FINDING OF NO SIGNIFICANT IMPACT
U.S. DEPARTMENT OF VETERANS AFFAIRS
PROPOSED SEISMIC AND FUNCTIONAL IMPROVEMENT PROJECTS
ROSEBURG VA MEDICAL CENTER
913 NW GARDEN VALLEY BOULEVARD
ROSEBURG, OREGON

Introduction

A Final Programmatic Environmental Assessment (PEA), 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 and functional improvement projects at the Roseburg VA Medical Center (Roseburg VAMC) located at 913 NW Garden Valley Boulevard in Roseburg, Douglas County, Oregon. The PEA 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).

VA is proposing a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the Roseburg VAMC campus, including construction of a new building (Building 100) to replace the function of Building 1. In addition, VA plans to transfer approximately 14 acres of the campus to the State of Oregon for the future development of a State Veterans Home (domiciliary or nursing home for Veterans). VA is currently in the preliminary, pre-design phase for the proposed seismic and functional improvement projects.

The PEA evaluated the potential environmental impacts of several proposed seismic and functional improvement projects being considered for the Roseburg VAMC campus to complete a comprehensive cumulative effects analysis. VA will review the PEA prior to implementing each proposed project, once additional details for that project are available. Where the impacts of the proposed project are identified and analyzed within the Final PEA, no further NEPA analysis will be needed or undertaken. If the impacts of the proposed project have not been evaluated within the Final PEA, VA will perform supplemental, tiered NEPA analyses, if necessary, to complete the evaluation of the potential effects of the proposed project. It is anticipated that supplemental NEPA analysis will be required for the future disposal of Building 1 once vacated, as the plans for this building are unknown at this time. In addition, supplemental NEPA analysis may be necessary for the Oregon Department of Veterans' Affairs' (ODVA's) future development of the State Veterans Home.

Purpose and Need

The purpose of the Proposed Action is to correct seismic, functional, and building size deficiencies at the Roseburg VAMC campus to meet the current and anticipated operational needs of the medical center and to enhance Veteran health care services. The Proposed Action would also provide land adjacent to the Roseburg VAMC to the State of Oregon for the future development of a State Veterans Home.

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 and requires federal agencies to adhere to seismic design requirements of current

national building codes and standards. EO 13717 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 Roseburg 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 high potential for ground shaking. Buildings in this earthquake hazard area are subject to the IBC Seismic Design Class D (may experience strong shaking) requirements. VA's Office of Facilities Planning also characterizes the Roseburg VAMC as being located within an area of high seismic activity.

The Proposed Action is needed to ensure the Roseburg 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 as required by EOs 12941 and 13717, VA Directive 7512, and VA Handbook 18-8, identified seven buildings at the Roseburg VAMC campus as seismically deficient (Buildings 1, 2, 3, 11, 13, 16, and 17). These buildings, all built in the 1930s, were 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, and are at risk for significant damage or failure from a seismic event. VA proposes to seismically retrofit and renovate Building 3, built in 1933 as nurses' quarters and currently used as administrative space, as a separate project. The proposed retrofit and renovation of Building 3 was previously addressed through a separate NEPA analysis (categorical exclusion). The remaining six seismically deficient buildings (Buildings 1, 2, 11, 13, 16, and 17) are addressed as part of this Proposed Action.

The Proposed Action is also needed to correct functional and space deficiencies at the Roseburg VAMC. Specifically, facility condition assessments of the Roseburg VAMC campus identified several significant facility condition deficiencies. The two primary campus buildings, Buildings 1 and 2, were constructed in 1933 and do not meet VA's modern sizing, layout functionality and other related standards for Veteran health care. Additionally, some health care department spaces within the buildings are undersized. Notably Building 1 is not configured to support required critical department adjacencies and has insufficient space for private patient rooms. VA estimates Building 1 is approximately 40,000 building gross square feet (BGSF) too small to meet the space requirements of VA's modern health care model. In addition, the Roseburg VAMC does not have a sufficient number of Community Living Center (CLC) beds. The Roseburg VAMC currently maintains 55 CLC beds; VA estimates 56 additional CLC beds are needed at the campus.

The Proposed Action is further needed to establish a State Veterans Home in Roseburg. Oregon Revised Statute 408.385 requires ODVA to establish a State Veterans Home in Roseburg. VA and the ODVA have identified land at the Roseburg VAMC campus as the preferred location for the State Veterans Home. ODVA may seek VA funding for up to 65% of the construction costs for the State Veterans Home but must hold title to the land prior to receiving funding.

