FINDING OF NO SIGNIFICANT IMPACT
U.S. DEPARTMENT OF VETERANS AFFAIRS
PROPOSED SEISMIC UPGRADE AND SPECIALTY CARE IMPROVEMENTS PROJECTS
FORT HARRISON VA MEDICAL CENTER
3687 VETERANS DRIVE
FORT HARRISON, MONTANA

Introduction

A Final Environmental Assessment (EA), included herein by reference, was prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the U.S. Department of Veterans Affairs' (VA's) proposed Seismic Upgrade and Specialty Care Improvements projects at the Fort Harrison VA Medical Center (VAMC) located at 3687 Veterans Drive in Fort Harrison, Lewis and Clark County, Montana. The EA was prepared in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code 4321 *et seq*.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26).

In 2015, VA began planning seismic upgrades at the Fort Harrison VAMC campus to rectify identified seismic structural deficiencies. The planned upgrades included the construction of a new bed tower building for acute inpatient care services and the seismic retrofitting and renovation of Buildings 141, 150, 154, and 154A. In addition, a new parking structure was planned to compensate for parking that would be eliminated by the bed tower construction. In 2018, VA prepared a NEPA EA and a Finding of No Significant Impact (FONSI) for the proposed seismic upgrades and renovation. However, the planned seismic correction/renovation projects were not constructed.

VA is now renewing its effort to complete the required seismic corrections at the Fort Harrison VAMC campus. The original seismic upgrade projects have been revised and expanded. Based on the revisions and expansions to the scope of the original seismic upgrade projects, VA has prepared a new EA and this new FONSI for the proposed Seismic Upgrade and Specialty Care Improvements projects.

Purpose and Need

The purpose of the Proposed Action is to correct seismic deficiencies at the Fort Harrison VAMC campus and to remodel and expand the retrofitted facilities to accommodate the operational needs of the medical center and enhance Veteran health care services.

Executive Order (EO) 12941 of 1994 requires all federal agencies to develop an inventory of their owned and leased buildings in order to identify and mitigate unacceptable seismic risks to those buildings. EO 13717 of 2016 was issued to establish a Federal Earthquake Risk Management Standard. EO 13717 requires federal agencies to adhere to seismic design requirements of current national building codes and standards and encourages agencies to exceed the minimum required codes and standards to ensure that buildings are fully earthquake resilient.

In compliance with EO 13717, VA issued Directive 7512 to establish a policy for the seismic safety of VA buildings. Under VA Directive 7512, seismic compliance for existing buildings requires adoption of the latest version of the *Standards of Seismic Safety for Existing Federally Owned and Leased Buildings*. For new buildings, VA Directive 7512 requires adoption of the 2015 edition of the International Building Code (IBC). On November 1, 2019, VA released VA Handbook 18-8:

Seismic Design Requirements to help inform facility planning with regard to seismic standards. This guidance was revised May 1, 2020.

The Fort Harrison VAMC is identified on the Federal Emergency Management Agency (FEMA) Earthquake Hazard Map for the Western U.S. as being located within an area near several active seismic faults, with a moderately high potential for ground shaking. Buildings in this earthquake hazard area are subject to the IBC Seismic Design Class C (may experience strong shaking) requirements. VA's Office of Facilities Planning also characterizes Fort Harrison as being located within an area of moderately high seismic activity.

The Proposed Action is needed to ensure the Fort Harrison VAMC campus facilities can provide protection to Veterans, employees, and other building occupants and can maintain health care and administrative operations in Critical and Essential facilities in the event of a major earthquake (VA Directive 7512).

VA's seismic inventory and evaluation efforts required by EOs 12941 and 13717, VA Directive 7512 and VA Handbook 18-8, identified four buildings at the Fort Harrison VAMC campus (Buildings 141, 150, 154 and 154A) and the corridor connecting these buildings as seismically deficient. Building 154 was classified as Seismic Deficiency Category 1 (in danger of collapse) and Category 2 (may not collapse, but may be heavily damaged), Buildings 141 and 150 were classified as Category 3 (may be damaged), and Building 154A was classified as Category 4 (may have non-structural deficiencies). These buildings were all constructed prior to modern seismic codes and do not meet current seismic building standards. As a result, they do not conform to current rules, standards, and design criteria for building seismic structural performance.

