of the main hospital building. From most of Dearborn Heights the Center is obscured by vegetation. Within a 1-mile radius from the Center boundary, the city zoning is predominantly Single Family Residential District (R-1B), with small pockets of Two Family Residential District (R-2), Multiple Family Residential (RM), Neighborhood Business District (C-1), General Business District (C-2), and Restricted Office District (RO-1) comprising no more than 2 acres each (Brandon M. Rogers & Associates, 1966). The residences in this community are attractive and well kept, and it appears many of them were built before 1950. The streets and yards boast mature vegetation that shades the avenues and buildings.

The City of Dearborn is less than 500 feet northwest of the main hospital building. In the City of Dearborn, within a 1-mile radius of the perimeter of the Center, the city zoning is predominantly One Family Residential District (R-A), with small areas of One Family Residential District (R-B), Local Business District (B-A), Community Business District (B-B), General Business District (B-C), Business Office District (O-S), and Vehicular Parking District (V-P)(City Planning Department, 1991). The Southfield Freeway separates the VAMC from the City of Dearborn. The residential buildings in this neighborhood were constructed during the 1940s and 1950s, and the urban vegetation in this community obscures the Center from most areas inside the City. Four schools and one hospital are also within a 1-mile radius of the Center (USGS, 1968).

Environmental Consequences and Mitigative Actions

No Action

Under the No Action Alternative, the outpatient clinic would be closed and the VA would maintain the property in a "mothballed" status. There would be no effect to tax status or land use patterns.

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Proposed Action

Under the Proposed Action, there will be a beneficial effect to the City of Allen Park. After FMLDC acquires the land from the VA the site will no longer be exempt from property tax, providing the City of Allen Park with millions of dollars in additional revenue (Kozuh, pers. comm.).

3.4.2 Aesthetics

Affected Environment

From most vantage points, the Allen Park VAMC campus is park-like in nature with large mowed lawns punctuated with small groups of trees and shrubs (Exhibit 4, Photo #1). The main hospital building is the dominant building in the community due to its height, size, and architectural nature (Exhibit 4, Photo #2). At 11 stories, the hospital is the tallest structure in an area that otherwise has a 35-foot maximum height building restriction. When travelling northeast on the Southfield Expressway, the VAMC and grounds are elevated from the road, emphasizing its prominence in the community (Exhibit 4, Photo #3).

Environmental Consequences and Mitigative Actions

No Action

Under the No Action Alternative, the grounds and buildings would require continued maintenance by the VA to preserve the existing aesthetics of the site. The buildings would continue to degrade structurally without significant investment (VA, 1986). Under the No Action Alternative, adverse effects to aesthetics would only occur after a long period of time as the abandoned buildings begin to show signs of neglect.

Proposed Action

Under the Proposed Action Alternative and considering both Demolition Alternatives, the aesthetic qualities of the site as they presently exist would be lost. Temporarily, the park-like setting of the Medical Center campus will be transformed into a construction site setting. During demolition, much of the original vegetation will be removed and replaced with debris staging sites, construction barriers, silt fencing, or other obstructions to mitigate impacts of the demolition to the surrounding areas. After demolition, disturbed earth will be covered with topsoil and seeded with grasses. The Proposed Action Alternative would have temporary and short-term adverse effects to the aesthetics of the site.

3.4.3 Noise

Affected Environment

When near or on the now mostly vacant grounds of the Allen Park VAMC, the most noticeable contribution to ambient noise is vehicular traffic. The triangular lot of the Center is bordered by Outer Drive to the south, Southfield Expressway to the northwest, and Snow Road to the northeast (Exhibit 3). Outer Drive is a four-lane road with a 25-foot vegetated median providing



Photo #1: View of the main hospital building looking east from Outer Drive



Photo #2: View of the main hospital building and residences on campus looking north from Outer Drive/Snow Road intersection



CLIENT Department of Veterans Affairs	TITLE PHOTOGRAPHS OF MEDICAL CENTER	
PROJ Allen Park VAMC Demolition Environmental Assessment		PROJ NO 89-f200100500
FILE J:\Veterans Hospital\Photos 1,2&3.PPT		EXHIBIT 4



Photo #3: View of the main hospital building looking east from Outer Drive bridge over the Southfield Expressway

CLIENT Department of Veterans Affairs	TITLE PHOTOGRAPHS OF MEDICAL CENTER	
PROJ Allen Park VAMC Demolition Environmental Assessment		PROJ NO 89-1200100500
FILE J:\Veterans Hospital\ Photos 1,2&3.PPT		EXHIBIT 4

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local access to the residential communities of Dearborn, Dearborn Heights, Melvindale, and beyond. It runs approximately 2,100 feet along the southern boundary of the hospital. Southfield Expressway is a limited access, six-lane highway and a major artery in and out of the City of Detroit. An additional two-lane access road buffers the Expressway on the northwest 2,000 feet of the hospital boundary.

Snow Road borders the Center grounds along 1,800 feet of the northeast boundary, dividing the Center and the adjacent landfill. Currently, as it runs adjacent to the VAMC, Snow Road is blocked to traffic. The Detroit Industrial Freeway (I-94), a limited access six-lane highway, is less than 2,000 feet from the VAMC.

Noise at a site is determined by averaging outdoor day and weighted night noise measurements that are taken over a consecutive 24-hour time period (Transportation Planning Handbook, 1992). Noise measurements taken at the Allen Park VAMC (Smith, Hinchman & Grylls, 1982) focused on the magnitude of sound reaching the areas immediately surrounding the main building. The loudest areas at the Center were between the Southfield Expressway and the noise-reflective brick exterior of the main hospital building, suggesting traffic from the Expressway contributes significantly to ambient noise levels. The quietest areas were located towards the center of the property, where they were buffered from traffic by the surrounding buildings. Although the surrounding roads seem to generate most of the ambient noise, the presence of the buildings themselves also contributes to the ambient noise dynamics of the site.

Environmental Consequences and Mitigative Actions

No Action

Under the No Action Alternative, the buildings would remain intact and there would be no additional noise contribution. Although closure of the outpatient clinic would mean less traffic and less activity at the VAMC, the reduction of noise levels resulting are not anticipated to be perceptible outside of the property limits. However, the buildings at the Allen Park VAMC would continue to provide a noise buffer to the small neighborhood in Allen Park. Therefore, the No Action Alternative may provide a perceptible beneficial effect to this neighborhood.

Proposed Action

Under the Proposed Action Alternative, there would be a temporary increase in the ambient noise at the site due to the activities associated with the demolition and debris removal. Demolition Alternative 1 would produce considerable noise over a brief period of time (minutes). Public involvement will be necessary to alert residents in the surrounding area to noise that would be generated by the implosion. Demolition Alternative 2 would produce a lesser degree of noise, but would continue over a much longer period of time (months).

Under both Demolition Alternatives, the loading and unloading of debris from dump trucks will also contribute to noise levels on site. However, given the magnitude of traffic already existing near the Allen Park VAMC site, debris-moving activities are not likely to have an impact on noise quality. Limiting demolition activities to daylight hours will minimize effects of noise to the surrounding communities.

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The buildings at the Allen Park VAMC create a buffer from traffic noise for a small neighborhood in Allen Park. The removal of these buildings may perceptibly increase ambient noise levels from the Southfield Expressway in neighborhoods opposite the Center.

Under the Proposed Action Alternative, there would be a temporary adverse effect on ambient noise during the demolition and debris removal activities, and perhaps a long-term adverse effect on the noise levels in parts of Allen Park. It is not anticipated that the amount of noise reaching the neighborhood in Allen Park would be considered Normally Unacceptable or Unacceptable (HUD, 2001).

3.4.4 Utilities

Affected Environment

Water

The Allen Park VAMC receives its water from the City of Allen Park via two mains that enter the parcel from Outer Drive. The first main is 8 inches in diameter, and feeds into a 10-inch diameter line, which circumnavigates the Center. It provides water to a network of fire hydrants and the sprinkler loop. The second main is also 8 inches in diameter as it enters the campus of the Center, but varies in diameter once on the grounds from 12 inches to 1.5 inches depending on water demand. This network circumnavigates the Center with a smaller radius than the first main, and transects the property several times, connecting to the main hospital and all of the Medical Center auxiliary buildings with plumbing. This main is used primarily for domestic water supply, with backup capabilities for the fire protection system. In addition, emergency backup to both the domestic and fire protection systems is provided by the City of Dearborn through an 8-inch main crossing the Southfield Expressway. It enters the Medical Center at the northern extent of the grounds and patches into the network through the Animal Lab (Building #31) (Allen Park VAMC, 1981). Presently, the Allen Park VAMC consumes an average of 41,938 gallons of water per month. In 1982 the condition of the two water systems was rated as "good," but estimated life expectancy was not forecasted past 2001 (VA, 1986). Water exits the site through a 24-inch main to the City of Dearborn combined sewer system.

Electrical

Detroit Edison Company supplies the Allen Park VAMC through an underground 4.8 kV circuit that enters the grounds from near the midpoint of the Southfield Expressway boundary. A second standby circuit has automatic throw-over capabilities. Eleven pad-mounted high voltage transformers and five emergency generators provide additional servicing (VA, 1986).

In addition to the grid powering the buildings on site are underground lines supporting the exterior and street lighting networks. The majority of these lines run under pavement and are located along the perimeter of the property (Allen Park VAMC, 1981).

Currently, total electricity demand for the Allen Park VAMC is 9320 kW hours.

Steam System

The Allen Park VAMC has its own on-site power plant containing four natural gas-fired boilers. Three of the boilers have a steam output capability of 20,000 pounds per hour. The fourth has a

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capability of 10,000 pounds per hour (VA, 1986). The boilers have not been operational since 1996 (Olson, pers. comm.)

Underground steam mains ranging from 1.5 inches to 10 inches supply heat to various Medical Center buildings. 1.25 inch gravity and pump return systems run parallel to some of the steam mains (Allen Park VAMC, 1981). The primary lines in the system have been installed since 1979, and estimated life expectancy was projected to decline after 2004 (VA, 1986).

Natural Gas

Natural gas for the Allen Park VAMC is used for the steam boilers and some domestic and medicinal support purposes. It is obtained from Michigan Consolidated Gas Company (Mich Con) via two 26-inch mains (VA, 1986). One main enters the property parallel to the power line near the midpoint of the Medical Center boundary with Southfield Expressway. The other runs parallel to Snow Road along the southern half of the property before entering the site behind the Boiler House (Building, #10). As of 1982, the gas system was rated in good condition (VA, 1986). Mich Con is responsible for maintaining the distribution system in a state of proper safety, efficiency, and dependability. A site plan (Allen Park VAMC, 1981) indicates that at least some of these lines have already been abandoned. Currently, the Allen Park VAMC does not use any natural gas (Olson, pers. comm.).

Communications Infrastructure

Michigan Bell Telephone Company services the Allen Park VAMC with 168 pairs of lines (VA, 1986) which enters the grounds through a primary line off of the Southfield Expressway adjacent and parallel to the Detroit Edison electric line (Allen Park VAMC, 1981).

Environmental Consequences and Mitigative Actions

No Action

Under the No Action Alternative, service for at least some utilities (stormwater drainage, electricity, and perhaps communications infrastructure) would continue in order to maintain the vacant buildings and grounds in a safe manner, free of hazards. As such, the hospital would use minimal amounts of resources and would not constitute a burden to surrounding communities. The No Action Alternative would not have an adverse effect to utility service in the surrounding communities.

Proposed Action

Under the Proposed Action Alternative, service for all utilities will be discontinued and capped, closed, or otherwise disconnected during the demolition process. All related infrastructure will be removed from the site. Portions of the combined sewer system may be retained for site drainage and stormwater management if necessary (Golder Associates Inc, 2001). When utilities are decommissioned, it is rare that the surrounding communities experience even a temporary lapse of service. It is not anticipated that the Proposed Action would adversely affect utility service to the surrounding community. The Demolition Alternatives would not have an additional adverse effect on utilities.

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3.4.5 Transportation

Affected Environment

Two major transit agencies provide bus services in the Detroit metropolitan area, although their services are not integrated. The Detroit Department of Transportation (DDOT) offers public transportation service to residents of the City of Detroit (with a few suburban routes), while the Suburban Mobility Authority for Regional Transportation (SMART) provides primarily suburb-to-suburb and some peak hour services between the suburbs and central city. There is no urban passenger rail system in the Detroit metropolitan area. The closest public transportation to the Allen Park VAMC is approximately 700 feet southwest of the Center near the Outer Drive Bridge over the Southfield Expressway.

According to the Labor Force and Commuting Data for the City of Detroit (USCB, 1990a) the average one-way commute time is 23.7 minutes. Eighty three percent of commuters drove to work alone, ten percent participated in carpools, two percent solicited public transportation, and four percent used other means of transportation or work from home.

A description of the roads surrounding the Allen Park VAMC is given in Section 3.3.3. On the segment of the Southfield Expressway adjacent to the Center, daily average traffic volume over a 24-hour period is 88,100 vehicles. On the segment of the Detroit Industrial Freeway closest to the Center, daily average traffic volume over a 24-hour period is 88,800 vehicles (MDOT, 2001). No information was available on the volume of traffic on Outer Drive, but its proximity to the Expressway and Freeway suggest the majority of traffic is local between Allen Park, Melvindale, Dearborn Heights, Dearborn, and other small, nearby communities.

From March 9 through August 15, 2001, MDOT has tentatively scheduled reconstruction activities on the Southfield Expressway and six bridges from Outer Drive north to Michigan Avenue (Gorman, pers. comm.). During this activity, northbound and southbound traffic patterns will be disrupted. From August 15, 2001 through June 1, 2002 there will be some service drive and restoration work.

Environmental Consequences and Mitigative Actions

No Action

Under the No Action Alternative, closure of the outpatient clinic would slightly decrease the existing traffic volume along Outer Drive. Although there would be less traffic, the impact to traffic volume may not be significant in comparison to estimated existing volume. Therefore, there would be a beneficial effect to existing traffic or transportation even if not perceptible.

Proposed Action

Under the Proposed Action Alternative, traffic volume would increase along Outer Drive during commuting hours due to the influx of the labor force performing the demolition. Because the work force would be small relative to the projected baseline of traffic volume, the impact to existing conditions would be minimal. The majority of debris removal will occur from the Medical Center grounds across Snow Road to the adjacent Ford Motor Company Clay Mine Landfill. This action would not influence any of the local traffic because Snow Road is already closed to traffic. A small amount of debris from the demolition would not be accepted at the

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Ford Motor Company Clay Mine Landfill and would have to be exported to a properly licensed landfill. This would increase traffic volume along Outer Drive or the access road running parallel to the Southfield Expressway, and along the Southfield Expressway and the Detroit Industrial Freeway. Because relatively small volumes of material would require transport to other landfills and the transport activities would be limited to non-peak traffic hours, the impact to traffic dynamics would be minimal.

The proposed construction work on the Southfield Expressway has the potential to significantly alter the travel patterns for both commuting contractors and debris removal activities. If access to the Southfield Expressway from Outer Drive is unavailable, the next closest access will require travel through residential neighborhoods of Allen Park.

Additionally, if the building is to be imploded, traffic in the immediate vicinity of the building may be disrupted for up to a day if the implosion process is deemed a threat to life or property along the adjacent roads or highways. Concerns were expressed that the implosion of the main hospital building may convey enough seismic force to have an impact on the adjacent Southfield Expressway (Chaput, pers. comm.). Additional data for this analysis may be required, and measurements at the time of implosion may be necessary to determine the extent of post-action mitigation.

Under the Proposed Action Alternative, the relatively small increase in traffic due to the daily arrival and departure of the demolition work force and hauling of debris would have minimal temporary adverse effects on transportation. Coordination with MDOT would be initiated to determine the exact schedule of road closures associated with the construction on the Southfield Expressway to minimize debris transport on roads that might effect local communities.

3.4.6 Local Employment and Economics

Affected Environment

Allen Park is located in Wayne County, Michigan, within the suburbs of the City of Detroit. The primary source of revenue in Wayne County and the State of Michigan is derived from the production of manufactured goods (USCB, 1997). Table 3.4.6-1 summarizes and compares economic indicators of the State, County, cities close to the Allen Park VAMC, and the Census Tract that contains the Allen Park VAMC.

Table 3.4.6 – 1: Comparison of Economic Indicators in Areas Near Allen Park VAMC

	State of Michigan	Wayne County	City of Allen Park	City of Dearborn	City of Dearborn Heights	Census Tract 5760
Median household income (\$/yr)	31020	27997	39925	34909	36771	36412
Individuals below poverty level (%)	12.8	19.8	3.2	10.8	5.4	2.5
Unemployment rate (%)	8.2	12.4	5.5	6.2	5.9	5.1

Source: U.S. Census Bureau, 1990b

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Although Wayne County has a lower median household income and higher poverty and unemployment rates than the State of Michigan as a whole, the cities of Dearborn, Dearborn Heights, and Allen Park appear more affluent than the State as whole.

The manufacture of durable goods, retail trade, and the health services industry employ the majority of the labor force in the cities of Allen Park, Dearborn, and Dearborn Heights. The same three sectors employ nearly a majority of the labor force in the State of Michigan, Wayne County, and Census Tract 5760. Table 3.4.6-2 compares employment by industry type.