1. Description of the Proposed Action and Alternatives

Proposed Action

VA's Proposed Action includes a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the campus. The Proposed Action includes the construction of a new approximately 165,000 BGSF building (Building 100) with associated parking to replace the functions currently within Building 1 (approximately 126,500 BGSF); seismic retrofitting/renovating Buildings 2, 11, 13, and 16; renovating/additions to three buildings; demolishing five buildings totaling approximately 21,000 BGSF; existing parking lot modifications; and associated roadway, infrastructure, and utility upgrades. In addition, the Proposed Action includes the transfer of approximately 14 acres of the campus to the State of Oregon for the future development of a State Veterans Home.

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 temporary swing space during construction. VA is currently in the preliminary, pre-design phase for the Proposed Action projects, and project design details are not yet available. VA anticipates that Proposed Action construction could begin in 2024 and could be completed as early as 2033. VA anticipates that the seismic retrofitting and renovation of Buildings 11, 13 and 16 could begin as early as 2026 and could be completed in 2027; Building 100 construction could begin in 2027 and could be completed in 2029; and the seismic retrofitting and renovation of Building 2 could begin in 2029 and could be completed in 2030. Some swing space would be provided by the existing campus buildings, but VA assumes that temporary trailers or modular buildings would also be installed on the Roseburg VAMC campus during construction to accommodate campus operations. VA estimates Building 1 could be vacated and available for transfer, reuse, or disposal after 2030. VA anticipates transferring the 14-acre area to the State of Oregon by 2026. Design and construction of the State Veterans Home would be conducted by ODVA, subject to the availability of funding. VA projects the State Veterans Home could be constructed between 2030 and 2033.

Alternatives Considered

After identifying the seismic structural, functional, and size deficiencies of Buildings 1 and 2, VA examined other potential buildings and spaces within the Roseburg 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 (see Section 2.5). Consequently, VA determined that construction a new, larger building (Building 100) to replace Building 1 and seismically retrofitting and renovating Building 2 was the only viable and reasonable alternative to meet the purpose and need for the Proposed Action. The new, larger main hospital building (Building 100) is required to maintain existing health care services at the campus during Proposed Action construction and is needed to address the existing Building 1 space deficiency. Once the existing functions within Building 1 are relocated to Building 100, the vacated Building 1 may be used to provide temporary swing space for Building 2 functions while Building 2 is seismically retrofitted and renovated.

Once it was determined that construction of a new main hospital building at the Roseburg VAMC campus was the only viable alternative, VA examined various locations at the campus for construction of the building. VA initially identified the Rose Garden north of Building 1AC as the preferred location for the new main hospital building. However, further evaluation of this alternative found that the Rose Garden did not provide adequate space for a new hospital building and associated required parking. Consequently, VA re-evaluated the campus and selected the unimproved, grassy area east of the Ellipse as the new preferred location for the new main

hospital building and parking lots. This area accommodates a larger building and expanded parking necessary to meet the requirements of the Proposed Action. In addition, this location would maintain the balance of structures along the Ellipse and would help retain the character of the Roseburg VAMC campus.

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

Proposed Action

The Proposed Action includes a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the campus, including construction of a new main hospital building (Building 100) to replace the function of Building 1 and the transfer, repurpose or disposal of Building 1, once vacated, following the process in the *VA Real Property Disposal Guide*. In addition, VA proposes to transfer approximately 14 acres of the campus to the State of Oregon for the future development of a State Veterans Home. All of the projects are located entirely within the Roseburg VAMC campus on land currently owned by the federal government.

The primary components of the Proposed Action include the following:

<u>New Construction</u>

- Constructing a 3 to 4-story, approximately 165,000 BGSF building (Building 100) east of the Ellipse perimeter road. The building would be designed to improve patient care, meet modern health care delivery standards, consolidate clinical departments, and improve workplace conditions. Existing clinical functions within the seismically-deficient, undersized, approximately 126,500 BGSF Building 1 would be relocated to Building 100. Additionally, clinics within Building 1AC would be relocated to Building 100 to improve health care delivery.
- Constructing approximately 425 surface parking spaces north, east, and south of Building 100 to support the parking needs of the building.
- Vacating and disposing of Building 1 once Building 100 is operational. Building 1, the current main hospital building, is a 5-story, red brick building that was constructed in 1933 and is located west of the Ellipse. Disposition plans would be determined in the future, at the appropriate time. VA would carefully assess transfer, repurpose, and disposal options for Building 1 following the process in the VA *Real Property Disposal Guide*. VA would evaluate potential adaptive reuse, transfer to another agency or appropriate private entity, or, if no appropriate use is determined viable, demolition. The VA *Real Property Disposal Guide* prioritizes reuse, adaptation, and transfer before considering other options.