The Proposed Action is also needed to correct functional and space deficiencies at the Fort Harrison VAMC, including:

- A number of departmental deficiencies within the Seismic Program project buildings, such as departmental spaces that are too small to meet current space requirements, departments that are not located adjacent to related departments and clinics as required by operational guidance, and the lack of clear patient flow patterns.
- A current boiler plant (Building 171) that does not meet seismic standards, requires repairs/upgrades for safe operation, and is insufficient to heat and cool the proposed expanded facility. In addition, this facility does not include a central chiller plant.
- Operating with a current parking deficit of approximately 50 parking spaces and the deficit would grow with the proposed expansion. In addition, all campus parking is currently provided by large, surface level parking lots, resulting in long distances from some parking spaces to the main hospital entrance.
- Insufficient existing building space at the campus, requiring VA to locate the Helena Medical Care Collections Fund, Network Authorization Office, and Helena Sleep Lab in leased facilities away from the main campus.

1. Description of the Proposed Action and Alternatives

Proposed Action

VA's Proposed Action is to conduct a series of seismic upgrade and improvement projects to correct seismic deficiencies at the Fort Harrison VAMC and to remodel and expand the retrofitted facilities to accommodate the operational needs of the medical center. The Proposed Action includes construction of a new acute inpatient care space through a three-story, approximately 82,600 building gross square feet (BGSF) bed tower building addition on the south side of Building 154; seismic retrofitting of Buildings 141, 150, 154, 154A and the connecting corridor; remodeling approximately 221,800 BGSF of space within these buildings to meet the current and projected

future VAMC operational needs; construction of a new, approximately 15,700 BGSF, two-story, central utility plant (CUP) north of Building 154; construction of an approximately four-story, 660-space parking garage north of Building 154; and infrastructure upgrades.

The Proposed Action construction activities would be conducted in phases over a period of approximately 10 years to minimize campus disruption, support continued campus operations, and minimize the need for of temporary swing space during construction. VA plans to construct the new parking garage and CUP in the first phase of construction. The second phase of construction would include the construction of the acute inpatient care building addition, followed by the sequential seismic retrofitting and renovation of Buildings 141, 150, 154 and 154A. VA is currently in the pre-design phase for the Proposed Action projects. Project design details are not available at this time. VA anticipates that the Proposed Action construction would begin in 2024 and would be completed in 2033.

Alternatives Considered

After identifying the seismic structural deficiencies of Buildings 141, 150, 154 and 154A, VA examined other potential buildings and spaces within the Fort Harrison VAMC campus for relocating the functions of these buildings. No existing suitable space for these services is available at the campus. VA also considered leasing new facilities, acquiring existing off-campus facilities, or contracting out health care services, but found that none of these options were viable. Consequently, VA determined that seismically retrofitting and renovating the four buildings was the only viable and reasonable alternative to meet the purpose and need for the Proposed Action. As part of the seismic retrofit alternative, a new acute inpatient care building is required to maintain inpatient health care services during the retrofitting of the other buildings. Following the completion of the Proposed Action construction activities, this new building would also provide the additional space needed to correct existing operational and space deficiencies.

In a 2018 Project Book pre-design analysis, VA examined potential locations at the Fort Harrison VAMC campus for the new acute inpatient care building. Three possible stand-alone building locations were identified to the north, south, and west of the main hospital building (Building 154). The western stand-alone building option was considered the preferred alternative and was selected for the proposed action within the 2018 EA and FONSI. In 2021, a Draft Concept Report was prepared for the new acute inpatient care building that further evaluated and refined potential building locations. The Draft Concept Report evaluated the new acute inpatient care building as an addition to the north, south, and west sides of Building 154. The analysis found that an approximately 82,600 BGSF, three-story addition on the southern side of Building 154 was the preferred alternative for the new acute inpatient care building.