Table 3.4.6 – 2: Employment by Industry Type in Areas Near Allen Park VAMC

	State of Michigan	Wayne County	City of Allen Park	City of Dearborn	City of Dearborn Heights	Census Tract 5760
Agriculture, forestry, and fisheries	2%	1%	0%	0%	0%	0%
Mining	0%	0%	0%	0%	0%	0%
Construction	5%	4%	4%	3%	5%	3%
Manufacturing, non-durable goods	6%	4%	4%	4%	4%	3%
Manufacturing, durable goods	19%	20%	22%	22%	22%	24%
Transportation	3%	5%	5%	4%	5%	7%
Communication and other public utilities	2%	3%	2%	2%	3%	3%
Wholesale trade	4%	4%	4%	4%	4%	4%
Retail trade	18%	17%	16%	18%	21%	13%
Finance, insurance, and real estate	5%	6%	7%	7%	6%	7%
Business and repair services	5%	6%	4%	5%	5%	6%
Personal services	3%	3%	2%	3%	3%	2%
Entertainment and recreation services	1%	1%	1%	1%	1%	4%
Health services	9%	10%	10%	10%	8%	8%
Educational services	9%	7%	8%	9%	5%	7%
Other professional and related services	6%	6%	6%	6%	5%	8%
Public administration	4%	5%	3%	3%	2%	3%

Source: U.S. Census Bureau, 1990b

The areas most likely to be impacted by the Allen Park VAMC demolition are similar to the State of Michigan as a whole with respect to employment by industry type.

The only employee on the site at the Allen Park VAMC full time, seven days per week, is a police officer. The outpatient clinic staff on duty when the clinic is open on Monday and Thursday is a Physician, a Registered Nurse, a Clerk, a Housekeeping Aide, and a Nurse Practitioner. Other staff at the clinic intermittently includes a neurologist who works two half days per month, and a dietitian who works one day per month. Upon relocation of the clinic services to contract providers, all staff currently at Allen Park will be reassigned to the Detroit facility (Paglione, pers. comm.).

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Environmental Consequences and Mitigative Actions

No Action

Under the No Action Alternative, the outpatient clinic at the Allen Park VAMC would be closed and the 700 patients outsourced to local physicians and medical technicians contracted by the VA. The outpatient clinic staff would be reassigned to the Detroit facility. The buildings at the Medical Center would continue to require security and grounds maintenance, providing up to 4 people full time employment and 5 or more people part time employment. Under the No Action Alternative, the use of local physicians and medical technicians by former outpatient clinic clientele would have a beneficial effect on local employment and the local economy in terms of additional revenues to the medical communities of Allen Park, Dearborn, and Dearborn Heights.

Proposed Action

Under the Proposed Action Alternative, contractors would be hired to perform the demolition activities. Although the proximity of the contractor to the demolition site may be a variable in the contract bid, the ultimate choice of contractor will lie with the resources the contractor has to complete the job within the schedule. Given the low percentage of the labor force in the area that is employed by the construction industry, and the degree of expertise required to perform the demolition of such a large building, it seems improbable that the Proposed Action Alternative will influence the labor force in the cities of Allen Park, Dearborn, or Dearborn Heights. The presence of the demolition crew in Allen Park for the duration of the activity may temporarily provide extra revenue to some of the local businesses (i.e. restaurants, gas stations) adjacent to the site.

Under Demolition Alternative 1 it would be even less likely that a local demolition contractor would be used due to the extra degree of specialization associated with this kind of activity.

Under the Proposed Action, the demolition activities may have temporary beneficial effects on local employment and the local commercial economy, and long-term beneficial effects on the medical community economy.

3.4.7 Community Services

Affected Environment

The City of Allen Park is an incorporated City within Wayne County in the greater Detroit metropolitan area. The City functions under a City Administrator. The Allen Park Public School System provides the primary and secondary education infrastructure to the City. The project area is serviced by Arno Elementary School, Allen Park Middle School, and Allen Park High School. The closest medical facility is Oakwood Hospital and Medical Center, located approximately one mile to the northwest. Fire and ambulance service is provided by the Allen Park Fire Department. Police protection is provided through the Allen Park Police Department.

Currently, the VA is operating an outpatient clinic at the Allen Park VAMC. This service is provided by the John Dingell VAMC and is offered two days a week. The VA estimates that the outpatient clinic provides care for approximately 700 veterans in the Allen Park, Dearborn, and Dearborn Heights areas.

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No Action

Under the No Action Alternative, the outpatient clinic would be closed and the patients outsourced in the local community. Although the outpatient clinic is considered an asset to services in the community, the replacement of those services by other qualified professionals will not result in an adverse effect to the community. No other community services would be adversely or beneficially affected under the No Action Alternative.

Proposed Action

Under the Proposed Action, there would be no adverse effect to the Allen Park City Government. Once the property is turned over to the Ford Land Development Corporation, the City would be able to collect property tax on the property. It is possible that the Allen Park Fire Department would be called on to answer emergency calls resulting from demolition-related accidents. This would not result in an adverse effect to the community, as this would be within the capacity of the fire department. The VA provides security for the VAMC and would continue to do so until the property is turned over to the Ford Motor Land Development Corporation.

The VA plans to close the outpatient care clinic. This care function would be outsourced to local physicians within the Allen Park, Dearborn, and Dearborn Heights area. Eligible Veterans would not receive a reduction in quality of care or incur higher costs of care. As a result, there would not be adverse effects anticipated under the Proposed Action Alternative.

3.4.8 Environmental Justice

Affected Environment

At 32,147, the population of Allen Park contains approximately 1.5 percent of the entire population of Wayne County. Allen Park and the adjacent cities of Dearborn and Dearborn Heights comprise approximately 8.7 percent of the total population of Wayne County. Although Wayne County has a large minority population, the City of Allen Park has a relatively small minority population. Table 3.4.8-1 summarizes and compares the low-income, minority, and age-related demographics of the geographic areas most likely impacted by the VAMC demolition:

Table 3.4.8 – 1: Population and Minority Demographics in Areas Near Allen Park VAMC

	Wayne County	City of Allen Park	City of Dearborn	City of Dearborn Heights
Total population (1997 est)	2,106,495 ¹⁹⁹⁹	32,147	91,013	59,987
% change since 1990	-0.2	3.4	1.9	-1.4
Median household income (\$/yr)	27,997	39,925	34,909	36,771
Individuals below poverty level (%)	19.8	3.2	10.8	5.4
% minority population	44.6	1.8	2.4	2.7
% of population over 65	12.6	8.2	18.0	11.0

Source: U.S. Census Bureau, 1999, 1997, 1990b

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The cities of Allen Park and Dearborn Heights have a very low poverty level compared to the County. The presence of a large elderly population may be a contributing factor to the poverty level in the City of Dearborn.

Environmental Consequences and Mitigative Actions

Environmental Justice

On February 11, 1994, President Clinton signed Executive Order (EO) 12898, which is entitled "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations." This EO instructs Federal agencies "...to make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States...."

No Action

Under the No Action Alternative, there would be no federal action and therefore, no compliance with EO 12898 to be considered.

Proposed Action

Based on the demographic data for the City of Allen Park and the adjacent Cities of Dearborn and Dearborn Heights, low-income or minority populations represent less than 2.7 percent of the population. The Proposed Action Alternative would not adversely or disproportionately affect low-income or minority populations because they represent only a small fraction of the overall population that would be affected by the demolition of the Allen Park VAMC.

3.4.9 Potential for Generating Substantial Controversy

The Proposed Action enjoys considerable support from local community leaders as well as state and federal government leaders (VA, 2000). Return of the Allen Park VAMC to private hands would result in a substantial increase in property tax revenue to the City of Allen Park.

However, a group of six state law makers submitted a letter to Congressman Dingell of Michigan expressing their concern over the potential closing of the outpatient clinic being operated at the Allen Park VAMC. It was their concern that the veterans currently receiving care two days a week would no longer receive adequate medical care from the VA. The patients treated at the outpatient facility are restricted in the distances they may travel by their health conditions. The State Representatives indicated that it was their desire for the VA to continue to operate the facility on a portion of the property following the demolition of the VAMC (Detroit News, 1999). On April 13, 1999, representatives of the Allen Park VAMC attended a Council meeting of the City of Allen Park where Representative Schermesser spoke of a task force that had been assembled to address the concerns of the lawmakers. On April 26, 1999, a scheduled meeting with representatives of the Detroit VAMC was cancelled by Representative Schermesser. On May 11 and 12, 1999, representatives of the Detroit VAMC provided the task force with background information and other data that was requested by Representative Schermesser. After May 12, 1999, no further contact was initiated by Representative Schermesser or the task force, and no comments have been submitted to the VA on any of the developments to date (Paglione,

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pers. comm.). As mentioned previously, the VA has indicated that the outpatient care services now provided at the VAMC would be outsourced to physicians in the Allen Park area. Treatment for these veterans would be fully funded by the VA. Under this plan, there would not be a gap in care or a drop in the quality of care for veterans in the Allen Park area (Paglione, pers. comm.).

Although demolition by mechanical means is not controversial in itself, the Implosion Alternative carries with it possibility for public controversy. The demolition of the J.L. Hudson building in downtown Detroit in 1998 created a substantial dust cloud which blanketed the area with dust from the building and caused damage to the People Mover mass transit system. Initial concerns included the perception that the fallout was contaminated with unhealthy levels of asbestos and lead. Subsequent analysis of the fall out indicated that the concentrations of lead and asbestos in the dust were within regulatory limits. Controversy of this nature could be avoided through adequate public education and involvement. Warnings to individuals with asthma and other respiratory ailments should be made repeatedly and well in advance of the implosion. Road closing and alternate travel routes should be well advertised and posted to avoid unnecessary transportation delays.

3.5 CULTURAL RESOURCES

Consideration of effects to cultural resources is mandated by NEPA but also by another Federal law, Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470-470w-6). Section 106 requires Federal agencies to take into account the effects of their undertakings on historic properties and to afford the Advisory Council on Historic Preservation (ACHP) an opportunity to comment on such undertakings. The procedures for implementing Section 106 are contained in the ACHP regulations 36 CFR Part 800, "Protection of Historic Properties."

The requirements of these regulations apply to Federal undertakings. These regulations define a Federal undertaking as an action that is proposed by a Federal agency (or a project proposed by others that will receive funding, permits, licenses, or authorizations from Federal agencies) that has the potential to affect historic properties. Historic properties are defined as properties that are either listed in or eligible for listing in the National Register of Historic Places (NHRP), including buildings, structures, historic districts, objects, sites, or archaeological resources. The regulations implementing the NRHP may be found in 36 CFR 60.4.

3.5.1 Historic Buildings

In its effort to address impacts to historic properties in accordance with NEPA, the VA used the process for determining effect through the ACHP regulations, 36 CFR Part 800, which implement Section 106 of National Historic Preservation Act (NHPA). Similar to NEPA, Section 106 is a procedural law that requires Federal agencies to consider what effect, if any, their actions will have to historic properties. According to Section 800.1(a) of the regulations, "Section 106 of the NHPA requires Federal agencies to take into account the effects of their undertakings on historic properties and to afford the Council a reasonable opportunity to comment on such undertakings." Furthermore, the Section 106 regulations provide guidance on how Federal agencies may coordinate Section 106 compliance with the requirements of NEPA. According to Section 800.8:

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Federal agencies are encouraged to coordinate compliance with Section 106 and the procedures in this part with any steps taken to meet the requirements of the National Environmental Policy Act (NEPA). Agencies should consider their Section 106 responsibilities as early as possible in the NHPA process, and plan their public participation, analysis, and review in such a way that they can meet the purposes and requirements of both statutes in a timely and efficient manner. The determination of whether an undertaking is a "major Federal action significantly affecting the quality of the human environment," and therefore requires preparation of an Environmental Impact Statement (EIS) under NEPA, should include consideration of the undertaking's likely effects on historic properties. A finding of adverse effect on a historic property does not necessarily require an EIS under NEPA.

An initial step in the review process outlined in the Section 106 regulations is to determine the area within which historic properties will be affected or are likely to be affected. As defined in 36 CFR Part 800.16(d), the Area of Potential Effects (APE) "is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking." Because NEPA and NHPA use different terminology, the APE for an undertaking as determined through Section 106 of the NHPA may be different from the area studied within the EA for impacts to other kinds of resources.

For the purposes of assessing effects through the Section 106 review process, direct effects may include but are not limited to the removal of a historic building from its historic setting to a new site, or the partial or total destruction of the historic property. Indirect effects may include but are not limited to visual, audible, or atmospheric effects, which alter the character or use of any of the qualities that qualify a property for listing in the National Register: location, design, setting, materials, workmanship, feeling or association.

No buildings or structures located on the Allen Park Veteran's Administration Medical Center are currently listed in the National Register of Historic Places. However, as part of the VA's proposed undertaking to construct the John D. Dingell VA Medical Center in Detroit, the VA consulted with the Michigan State Historic Preservation Office (SHPO) about the Allen Park VA Medical Center's eligibility for listing in the National Register. On December 2, 1980, the Michigan SHPO stated its opinion that the Allen Park VA Medical Center property was eligible for listing as a historic district through "its outstanding architectural qualities and its historic importance in Michigan as a manifestation of the National humanitarian concern for the medical care of America's former soldiers" (see Appendix B). In addition, the VA consulted with the Keeper of the National Register about the property's eligibility for the National Register of Historic Places. On January 6, 1981, the Keeper determined that a concentration of buildings on the Allen Park VA Medical Center campus qualified for listing on the National Register under Criteria A and C (see Appendix B).

Because Section 106 of NHPA requires Federal agencies to consider the effects that their undertakings will have on properties that have been determined National Register-eligible as well as properties formally listed in the National Register, it was also necessary for the VA to determine the effects of the proposed construction of the John D. Dingell VA Medical Center to

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the Allen Park VA Medical Center. Furthermore, had the proposed construction of the John D. Dingell VA Medical Center been determined to have an adverse effect to historic properties, Section 106 would have required the VA to seek ways to avoid, minimize, or mitigate the adverse effect in consultation with the Michigan SHPO. Accordingly, in its 1986 Final Environmental Impact Statement, the VA noted that:

Due to the historic values of the [Allen Park VA Medical Center] complex, implementation of any alternative other than "no action" will require steps to ensure compliance with the National Historic Preservation Act (36 CFR Part 800) Therefore, the VA Historic Preservation Officer will initiate review procedures pursuant to Section 106 of the National Historic Preservation Act to determine, in consultation with the [Michigan] State Historic Preservation Officer and the Advisory Council on Historic Preservation, the nature of any effects and appropriate mitigation measures for identified adverse effects (36 CFR 800.6). Such measures may include removal, retention, and reuse of certain significant structural elements, photographic recordation, and/or National Architectural and Engineering Record documentation. . . . [If] the VAMC is relocated to Detroit, the Allen Park site no longer will be used by the VA and the site will revert to the Ford family. The ultimate disposition of the various structures in such a case is unknown and, therefore, impacts to the historic architectural values of the property can not be specifically defined in this EIS. However, "transfer or sale of a property without adequate conditions or restrictions regarding preservation, maintenance, or use" constitute an adverse effect under 36 CFR 800.3(b)(5).

The VA completed the John D. Dingell VA Medical Center and moved the operation of the Allen Park VA Medical Center to the new facility in 1996. Since the time that operations were transferred to the John D. Dingell VA Medical Center, the buildings at the Allen Park VA Medical Center have largely been under-utilized or vacant.

Because the VA regards the proposed transfer of the Allen Park Veteran Medical Center property to Ford Motor Land Development Corporation (FMLDC) as a separate undertaking from its earlier action to construct the John D. Dingell VA Medical Center, it is necessary for the VA to again comply with Section 106. In accordance with Section 800.5 of the ACHP regulations, the VA applied the "criteria of adverse effect" to the Proposed Action. Furthermore, the VA has initiated consultation with the Michigan SHPO about the proposed property transfer's effects on the Allen Park Veteran's Hospital historic district.

In a January 12, 2001 letter to the Michigan SHPO, the VA notified the Michigan SHPO that the VA proposed to demolish the buildings and transfer the property to FMLDC (see Appendix B). In this letter the VA stated that because the original 1937 deed of transfer stipulated that if the Federal government ceased using the property as a Veteran's facility it must return the property to the Henry Ford family (now represented by FMLDC) unencumbered and without buildings, there was no option to the proposed demolition of the buildings on the property.

Thus, it is the opinion of the VA that the demolition of the historic buildings on the Allen Park VA Medical Center site and the transfer of the Allen Park VA Medical Center property to the FMLDC will have an adverse effect on the Allen Park VA Medical Center Historic District. The VA has also proposed the following measures to mitigate the adverse effect:

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- Notify the Keeper of the National Register of Historic Places, National Park Service of the destruction of the historic district to have it removed from the list of VA properties eligible for listing;
- Ensure permanent storage at the Detroit VA Medical Center Library of all existing historic documents relating to the site, including all modern and historic photographs, site plans, construction drawings (paper and/or microfiche), pamphlets, brochures, and written historic accounts;
- Allow the local historical society in Allen Park an opportunity to tour the buildings and remove any and all architecturally significant fixtures and elements the society deems worthy of saving for its own curation or future use;
- Work with the Michigan SHPO on the design, wording, and placement of the commemorative flagpole (re-using the existing one, if possible) and plaque, as specified in the Congressional legislation;
- Thirty days prior to demolition, FMLDC will notify the Michigan SHPO of the intention to demolish the structures. This notification will not trigger new rounds of consultations or delays, but is provided as a courtesy; and
- If an archaeological discovery is made during building demolition, in consultation with the Michigan SHPO, VA and FMLDC will ensure that a plan is developed to recover and document information that would otherwise be lost.

A reply from the Michigan SHPO dated March 22, 2001, states that the SHPO is in concurrence with the VA's adverse effect finding of the proposed action. However, the proposed mitigation outlined in the Memorandum of Agreement drafted by the VA is "...inadequate given the significance of this historic resource and the current impossibility to consider alternatives to this adverse effect. We [SHPO] will seek mitigation that is commensurate with the circumstances and the loss of a resource of statewide and national significance." Furthermore, the SHPO will not be able to consider appropriate mitigation until additional comment has been solicited from: the National Trust for Historic Preservation, the Michigan Historic Preservation Network, Preservation Wayne, Detroit Metropolitan Preservation League, Henry Ford Museum/Greenfield Village, the Southeastern MI Council of Governments, Wayne County and other local governments, and historical societies and preservation organizations within the vicinity.

