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U.S. DEPARTMENT OF VETERANS AFFAIRS

Finding of No Significant Impact: Seismic Upgrades and Renovations at Puget Sound Health Care System American Lake Division Campus Tacoma, WA

Introduction

The U.S. Department of Veterans Affairs (VA) has prepared an environmental assessment (EA) to identify, analyze, and document the potential environmental impacts associated with proposed seismic upgrades and renovations at the VA Puget Sound Health Care System American Lake Division Campus, located at 9600 Veterans Drive in Tacoma, Washington. The EA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code [U.S.C.] 4321 et seq.), the President's Council on Environmental Quality Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] Parts 1500–1508), Environmental Effects of the Department of Veterans Affairs Actions (38 CFR Part 26), and VA's NEPA Interim Guidance for Projects.

Purpose and Need

The purpose of the Proposed Action is to address existing seismic deficiencies at the VA Puget Sound Health Care System American Lake Division Campus to meet VA seismic design requirements and to provide for renovations to meet regulatory and policy requirements.

The Proposed Action is needed to improve safety and reduce existing seismic risks for Veterans, staff, and visitors, and to ensure the continuity of health care services to Veterans following a seismic event.

Proposed Action

VA proposes to implement a phased program consisting of seismic upgrades and renovation activities to address seismic deficiencies at Buildings 7, 8, 9, 81, and 111. Overall, the majority of the seismic upgrades would occur within the interior confines of each building; however, VA would perform limited upgrades to some building exteriors and upgrade utilities within and leading to each building, as needed.

The proposed renovations would consist of performing improvements to existing campus roads, pathways, intersections, curbs, and opportunistically installing rooftop solar photovoltaic arrays on existing structure(s) or over existing parking area(s).

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The total duration of the Proposed Action would be approximately five to seven years but may be longer depending on funding and coordination with other projects and priorities. By phasing the upgrades over several years VA would ensure continuity of care to Veterans.

Alternatives

The EA examined two alternatives—the Proposed Action and the No Action Alternative—defined as follows:

- **Proposed Action:** VA would implement a phased program consisting of seismic upgrades and renovations over several years to address seismic deficiencies and renovation needs at the existing campus.
- **No Action Alternative:** VA would not implement the Proposed Action. Existing seismic issues and associated seismic risks would persist at the campus. The No Action Alternative does not meet the purpose of and need for the Proposed Action. However, as required by the VA NEPA regulations (38 CFR Part 26), the No Action Alternative is evaluated in VA EAs and provides a benchmark against which VA can compare the impacts of the Proposed Action.

Potential Environmental Effects

The potential environmental effects associated with implementing the alternatives as analyzed in the EA are summarized in Table 1.

Table 1. Summary of Potential Environmental Consequences

Resource	Proposed Action	No Action Alternative
Aesthetics	Less than significant impact	No impact
Air Quality and Climate Change	Less than significant impact	Less than significant impact
Cultural Resources	With mitigation, less than significant impact	No impact
Geology and Soils	Less than significant impact to geology, topography, and soils; beneficial impact to seismic concerns	No impact to geology, topography, and soils. Significant adverse impact to seismic concerns1
Hydrology and Water Quality	Less than significant impact	No impact
Wildlife and Habitat	Less than significant impact	No impact
Noise and Vibration	Less than significant impact	No impact
Land Use	No impact	No impact
Floodplains, Wetlands, and Coastal Zone Management	No impact to floodplains, less than significant impact to wetlands and coastal zone resources	No impact
Socioeconomics	Beneficial impact	No impact
Community Services	Beneficial impact	Significant adverse impact[1]
Solid Waste and Hazardous Materials	Less than significant impact	No impact

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Resource	Proposed Action	No Action Alternative
Transportation and Parking	Beneficial impact	Less than significant impact
Utilities	Beneficial impact	Less than significant impact
Environmental Justice	No impact	No impact

[1] Significant impact due to continuation of seismic concerns and related risks to people and property. These concerns are the need for the Proposed Action.

The project-specific mitigation measures listed in Attachment A are incorporated into the Proposed Action and would ensure the impacts would be less than significant.