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

Proposed Action

The Proposed Action includes the construction of a bed tower addition on the south side of Building 154, performing seismic corrections and renovations for Buildings 141, 150, 154 and 154A, constructing a new CUP, constructing a new parking garage, and all appurtenant infrastructure upgrades. The proposed project locations are mostly paved parking lots, maintained grassy areas, and areas near existing buildings within the Fort Harrison VAMC campus.

The primary components of the Proposed Action include:

- Constructing a three-story, approximately 82,600 BGSF addition on the south side of the main hospital building (Building 154). The building addition would 1) allow the acute inpatient care and associated functions to relocate to the new space and continue to provide life-saving medical care while the existing medical center complex is seismically retrofitted; 2) provide departments with the necessary space to expand their operations

to meet current standards; 3) allow departments to reorganize locations within the building, enabling staff and patients to travel more efficiently within the facility and meet current operational guidelines; and 4) allow off-campus departments to relocate to the Fort Harrison VAMC.

- Structurally retrofitting the administration building (Building 141), dietetics building (Building 150), main hospital building (Building 154) and the outpatient building (Building 154A) to correct seismic building code deficiencies. Retrofitting would include the demolition of the interiors of the buildings and the installation of the structural upgrades and new mechanical systems within the building interiors. Following the completion of the upgrades, the building interiors would be redesigned and constructed to meet the current and future anticipated operational needs of the buildings. Approximately 221,800 BGSF would be seismically corrected and renovated.
- Bracing/securing mechanical, electrical, and plumbing utilities within the connecting corridor between Buildings 141, 150, 154 and 154A.
- Constructing a new, approximately 15,700 BGSF, two-story, CUP north of Building 154. The new CUP would include more efficient steam boilers and a chilled water plant sized to meet anticipated heating and cooling demands of the expanded facility.
- Constructing an approximately four-story, 660-space parking garage north of Building 154A. The new parking garage would 1) correct the current parking space deficit at the campus; 2) replace parking spaces lost from the proposed building addition and CUP; and 3) allow more parking spaces, including Americans with Disability Act-accessible parking spaces, to be located closer to the main building entrance.
- Associated infrastructure upgrades to support the proposed development, including the installation, relocation, and removal of campus utilities and roads, as necessary, based on the final design.

No Action Alternative

Under the No Action Alternative, seismic corrections and functional/operational building improvements for the Fort Harrison VAMC campus would not be implemented. VA would continue to use the four Seismic Program buildings (Buildings 141, 150, 154 and 154A) with no seismic upgrades. The buildings would remain structurally deficient and at risk of significant damage or failure from a major seismic event. This alternative would not improve patient, staff, and visitor safety in the event of a major earthquake and would not enable the facility to return to operation quickly in the aftermath of such a seismic event, and thus would not meet the requirements of VA's Seismic Program.

Additionally, functional and space deficiencies would persist at the Fort Harrison VAMC, which would limit VA's ability to provide health care services to regional Veterans consistent with VA's modern standards of care. The No Action Alternative would not meet the purpose of or need for the Proposed Action. However, the No Action Alternative was evaluated in the EA as required under the CEQ regulations; it also provides a benchmark for comparing potential impacts of the Proposed Action.

2. Environmental Analysis

Environmental Consequences

The Final EA concluded that the Proposed Action would result in potential short-term and/or long-term potential impacts as summarized in the table below. All of these potential impacts are less than significant and would be further reduced through careful coordination and implementation of

general best management practices (BMPs); management, minimization, and mitigation measures; and compliance with regulatory requirements.