<u>Seismic Retrofit and Renovation</u>

- Seismically retrofitting/renovating Building 2, the approximately 74,500 BGSF mental health clinic building. Retrofitting would include the demolition of the interior of the building and the installation of the structural upgrades and new mechanical systems to the building interior. It is anticipated that little or no exterior modification would be required. Following the completion of the upgrades, the building interior would be redesigned and constructed to meet the current health care delivery requirements. The existing mental health clinic and administrative functions would remain in the retrofitted/renovated Building 2. In addition, administrative and support spaces from Buildings 1, 17, and 57 would be relocated to Building 2.
- Seismically retrofitting/renovating Buildings 11 (laundry), 13 (warehouse), and 16 (chapel/auditorium). The seismic retrofits are anticipated to include selective demolition of the interiors of the buildings, the installation of shear walls and other interior

improvements, and interior renovation. Some exterior retrofits may be constructed on the sides and rear of Building 16 to minimize interior impact to the auditorium. The proposed renovation would retain the chapel and auditorium within Building 16. Following renovation, the buildings would be returned to their current uses.

Renovation/Additions

- Renovating the vacated clinical space of the ambulatory care/outpatient clinic building (Building 1AC) for an approximately 30-bed CLC facility. Approximately 25,000 BGSF of space within Building 1AC would be vacated and renovated. In addition, education facilities that are currently located in Building 2 would be relocated to Building 1AC.
- Remodeling the interior and adding a small wing to an existing CLC building (Building 81). The addition would result in approximately 14 additional CLC beds.
- Renovating the interior of Building 71 (patient food and nutrition, and campus canteen).

Demolition

- Demolishing five buildings in the northern portion of the campus, totaling approximately 21,000 BGSF, to allow for improved site access and parking. These buildings include Building 17 (VAMC offices), Building 57 (VA police station), Building 58 (environmental management and greenhouse), Building 63 (hazardous materials storage), and Building T15 (storage). Functions within Buildings 17 and 57 would be relocated to Building 2. Functions within Buildings 58, 63 and T15 would be relocated to Building 3.
- Depending on the disposition of Building 1, demolition of Building 60 (electrical utility building) and Building 84 (MRI building). These small buildings are located adjacent to and support Building 1.

Existing Parking Lot Modification

- Rebalancing existing surface parking lots at the campus. Once Building 1 operations are transferred to Building 100, less parking would be needed in the western portion of the campus. Other proposed projects would also affect existing parking in the northern and western portions of the campus. It is anticipated that approximately 97 new parking spaces would be constructed, approximately 165 parking spaces would be demolished, and approximately 189 parking spaces would no longer be used. However, the future disposition of Building 1 would determine the number of parking spaces needed in the western portion of the campus. In the near term, existing parking lots would likely be used for construction contractor parking and material storage and/or temporary swing space for the Proposed Action construction.

Infrastructure and Utilities

- Constructing/realigning campus roads as needed to provide access to proposed Building 100, the future State Veterans Home, and other campus buildings. Veterans Way may be extended (reconnected) from the northern campus entrance between Buildings 2 and 16 to the road circling the Ellipse, which would lead to new roads in the eastern portion of the campus that would serve Building 100 and the State Veterans Home. Other campus road modifications may also be constructed to improve traffic flow and pedestrian safety.
- Infrastructure upgrades to support the proposed development, including installing, relocating, and removing campus utilities, as necessary, based on the final design.

Campus Enhancements

- Installation of picnic tables, benches, pavilions, and/or exercise equipment on four concrete pads along the perimeter of the Ellipse.

- Renovating and enhancing of the existing flagpole area within the Ellipse in front of Building 1.

Land Transfer for State Veterans Home

- Transferring approximately 14 acres of land located in the eastern portion of the campus to the State of Oregon for ODVA's future construction of a State Veterans Home. Based on preliminary information provided by ODVA, it is anticipated that the State Veterans Home would include several connected, single-story buildings totaling approximately 130,000 BGSF and would include approximately 150 beds.

No Action Alternative

Under the No Action Alternative, the proposed seismic corrections and functional/operational improvement projects for the Roseburg VAMC campus would not be implemented. VA would continue to use the six seismically deficient buildings (Buildings 1, 2, 11, 13, 16, and 17) with no seismic upgrades or corrections. VA would not be compliant with the requirements of EO 13717 or VA Directive 7512 for the Roseburg VAMC campus. 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 Roseburg VAMC, which would significantly limit VA's ability to provide health care services to regional Veterans consistent with VA's modern standards of care. In addition, ODVA would not have designated land at or adjacent to the Roseburg campus to establish a State Veterans Home.