Public Comment and Agency Consultation

VA made the Draft EA available for public review by publishing a notice of availability of the Draft EA in the Tacoma News Tribune on October 31, 2021, and November 1, 2021, posting the notice of availability and the Draft EA to the VA Office of Construction & Facilities Management website (www.cfm.va.gov/environmental/index.asp), and notifying stakeholders via email on November 1, 2021. The 30-day public review period ended December 1, 2021. Agencies, Tribes, elected officials, and other stakeholders were notified via email of the availability of the Draft EA.

VA received two comments on the Draft EA. The State of Washington Department of Ecology provided substantive comments regarding hazardous materials and water resources; these comments were addressed in the Final EA. VA also received an acknowledgement response from Snoqualmie Tribe, who stated they had no substantive comments to offer at that time.

VA initiated Section 106 consultation with the Washington State Historic Preservation Officer (SHPO) and Advisory Council on Historic Preservation (ACHP) to resolve the adverse effects of the Proposed Action in a Programmatic Agreement (PA), which was signed by all parties in December 2022.

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Finding of No Significant Impact

Based on the analyses in the EA, which is summarized and incorporated by reference herein, VA concludes that implementing the Proposed Action would not have a significant adverse impact on the quality of the natural or human environment within the meaning of Section 102(2c) of NEPA. Therefore, preparation of an environmental impact statement is not required.

CHRISTINE MODOVSKY

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ATTACHMENT A

Mitigation Measures Incorporated into the Proposed Action

VA would implement the following mitigation measures (from the Programmatic Agreement) as part of the Proposed Action to address potential impacts to cultural resources:

I. GENERAL

a. Consulting parties shall send and accept official notices, comments, requests for additional information and/or documentation, and all other communications required by the PA via email with VA.

b. Time designations shall be in calendar days.

c. For the purposes of the PA, the definitions provided in 36 CFR 800.16(a) through (z) shall apply.

d. VA shall ensure that federal or contractor staff who meet the applicable Secretary of the Interior's (SOI's) Professional Qualification Standards for architectural history, history, archaeology, architecture, and historic architecture (36 CFR 61) participate in the review and implementation of the treatment measures required as part of the PA. In addition, where individual reviews are performed and require adherence to the Professional Qualifications Standards, VA shall ensure that a staff member or contractor who meets the appropriate standard is included in the design process.

e. Annually, within two weeks of the anniversary of the execution of the PA, until it is closed out, expires, or is terminated, VA shall provide all parties to the PA a summary report detailing work undertaken pursuant to its terms. The report shall include any scheduling changes proposed, any problems encountered, and any disputes or objections received in VA's efforts to carry out the terms of the PA.

II. DETERMINATION OF ADVERSE EFFECTS

a. For project actions within the area of potential effects, VA shall assess adverse effects of the proposed design on historic properties in accordance with 36 CFR § 800.5. The design may be for the overall reconfiguration undertaking, a single component or multiple components. Pursuant to 800.5(a)(3), VA shall use a phased process in applying the criteria of adverse effect should designs be submitted as separate components.

b. VA shall submit a 60 % design concept documentation package to all Consulting Parties including its finding of effect.

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i. The package shall include maps, design drawings, photographs, and/or projections sufficient to support VA's finding of effect.

c. Submittal will be via electronic format unless file size is prohibitive. VA will seek measures in project design to avoid and/or minimize any adverse effect on historic properties. This will include complying with the Secretary of the Interior's Standards for Rehabilitation, 36 CFR 67.7, to the extent practicable.

d. If VA determines the Undertaking will not adversely affect historic properties in accordance with 36 CFR § 800.5(b) and the SHPO concurs, VA shall have no further obligations under the PA regarding the built environment.

e. If VA determines the Undertaking will adversely affect historic properties in accordance with 36 CFR § 800.5(d)(2), VA shall consult with Consulting Parties regarding adverse effects to historic properties and measures to avoid, minimize, or mitigate effects in accordance with 36 CFR § 800.6.

i. Consultation may proceed via exchange of emails, letters, discussions over webinar/conference call, and/or in-person at the discretion of VA.

ii. The measures to resolve adverse effects shall include specific timelines to ensure VA's construction schedule can proceed effectively.

iii. A timeline will be developed by VA and Consulting Parties for each of the agreed upon measures to resolve adverse effects.

f. Information about the implementation of measures to resolve adverse effects shall be included in the annual summary report as described in Stipulation II.e.