VA subsequently conducted discussions (including two meetings in the Detroit area) with the Michigan SHPO and representatives of the organizations noted above to consider ways in which the VA could minimize or mitigate adverse effects on historic properties. Those discussions thus far have failed to produce an agreement on appropriate mitigation actions. Consequently, by letter dated August 10, 2001, VA advised the Advisory Council on Historic Preservation, pursuant to section 800.7 of the Council's regulations, that VA has been unable to achieve an agreement with the consulting parties regarding appropriate project mitigation and thus was seeking the Council's final comments on the proposed action. Pursuant to the Council's regulations, once the Council renders its final comments, VA would be obligated to "take into account" those comments in reaching its decision on how to proceed with its proposed action.

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In terms of the consequences of the project in accordance with NEPA criteria, the VA assessed the impact of the proposed action to historic properties according to each of the alternatives that are being considered.

No Action

Under the No Action Alternative, the VA determined that no impacts to historic properties would occur because the VA would not transfer the Allen Park VA Medical Center property to the FMLDC but the VA would retain Federal ownership of the property. However, the buildings would continue to suffer from the gradual deterioration of their materials and would constitute an impact as a degradation to a historic property and would pose a health and safety threat.

Proposed Action

Under of the Proposed Action, the VA determined that the demolition of the historic buildings by either implosion or mechanical means on the Allen Park VA Medical Center site and the transfer of the Allen Park VA Medical Center to the FMLDC would constitute an impact. However, VA has determined that even though the impact will constitute an adverse effect under the Section 106 criteria, it will not constitute an impact under NEPA, which will mandate the preparation of an Environmental Impact Statement. This determination is based upon two factors:

- The Allen Park VA Medical Center belongs to the VA's Architectural Set, a thematic multiple property nomination to the National Register of Historic Places, which includes 49 other VA Medical Centers built throughout the U.S. following the same floor plan, campus siting/landscaping, and overall health care design strategy. While the ultimate demolition of the Allen Park VA Medical Center will result in the destruction of the entire historic district, other VA Medical Centers will remain, including the Medical Center at Battle Creek, Michigan; and
- Through its compliance with the requirements of the ACHP regulations implementing Section 106, the VA has proposed several measures to mitigate the impact to the Allen Park VA Medical Center Historic District including the storage of historic documents such as photographs, site plans, construction drawings, and other forms of written information; donation of architecturally significant fixtures and elements to the local historical society; and consultation with the Michigan SHPO on the design, working and placement of a commemorative flagpole and plaque.

VA will continue with and complete the Section 106 consultation process and take appropriate mitigative actions to mitigate the project's adverse effects on the Allen Park VA Medical Center Historic District..

3.5.2 Archaeological Sites

Affected Environment

There are currently no known archaeological sites within the Allen Park VAMC property. Although the Allen Park VA Medical Center has not been subject to a Phase I archaeological identification survey or assessment, it is believed that the property has a low potential for

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prehistoric or historic archaeological resources. A preliminary review of topographic maps for the property conducted by the VA indicated that the environmental setting was not an attractive location for prehistoric activities due to the lack of nearby water and few known archaeological sites in the general vicinity (K. Tupek, pers. comm.). The determination is also based upon a lack of historic usage of the property.

The January 12, 2001 letter to the Michigan SHPO from the VA does not discuss archaeological resources, however, based upon verbal discussions with the VA, it is their opinion that the site does not hold any potential for significant archaeological resources to be affected by the Proposed Action (K. Tupek, pers. comm.).

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No Action

Under the No Action Alternative, there would be no impact to potential archaeological resources because the ground would not be disturbed.

Proposed Action

The January 12, 2001 letter to the Michigan SHPO from the VA does not discuss archaeological resources, however, based upon verbal discussions with the VA, it is their opinion that the site does not hold any potential for significant archaeological resources to be affected by the Proposed Action (K. Tupek, pers. comm.). Consequently, the proposed action would not adversely affect any prehistoric and historic archaeological resources. However, should any prehistoric and historic archaeological resources be discovered during site demolition activities, VA would stop work and report the finding to the Michigan SHPO for further consultation.

The following mitigation actions would be required for the implementation of the Proposed Action, the demolition of the Allen Park VAMC and environmental restoration of the property:

1. Prior to selecting the Implosion Alternative, the VA would have to demonstrate that ground vibration created under this alternative would not have an adverse impact to buildings and other structures in the area.
2. The VA would be required to obtain an NPDES General Construction Permit from the Michigan Department of Environmental Quality.
3. The VA would be required to obtain a Soil Erosion and Sedimentation Control Permit from the City of Allen Park Engineering Department.
4. The VA would be required to utilize BMPs at the property to prevent sedimentation and erosion impacts to site soils and nearby streams
5. The VA would be required to utilize water and other engineering controls to control fugitive dust during demolition operations.
6. The VA would be required to establish an air-monitoring plan to protect on-site workers and the public from potential airborne pathogens such as asbestos and lead.
7. The VA would be required to perform asbestos abatement and removal in Allen Park VAMC facilities in accordance with the requirements of 40 CFR 61 Subpart M.
8. The VA would be required to provide ample public notice to inform the individuals with asthma and other respiratory ailments to take precautions if the implosion demolition alternative is chosen.
9. The VA would be required to remediate chloride-contaminated soils on the property.
10. The VA would be required to resolve the issue of arsenic contamination on the site through an agreement with the Ford Motor Land Development Corporation, such as deed restriction or indemnification agreement, or through further study, or removal or arsenic contaminated soils from the site
11. The VA would be required to dispose of or recycle asbestos and other hazardous materials from the property, facilities, and buildings in accordance with Federal, State and local laws and regulations.
12. The VA would be required to perform Resources Conservation and Recovery Act (RCRA) hazardous waste analysis (Toxicity Characteristic Leachate Procedure – under EPA SW-846, method 1311) to determine if the demolition debris is hazardous waste. If not hazardous the VA would be required to dispose of demolition debris in a landfill approved for disposal of construction and demolition materials. If hazardous, the VA would be required to dispose of demolition debris in a landfill approved for hazardous waste.
13. The VA would be required to develop a site health and safety plan in accordance with regulations issued by the U.S. Occupational Safety and Health Administration (OSHA) and approved by a Certified Industrial Hygienist.
14. The VA would be required to coordinate with the Michigan Department of Transportation and the City of Allen Park to minimize potential traffic congestion due to demolition operations.

15. The VA would be required to provide for continued local outpatient care to veterans in the Allen Park area.
 16. VA would be required to consult with the Advisory Council on Historic Preservation and other appropriate parties pursuant to the procedures of the National Historic Preservations Act's section 106 process. Following the conclusion of that process, VA would be required to comply with any Memorandum of Agreement executed pursuant to that process or, if no agreement is executed, "take into account" the comments of the Advisory Council on Historic Preservation.
-
-

SECTION FIVE

Agency Coordination

Mr. Will Bowman
USDA NRCS
3001 Coolidge Road
Suite 250
East Lansing, MI 48823-6123

Mr. Craig Czarnecki
USFWS
2651 Coolidge Rd.
Suite 101
East Lansing, MI 48823

Endangered Species Specialist
MDNR
Wildlife Division
P.O. Box 30444
Lansing, MI 48909-7944

Mr. Ken Westlake
US EPA Region 5
77 West Jackson Blvd. B-19J
Chicago, IL 60604

Mr. Michael Prochaska
Planning Dept., Wayne County
600 Randolph Street
Suite 323
Detroit, MI 48226

Dir. James Murray
Environmental Dept., Wayne County
415 Clifford Street
7th Floor
Detroit, MI 48226

Mr. Kevin Welch
City Administrator
City of Allen Park
16850 Southfield Road
Allen Park, MI 48101

Mr. Edward Opalewski
Dept. of Building and Engineering
6045 Fenton Avenue
Dearborn Heights, MI 48127

Mr. Robert DeBerardino
Dept. Director
Dept. of Building and Safety
4500 Maple Street
Dearborn, MI 48126

Mr. Charles F. Gill
Senior Health Physicist
United States Nuclear Regulatory
Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

City of Melvindale Planning Commission
3100 Oakwood
Melvindale, MI 48122

Ms. Beth Venf
Environmental Response Division
Dept. of Environmental Quality
38980 West Seven Mile Road
Livonia, MI 48152

Mr. Les Weigum
United States Army Corps of Engineers
Detroit, MI
(313) 226 6752

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Personal Communications

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- Ciotti, John. 2001. Building Official, City of Allen Park with Tom Hay, URS, February 14, 2001
- Kozuh, John. 2001. City Engineer, City of Allen Park with Tom Hay, URS, February 20, 2001
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- Tomyn, Mark. 2001. Engineer, Ford Motor Land Development Corporation with Tom Hay, URS, March 26, 2001

SECTION SEVEN

List of Preparers

Stephen Carruth, URS – Project Manager

Tom Hay, URS – Technical Lead

Maggie O'Connor, URS – Preparer

Jeff Durbin, URS – Cultural Resources

Tom Bodor, URS – Cultural Resources

Angela Chaisson, URS – Peer Review

Colin Vissering, URS – Peer Review

Appendix A
Agency Coordination Letters



January 23, 2001

Mr. Edward Opalewski
Dept. of Building and Engineering
6045 Fenton Avenue
Dearborn Heights, MI 48127

Re: Request for Project Review – Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation

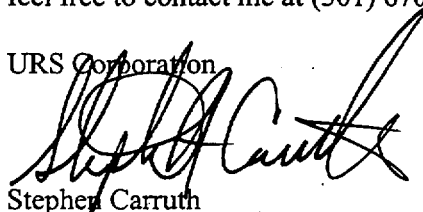
Dear Mr. Opalewski:

URS Corporation (URS) has been retained by the Department of Veterans Affairs (VA) to prepare an Environmental Assessment for the demolition and environmental remediation of the Allen Park VA Medical Center. Following demolition and environmental remediation, the property will be formally transferred to the Ford Motor Land Services Corporation. This action is being taken pursuant to the specific requirements of Public Law 106-419, Section 243. Therefore, the scope of this Environmental Assessment will evaluate the transfer of the property to the Ford Motor Land Services Corporation as the Federal action, which includes demolition of the facilities and infrastructure and environmental remediation of the property. Future use of the property by the Ford Motor Land Services Corporation is not included in the scope of consideration.

The City of Allen Park is located near Detroit in eastern Michigan. The Medical Center is located in the northwestern section of the City of Allen Park, situated between the Southfield Expressway on the west, Interstate 94 on the east, Outer Drive on the south, and Snow Road on the north. The Property is a 39-acre site consisting of 25 buildings that compose the Medical Center. The buildings on the property date from 1938 through the 1980s. Nearly half of the property is characterized as open space with lawns, trees, and paved walkways. Enclosed please find a U.S. Geological Survey 7.5' quadrangle map showing the location of the Allen Park VA Medical Center.

On behalf of the Department of Veterans Affairs, and in compliance with the National Environmental Policy Act of 1969, as amended, URS requests that your agency review the proposed action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions please feel free to contact me at (301) 670-5478.

URS Corporation



Stephen Carruth
Senior Environmental Scientist

Enclosure as noted

cc: Bob Frazier, Department of Veterans Affairs
Colin Vissering, URS Corporation

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780
Fax: 301.869.8728



January 23, 2001

Mr. Robert DeBerardino
Dept. Director
Dept. of Building and Safety
4500 Maple Street
Dearborn, MI 48126

Re: Request for Project Review – Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation

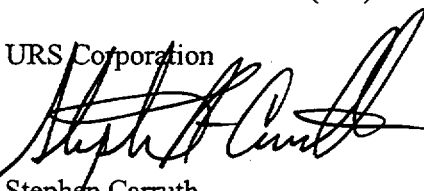
Dear Mr. DeBerardino:

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URS Corporation



Stephen Carruth
Senior Environmental Scientist

Enclosure as noted

cc: Bob Frazier, Department of Veterans Affairs
Colin Vissering, URS Corporation

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780
Fax: 301.869.8728



January 23, 2001

City of Melvindale Planning Commission
3100 Oakwood
Melvindale, MI 48122

Re: Request for Project Review – Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation

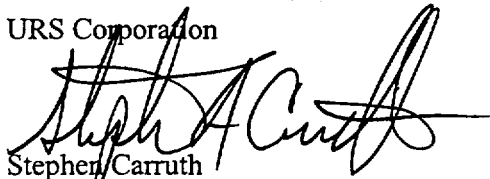
Dear Planning Commission:

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URS Corporation



Stephen Carruth
Senior Environmental Scientist

Enclosure as noted

cc: Bob Frazier, Department of Veterans Affairs
Colin Vissering, URS Corporation

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780
Fax: 301.869.8728



January 23, 2001

Mr. Michael Prochaska
Planning Dept., Wayne County
600 Randolph Street
Suite 323
Detroit, MI 48226

Re: Request for Project Review – Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation

Dear Mr. Prochaska:

URS Corporation (URS) has been retained by the Department of Veterans Affairs (VA) to prepare an Environmental Assessment for the demolition and environmental remediation of the Allen Park VA Medical Center. Following demolition and environmental remediation, the property will be formally transferred to the Ford Motor Land Services Corporation. This action is being taken pursuant to the specific requirements of Public Law 106-419, Section 243. Therefore, the scope of this Environmental Assessment will evaluate the transfer of the property to the Ford Motor Land Services Corporation as the Federal action, which includes demolition of the facilities and infrastructure and environmental remediation of the property. Future use of the property by the Ford Motor Land Services Corporation is not included in the scope of consideration.

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URS Corporation

Stephen Carruth
Senior Environmental Scientist

Enclosure as noted

cc: Bob Frazier, Department of Veterans Affairs
Colin Vissering, URS Corporation

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780
Fax: 301.869.8728



April 2, 2001

Mr. Les Weigum
USACE
Fax (313) 226 2013

Re: Request for Project Review – Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation


Dear Mr. Weigum:

URS Corporation (URS) has been retained by the Department of Veterans Affairs (VA) to prepare an Environmental Assessment for the demolition and environmental remediation of the Allen Park VA Medical Center. Following demolition and environmental remediation, the property will be formally transferred to the Ford Motor Land Services Corporation. This action is being taken pursuant to the specific requirements of Public Law 106-419, Section 243. Therefore, the scope of this Environmental Assessment will evaluate the transfer of the property to the Ford Motor Land Services Corporation as the Federal action, which includes demolition of the facilities and infrastructure and environmental remediation of the property. Future use of the property by the Ford Motor Land Services Corporation is not included in the scope of consideration.

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URS Corporation


Stephen Carruth
Senior Environmental Scientist

Enclosure as noted

cc: Bob Frazier, Department of Veterans Affairs
Colin Vissering, URS Corporation

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780
Fax: 301.869.8728



DEPARTMENT OF THE ARMY
DETROIT DISTRICT, CORPS OF ENGINEERS
BOX 1027
DETROIT, MICHIGAN 48231-1027

IN REPLY REFER TO:

MAY 02 2001

Programs and Project Management Division
Environmental Analysis Branch

Mr. Stephen Carruth
Senior Environmental Scientist
URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, Maryland 20878

Dear Mr. Carruth:

We are writing in response to your April 2, 2001, request for comments on the proposed Demolition of the Allen Park, Michigan, Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation. The following comments are provided pursuant to our civil works/floodplain management program and our regulatory program.

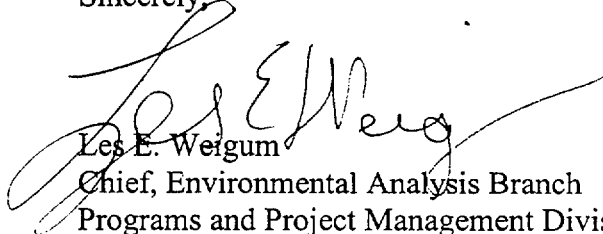
Our civil works program does not include any current or future plans to develop the waterways mentioned in your letter; nor are there any current or proposed studies for the part of Allen Park identified in your letter. Our Flood Plain Manager notes that the City of Allen Park participates in the Regular Phase of the National Flood Insurance Program. Based on the information provided, we have determined that the proposed project is in Zone C, and area of minimal flooding. To ensure full compliance with local and state flood plain management regulations and acts, we recommend that you coordinate the proposed project design with the Michigan Department of Environmental Quality (MDEQ) and with local officials to determine the applicability of a flood plain permit prior to construction.

Our Regulatory Office has reviewed your proposal for regulatory compliance pursuant to Section 10 of the Rivers and Harbors Act of 1899 and Section 404 of the Clean Water Act. No activities under the Corps of Engineers' regulatory jurisdiction may commence without prior Corps' authorization. The project is outside our regulatory jurisdiction and therefore a Department of the Army permit will not be required. Please contact the MDEQ at 517-373-9244 for a determination of state permit requirements. Please note this preliminary review does not represent a comprehensive public interest review such as is conducted during a permit application evaluation.

We appreciate the opportunity to comment upon your project proposal. Any questions regarding the District's civil works/floodplain management program should be directed to Mr.

Charlie Uhlarik, Planning Branch, at 313-226-6753. Questions regarding our regulatory program should be directed to Mr. Robert Tucker, Chief, Enforcement Branch, Regulatory Office, at 313-226-6812 (please reference file # 01-239-000-0). Other environmental review questions may be directed to me or Mr. Paul Allarding at 313-226-7590.

Sincerely,



Les E. Weigum
Chief, Environmental Analysis Branch
Programs and Project Management Division



January 23, 2001

Mr. Kevin Welch
City Administrator
City of Allen Park
16850 Southfield Road
Allen Park, MI 48101

Re: Request for Project Review – Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation

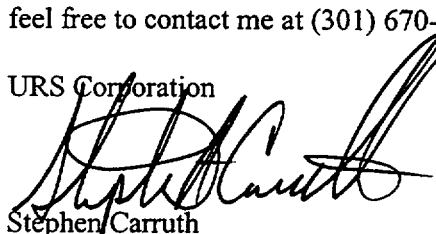
Dear Mr. Welch:

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On behalf of the Department of Veterans Affairs, and in compliance with the National Environmental Policy Act of 1969, as amended, URS requests that your agency review the proposed action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions please feel free to contact me at (301) 670-5478.