Summary of Impact Analysis

Resource Area	Proposed Action	No Action
Aesthetics	The Proposed Action would not result in an abrupt change to the visual resources of the area. New project buildings would be constructed in an area that is currently developed and would be consistent with the size and character of the existing campus buildings in the area. Minor, long-term adverse impact.	None
Air Quality	Dust, particulate matter, and construction equipment emissions during construction managed with BMPs. Additional vehicle and stationary equipment emissions during operation. Campus is located within a NAAQS full attainment area. In addition, emissions are anticipated to be below general conformity de minimis levels. Less-than-significant, short-term and long-term adverse impacts.	None
Cultural Resources	Building 141 is a contributing resource to the NRHP-listed Fort Harrison Veteran's Hospital Historic District. The seismic retrofitting/renovation of Building 141 would be conducted only within the interior of the building, which no longer retains historic integrity, and would have no effect on the Historic District. The proposed addition to the south side of Building 154 would likely encroach into the parade ground, which would be an adverse effect to the Historic District; however, the level of effect cannot be determined until the design in completed. VA executed a Programmatic Agreement (PA) under Section 106 of the NHPA with Montana SHPO and ACHP to avoid, minimize, and/or mitigate historic property impacts from the Proposed Action. No significant impact with implementation of the PA stipulations.	None
Geology and Soils	Soil erosion and sedimentation impacts during construction managed with BMPs. Proposed Action would mitigate existing seismic building hazards associated with four main buildings at the campus. Less-than-significant, short-term adverse impact. Significant, long-term beneficial impact.	Four main buildings at the campus would remain structurally deficient and at risk of significant damage from a major seismic event.

Resource Area	Proposed Action	No Action
Hydrology and Water Quality	Construction related stormwater runoff during construction managed through BMPs. The Proposed Action would include system evaluation, design, and construction of improvements to the on-campus stormwater management system to ensure it complies with EISA Section 438 requirements. These would include any required improvements to the existing stormwater detention pond (which is anticipated to receive additional stormwater as a result of the Proposed Action), and other on-campus stormwater management and retention structures (to capture stormwater from the proposed parking garage and CUP development). Less-than-significant, short-term adverse impact.	None
Wildlife and Habitat	Campus does not contain habitat for federally-listed species. Montana does not have a list of state-protected species. Proposed Action construction areas may contain marginal habitat for migratory birds and prairie dogs. Potential impacts to these species during construction would be addressed through BMPs. Minor short-term adverse impact during construction.	None
Noise	Short-term noise impacts during construction managed through BMPs. Minor operational impacts associated with vehicle traffic, HVAC systems, and grounds maintenance, similar to existing noise levels. Less-than-significant, short-term and long-term adverse impact.	None
Land Use	Proposed Action is consistent with existing use of the Fort Harrison VAMC campus and current zoning and is compatible with surrounding land use. No/negligible impact.	None
Floodplains, Wetlands, and Coastal Zone Management	No wetlands or floodplains located on the Fort Harrison VAMC campus or immediately adjacent properties. Campus not located in a designated coastal zone. No impact.	None
Socioeconomics	Short-term local beneficial impact to employment during construction. Significant long-term beneficial socioeconomic impacts by addressing seismic hazards associated with existing campus buildings and providing improved and modernized health care facilities and services to regional Veterans.	Seismically deficient buildings would continue to pose life-safety and VAMC operational risks
Community Services	Proposed Action would not put a significant additional load on local community services. No/negligible adverse impact.	None

Resource Area	Proposed Action	No Action
Solid Waste and Hazardous Materials	Existing project buildings contain asbestos and may contain lead-based paint. Asbestos would be removed prior to interior building demolition/renovation. Interior demolition BMPs to control dust would control potential lead-based paint emissions. Potential impacts from petroleum and hazardous substance handling during construction and operation would be managed through BMPs and regulatory compliance. Less-than-significant, short-term and long-term adverse impacts.	None
Transportation and Parking	Minor short-term adverse impact from construction traffic and temporary loss of parking. A traffic impact study (TIS) found area roads currently operate at a good level of service (LOS A) and would continue to operate at a good LOS with the Proposed Action (LOS A or B). No potential vehicle queueing concerns were identified. Less-than-significant, long-term adverse traffic impact. Additional parking spaces created by the Proposed Action would exceed the anticipated future parking demand and would eliminate the current parking space deficit, a long-term, beneficial parking impact.	The campus would continue to operate with a parking space deficit
Utilities	Proposed Action would result in an increase in the consumption of utilities. Capacity of local utility providers appear to be adequate to support the Proposed Action. Portions of the on-campus sanitary system piping are at or near capacity. Proposed Action would include further system evaluation, and design/construction of targeted sanitary system improvements required to meet projected sanitary discharge from the Proposed Action. Less-than-significant, long-term adverse impact.	None
Environmental Justice	Located in an area with a lower minority population and a lower low-income population than the State of Montana. Proposed Action would have little impact on area residents. Low-income and minority Veterans would benefit from the implementation of the Proposed Action at the Fort Harrison VAMC. Negligible impact.	None