III. POTENTIAL MITIGATION MEASURES

a. For project actions within the District for which adverse effects on contributing properties cannot be avoided as described in Stipulation III.e, VA will follow guidance in the American Lake Veterans Hospital Preservation Plan (Preservation Plan) to propose potential mitigation measures as described below:

i. VA may complete full Historic American Building Survey/Historic American Engineering Record documentation and the acceptable levels of documentation outlined in VA Directive 7545.

ii. The VA may also determine, in consultation with SHPO and concurring parties, that interpretive activities that engage the public, research that offers new understanding of remaining properties, and/or off-site mitigation that proactively protects other endangered historic properties will be conducted.

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b. VA will notify consulting parties of their proposed mitigation measure(s) either at the time of submittal of 60% design concepts or at a later date and will provide a 30-day period for comment.

c. Should no comments be received within 30 days that result in changes to the mitigation measure(s), no further consultation will be required, and VA will proceed with the proposed action and mitigation measure(s).

d. If VA elects to make changes to the mitigation measure(s) as a result of consulting party comments, VA will notify the consulting parties of the revised measure(s) and allow another 10 days for comment.

e. If the SHPO responds within designated comment periods and does not concur with the mitigation measure(s) that VA proposes for a project action, all parties shall proceed in accordance with Stipulation VIII.

IV. INADVERTENT DISCOVERY PLAN

a. Prior to any project-related ground disturbance associated with the undertaking, which may consist of completing new utility connections, repairs, and maintenance within previously disturbed soils, VA shall create a project-specific inadvertent discovery plan, to be distributed to construction personnel, and signed by a professional archaeologist meeting the secretory of the Interior Professional Standards for Archaeology (36 CFR 61).

b. During demolition and construction activities, should inadvertent or unknown archaeological resources be discovered or unanticipated effects identified, work in the impacted area shall cease and an archaeologist meeting the SOI Professional Qualification Standards (Federal Register Volume 61, No. 119, pg. 33713, 33719, 1977) (SOI qualified archaeologist) will evaluate the finding. If appropriate, Native American tribes and the SHPO will be consulted.

c. If unanticipated or archaeological resources are discovered, VA will:

    i. Ensure the discovery is confirmed, assessed, and recorded by a SOI qualified archaeologist.

    ii. Determine eligibility for listing in the National Register of Historic Places (NRHP), following the criteria of 36 CFR 60.4 and consult with the SHPO on that determination. The SHPO shall have ten (10) calendar days from receipt to provide comments on VA's determination.

d. If VA in consultation with the SHPO, determines that the discovered site is not eligible for listing in the NRHP, then no further action will be required.

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e. If VA, in consultation with the SHPO, determines that the discovered site is eligible for listing in the NRHP, then VA shall further consult with the SHPO on measures to resolve any adverse effects to the historic property.

V. POST-REVIEW DISCOVERIES

a. Buildings, Structures, and/or Objects

i. In the event that unanticipated effects on buildings, structures, and/or objects are found during the implementation of the PA, VA will stop any work that may adversely affect the historic property or that may foreclose opportunities to avoid such adverse effects. VA shall notify the SHPO and make efforts to avoid, minimize or mitigate adverse effects to such properties. VA and the SHPO shall be guided by the steps established in 36 CFR § 800.13(b).

b. Archaeological Resources

i. If deposits are discovered where no on-site monitor is present, VA shall follow the procedures at Stipulation V.a. through V.e. and ensure that these procedures are carried out by or under the direct supervision of a person or persons meeting the Professional Qualification Standards for archeology as described in Stipulation V.b.

c. Human Remains

i. If potential human remains and/or potential funerary objects are identified, VA shall stop construction work within 50 feet of the discovery and:

1. Contact local law enforcement to determine whether the human remains may be involved in a legal investigation or not, consistent with Revised Code of Washington Chapter 68.50.

2. Treat non-Native American remains and objects in a manner consistent with applicable state statutes.

3. Treat discoveries related to Native Americans and Native American lifeways in accordance with the Native American Graves Protection and Repatriation Act (Public Law 101-601, 25 USC 3001 et seq., 104 Stat. 3048).