URS Corporation



Stephen Carruth
Senior Environmental Scientist

Enclosure as noted

cc: Bob Frazier, Department of Veterans Affairs
Colin Vissering, URS Corporation

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780
Fax: 301.869.8728

City of Allen Park

16850 SOUTHFIELD ROAD
ALLEN PARK, MICHIGAN 48101-2599
PHONE: 928-1400
FAX: 928-0530



KEVIN M. WELCH, MPA
City Administrator

February 16, 2001

Mr. Stephen Carruth
Senior Environmental Scientist
URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878

Re: Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center

Dear Mr. Carruth;

I am in receipt of your letter of January 23, 2001 regarding the demolition of the Veterans Affairs Medical Building. The project has been reviewed and the City of Allen Parks finds no objection to the proposed plan. Please be advised, however, of the need for URS to comply with the City of Allen Park's Building Department in the proper acquirement of permits as they relate to this project.

If I can be of further assistance, please contact me at 313-928-2473.

Sincerely,

Kevin M. Welch
City Administrator

KMW:pls



January 23, 2001

Mr. Craig Czarnecki
USFWS
2651 Coolidge Rd.
Suite 101
East Lansing, MI 48823

Re: Request for Project Review – Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation

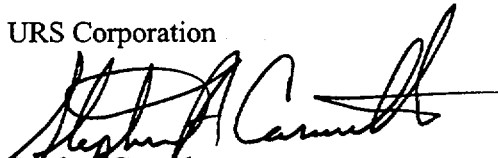
Dear Mr. Czarnecki:

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On behalf of the Department of Veterans Affairs, and in compliance with the National Environmental Policy Act of 1969, as amended, URS requests that your agency review the proposed action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions please feel free to contact me at (301) 670-5478.

URS Corporation



Stephen Carruth
Senior Environmental Scientist

Enclosure as noted

cc: Bob Frazier, Department of Veterans Affairs
Colin Vissering, URS Corporation

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780
Fax: 301.869.8728



IN REPLY REFER TO:

United States Department of the Interior

FISH AND WILDLIFE SERVICE
East Lansing Field Office
2651 Coolidge Road, Suite 101
East Lansing, Michigan 48823-6316

February 7, 2001

Stephen Carruth
URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878

Re: Endangered Species List Request, Proposed Demolition and Environmental Remediation, Allen Park VA Medical Center, Allen Park, Michigan

Dear Mr. Carruth:

Thank you for your January 23, 2001 request for information on endangered, threatened, proposed, or candidate species and critical habitat which may be present within the proposed action area. Your request and this response are made pursuant to Section 7 of the Endangered Species Act of 1973 (the Act), as amended, (87 Stat. 884, 16 U.S.C. 1531 et seq.).

Based on information presently available, there are no endangered, threatened, proposed, or candidate species, or critical habitat occurring within the proposed action area. This presently precludes the need for further action on this project as required under Section 7 of the Act.

We advise, however, that should a species become officially listed or proposed before completion of this project, the Federal action agency for the work would be required to reevaluate its responsibilities under the Act. Further, should new information become available that indicates listed or proposed species may be present and/or affected, consultation should be initiated with the us.

Since threatened and endangered species data is continually updated, new information pertaining to this action may become available which may modify these recommendations. Therefore, we recommend your agency annually request updates to this list.

We appreciate the opportunity to provide these comments. Please refer any questions directly to Tameka Dandridge of this office at (517) 351-8315 or the above address.

Sincerely,

[Signature]
for Craig A. Czarnecki
Field Supervisor

cc: Michigan Department of Natural Resources, Wildlife Division, Lansing, MI
(Attn: Lori Sargent)



January 23, 2001

Endangered Species Specialist
MDNR
Wildlife Division
P.O. Box 30444
Lansing, MI 48909-7944

Re: Request for Project Review – Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation

Dear Endangered Species Specialist:

URS Corporation (URS) has been retained by the Department of Veterans Affairs (VA) to prepare an Environmental Assessment for the demolition and environmental remediation of the Allen Park VA Medical Center. Following demolition and environmental remediation, the property will be formally transferred to the Ford Motor Land Services Corporation. This action is being taken pursuant to the specific requirements of Public Law 106-419, Section 243. Therefore, the scope of this Environmental Assessment will evaluate the transfer of the property to the Ford Motor Land Services Corporation as the Federal action, which includes demolition of the facilities and infrastructure and environmental remediation of the property. Future use of the property by the Ford Motor Land Services Corporation is not included in the scope of consideration.

The City of Allen Park is located near Detroit in eastern Michigan. The Medical Center is located in the northwestern section of the City of Allen Park, situated between the Southfield Expressway on the west, Interstate 94 on the east, Outer Drive on the south, and Snow Road on the north. The Property is a 39-acre site consisting of 25 buildings that compose the Medical Center. The buildings on the property date from 1938 through the 1980s. Nearly half of the property is characterized as open space with lawns, trees, and paved walkways. Enclosed please find a U.S. Geological Survey 7.5' quadrangle map showing the location of the Allen Park VA Medical Center.

On behalf of the Department of Veterans Affairs, and in compliance with the National Environmental Policy Act of 1969, as amended, URS requests that your agency review the proposed action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions please feel free to contact me at (301) 670-5478.

URS Corporation

Stephen Carruth
Senior Environmental Scientist

Enclosure as noted

cc: Bob Frazier, Department of Veterans Affairs
Colin Vissering, URS Corporation

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780
Fax: 301.869.8728

**NATURAL RESOURCES
COMMISSION**

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JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T. MASON BUILDING, PO BOX 30028, LANSING MI 48909-7528

K. L. COOL, Director

REPLY TO:
NATURAL HERITAGE
P.O. BOX 30180
LANSING MI 48909

March 7, 2001

Mr. Stephen Carruth
URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878

RE: proposed demolition

Dear Mr. Carruth:

Your request for information was checked against known localities for special natural features recorded in the Michigan Natural Features Inventory (MNFI) database, which is part of the DNR, Wildlife Division, Natural Heritage Program.

The MNFI database is an ongoing, continuously updated information base, which is the only statewide, comprehensive source of existing data on Michigan's endangered, threatened, or otherwise significant plant and animal species, natural plant communities, and other natural features. Records in the MNFI database indicate that a qualified observer has documented the presence of special natural features at a site. The absence of records in the database for a particular site may mean that the site has not been surveyed. Records are not always up-to-date, and may require verification. In some cases, the only way to obtain a definitive statement on the status of natural features is to have a competent biologist perform a complete field survey.

The presence of threatened or endangered species does not necessarily preclude development but may require alterations in a development plan. If a threatened or endangered species has the potential to be "taken" or "harmed" by a proposed development or activity, an Endangered Species Permit will be required from the Department of Natural Resources, Wildlife Division.

If the project is located on or adjacent to wetlands, inland lakes, or streams, additional permits may be required. Contact the Michigan Department of Environmental Quality, Land and Water Management Division, P.O. Box 30473, Lansing, MI 48909 (517-373-1170).

The following is a summary of the results of the MNFI review of the site(s) in question:

There are no known occurrences of federal- or state-listed endangered, threatened, or otherwise significant species, natural plant communities, or natural features at the location(s) specified:
Wayne County, T2S R10E Section 35.

Thank you for your advance coordination in addressing the protection of Michigan's natural resource heritage. If you have further questions, please call me at 517-373-1263.

Sincerely,

A handwritten signature in cursive script that reads "Lori G. Sargent".

Lori G. Sargent
Endangered Species Specialist
Wildlife Division

LGS:kpg



January 23, 2001

Mr. Will Bowman
USDA NRCS
3001 Coolidge Road
Suite 250
East Lansing, MI 48823-6123

Re: Request for Project Review – Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation

Dear Mr. Bowman:

URS Corporation (URS) has been retained by the Department of Veterans Affairs (VA) to prepare an Environmental Assessment for the demolition and environmental remediation of the Allen Park VA Medical Center. Following demolition and environmental remediation, the property will be formally transferred to the Ford Motor Land Services Corporation. This action is being taken pursuant to the specific requirements of Public Law 106-419, Section 243. Therefore, the scope of this Environmental Assessment will evaluate the transfer of the property to the Ford Motor Land Services Corporation as the Federal action, which includes demolition of the facilities and infrastructure and environmental remediation of the property. Future use of the property by the Ford Motor Land Services Corporation is not included in the scope of consideration.

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On behalf of the Department of Veterans Affairs, and in compliance with the National Environmental Policy Act of 1969, as amended, URS requests that your agency review the proposed action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions please feel free to contact me at (301) 670-5478.

URS Corporation

Stephen Carruth
Senior Environmental Scientist

Enclosure as noted

cc: Bob Frazier, Department of Veterans Affairs
Colin Vissering, URS Corporation

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780
Fax: 301.869.8728



United States
Department of
Agriculture

Natural
Resources
Conservation
Service

Michigan State Office
3001 Coolidge Road, Suite 250
East Lansing, MI 48823-6350
517-324-5270 (t); 517-324-5171 (f)

February 13, 2001

Mr. Stephen Carruth
Senior Environmental Scientist
URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878

RE: Project Review - Demolition of Michigan Department of Veterans Affairs Medical Center, Allen Park, Michigan and Transfer of Property to Ford Motor Land Development Corporation

Dear Mr. Carruth:

We received your letter regarding the demolition of the Veterans Affairs' Medical Center in Allen Park, Michigan. Upon our examination of the area, we have determined that no prime and unique farmland or forestland, on or in the vicinity of the demolition will be adversely affected.

If surface soils are disturbed during demolition, care should be taken to retard the movement of soil materials towards open drains. The Tyre Drain is adjacent to the property and can run the risk of surface water pollution during heavy rains.

We appreciate the opportunity to review and comment on this matter.

Sincerely,

RONALD C. WILLIAMS
State Conservationist

cc:

Albert Jones, ASTC(FO), NRCS, East Lansing, Michigan
William Bowman, Soil Scientist, ICCS Leader, NRCS, East Lansing, Michigan
Steve Olds, DC, NRCS, Ann Arbor, Michigan



January 23, 2001

Mr. Charles F. Gill
Senior Health Physicist
United States Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, IL 60532-4351

Re: Request for Project Review – Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation

Dear Mr. Gill:

URS Corporation (URS) has been retained by the Department of Veterans Affairs (VA) to prepare an Environmental Assessment for the demolition and environmental remediation of the Allen Park VA Medical Center. Following demolition and environmental remediation, the property will be formally transferred to the Ford Motor Land Services Corporation. This action is being taken pursuant to the specific requirements of Public Law 106-419, Section 243. Therefore, the scope of this Environmental Assessment will evaluate the transfer of the property to the Ford Motor Land Services Corporation as the Federal action, which includes demolition of the facilities and infrastructure and environmental remediation of the property. Future use of the property by the Ford Motor Land Services Corporation is not included in the scope of consideration.

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On behalf of the Department of Veterans Affairs, and in compliance with the National Environmental Policy Act of 1969, as amended, URS requests that your agency review the proposed action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions please feel free to contact me at (301) 670-5478.

URS Corporation

Stephen Carruth
Senior Environmental Scientist

Enclosure as noted

cc: Bob Frazier, Department of Veterans Affairs
Colin Vissering, URS Corporation

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780
Fax: 301.869.8728



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
801 WARRENVILLE ROAD
LISLE, ILLINOIS 60532-4351

OCT 30 2000

Steven D. Conatser
Radiation Safety Officer
V.A. Medical Center
4646 John R.
Detroit, MI 48201

Dear Mr. Conatser:

Enclosed is Amendment No. 87 to your NRC Material License No. 21-04234-01 in accordance with your request. Please note that the changes made to your license are printed in **bold font**.

Please note that this amendment authorizes you to release for unrestricted use your buildings at the V.A. Medical Center, Southfield and Outer Drive, Allen Park, Michigan, with the exception of Room 18 of Building 31. This action is based on your request, supported by the results of your close-out surveys attached to your letters dated July 27, 2000, August 11, 2000, September 28, 2000, October 5, 2000, October 12, 2000, and October 23, 2000.

With regards to your proposed close-out of Room 18 of Building 31 in Allen Park, please be advised that we can not authorize you to release this facility for unrestricted use (even by other members of your staff) until we have received and reviewed a copy of the results of your close-out survey. The survey should consist of exposure rate measurements to show that all sources of radioactive material have been removed, and contamination checks of areas where radioactive materials were used or stored. Average radiation levels associated with surface contamination and removable contamination should not exceed those specified in the enclosed decontamination guide. Please submit the following information with your close-out survey:

- a. A diagram of your old facility with survey and wipe test results keyed to specific locations.
- b. The name and qualifications of the person performing the survey.
- c. The date the survey was performed.
- d. The instrument(s) used for exposure rate measurements and for analysis of the wipes.
- e. Background readings.
- f. The date the survey instrument was last calibrated.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers.

S. D. Conatser
Radiation Safety Officer

2

Please be advised that your license expires at the end of the day, in the month, and year stated in the license. Unless your license has been terminated, you must conduct your program involving byproduct materials in accordance with the conditions of your NRC license, representations made in your license application, and NRC regulations. In particular, note that you must:

1. Operate in accordance with NRC regulations 10 CFR Part 19, "Notices, Instructions and Reports to Workers; Inspections," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.
2. Notify NRC, in writing, within 30 days:
 - a. When an authorized user or Radiation Safety Officer permanently discontinues performance of duties under the license or has a name change; or
 - b. When the mailing address listed on the license changes. (No fee is required if the location of byproduct material remains the same.)
3. In accordance with 10 CFR 30.36(b) and/or license condition, notify NRC, promptly, in writing, and request termination of the license when you decide to terminate all activities involving materials authorized under the license.
4. Request and obtain a license amendment before you:
 - a. Receive or use byproduct material for a clinical procedure permitted under Part 35 but not permitted by your license issued pursuant to this Part;
 - b. Permit anyone, except individuals described in 10 CFR 35.13(b), to work as an authorized user under the license;
 - c. Change Radiation Safety Officers;
 - d. Order byproduct material in excess of the amount, or radionuclide, or form different than authorized on the license;
 - e. Add or change the areas of use or address or addresses of use identified in the license application or on the license; or
 - f. Change ownership of your organization.
5. Submit a complete renewal application or termination request at least 30 days before the expiration date of your license. You will receive a reminder notice approximately 90 days before the expiration date. Possession of byproduct material after your license expires is a violation of NRC regulations. A license will not normally be renewed, except on a case-by-case basis, in instances where licensed material has never been possessed or used.

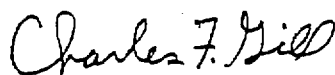
S. D. Conatser
Radiation Safety Officer

3

In addition, please note that NRC Form 313 requires the applicant, by his/her signature, to verify that the applicant understands that all statements contained in the application are true and correct to the best of the applicant's knowledge. The signatory for the application should be the licensee or certifying official rather than a consultant.

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions. Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

Sincerely,



Charles F. Gill
Senior Health Physicist
Materials Licensing Branch

License No. 21-04234-01
Docket No. 030-02050

Enclosure: Amendment No. 87

cc w/encl: National Health Physics Program (115HP/NLR)
Department of Veterans Affairs
Veterans Health Administration
200 Fort Roots Drive
North Little Rock, AK 72114

OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages ► 4

To <i>Steve</i>	From <i>C. Diod/NOIC</i>
Dept./Agency <i>UKS CnG</i>	Phone # <i>630-829-9814</i>
Fax # <i>301-869-8728</i>	Fax # <i>630-515-1259</i>

NSN 7540-01-317-7368

5099-101

GENERAL SERVICES ADMINISTRATION



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
801 WARRENVILLE ROAD
LISLE, ILLINOIS 60532-4351

FEB 06 2001

Steven D. Conatser
Radiation Safety Officer
V.A. Medical Center
4646 John R.
Detroit, MI 48201

Dear Mr. Conatser:

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Please note that this amendment authorizes you to release for unrestricted use your buildings at the V.A. Medical Center, Southfield and Outer Drive, Allen Park, Michigan. This action is based on your request, supported by the results of your close-out surveys attached to your letters dated July 27, 2000, August 11, 2000, September 28, 2000, October 5, 2000, October 12, 2000, October 23, 2000, and November 22, 2000.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers.

Please be advised that your license expires at the end of the day, in the month, and year stated in the license. Unless your license has been terminated, you must conduct your program involving byproduct materials in accordance with the conditions of your NRC license, representations made in your license application, and NRC regulations. In particular, note that you must:

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 - c. Change Radiation Safety Officers;
 - d. Order byproduct material in excess of the amount, or radionuclide, or form different than authorized on the license;
 - e. Add or change the areas of use or address or addresses of use identified in the license application or on the license; or
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S. D. Conatser
Radiation Safety Officer

3

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Sincerely,



Charles F. Gill
Senior Health Physicist
Materials Licensing Branch

License No. 21-04234-01
Docket No. 030-02050

Enclosure: Amendment No. 88

cc w/encl: National Health Physics Program (115HP/NLR)
Department of Veterans Affairs
Veterans Health Administration
200 Fort Roots Drive
North Little Rock, AK 72114

URS

La Niche Niche
(312) 886-455

January 23, 2001

Mr. Ken Westlake
US EPA Region 5
77 West Jackson Blvd.
B-19J
Chicago, IL 60604

Re: Request for Project Review – Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation

Dear Mr. Westlake:

URS Corporation (URS) has been retained by the Department of Veterans Affairs (VA) to prepare an Environmental Assessment for the demolition and environmental remediation of the Allen Park VA Medical Center. Following demolition and environmental remediation, the property will be formally transferred to the Ford Motor Land Services Corporation. This action is being taken pursuant to the specific requirements of Public Law 106-419, Section 243. Therefore, the scope of this Environmental Assessment will evaluate the transfer of the property to the Ford Motor Land Services Corporation as the Federal action, which includes demolition of the facilities and infrastructure and environmental remediation of the property. Future use of the property by the Ford Motor Land Services Corporation is not included in the scope of consideration.