Cumulative Impacts

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

Management, Minimization and Mitigation Measures

VA will include the BMPs; management, minimization and mitigation measures; and regulatory compliance measures summarized in Table 4-1 of the Final EA (attached herein as Appendix A) in the Proposed Action to minimize and maintain adverse effects at less-than-significant levels.

3. Regulations

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

4. Commitment to Implementation

VA affirms its commitment to implement the BMPs; management, minimization and mitigation measures; and regulatory compliance measures identified in the Final EA and this FONSI.

5. Agency and Public Involvement

VA has consulted with appropriate federal, state, and local regulatory agencies, and federally recognized Indian tribes identified as having possible ancestral ties to the Fort Harrison VAMC area. This consultation is documented in the Final EA. Comments and input submitted by regulatory agencies and tribes have been addressed in the Final EA.

VA published and distributed the Draft EA for a 30-day public comment period, as announced by a Notice of Availability published in the Helena Independent Record, a local newspaper of general circulation, on October 17 and 21, 2023. The Draft EA was posted for public review on the VA Office of Construction and Facilities Management Environmental Program website: (https://www.cfm.va.gov/environmental/index.asp). In addition, a hard copy of the Draft EA was made available for public review at the Lewis and Clark Library, located at 120 S. Last Chance Gulch, Helena, MT. VA also emailed notification of the release of the Draft EA to the stakeholders previously contacted during the NEPA scoping and NHPA Section 106 consultation. The notice contained a link to the Draft EA on VA's website and invited stakeholders to provide comments on the document. VA did not receive any agency or public comments on the Draft EA.

6. Finding of No Significant Impact

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

This analysis fulfills the requirements of the NEPA and is consistent with the VA and CEQ regulations implementing the Act. An environmental impact statement is not required.

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Table 4-1 Management, Minimization and Mitigation Measures Incorporated into the Proposed Action

Technical Resource Area	Measure
Aesthetics	Comply with the development standards of the Lewis and Clark County Ordinances (LCCO) and Lewis and Clark County Zoning Regulations, to the extent practicable.
Air Quality	Use appropriate dust suppression methods (such as the use of water, dust, palliative, covers, and suspension of earth moving in high wind conditions) during onsite construction activities.
	Stabilize disturbed area through re-vegetation or mulching if the area would be inactive for several weeks or longer.
	Implement measures to reduce diesel particulate matter emissions from construction equipment, such as reducing idling time and using newer equipment with emissions controls.
	Comply with the federal Clean Air Act as adopted in MTDEQ air quality regulations. Obtain a new or revised MTDEQ Montana Air Quality Permit for the new campus boilers and equipment.
Cultural and Historic Resources	Comply with the stipulations of the executed Programmatic Agreement (PA) to avoid, minimize, and/or mitigate potential adverse effects to historic properties.
	Should potentially historic or culturally significant items be discovered during project construction, the construction contractor would immediately cease work in the area until VA, a qualified archaeologist, the Montana SHPO, and other consulting parties are contacted to properly identify and appropriately treat discovered items in accordance with applicable state and federal laws.
Geology and Soils	Control soil erosion and sedimentation impacts during construction by implementing erosion prevention measures and complying with the MTDEQ-issued Montana Pollutant Discharge Elimination System (MPDES) permit required under the federal Clean Water Act, including the development and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP). The MPDES permit would require stormwater runoff and erosion management using BMPs, such as earth berms, vegetative buffers and filter strips, and spill prevention and management techniques. The construction contractor would implement the sedimentation and erosion control measures specified in the MPDES permit and the SWPPP to protect surface water quality.