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On behalf of the Department of Veterans Affairs, and in compliance with the National Environmental Policy Act of 1969, as amended, URS requests that your agency review the proposed action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions please feel free to contact me at (301) 670-5478.

URS Corporation


Stephen Carruth
Senior Environmental Scientist

Enclosure as noted

cc: Bob Frazier, Department of Veterans Affairs
Colin Vissering, URS Corporation

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780
Fax: 301.869.8728



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 22 2001

REPLY TO THE ATTENTION OF

B-19J

Mr. Stephen Carruth
Senior Environmental Scientist
URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878

Re: **Request for Project Review - Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation**

Dear Mr. Carruth:

Consistent with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (USEPA) is responding to your letter dated January 23, 2001 requesting scoping comments on the preparation of an environmental assessment (EA) on the above cited project. We acknowledge the constraints of the original transfer of property and find the proposed scope of the EA appropriate.

In order to aid you in the preparation of the above document, we recommend that the following areas be fully addressed and included in your EA:

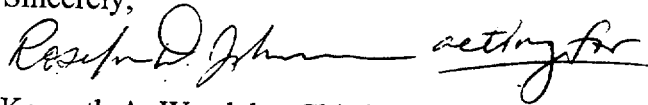
- Location of all current and former underground and above ground storage tanks
- Location of all hazardous waste and hazardous material treatment, storage and disposal areas
- Location and disposition plans for all equipment containing polychlorinated biphenyls (PCBs)
- Delineation of all structures containing asbestos, pursuant to asbestos National Emission Standards for Hazardous Air Pollutants (NESHAP) rules at 40 CFR Subpart M and/or lead-based paint (Note: abatement may be necessary prior to transfer)
- Results of a radiological survey to include all sources of past or present use and storage of radioactive material
- Results of a radon survey of all structures
- Delineation of any and all unexploded ordinances
- Delineation of any unremediated landfills
- Notice of any other hazardous condition(s) known to exist in or adjacent to the property being transferred

We note that this 39 acre site is surround by residential neighborhoods. We suggest several actions for inclusion in the EA. With respect to the building structures, we encourage the maximum amount of deconstruction and reuse of materials. Dust conditions should be minimized at all phases to ensure that the neighborhoods are not subject to asthma triggers as a result of this project. In case implosion is the preferred alternative for building demolition, we are sharing draft demolition health alert procedures developed by Region 5 for the City of Chicago for similar projects. While the city government structures are different, this document will help you identify appropriate officials to assist in protecting the sensitive populations in the surrounding neighborhoods. We are enclosing the procedures with this letter.

We strongly encourage you to fully coordinate with all state and local agencies which have responsibility for protecting human health and the environment to obtain their concurrence and approval as necessary. Transfer should not occur until all unacceptable risks to human health and the environment have been adequately addressed.

Thank you for the opportunity to provide comments. If you have any questions regarding this letter, please contact Janette Marsh of my staff, at 312-886-4856 or by email at marsh.janette@epa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ken Westlake", followed by the words "acting for" written in a smaller, less legible cursive script.

Kenneth A. Westlake, Chief
Environmental Planning and Evaluation Branch
Office of Strategic Environmental Analysis

enclosure

DRAFT - DEMOLITION HEALTH ALERT PROCEDURES (fb) 9/20/2000

Several high-rise Chicago Housing Authority (CHA) buildings will be demolished over the next several months and perhaps years. During previous demolitions, asthmatics, children and the elderly experienced respiratory problems and there appeared to be an increase in asthma related emergency room visits and hospitalizations. Asthma is a serious public health problem in Chicago, excessive dust particles can become a additional asthma trigger in communities that are already over burdened with health, environmental, economic and social problems. The following community notification process is recommended:

1. **When CHA schedules a demolition, a 10 day notice is sent to the Illinois Environmental Protection Agency, Chicago Department of Environmental is also informed. A Fax or E-mail will also be sent to Gregory Washington, Executive Director, Grand Boulevard Federation, Fax No. (773) 548-6622, Phone No. (773) 548-8140, E-Mail, wash@ameritech.net. The Grand Boulevard Federation will take leadership in community capacity building in achieving economic and environmental sustainability.**
2. **A Contact/Fax/E-mail, Phone list must be developed so that a demolition notice can be sent to contacts of community hospitals, agencies and organizations such as Provident, University of Chicago, Michael Reese, and Mercy Hospitals, Charles Hayes Family Health Center, Grand Boulevard Federation, LAC Presidents, Chicago Department of Public Health, City Department of Human Resources, Illinois Department of Children and Family Services, HUD Community Builder, local elementary and high schools, other CPS Resources, churches, Alcohol/Drug Agencies, Battered Women Agencies, Child Abuse and Neglect Agencies, Chicago Park District, YMCA Washington Park, Chicago Asthma Consortium, Chicago Health Corps/Americorps, and the American Lung Association. A contact person and back up person must be identified with phone and fax number and e-mail address and added to the Asthma Educators Asthma Resource Guide. The Resource Guide can be used in other programs and should be updated regularly.**
3. **The Alder woman, Dorothy Tillman must be notified, a contact person must be identified, also a contact from Mayors office. News media should be informed, local radio stations, TV, newspapers. (Resources: GBF staff, Community Asthma Health Educators other volunteers from, Asthma/Environmental Health Task Force, LAC Presidents, CHA residents, to phone agencies etc. to ask for contacts, phone, fax numbers and e-mail addresses). In areas scheduled for demolitions other than the Bronzeville community, the Contact/Fax/E-mail list will need to be amended.**
4. **Identify community locations where residents may be able to relocate temporarily during demolitions, Girls and Boys Club, Churches, possibly empty schools after hours, Chicago Park District, Police Department/CAP leads, other city buildings.**

5. **GBAC/Demolition Sub-Committee should be formed to develop DEMOLITION HEALTH ALERT FLYERS etc. to be distributed to each agency contact and to be distributed in the community where demolition is scheduled.**
6. **Each hospital, clinic agency, organization or community group can send a e-mail or fax and pass out flyers to inform appropriate staff of scheduled demolition, provide information to patients and community residents voluntary steps they should take to reduce asthma related emergency room visits. Perhaps hospitals, pharmacies, Chicago Department of Health can give free asthma inhalers and peak flow meters. Demolition Alert Example:**

DEMOLITION HEALTH ALERT, SEPTEMBER 4, 2000

SATURDAY, SEPTEMBER 4 IS A DEMOLITION HEALTH ALERT DAY!
CHA has given a 10 day notice to Illinois Environmental Protection Agency, Chicago Department of Environment and USEPA that a CHA Demolition will begin on September 4 through September 30, 2000 at the Robert Taylor Home building located at 4700 S. State, during the hours of 10:00am to 9:00pm.

Demolition dust is a respiratory irritant that can affect all of us. Children, the elderly, asthmatics and those with other respiratory and heart conditions are especially vulnerable.

On DEMOLITION HEALTH ALERT DAYS, use this list of voluntary actions to help reduce exposure to dust particles.

HEALTH TIPS

- 1) Make sure you have ample medications and peak flow meters, keep peak flow diary, use them as directed, keep medical appointments.**
- 2) Relocate if possible, stay with relatives or friends, or a public building if identified.**
- 3) Stay indoors as much as possible or limit outdoor activities.**
- 4) When you must go outdoors, cover mouth and nose with a scarf or mask, make sure you can breath comfortably.**
- 5) Keep windows closed.**
- 6) Keep a fan or air conditioner on but do not place fan in a window.**
- 7) Drink plenty of water and rest.**
- 8) know what your asthma triggers are and reduce them.**
- 9) List public buildings identified for relocation.**

- 10) Free medication, peak flow meters, where they will be available.
- 11) Breathmobile location and dates if available.
- 12) Form Support Groups - Asthmatics who have received asthma education through Provident or University of Chicago Hospitals, or who are self educated, help by educating others. Start your own small informal support groups. Educated asthmatics are the greatest resources to the community, who knows better than an asthmatic that "WHEN YOU CAN'T BREATHE, NOTHING ELSE MATTERS".

- 7. The new CEO, Terry Peterson was invited by Illinois Environmental Protection Agency's/ Partners For Clean Air Program to become a Partner of the Ozone Action Day voluntary program. We believe this invitation will be accepted very soon. Although we were advised that most of the CHA demolitions will not take place during summer months, if they occur, the above Demolition Alert procedure will include a Ozone Action Day alert when weather forecasters predict a Ozone Action Day will occur. Ground level ozone is another asthma trigger.

(EXAMPLE, SEE OZONE ACTION DAY ALERT PROCEDURES ATTACHED)



January 23, 2001

Ms. Beth Venf
Environmental Response Division
Dept. of Environmental Quality
38980 West Seven Mile Road
Livonia, MI 48152

Re: Request for Project Review – Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation

Dear Ms. Venf:

URS Corporation (URS) has been retained by the Department of Veterans Affairs (VA) to prepare an Environmental Assessment for the demolition and environmental remediation of the Allen Park VA Medical Center. Following demolition and environmental remediation, the property will be formally transferred to the Ford Motor Land Services Corporation. This action is being taken pursuant to the specific requirements of Public Law 106-419, Section 243. Therefore, the scope of this Environmental Assessment will evaluate the transfer of the property to the Ford Motor Land Services Corporation as the Federal action, which includes demolition of the facilities and infrastructure and environmental remediation of the property. Future use of the property by the Ford Motor Land Services Corporation is not included in the scope of consideration.

The City of Allen Park is located near Detroit in eastern Michigan. The Medical Center is located in the northwestern section of the City of Allen Park, situated between the Southfield Expressway on the west, Interstate 94 on the east, Outer Drive on the south, and Snow Road on the north. The Property is a 39-acre site consisting of 25 buildings that compose the Medical Center. The buildings on the property date from 1938 through the 1980s. Nearly half of the property is characterized as open space with lawns, trees, and paved walkways. Enclosed please find a U.S. Geological Survey 7.5' quadrangle map showing the location of the Allen Park VA Medical Center.

On behalf of the Department of Veterans Affairs, and in compliance with the National Environmental Policy Act of 1969, as amended, URS requests that your agency review the proposed action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions please feel free to contact me at (301) 670-5478.

URS Corporation



Stephen Carruth
Senior Environmental Scientist

Enclosure as noted

cc: Bob Frazier, Department of Veterans Affairs
Colin Vissering, URS Corporation

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780
Fax: 301.869.8728



JOHN ENGLER, Governor
DEPARTMENT OF ENVIRONMENTAL QUALITY

"Better Service for a Better Environment"
HOLLISTER BUILDING, PO BOX 30473, LANSING MI 48909-7973

INTERNET: www.deq.state.mi.us

RUSSELL J. HARDING, Director

REPLY TO:

SE MICHIGAN DISTRICT OFFICE
38980 SEVEN MILE RD
LIVONIA MI 48152-1006

February 12, 2001

Attention: Ms. Patricia Greenberg
URS Corporation
200 Orchard Ridge Drive Ste 101
Gaithersburg, MD 20878

Dear: Ms. Greenberg

SUBJECT: Request for disclosure of official files

Your request dated January 29, 2001 to examine or receive a copy of the following documents is denied.

Description of documents being denied: Allen Park, VA Medical Center

Reason for denial: The public record does not exist under the name given by the requester, or by another name reasonably known to the public body. The SE District office, Environmental Response Division does not have any information or material regarding this site.

Authority for denial: Public Act No. 442 of 1976, as amended, Section 5(4)(b).

Act 442, PA 1976, The Freedom of Information Act, gives you the right to appeal this decision. The section of the Act describing the appeal process is printed below for your information.

"Sec. 10.(1) If a public body makes a final determination to deny all or a portion of a request, the requesting person may do 1 of the following at his or her option:

(a) submit to the head of the public body a written appeal that specifically states the word "appeal" and identifies the reason or reasons for reversal of the denial.

(b) commence an action in the circuit court to compel the public body's disclosure of the public records within 180 days after a public body's final determination to deny a request.

(2) Within 10 days after receiving a written appeal pursuant to subsection (1)(a), the head of a public body shall do 1 of the following:

(a) reverse the disclosure denial.

(b) issue a written notice to the requesting person upholding the disclosure denial.

(c) reverse the disclosure denial in part and issue a written notice to the requesting person upholding the disclosure denial in part.

(d) under unusual circumstances, issue a notice extending for not more than 10 business days the period during which the head of the public body shall respond to the written appeal. The head of a public body shall not issue more than 1 notice of extension for a particular written appeal.

(3) A board or commission that is the head of a public body is not considered to have received a written appeal under subsection (2) until the first regularly scheduled meeting of that board or commission following submission of the written appeal under subsection (1)(a). If the head of the public body fails to respond to a written appeal pursuant to subsection (2), or if the head of the public body upholds all or a portion of the disclosure denial that is the subject of the written appeal, the requesting person may seek judicial review of the nondisclosure by commencing an action in circuit court under subsection (1)(b).

(4) In an action commenced under subsection(1)(b), a court that determines a public record is not exempt from disclosure shall order the public body to cease withholding or to produce all or a portion of a public record wrongfully withheld, regardless of the location of the public record. The circuit court for the county in which the complainant resides or has his principal place of business, or the circuit court for the county in which the public record or an office of the public body is located has venue over the action. The court shall determine the matter de novo and the burden is on the public body to sustain its denial. The court, on its own motion, may view the public record in controversy in private before reaching a decision. Failure to comply with an order of the court may be punished as contempt of court.

(5) An action commenced under this section and an appeal from an action commenced under this section shall be assigned for hearing and trial or for argument at the earliest practicable date and expedited in every way.

(6) If a person asserting the right to inspect, copy, or receive a copy of all or a portion of a public record prevails in an action commenced under this section, the court shall award reasonable attorneys' fees, costs and disbursements. If the person or public body prevails in part, the court may, in its discretion, award all or an appropriate portion of reasonable attorneys' fees, costs, and disbursement. The award shall be assessed against the public body liable for damages under subsection (7).

(7) If the circuit court determines in an action commenced under this section that the public body has arbitrarily and capriciously violated this act by refusal or delay in disclosing or providing copies of a public record, the court shall award, in addition to any action or compensatory damages, punitive damages in the amount of \$500.00 to the person seeking the right to inspect or receive a copy of a public record. The damages shall not be assessed against an individual, but shall be assessed against the next succeeding public body that is not an individual and that kept or maintained the public record as part of its public function."

If you have any questions regarding this letter please contact Lorie Coburn, ERD FOIA Coordinator, At (734) 953-1487 or (734) 953-1525 (fax).



Oladipo Oyinsan, District Supervisor
Environmental Response Division



January 23, 2001

Dir. James Murray
Environmental Dept., Wayne County
415 Clifford Street
7th Floor
Detroit, MI 48226

Re: Request for Project Review – Demolition of Allen Park, Michigan Department of Veterans Affairs Medical Center and Transfer of Property to Ford Motor Land Development Corporation

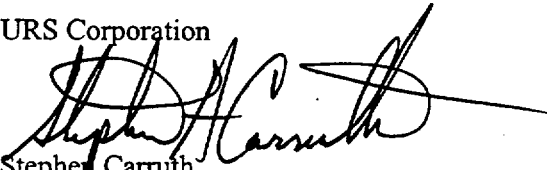
Dear Mr. Murray:

URS Corporation (URS) has been retained by the Department of Veterans Affairs (VA) to prepare an Environmental Assessment for the demolition and environmental remediation of the Allen Park VA Medical Center. Following demolition and environmental remediation, the property will be formally transferred to the Ford Motor Land Services Corporation. This action is being taken pursuant to the specific requirements of Public Law 106-419, Section 243. Therefore, the scope of this Environmental Assessment will evaluate the transfer of the property to the Ford Motor Land Services Corporation as the Federal action, which includes demolition of the facilities and infrastructure and environmental remediation of the property. Future use of the property by the Ford Motor Land Services Corporation is not included in the scope of consideration.

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On behalf of the Department of Veterans Affairs, and in compliance with the National Environmental Policy Act of 1969, as amended, URS requests that your agency review the proposed action and provide comments and any available information on resources under your agency's jurisdiction within the project area. Please direct comments and information directly to me at the letterhead address. If you have any questions please feel free to contact me at (301) 670-5478.

URS Corporation

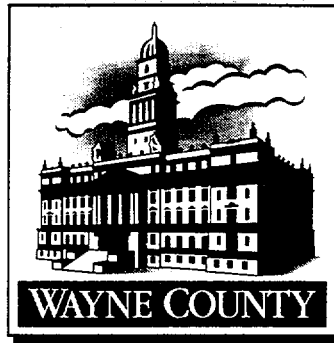


Stephen Carruth
Senior Environmental Scientist

Enclosure as noted

cc: Bob Frazier, Department of Veterans Affairs
Colin Vissering, URS Corporation

URS Corporation
200 Orchard Ridge Drive, Suite 101
Gaithersburg, MD 20878
Tel: 301.258.9780
Fax: 301.869.8728



Edward H. McNamara
County Executive

February 19, 2001

Stephen Carruth
Senior Environmental Scientist
URS Corporation
200 Orchard Ridge Drive
Gaithersburg, MD 20878

SUBJECT: Demolition of VA Medical Center Building, Allen Park, MI

Dear Mr. Carruth:

This letter confirms our telephone conversation regarding the applicability of the National Emission Standards for Hazardous Air Pollutants ("NESHAP") for Asbestos, Code of Federal Regulations, Title 40, Part 61, Subpart M to the project. Please notify the Wayne County Department of Environment, Air Quality Management Division for any asbestos removal from the building and demolition of the building.

Thank you for your prompt consideration of this important matter. Please check the following Internet web sites for additional information regarding federal asbestos NESHAP regulations, notification forms and guidelines for completing the notification:
<http://www.deq.state.mi.us/aqd/ce/asbestosprg.htm>,
<http://www.cis.state.mi.us/bsr/divisions/occ/asbestos/forms.htm>,
<http://www.epa.gov/region04/air/asbestos/asbestos.htm>, and <http://yosemite.epa.gov/r5/r5ard.nsf/>. If you have any further questions regarding this matter, please contact me at (313) 833-3524.

Sincerely,

Philip Kurikesu
Asbestos NESHAP Coordinator

Copy to: Beth Venf, MDEQ, ERD
Patrick Cullen, Supervisor, Compliance & Enforcement Section
Thomas Vincent, Air Quality Inspector

DEPARTMENT OF ENVIRONMENT - AIR QUALITY MANAGEMENT DIVISION
640 TEMPLE, SUITE 700 • DETROIT, MICHIGAN 48201 • 313-833-7030



TRANSPORTATION
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LH-MET-7 (01/01)

STATE OF MICHIGAN



JOHN ENGLER, GOVERNOR

DEPARTMENT OF TRANSPORTATION

TAYLOR TRANSPORTATION SERVICE CENTER
5831 CORTLAND, ALLEN PARK, MICHIGAN 48101

PHONE: 313-563-8770 FAX: 313-563-2378

GREGORY J. ROSINE, DIRECTOR

February 16, 2001

To: Tom Hay

From: Mike Gorman
MDOT

Re: M-39 Reconstruction Schedule

Dear Tom,

Here are some good tentative dates for construction operations on the M-39 project starting in spring of 2001.

March 9 thru June 3: Work on six bridges will commence from Outer Drive north to Mich.
Ave.

June 4 thru July 9: Northbound mainline M-39 closed between Outer Drive and Ford Rd. (M-153) for reconstruction. Northbound M-39 traffic detoured. Two lanes of the northbound service drive will be open from Outer Drive to Ford Rd.

July 10 thru Aug 9: Southbound traffic switched onto newly constructed northbound lanes and southbound M-39 is closed from Ford Rd. south to Outer Dr. for reconstruction. The northbound detour remains in effect. Two lanes of traffic will be maintained on both the northbound and southbound M-39 service drives at all times throughout the life of the project.

Aug 10 - Aug 13: Miscellaneous construction.

Aug. 14: Open both northbound and southbound mainline M-39 to traffic.

From Aug 15, 2001 thru June 01, 2002 (with seasonal shutdown between 11/15/01 and 4/15/02) there will be some service drive work, restoration work, and punch list work being done. Please feel free to contact me throughout this project with any concerns you may have. 313.563.8770

Regards,
Mike Gorman
Asst. Resident Engineer

Appendix B
VA Correspondence to State Historic Preservation Officer



DEPARTMENT OF VETERANS AFFAIRS
Veterans Health Administration
Washington DC 20420

AUG 10 2001

In Reply Refer To: 18/182B

Mr. John Fowler
Executive Director
Advisory Council on Historic Preservation
The Old Post Office Building
1100 Pennsylvania Avenue, NW, Suite 809
Washington, DC 20004

Dear Mr. Fowler:

The purpose of this letter is to notify you and the consulting parties pursuant to section 800.7 of your regulations that after good faith discussions with the consulting parties, the Department of Veterans Affairs (VA) has been unable to achieve agreement upon appropriate mitigation actions regarding its proposed project at the Allen Park VA Medical Center. VA proposes to demolish all structures located on a property known as the Allen Park VA Medical Center, located in the town of Allen Park, and revert title for the site to the Ford Motor Land Development Corporation (FMLDC) pursuant to the mandate of Section 243 of the Veterans Benefits and Health Care Improvement Act of 2000 (P.L.106-419). The National Park Service determined the property eligible for listing on the National Register of Historic Places on January 6, 1981, as part of VA's Architectural Set of 50 Medical Centers throughout the nation.

Public Law 106-419 was passed by Congress and signed into law on November 1, 2000. It mandates that VA enter into an agreement with FMLDC, which is to begin in fiscal year 2001, to demolish all structures on the Allen Park site and remediate the site of contaminants, then revert ownership of the property to FMLDC. VA's proposed action, which is pursuant to this statutory mandate, will constitutes an adverse effect on the Allen Park VA Medical Center Historic District.

VA has consulted for several months with many interested preservation groups in the State and local areas surrounding the VA property. The parties consulted have included Ms. Druscilla Null of your staff, Mr. Brian Conway (State Historic Preservation Officer) (SHPO), staff from the National Trust for Historic Preservation, representatives from several State and local preservation and museum organizations, Congressional staff, the mayor and other town officials from the town of Allen Park, and representatives of veterans groups. While VA is sympathetic to the concerns raised by many of these parties regarding the demolition of the structures on the site, VA is bound by the mandate of the legislation. Consequently, VA's options regarding mitigation actions have been limited.

Following the November 1, 2000, enactment of P.L. 106-419, VA's Historic Preservation Officer notified the Michigan SHPO of VA's proposed action by letter dated January 12, 2001. Transmitted with that letter was a draft Memorandum of Agreement (MOA) prepared by VA suggesting various mitigative actions that VA was willing to consider for the project. The Michigan SHPO responded to that letter agreeing that the proposed VA action constituted an adverse effect but not accepting VA's proposed MOA. By letter dated April 16, 2001, the Advisory Council on Historic Preservation advised VA that the Council would participate in the consultation process.

In an effort to pursue further consultation with the affected parties, VA scheduled a meeting with them at the Allen Park VA Medical Center site for May 24, 2001. Immediately prior to the commencement of that meeting, VA personnel conducted the attending parties on a tour of the site. In lieu of discussing changes to VA's proposed mitigative actions to be included in an MOA, the SPHO submitted a "Resolution" which included a proposal for the creation of a \$2 million preservation fund for the benefit of the cultural heritage of the State of Michigan. Following consultation with VA management, VA's Historic Preservation Officer advised the Michigan SHPO that his proposal for the creation of such a preservation fund was not acceptable to VA. She also inquired of FMLDC if they would be interested in supporting such an arrangement.

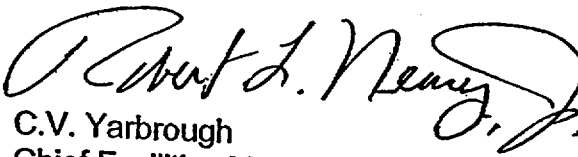
Subsequently, VA's Historic Preservation Officer contacted the affected parties and scheduled another meeting in the Detroit area for July 19, 2001, to discuss further potential mitigation actions. VA requested that the parties submit other potential mitigation actions to VA in advance of the meeting so that VA could consider them prior to the meeting; however, no such proposed actions were received prior to the meeting. At the meeting FMLDC announced that it would not participate in the proposed preservation fund, and the parties were unable to reach agreement on any other proposed mitigation actions. At the conclusion of the meeting, the consulting parties and the representatives of FMLDC indicated to VA that they wished to pursue further discussions outside of the meeting. VA's Historic Preservation Officer agreed to this. Subsequently, FMLDC has advised VA that those discussions have not resulted in any agreements.

It now appears that further consultations will not be productive, and that consequently there is a failure to agree on appropriate measures to mitigate the proposed VA action. Therefore, under Section 800.7 of your regulations, we request that the Advisory Council provide VA with final comments on the undertaking. Given the statutory mandate that VA enter into an agreement with FMLDC beginning in fiscal year 2001, we urge the Council to provide its comments as soon as possible.

Page 3
Mr. John Fowler

VA staff members are available to facilitate the review and consideration of this project by the Council. Please feel free to contact Karen Ronne Tupek, VA's Historic Preservation Officer, at (202) 565-5680 or Mr. John Paglione at the John D. Dingell VA Medical Center in Detroit at (313) 576-1000, extension 3234.

Sincerely,


For: C.V. Yarbrough
Chief Facilities Management Officer

Enclosure

cc:

Druscilla Null
Office of Planning and Review
Advisory Council on Historic Preservation
Old Post Office Building, Suite 809
1100 Pennsylvania Avenue, NW
Washington, DC 20004

Brian D. Conway
State Historic Preservation Officer
State Historic Preservation Office
Michigan Historical Center
717 West Allegan Street
Lansing, MI 48918

Dennis Archambault
Detroit Metropolitan Preservation League
P.O. Box 474
Royal Oak, MI 48068

Jennifer Radcliff
Michigan Historic Preservation Network
P.O. Box 720
Clarkston, MI. 48347-0720

Dan Hendee
Veterans Integrated Service Network 11
P.O. Box 134002
Ann Arbor, MI 48113

John Paglione
Bill Browning
Detroit Veterans Affairs Medical Center
4646 John R
Detroit, MI 48201

Kathy Wendler
Southwest Detroit Business Association
7752 W. Vernor
Detroit, MI 48209

Paul Tait
Southeast Michigan Council of Governments
535 Griswold Street, Suite 300
Detroit, MI 48226

Joseph Paul Griggs, President
Lincoln Park Preservation Alliance
2119 Fort Park
Lincoln Park, MI 48146

Mark Tomy
Mark Woods
Ford Land Development Corporation
550 Town Center Drive, Suite 200
Dearborn, MI 48126

Henry Ford Museum & Greenfield Village
20900 Oakwood Blvd.
Dearborn, MI 48124-4088

Elizabeth Merritt
Deputy General Counsel
National Trust for Historic Preservation
1785 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Michael Matts
National Trust for Historic Preservation
Midwest Office
53 W. Jackson Boulevard
Ste. 350
Chicago, Illinois, 60604

Levon G. King, Mayor
City of Allen Park
16850 Southfield
Allen Park, MI 48101

Katherine Clarsen
James Turner
Preservation Wayne
David Mackenzie House
4735 Cass Avenue
Detroit MI 48202

301 869-8728

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

APR 16 2001

The Honorable Anthony J. Principi
Secretary of Veterans Affairs
Department of Veterans Affairs
810 Vermont Avenue, NW
Washington, DC 20420

Dear Mr. Secretary:

The Council has been notified by the Department of Veterans Affairs (VA), pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800), that the demolition and transition of the Allen Park Veterans Affairs Medical Center will adversely affect the district of historic buildings at that property. We are notifying you that the Council intends to participate in the consultation to consider options for mitigating these adverse effects. We are providing this notice as required by 36 CFR §800.6(a)(1)(iii).

In reaching this decision, the Council determined that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of the regulations is met. As described in further detail in enclosed correspondence to VA's Federal Preservation Officer, the criteria are met both because the timing of consultation on the proposed project raises questions regarding VA's interpretation of its responsibilities under Section 106 and the project will result in the demolition of an entire historic district

Sincerely,



John M. Fowler
Executive Director

Enclosure

Advisory Council On Historic Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

APR 16 2001

Ms. Karen Ronne Tupek
Federal Preservation Officer
Veterans Health Administration
Department of Veterans Affairs
Washington, DC 20420

REF: Demolition and Transfer of Allen Park Veterans Affairs Medical Center
Allen Park, Michigan

Dear Ms. Tupek:

The Council acknowledges receipt of your notification that the referenced undertaking will adversely affect the Allen Park Veterans Affairs Medical Center (VAMC), a property listed on the National Register of Historic Places. We have also recently received a copy of the Michigan State Historic Preservation Officer's (SHPO) letter to you of March 22, wherein he requests that the Council participate in consultation on this action pursuant to Section 106 of the National Historic Preservation Act and the Council's regulations, 36 CFR Part 800. We hereby wish to notify you that the Council will participate in consultation.

It is unclear, based on the material available to us, to what extent the construction of a new VAMC in Detroit and the foreseeable impact on historic properties at Allen Park VAMC received adequate environmental review when proposed in 1986. In that year, the Michigan SHPO concurred that no properties on the site of the proposed new facility were eligible for the National Register of Historic Places. However, we have not been provided with any Section 106 review correspondence from that date documenting either a determination of effect by VA or the views of the Michigan SHPO regarding the potential effects of constructing a new VAMC on the Allen Park facility. Excerpts from a 1986 Environmental Impact Statement (EIS) indicate that consideration of any such effects was essentially "postponed" for later review under Section 106 and was not addressed substantively during compliance with the National Environmental Policy Act (NEPA). Indeed, the EIS did not disclose that reversion of the potential reversion of the Allen Park property to the Ford family would, according to the terms of the reversion clause as described in your letter, necessitate demolition of the historic complex. It states instead that:

... if the VAMC is relocated to Detroit, the Allen Park site no longer will be used by the VA and the site will revert to the Ford family. The ultimate disposition of the various structures

in such a case is unknown and, therefore, impacts to the historic architectural values of the property can not be specifically defined in this EIS.

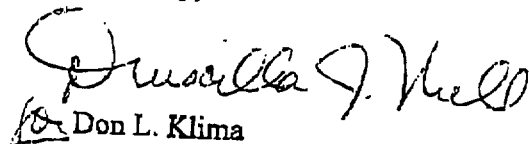
Even if one accepts the appropriateness of addressing the fate of the Allen Park facility at a later date, VA did not initiate Section 106 review once the new Detroit VAMC opened and active discussions were underway regarding the fate of the Allen Park facility. Based on the materials you provided, it appears that such discussions were ongoing from 1997 through 2000, and that demolition and transfer was the VA's official preferred alternative from at least Spring 2000. Yet VA did not initiate Section 106 consultation with the Michigan SHPO when it appeared that maintaining the Allen Park VAMC as a functioning facility was no longer viable. If Section 106 review had occurred in a timely fashion, we could be confident that the historic significance of the property was fully considered in decisionmaking. As it stands, intervening Congressional action has precluded the option of discussing alternatives to demolition during Section 106 review.

Given the questions that this undertaking raises regarding VA's interpretation of its responsibilities under Section 106, we conclude that Criterion 2 of the *Criteria for Council Involvement in Reviewing Individual Section 106 Cases* (Appendix A, 36 CFR Part 800) applies to this undertaking. Criterion 1 is also met, since the entire historic district in question will be demolished. The Council, therefore, will participate in this consultation. We are providing written notification, copy enclosed, of the Council's decision to enter the consultation on this project to Secretary Principi, as required by 36 CFR §800.6(a)(1)(iii).

We share the Michigan SHPO's concerns regarding the need for mitigation measures to be commensurate with the complete loss of this historic district. To help gauge interest in possible mitigation options, we agree with the Michigan SHPO that targeted public outreach efforts are needed, either separate from or integrated as part of NEPA compliance.

Should you have any questions or wish to discuss this matter further, please contact Druscilla Null at (202) 606-8528, or via e-mail at dnull@achp.gov.

Sincerely,


for Don L. Klima
Director
Office of Planning and Review

Enclosure



MICHIGAN DEPARTMENT OF STATE
Candice S. Miller, Secretary of State

Lansing, Michigan 48918-0001

STATE HISTORIC PRESERVATION OFFICE
Michigan Historical Center
717 West Allegan Street
Lansing, Michigan 48918-1800

March 22, 2001

KAREN RONNE TUPEK
FEDERAL PRESERVATION OFFICER
DEPARTMENT OF VETERANS AFFAIRS
VETERANS HEALTH ADMINISTRATION
WASHINGTON, DC 20420

RE: ER-5558 Proposed Demolition of the Allen Park VA Medical Center and Subsequent
Property Reversion, Allen Park, Wayne County (VA)

Dear Ms. Tupek:

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed the above-cited undertaking at the location noted above. Based on the information provided for our review, the State Historic Preservation Officer (SHPO) concurs with the determination of the Department of Veterans Affairs (VA) that the proposed undertaking will have an adverse effect on the Allen Park VA Medical Center, which has been determined to be eligible for listing in the National Register of Historic Places by the Keeper of the National Register (June 6, 1981).

This undertaking meets the criteria of adverse effect because: *the undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association [36 CFR § 800.5(a)(1)]* Specifically, the undertaking will result in:

- Physical destruction of or damage to all or part of the property.

We have reviewed the consultation package submitted with your determination of adverse effect and while it contains substantial information regarding the circumstances of the proposed undertaking, we are dismayed that consultation with the SHPO on the abandonment and demolition of the Allen Park VA Hospital has not occurred earlier in this process. It is clear that decisions regarding this project, including the passage of legislation mandating the demolition of the property, have been years in the making and now have effectively forsaken any meaningful consideration of alternatives to avoid this adverse effect as required under the Section 106 regulations (36 CFR 800).

While we fully recognize the unusual circumstances surrounding this undertaking, particularly with regard to the property reversion clause in the property deed, the manner in which this matter has unfolded is contrary to national preservation policies that have existed for more than thirty years. The VA had numerous opportunities to enter into meaningful consultation with the SHPO concerning this demolition before now. The EIS was completed a full ten years before the opening of the new facility in Detroit and did not deal with the demolition of this facility. Moreover, the Detroit facility has been fully operational since 1996 and you have supplied information indicating that discussion regarding the demolition of the Allen Park facility goes back at least to 1997. Since the 1986 EIS did not address this issue, the SHPO and the Advisory Council on Historic Preservation (ACHP) should have been consulted when it became readily apparent that there were no reasonable alternatives to allow the continued use of the Allen Park facility by the VA. Your consultation information indicates that the VA has communicated with legislators, the community of Allen Park and Ford Motor Land Development

Corporation (FMLDC) regarding the fate of this national register eligible facility for at least the past four years and yet the SHPO or ACHP have never been represented in or informed about any of these discussions.

With our concurrence in your finding of adverse effect and with the lack of alternatives, the only meaningful role the SHPO now has is in the negotiation of appropriate mitigation. The mitigation proposed in your draft Memorandum of Agreement (MOA) is grossly inadequate given the significance of this historic resource and the current impossibility to consider alternatives to this adverse effect. We will seek mitigation that is commensurate with the circumstances and the loss of a resource of statewide and national significance.