Technical Resource Area	Measure
Hydrology and Water Quality	Control soil erosion and sedimentation impacts during construction by complying with the MTDEQ MPDES permit.
	Use low impact development practices, to the extent possible, during the Proposed Action design.
	Ensure Fort Harrison VAMC stormwater infrastructure affected by the Proposed Action is upgraded, as necessary, to accommodate a 100-year stormwater event and all other related VA design criteria and requirements.
	Design and construct stormwater system improvements as needed to comply with the requirements of Energy Independence and Security Act Section 438 with respect to stormwater runoff quantity and characteristics.
Wildlife and Habitat	Use native species to the extent practicable when re-vegetating land disturbed by construction to avoid the potential introduction of non-native or invasive species.
	Conduct vegetation clearing between August 11 and May 14 or conduct a survey for active bird nests prior to clearing. If active nests are discovered, maintain a buffer around the nests until the young birds have fledged.
	Inspect construction areas for active prairie dog burrows prior to ground disturbance. If active prairie dog burrows are discovered, consult with MTFWP to develop a plan to relocate prairie dogs that could be impacted by Proposed Action construction activities.
	Use downward facing outdoor lighting.
Noise	Limit, to the extent possible, exterior construction and associated heavy truck traffic to occur between 7:00 a.m. and 7:00 p.m. on Monday through Friday, and between the hours of 8:00 a.m. and 7:00 p.m. on Saturdays and legal holidays.
	Locate stationary operating equipment as far away from sensitive receptors as possible.
	Shut down noise-generating heavy equipment when it is not needed.
	Maintain equipment per manufacturer's recommendations to minimize noise generation.
	Encourage construction personnel to operate equipment in the quietest manner practicable (such as speed restrictions, retarder brake restrictions, engine speed restrictions).
Land Use	Comply with the applicable Lewis and Clark County zoning regulations and development standards, to the extent practicable.
Wetlands, Floodplains, and Coastal Zone Management	None required.
Socioeconomics	Secure construction areas to prevent unauthorized access by children from nearby residential areas.

Technical Resource Area	Measure
Community Services	None required.
Solid Waste and Hazardous Materials	Comply with applicable federal and state laws governing the use, generation, storage, transportation, and disposal of solid and hazardous materials and medical wastes.
	Conduct UST removals, if necessary, in accordance with MTDEQ requirements, including closure assessment soil sampling. If closure assessment sampling identifies contamination, conduct further investigation and/or remediation, as required by MTDEQ.
	Remove asbestos containing materials (ACMs) in accordance with the federal and state requirements prior to building renovation or interior demolition activities.
	Implement dust control measures during interior demolition/renovation to control possible lead-based paint emissions.
	Register, install, and operate new emergency generator and boiler USTs and ASTs in accordance with Fort Harrison VAMC's Spill Prevention, Control and Countermeasures (SPCC) Plan, and MTDEQ requirements, as applicable and to the extent practicable.
Traffic, Transportation, and Parking	Ensure construction traffic does not adversely affect traffic flow on local roadways. Time construction traffic and select transportation routes to minimize transportation impacts, to the extent practicable. If disruptive construction traffic impacts cannot be avoided, notify Lewis and Clark County Public Works Department (LCCPWD) and the public in advance.
	Ensure debris and/or soil is not deposited on local roadways during the construction activities.
	Monitor for construction traffic road impacts on Williams Street near the campus. Work with LCCPWD to prepare a road mitigation plan, if warranted.
Utilities	Further evaluate the campus sanitary sewer system during project design Phase and design and implement any necessary improvements to accommodate the increased flow associated with the Proposed Action.
	Submit design plans to each utility provider to determine the specific connection/extension requirements and implement the necessary requirements.
	Obtain a modified MTDEQ Public Water System permit, if required.
Environmental Justice	None required.