We will not be able to consider appropriate mitigation, however, until the VA demonstrates that it has sought a reasonably high level of public comment for this project per 36 CFR § 800.6(a)(4). The information we have received to date indicates that the VA's consultation has been limited to the local community and historical society and FMLDC. This is insufficient for a resource with statewide and national significance. Additional comment should be sought from the National Trust for Historic Preservation, the Michigan Historic Preservation Network, Preservation Wayne, Detroit Metropolitan Preservation League, Henry Ford Museum/Greenfield Village, the Southeastern MI Council of Governments, Wayne County and other local governments, historical societies and preservation organizations within the vicinity. Consultation with Native American tribes should also be demonstrated per 36 CFR § 800.2(c). If you are planning to develop an EA or EIS to address this demolition in compliance with the National Environmental Policy Act (NEPA), we would be happy to consider public comment obtained through NEPA consultation for the purposes of Section 106.

We welcome the opportunity to meet with all of the consulting parties and discuss this matter further. Given the magnitude of this undertaking and the unique issues it presents, we are requesting that the Advisory Council on Historic Preservation participate in consultation.

Please note that the Section 106 process will not conclude according to 36 CFR § 800.6 "Resolution of Adverse Effects" until the consultation process is complete, an MOA is developed, executed and implemented, and the formal comments of the Advisory Council have been received.

If you have any questions, please contact Martha MacFarlane-Faes, Environmental Review Coordinator, at (517) 335-2721. **Please reference our project number in all communication with this office regarding this undertaking.** Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,



Brian D. Conway
State Historic Preservation Officer

BDC:MMF

copy: Drucilla Null, ACHP



MICHIGAN DEPARTMENT OF STATE
Candice S. Miller, Secretary of State

Lansing, Michigan 48918-0001

STATE HISTORIC PRESERVATION OFFICE
Michigan Historical Center
717 West Allegan Street
Lansing, Michigan 48918-1800

March 22, 2001

DRUCILLA NULL
HISTORIC PRESERVATION SPECIALIST
ADVISORY COUNCIL ON HISTORIC PRESERVATION
OLD POST OFFICE BUILDING
1100 PENNSYLVANIA AVENUE NW
SUITE 809
WASHINGTON DC 20004

RE: ER-5558 Proposed Demolition of the Allen Park VA Medical Center and Subsequent
Property Reversion, Allen Park, Wayne County (VA)

Dear Ms. Null:

As you are aware, the Veterans Administration has determined that the above cited project will have an adverse effect on the Allen Park VA Medical Center, which has been determined eligible for listing in the National Register of Historic Places by the Keeper of the National Register (1981). The demolition of this structure has been mandated by recent congressional action, thereby preempting any meaningful opportunity for the consideration of alternatives. Furthermore, a reversionary clause within the property deed requires that should the VA cease to operate the facility, the property would revert to the Ford Motor Land Development Corporation unencumbered. Given these unusual circumstances, the national significance of the resource, and the precedent this case may present for future Section 106 undertakings impacted by federal legislation, we respectfully request the Council's involvement in consultation per 36 CFR 800.6(b)(2).

Thank you for your consideration of this request. If you have any questions, please contact Martha MacFarlane-Faes, Environmental Review Coordinator, at (517) 335-2721. Please reference our project number in all communication with this office regarding this undertaking

Sincerely,

Brian D. Conway
State Historic Preservation Officer

BDC:MMF

Copy: Karen Ronne Tupek, VA ✓

E.O. **11593**

DETERMINATION OF ELIGIBILITY NOTIFICATION
National Register of Historic Places
Heritage Conservation and Recreation Service

Name of property: Veterans Administration Hospital - Allen Park
Location: Allen Park, Wayne County State: MI
Request submitted by: VA Gjore Mollenhoff
Date received: 12/22/80 Additional information received:

Opinion of the State Historic Preservation Officer:

☒ Eligible ☐ Not Eligible ☐ No Response

Comments:

The Secretary of the Interior has determined that this property is:

☒ Eligible ☐ Not Eligible
Applicable criteria: A, C Exception G

Comments: 36 CFR Part 63.3
Determination

☐ Documentation insufficient
(Please see accompanying sheet explaining additional materials required)

for Bonnie Mae Dangel
Keeper of the National Register

Date: 1/6/81

MICHIGAN DEPARTMENT OF STATE
RICHARD H. AUSTIN SECRETARY OF STATE



LANSING
MICHIGAN 48918

December 2, 1980

MICHIGAN HISTORY DIVISION
ADMINISTRATION, ARCHIVES,
HISTORIC SITES, AND PUBLICATIONS
3423 N. Logan Street
517-373-0510
STATE MUSEUM
505 N. Washington Avenue
517-373-0515

Miss Gjore J. Mollenhoff
Federal Agency Representative O8A-1
Veteran's Administration
Office of Construction
810 Vermont Avenue, N.W.
Washington, D. C. 20420

Dear Miss Mollenhoff:

I have reviewed the documentation you submitted supporting the historic designation of the Allen Park Veteran's Administration Medical Center in Dearborn, Michigan. It is my opinion as State Historic Preservation Officer that this property is eligible for listing on the National Register of Historic Places as an historic district as a result of its outstanding architectural qualities and its historic importance in Michigan as a manifestation of the National humanitarian concern for the medical care of America's former soldiers. Although less than fifty years of age, it is my opinion that the district is eligible for listing as a result of its exceptional importance as one of Michigan's finest and largest examples of Institutional Georgian Revival architecture.

Sincerely,

A handwritten signature in cursive script, reading "Martha M. Bigelow".

Martha M. Bigelow
Director, Michigan History Division
and
State Historic Preservation Officer

MMB:tj



DEPARTMENT OF VETERANS AFFAIRS
Veterans Health Administration
Washington DC 20420

January 12, 2001

In Reply Refer To:

Brian D. Conway
State Historic Preservation Officer
State Historic Preservation Office
Michigan Historical Center
717 West Allegan Street
Lansing, MI 48918

Attn: Martha MacFarlane, Environmental Compliance

Dear Mr. Conway:

The Department of Veterans Affairs (VA) plans to turn over to private ownership a property known as the Allen Park VA Medical Center, located in the suburban Allen Park town to the west of downtown Detroit. The property was determined eligible by the National Park Service for listing on the National Register of Historic Places on January 6, 1981. Its significance is derived from its inclusion in the VA's Architectural Set of 50 Medical Centers throughout the nation. The Architectural Set is a thematic, multiple property nomination to the National Register. The properties share a common prototype floor plan, campus siting/landscaping, and overall health care design strategy; the exterior facades differ regionally by architectural style. The Allen Park campus was originally constructed in 1938 in the Georgian Colonial Style. One of the enclosures describes the set.

We take this opportunity to bring you up to date regarding the Allen Park site. Congress passed and the President signed on November 1, 2000, a public law mandating the transfer of the entire medical center campus to the Ford Motor Land Development Corporation (FMLDC). It further states that VA will reimburse the FMLDC two million dollars per year for seven years, up to \$14 million dollars, for their cost to demolish all structures on the property. The only historic reference prescribed in the law is the requirement to place a flagpole and plaque on the site to acknowledge the one-time presence of the VA in caring for veterans.

This action is required by the original title executed by Henry Ford in 1937, transferring the land to the then Veterans Administration, stipulating that the land should always be used for the care of veterans. If VA ceases to need it or use it for that purpose, the land should revert back to the Ford family, now represented by FMLDC. It further requires the land to be returned unencumbered and in its original condition, without buildings. VA no longer has use for the property. The justification for this decision is demonstrated in numerous documents enclosed.

This issue is being considered within the VA organization and discussions are ongoing between local VA officials, VA Headquarters, and the FMLDC. The issues being addressed by the VA and the FMLDC are complex and difficult to explain and understand. With that in mind we want to review some of the events that have brought us to where we are now.

When the Record of Decision, the document which initiated the planning and eventual construction of the new VA Medical Center in downtown Detroit, was signed in 1986, the long range plan for the Allen Park site was for it to house a long term care facility which included a primary care component. During the years from 1986 to 1996 when the Detroit facility was activated, Departmental priorities changed and the funding for new construction was not allocated. In addition, major changes had occurred in how health care in the VA was being provided. We had shifted our focus from inpatient care to outpatient care. Our inpatient census, like most health care facilities, dropped so that beds were available in the replacement facility for the nursing home care function originally intended to remain at Allen Park. The primary care function, always planned as part of the services remaining at the Allen Park site, was implemented to serve Downriver veterans and was activated in June 1996 as a full-time 5 day per week operation. It had been estimated that 5300 veterans who were users of the Allen Park facility lived within the zip codes that surrounded the Allen Park site. And the estimated workload of the clinic at Allen Park would be 26,500 visits per year. However, this anticipated demand for services at the Allen Park location did not materialize. As a result, the primary care clinic at Allen Park was reduced first to a three day per week operation, then to a two day per week operation. This was an internal management decision regarding the deployment of personnel to meet the expanding demand by veterans at the Detroit facility.

After the Detroit VAMC activation a number of uses for the Allen Park site were discussed, including nursing home care, assisted living, residential care, shelter for homeless veterans, as well as the continuation of the primary care function. However, with the exception of primary care, none of these suggested functions was implemented due, in part, to the fact that in order to activate any one of them a facility, staffing, and resources were needed. Renovation of the existing facility is not an option because it was determined it was not cost effective to renovate the existing facility at the Allen Park site. An alternative method for acquiring a facility that was considered was the enhanced use lease legislation. This is legislation that was provided to the VA whereby the VA provides land to a non-VA organization and in turn receives facilities, space, services or money. Therefore, if the enhanced use option is to be exercised, the issue of land ownership becomes a serious issue that requires resolution prior to the VA entering into any agreement with a non-VA entity. This option was foreclosed by the passage and signing of the new law, a copy of which is enclosed.

I hope that this review provides you some background on the Allen Park site. As you can imagine, this site has special significance for the VA. It has been continuously occupied as a site to provide service to Michigan veterans since 1939. And while we are sensitive to the desires of the City of Allen Park and the State of Michigan, we do not want to

make a precipitous decision without considering all of the consequences of such a decision.

It is the opinion of the agency that the undertaking as mandated by law will constitute an adverse effect on the Allen Park VA Medical Center Historic District. Accordingly, we invite the Advisory Council on Historic Preservation an opportunity to participate in the consultation about this project, by way of receiving an identical copy of this package.

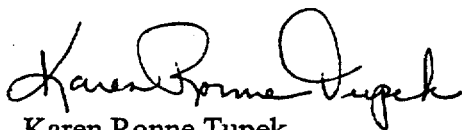
This action is clearly an adverse effect, but also one that is unavoidable and without feasible preservation alternatives. The issue of whether these buildings can be retained appears to be moot. However, through consultation, we can devise appropriate ways of mitigating the adverse effects to the satisfaction of the community.

It would seem that the community welcomes a new use for the land, local control over the property, and the anticipated tax revenue it will generate. In discussions with them, the local historic society does not appear to oppose the demolition of these buildings. The historic society contact is solely interested in touring through the buildings prior to demolition to retrieve architectural elements that have intrinsic historic or architectural value.

To further this discussion, I have taken the liberty of drafting a proposed Memorandum of Agreement for review by all parties. We offer to meet with you to discuss the issues and/or tour the site.

We do appreciate the interest of the public in the issue of the Allen Park site and in supporting our efforts to provide health care services to veterans. We can assure you that the VA will consider any suggestions as they relate to the mitigation of effects at the Allen Park site. Please feel free to contact me at 202-565-5680 or Mr. John Paglione at the John D. Dingell VA Medical Center in Detroit at 313-576-1000 extension 3234.

Sincerely,



Karen Ronne Tupek
Federal Preservation Officer

Enclosed:

- Architectural Set List and Summary Information
- Determination of Eligibility Notification from the National Park Service
- Determination of Eligibility Submission and Information with Map highlighting contributing buildings and boundaries of historic district
- Photo copies of pictures of all buildings on the historic district site
- Historical information about the site
- Public Law authorizing transfer of land out of VA ownership
- Abbreviated version of Public Law pertaining to Allen Park

Project Application to Congress for Funds: "Capital Investment Proposal"
Briefing Paper

Summary of contacts with interested public

Needs Assessment for veterans' nursing home care in Detroit area, part of
decisionmaking process

Draft Memorandum of Agreement, mitigating adverse effects



DEPARTMENT OF VETERANS AFFAIRS
Veterans Health Administration
Washington DC 20420

January 17, 2001

In Reply Refer To:

Don L. Klima, Director
Office of Planning and Review
Advisory Council on Historic Preservation
Old Post Office Building
1100 Pennsylvania Avenue, NW, Suite 809
Washington, DC 20004

Attn: Tom M. McCulloch, historic preservation specialist

Dear ^{Don}~~Mr.~~ Klima:

The Department of Veterans Affairs (VA) plans to turn over to private ownership a property known as the Allen Park VA Medical Center, located in the suburban Allen Park town to the west of downtown Detroit. The property was determined eligible by the National Park Service for listing on the National Register of Historic Places on January 6, 1981, as part of VA's Architectural Set of 50 Medical Centers throughout the nation.

Rather than repeat information contained in the enclosed copy of our letter to the Michigan State Historic Preservation Officer, I will only mention the key points of this land transfer. Congress passed and the President signed on November 1, 2000, a public law mandating the transfer of the entire medical center campus to the Ford Motor Land Development Corporation (FMLDC). It further states that VA will reimburse the FMLDC two million dollars per year for seven years, up to \$14 million dollars, for their cost to demolish all structures on the property.

VA's relinquishing the property to Ford is required by the original title executed by Henry Ford in 1937, transferring the land to the then Veterans Administration, stipulating that the land should always be used for the care of veterans. If VA ceases to need it or use it for that purpose, the land should revert back to the Ford family, now represented by FMLDC. It further requires the land to be returned unencumbered and in its original condition, without buildings. VA no longer has use for the property. The justification for this decision is demonstrated in numerous documents enclosed.

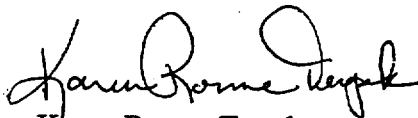
This action is clearly an adverse effect, but also one that is unavoidable and without feasible preservation alternatives. The issue of whether these buildings can be retained appears to be moot. However, through consultation, we can devise appropriate ways of mitigating the adverse effects to the satisfaction of the community, which appears to support the land transfer and building demolition to gain a new use for the land, local control over the property, and the anticipated tax revenue it will generate.

It is the opinion of the VA that the undertaking as mandated by law will constitute an adverse effect on the Allen Park VA Medical Center Historic District. Accordingly, we offer the Advisory Council on Historic Preservation an opportunity to participate in the consultation about this project. A full copy of the package sent to the SHPO is enclosed with this letter.

To further this discussion, I have taken the liberty of drafting a proposed Memorandum of Agreement for review by all parties.

We do appreciate the interest of the public in the issue of the Allen Park site and in supporting our efforts to provide health care services to veterans. We can assure you that the VA will consider any suggestions as they relate to the mitigation of effects at the Allen Park site. Please feel free to contact me at 202-565-5680 or Mr. John Paglione at the John D. Dingell VA Medical Center in Detroit at 313-576-1000 extension 3234.

Sincerely,



Karen Ronne Tupek
Federal Preservation Officer

Enclosed:

- Copy of January 12., 2001, Letter to the Michigan State Historic Preservation Officer
- Architectural Set List and Summary Information
- Determination of Eligibility Notification from the National Park Service
- Determination of Eligibility Submission and Information with Map highlighting contributing buildings and boundaries of historic district
- Photo copies of pictures of all buildings on the historic district site
- Historical information about the site
- Public Law authorizing transfer of land out of VA ownership
- Abbreviated version of Public Law pertaining to Allen Park
- Project Application to Congress for Funds: "Capital Investment Proposal"
- Briefing Paper
- Summary of contacts with interested public
- Needs Assessment for veterans' nursing home care in Detroit area, part of decisionmaking process
- Draft Memorandum of Agreement, mitigating adverse effects

Appendix C
VA Environmental Checklist

ENVIRONMENTAL ASSESSMENT SUMMARY
DEPARTMENT OF VETERANS AFFAIRS

VA FACILITY: Allen Park Medical Center
PROJECT TITLE: Environmental Assessment

OFFICE OF
FACILITIES MANAGEMENT
PROJECT NO: 89-F2001005.00
ASSESSED BY: URS

Project Description:

- ♦ **Section 243 of the Veterans Benefits and Health Care Act of 2000 (PL 106-419) mandated that the Department of Veterans Affairs (VA) demolish the buildings comprising the Allen Park VA Medical Center (VAMC) in Detroit, Michigan. The property is to be abandoned by the VA and returned in open space and remediated condition to the Ford Motor Land Development Corporation under the terms of the original 1937 deed.**

Alternatives Considered:

- ♦ **No Action – Discontinue operation of the outpatient clinic at the Allen Park VAMC and outsource patients to local physicians under contract. All buildings will be vacated and preserved in a “mothball” condition.**
- ♦ **Proposed Action – Demolition of all structures, utilities, and roadways on the Allen Park VAMC parcel. The proposed action includes the remediation required for the removal and disposal of any contaminants present on the parcel, and returning the parcel to open space. Under the Proposed Action, two alternative methods of demolition (implosion and mechanical demolition) of the main hospital building are considered.**

Environmental Impacts:

- ♦ **Temporary noise and air quality impact associated with the demolition and debris removal of the Allen Park VAMC structures.**
- ♦ **Adverse impact to the Allen Park VAMC Historic District, which has been determined eligible for listing in the National Register of Historic Places.**

Mitigative Actions:

- ♦ **If implosion alternative is selected, demonstrate that ground vibrations would not adversely affect structures in the area and provide adequate public notice.**
- ♦ **Obtain an NPDES General Construction Permit and a Soil Erosion and Sedimentation Control Permit; utilize Best Management Practices.**
- ♦ **Control fugitive dust during demolition and establish air-monitoring plan to protect on-site workers and the public.**

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DEPARTMENT OF VETERANS AFFAIRS

VA FACILITY: Allen Park Medical Center
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FACILITIES MANAGEMENT
PROJECT NO: 89-F2001005.00
ASSESSED BY: URS

- ♦ Perform asbestos abatement and removal, as well as proper disposal.
- ♦ Remediate chloride- and arsenic-contaminated soils on the property.
- ♦ Conduct RCRA hazardous waste analysis on demolition debris.
- ♦ Develop Health and Safety Plan.
- ♦ Minimize potential traffic congestion due to demolition operations.
- ♦ Provide continued local outpatient care to veterans in the Allen Park area.

ENVIRONMENTAL ASSESSMENT SUMMARY
DEPARTMENT OF VETERANS AFFAIRS

VA FACILITY: Allen Park Medical Center
PROJECT TITLE: Environmental Assessment

OFFICE OF
FACILITIES MANAGEMENT

PROJECT NO: 89-F2001005.00
ASSESSED BY: URS

STAFF RECOMMENDATION DATE:

- ☐ Defer Action
☒ EA Complete (FONSI)
☐ Supplemental EA Required
☐ EIS Required

IMPACTS

ATTRIBUTES

S	M	MI	N	
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Aesthetics
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Air Quality
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Community Services
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cultural Resources
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Economic Activity
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Floodplains, Wetlands, Coastal Zone, etc.
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Geology and Soils
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hydrology and Water Quality
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Land Use
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Noise
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Potential For Generating Substantial Controversy
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Real Property
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Resident Population
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Solid/Hazardous Waste
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Transportation and Parking
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Utilities
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Vegetation and Wildlife
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	US Environmental Regulations

S = Severe
M = Moderate
MI = Minimal
N = None

ENVIRONMENTAL ASSESSMENT SUMMARY
DEPARTMENT OF VETERANS AFFAIRS

VA FACILITY: Allen Park Medical Center
PROJECT TITLE: Environmental Assessment

OFFICE OF
FACILITIES MANAGEMENT

PROJECT NO: 89-F2001005.00
ASSESSED BY: URS

Aesthetics

Impacts

Attributes

S M MI N

☐ ☐ ☒ ☐

- ☒ Vegetation Removal
- ☒ Landscape Alteration
- ☐ Open Space Altered
- ☐ New Building Construction
- ☒ Adverse
- ☐ Beneficial

- ☐ Building Restoration
- ☐ Utility or Service Area Development
- ☐ Ground Improvement Amenities
- ☐ Long Term
- ☒ Short Term

Comments:

The Proposed Action is anticipated to adversely affect aesthetics immediately on the Allen Park VAMC site during the demolition process. These aesthetic effects would be temporary.

Air Quality

Impacts

Attributes

S M MI N

☐ ☒ ☐ ☐

- ☐ Carbon Monoxide
- ☐ Photochemical Oxidants
- ☐ Nitrogen Oxides
- ☐ Occurs in an Air Quality Maintenance Area (AQMA)
- ☒ Adverse
- ☐ Beneficial

- ☐ Presence of Odors
- ☒ Particulate Emissions
- ☐ Hydrocarbons
- ☐ Sulfur Oxides
- ☒ Temporary
- ☐ Long Term
- ☒ Short Term

Comments:

The Proposed Action would moderately affect air quality due to dust and particulate matter emissions during the demolition process, as well as emissions from heavy equipment required to remove the debris. The implosion demolition alternative may carry a higher risk of particulate

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DEPARTMENT OF VETERANS AFFAIRS

VA FACILITY: Allen Park Medical Center
PROJECT TITLE: Environmental Assessment

OFFICE OF
FACILITIES MANAGEMENT

PROJECT NO: 89-F2001005.00
ASSESSED BY: URS

emission. However, these impacts would be temporary in nature and adequate safety warnings such as public notifications and road closings would ensure public safety during the process.

Community Services

Impacts

Attributes

S M MI N

☐ ☐ ☒ ☐

- ☒ Alteration of Public Facilities
- ☐ Adverse
- ☒ Beneficial

- ☒ Alteration of Public Services
- ☐ Alteration of Public Utilities
- ☒ Long Term
- ☐ Short Term

Comments:

Minimal impact to nationwide veterans' community is anticipated. Patients currently being treated at the Allen Park outpatient facility would receive care (funded by the VA) from the newly constructed Detroit VAMC, or from private physicians in the Allen Park area.

Cultural Resources

Impacts

Attributes

S M MI N

☒ ☐ ☐ ☐

- ☐ National Register Property
- ☒ Eligible Property
- ☐ Architecturally Significant Property
- ☒ Adverse
- ☐ Beneficial

- ☐ Criteria of Adverse Effect
- ☐ Criteria of Effect
- ☒ Action Requires Historic Preservation Officer Coordination
- ☒ Long Term
- ☐ Short Term

Comments:

After coordination with SHPO, several buildings located on the Allen Park VAMC now qualify for listing as a historic district and several of its buildings are eligible for listing on the National

**ENVIRONMENTAL ASSESSMENT SUMMARY
DEPARTMENT OF VETERANS AFFAIRS**

VA FACILITY: Allen Park Medical Center
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**OFFICE OF
FACILITIES MANAGEMENT**

PROJECT NO: 89-F2001005.00
ASSESSED BY: URS

Register of Historic Places. Most recent coordination letters from SHPO indicate that the demolition of these buildings would have an adverse effect upon cultural/historic resources. However, the deed specifically stated if the government ceased to use the parcel, it must be returned to the Henry Ford family, now overseen by the Ford Motor Land Development Corporation, and P.L. 106-419 required demolition of buildings on site prior to the return. Further communication and coordination with SHPO is required.

Economic Activity

Impacts

Attributes

S M MI N

☐ ☒ ☐ ☐

- ☐ Reduction in Wages to Area
- ☐ Additional Wages Will Be Available to Area
- ☐ Adverse
- ☒ Beneficial

- ☒ Local Purchase of Goods and Services
- ☐ Increase or Decrease Direct Work Force
- ☒ Long Term
- ☒ Short-Term

Comments:

The Allen Park VAMC has already been closed. Currently, a small nursing and physician staff operates the outpatient clinic two days a week, and a security staff of 3 to 4 individuals secures the premises on a 24-hour basis. These employees would be offered alternative employment at the Detroit VAMC or comparable positions in nearby locations. The Allen Park VAMC parcel would create tax revenue for the city of Allen Park when it is transferred to private ownership once it has been vacated by the Secretary of the Veterans Administration. Local purchase of goods and services may increase for the tenure of the demolition process with the presence of the demolition crew.

Floodplains, Wetlands, Watersheds, Rivers, Lakes, Coastal Zone, Etc.

Impacts

Attributes

S M MI N

☐ ☐ ☐ ☒

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DEPARTMENT OF VETERANS AFFAIRS

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- ☐ 100 - Year Floodplain
- ☐ 500 - Year Floodplain
- ☐ Critical action (E.O. 11988)
- ☐ Adverse
- ☐ Beneficial

- ☐ Coastal Zone Management Area
- ☐ Critical environmental Area of Wetlands
- ☐ Long Term
- ☐ Short-Term

Comments:

No adverse effects are anticipated for the Proposed Action because the Allen Park VAMC parcel is not located within the 500-year floodplain according to FIRM documentation.

Geology and Soils

Impacts

Attributes

S M MI N

- ☐ ☐ ☒ ☐

- ☐ Rock Excavation
- ☐ Cut/Fill Operations
- ☒ Grading

- ☒ Adverse
- ☐ Beneficial

- ☐ Soil Erosion
- ☒ Soil Compaction
- ☒ Soil Horizon Removal and Mixing
- ☐ Long Term
- ☒ Short Term

Comments:

Although some minor grading, soil compaction, and soil horizon mixing may occur during the demolition process, a negative impact to the soils is not anticipated due to the urban nature of the site.

Hydrology, Water Quality

Impacts

Attributes

S M MI N

- ☐ ☐ ☒ ☐

ENVIRONMENTAL ASSESSMENT SUMMARY
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- ☒ Potential for Erosion and/or Sedimentation (NPDES)
- ☐ Potential for Contamination of Water Regime (From Hazardous/ Toxic Wastes)
- ☒ Adverse
- ☐ Beneficial

- ☒ Alteration/Quality Change of Surface Water Drainage
- ☐ Alteration/Quality Change of Ground Water Regime
- ☐ Long Term
- ☒ Short Term

Comments:

The Allen Park VAMC is located in the Detroit River watershed, which is already characterized by poor water quality due to the area's sedimentation, runoff and pathogens. Drainage for the parcel is characterized as poor due to the area soils, with ponding apparent after rain events. Stormwater and runoff are currently drained through natural features or enter a combined sewer system. Stormwater and drainage conduits would be removed in accordance with returning the property to the open space condition, and drainage patterns for the parcel would rely upon natural features. Prior to demolition, a NPDES General Construction Permit would be required, in conjunction with BMPs to mitigate against any adverse impacts of sedimentation and runoff containing hazardous materials into nearby receiving waters. Therefore, no long-term impacts to hydrology or water quality anticipated from the Proposed Action.

Land Use

Impacts

Attributes

S M MI N
☐ ☐ ☒ ☐

- ☐ Encroachment on Existing Land Use
- ☒ Changes in Land Use Pattern
- ☐ Service and Operational
- ☒ Hospital-Medical Facility
- ☐ Laboratories-Clinics
- ☐ Administrative Facility
- ☐ Adverse
- ☒ Beneficial
- ☐ Sewage-Waste Treatment Facility
- ☒ Utilities
- ☒ Roads and Parking
- ☒ Recreational
- ☒ Ground Improvements
- ☐ Cemetery
- ☒ Long Term
- ☒ Short Term

Comments:

ENVIRONMENTAL ASSESSMENT SUMMARY
DEPARTMENT OF VETERANS AFFAIRS

VA FACILITY: Allen Park Medical Center
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OFFICE OF
FACILITIES MANAGEMENT

PROJECT NO: 89-F2001005.00
ASSESSED BY: URS

In accordance with federal law, the Allen Park VAMC must be returned as open space to the Ford Motor Land Development Corporation. All buildings, roadways, and utility infrastructure will be removed from the parcel, along with the majority of vegetation. Additionally, any contaminated materials or soils would also be removed from the parcel, improving the environmental quality of the Allen Park parcel. Therefore, no adverse impacts to land use are anticipated from the Proposed Action.

Noise

Impacts

Attributes

S M MI N

☐ ☒ ☐ ☐

- ☐ Utility Source Generation
- ☒ Traffic
- ☒ Construction
- ☒ Adverse
- ☐ Beneficial

- ☐ Operational
- ☐ Vibrations
- ☒ Long Term
- ☒ Short Term

Comments:

The activities surrounding the demolition of buildings and debris removal at the Allen Park VAMC site will create moderate noise levels. However, these effects are considered temporary. It is possible that noise levels in a small part of the City of Allen Park may have perceptible long-term impacts to noise levels from the Southfield Expressway as a result of the Proposed Action.

Potential for Generating Substantial controversy

Impacts

Attributes

S M MI N

☐ ☐ ☒ ☐

- ☐ Indirect or Direct Effects on Community Organizations
- ☐ Consistent With Profile of

- ☒ Interpretation of How the Action Will Affect community Response Is In Question

**ENVIRONMENTAL ASSESSMENT SUMMARY
DEPARTMENT OF VETERANS AFFAIRS**

VA FACILITY: Allen Park Medical Center
PROJECT TITLE: Environmental Assessment

**OFFICE OF
FACILITIES MANAGEMENT**

PROJECT NO: 89-F2001005.00
ASSESSED BY: URS

- Community
☐ Adverse
☐ Beneficial

- ☐ Long Term
☐ Short Term

Comments:

Potential adverse reaction from various groups is possible. Some local community representatives have voiced their concerns over veterans having to travel to the Detroit VAMC, and being able to receive adequate medical care within the immediate area. However, these veterans would be allowed to see private physicians in the Allen Park area, which would be funded by the VA.

Real Property

Impacts

Attributes

S M MI N

- ☐ ☒ ☐ ☐

- ☐ Reduction of Land on Tax Rolls
☐ Changes of Land Values
☐ Encroachment on Critical Areas
☐ Acquisition (Donation, Purchase)
☐ Adverse
☒ Beneficial

- ☐ Excess Action
☒ Changes in Ownership
☐ Boundaries
☐ Changes of Easement or Right of Way
☒ Long Term
☐ Short Term

Comments:

The Proposed Action involves the conveyance of the Allen Park VAMC back to the Ford Motor Land Development Corporation as open space, specified in the 1937 deed. This would convey beneficial effects to the City of Allen Park through an increase in land tax revenue.

Resident Population

Impacts

Attributes

S M MI N

- ☐ ☐ ☐ ☒

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- | | |
|--|---|
| <input type="checkbox"/> Addition of Staff to Facility | <input type="checkbox"/> Change in Neighborhood Characteristics |
| <input type="checkbox"/> Alteration of Demographic Characteristics | <input type="checkbox"/> Long Term |
| <input type="checkbox"/> Adverse | <input type="checkbox"/> Short Term |
| <input type="checkbox"/> Beneficial | |

Comments:

The Allen Park VAMC has already been closed. There is no resident population of the site and therefore, no adverse impacts to any such population.

Solid/Hazardous Waste

Impacts

Attributes

S M MI N

☐ ☒ ☐ ☐

- | | |
|--|--|
| <input checked="" type="checkbox"/> Steel Removal/Demolition | <input type="checkbox"/> Construction Site Stockpiling |
| <input type="checkbox"/> Bulk Operational Waste | <input type="checkbox"/> Concrete Debris |
| <input type="checkbox"/> Earth and/or Rock Debris | <input checked="" type="checkbox"/> Hazardous Waste |
| <input type="checkbox"/> Adverse | <input type="checkbox"/> Long Term |
| <input checked="" type="checkbox"/> Beneficial | <input type="checkbox"/> Short Term |

Comments:

All ACMs and other hazardous materials would be disposed of in landfills designated to hold such debris. Because the buildings are now vacant, there is a greater risk to public safety if these structures continue to fall into disrepair and are not demolished. The building debris and any contaminated soils or materials resulting from the demolition would be removed from the site and disposed of in accordance with applicable regulations. Therefore, the Proposed Action would have a beneficial and long-term impact on any threats posed by contaminants or hazardous materials contained at the Allen Park facility.

Transportation and Parking

Impacts

Attributes

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S M MI N
☐ ☐ ☒ ☐

- ☐ Alteration of Public Transportation
- ☐ Alteration of Facility Access Roads
- ☐ Adverse
- ☐ Beneficial

- ☐ Alteration of Existing On-Site Roads or Parking
- ☐ Construction of New Roads or Parking
- ☐ Long Term
- ☒ Short Term

Comments:

All roads located on the Allen Park VAMC would be demolished and removed. However, no roads in the surrounding areas would be affected, except temporarily during demolition. Therefore, a minimal impact to transportation from the Proposed Action is anticipated.

Utilities

Impacts

Attributes

S M MI N
☐ ☐ ☐ ☒

- ☒ Water System, Supply
- ☒ Storm Water Drainage
- ☒ Sewage Treatment
- ☒ Electrical
- ☒ Heat Generation
- ☐ Adverse
- ☐ Beneficial

- ☐ Incinerator
- ☐ Air Conditioning and Refrigeration
- ☐ Excavation
- ☐ Maintenance and Repair
- ☐ Conservation
- ☒ Long Term
- ☐ Short Term

Comments:

All infrastructure and utilities would be removed from the Allen Park VAMC, in accordance with the 1937 deed. However, no adverse impacts to utilities for the surrounding areas from the Proposed Action are anticipated.

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Vegetation and Wildlife

Impacts

Attributes

S M MI N

☐ ☐ ☒ ☐

- ☐ Presence of Endangered or
Threatened Wildlife Species
- ☒ Adverse
- ☐ Beneficial

- ☒ Tree Removal
- ☒ Groundcover Removal
- ☐ Presence of Significant
Wildlife
- ☐ Long Term
- ☒ Short Term

Comments:

Some existing vegetation will be removed from the site, which will be returned to open space. While commons species such as pigeons, doves, squirrels, etc., are known to populate the area, no threatened or endangered species are known to exist on the parcel due to the highly urbanized setting of the Allen Park VAMC. Therefore, no impact from the Proposed Action upon such species is anticipated.

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Sources Consulted: See Section 5, Agency Coordination

FEDERAL REGULATIONS ESTABLISHING ENVIRONMENTAL STANDARDS

- FI - Requires Further Investigation (See Attachment)
- MR- Mitigation Required, Non-Compliance Anticipated
- CA - Compliance Anticipated
- NA - Not Applicable

- NA Executive Order 11988, Floodplain Management (Specify 100-year, Critical Action, or 500 – year)
- CA Executive Order 11990, Protection of Wetlands
- NA Executive Order 11987, Exotic Organisms
- CA Executive Order 12088, Federal Compliance
- NA Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations
- CA Federal Water Pollution Control Act, Sec. 313, as Amended by Clean Water Act of 1977 (33 USC 1323)
- CA Endangered Species Act as Amended (P: 93-205)
- NA Wild and Scenic Rivers Act (16 USC 1274 et seq.)
- CA Noise Control Act of 1972
- CA Safe Drinking Water Act. Sect 1447, (PL 93-523)
- NA Coastal Barrier Resources Act (PL 97-348)
- NA Coastal Zone Management Act (16 USC 1451 et seq., amended by PL 101-508)
- CA EPA Regulations on Discharge of Dredged or Fill material Into Navigable Waters (40 CFR 230)
- CA EPA Regulations on Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- CA EPA Regulations on the National Pollutant Discharge Elimination System (40 CFR 122)
- NA EPA Regulations on Polychlorinated Biphenyls Manufacturing, Processing Distribution in Commerce and Use prohibitions (40 CFT 761)
- CA Advisory Council on Historic Preservation Regulations, Protection of Historic and Cultural Properties (36 CFT 800)