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 PEA 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 PEA 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 consistent with the size and general character of the existing campus buildings in the area. Demolition of Building 17 would not significantly alter the appearance or character of the campus. Minor, long-term adverse impact.	None

Resource Area	Proposed Action	No Action
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	Several of the campus buildings that are proposed for modification or demolition (Buildings 1, 2, 13, 16, and 17), the Ellipse, the flagpole, and the campus roadway system are contributing resources to the NRHP-listed Historic District. The Proposed Action has the potential to adversely affect these historic properties. In addition, the Proposed Action has the potential to interrupt existing viewsheds in the Historic District. However, the full levels of effect cannot be determined until the project designs are completed. VA executed a Programmatic Agreement (PA) under Section 106 of the NHPA with the OR SHPO, ACHP, HRRC, and ODVA to avoid, minimize, and/or mitigate historic property impacts from the Proposed Action. No significant impact with the 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 six buildings at the campus. Less-than-significant, short-term adverse impact. Significant, long-term beneficial impact.	Six buildings at the campus would remain structurally deficient and at risk of significant damage from a major seismic event.
Hydrology and Water Quality	Stormwater runoff during construction managed through BMPs. The Proposed Action would include evaluation, design, and construction of improvements to the on-campus stormwater management system to ensure it complies with EISA Section 438 requirements for the Proposed Action development. These would include new on-campus stormwater management and retention structures and any required improvements to the existing campus stormwater management system to comply with EISA Section 438. Less-than-significant, short-term adverse impact.	None

Resource Area	Proposed Action	No Action
Wildlife and Habitat	Campus does not contain habitat for federally-listed or state-listed species. Proposed Action construction areas contain habitat for migratory birds, Oregon sensitive bird species, and bats. Potential impacts to these species during construction would be minimized through seasonal vegetation clearing. 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 Roseburg VAMC campus and current zoning, and is compatible with surrounding land use. No/negligible impact.	None
Floodplains, Wetlands, and Coastal Zone Management	No federally jurisdictional wetlands or waters of the US are present in the Proposed Action construction areas. An excavated drainage ditch considered potential waters of the State is located in the proposed Building 100 and Building 100 parking area. VA would design Building 100 and its parking lots with a buffer of undeveloped land along the drainage ditch to avoid encroaching on waters of the State. An 0.62-acre wetland considered waters of the State is located on the eastern portion of the campus within the 14-acre proposed State Veterans Home parcel. It is anticipated that ODVA would design the State Veterans Home with a buffer to avoid encroachment on the identified wetlands to the extent possible. If wetland impacts cannot be avoided, ODVA would proceed with wetland mitigation in coordination with ODSL. Less-than-significant long-term adverse wetland impacts. The Roseburg VAMC campus is not located within a 100-year floodplain or designated coastal zone. No floodplain or coastal zone 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

Resource Area	Proposed Action	No Action
Community Services	Proposed Action would not put a significant additional load on local community services. Additional construction and operational traffic associated with the Proposed Action has the potential to emergency vehicles exiting the adjacent fire station. However, fire station operations are not anticipated to be significantly impacted. Less-than-significant short-term and long-term adverse impacts.	None
Solid Waste and Hazardous Materials	Existing project buildings contain asbestos and may contain lead-based paint. Asbestos would be removed prior to building renovation/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	Less-than-significant, short-term adverse impact from construction traffic and temporary loss of parking. A Traffic Impact Analysis (TIA) found that new traffic generated by the Proposed Action, using conservative trip generation assumptions, would not have a significant impact on area intersections. Overall intersection levels of service would remain adequate (LOS D or better) and would generally be consistent with background levels without the Proposed Action. The TIA found that the left turn movement from NW Garden Valley Boulevard on to Estelle Street (traffic entering the medical center) would operate at LOS E during the a.m. peak hour with the Proposed Action, if Building 1 were to be reused by others for offices (conservative assumption). The queueing analysis found that this traffic would exceed the striped storage currently demarcated in the turn lane; however, would not interfere with storage needed within the turn lane for the next intersection. 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 free up space for construction contractor parking and staging, a long-term beneficial impact.	None
Utilities	Proposed Action would result in an increase in the consumption of utilities. Capacities of local utilities appear to be adequate to support the Proposed Action. Negligible impact.	None

Resource Area	Proposed Action	No Action
Environmental Justice	Located in an area with a lower minority population and a higher low-income population than the State of Oregon. 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 Roseburg VAMC. Negligible impact.	None

Cumulative Impacts

The Final PEA 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 PEA, 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 PEA (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 PEA.

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 PEA 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 Roseburg VAMC area. This consultation is documented in the Final PEA. Comments and input submitted by regulatory agencies and tribes have been addressed in the Final PEA.

VA published and distributed the Draft PEA for a 30-day public comment period, as announced by a Notice of Availability published in The News-Review on May 3 and 5, 2024. The Draft PEA was posted for public review on the VA Office of Construction and Facilities Management Environmental Program Office website: (https://www.cfm.va.gov/environmental/index.asp). In addition, a hard copy of the Draft PEA was made available for public review at the Roseburg Public Library, located at 1409 NE Diamond Lake Boulevard, Roseburg, OR. VA emailed notification of the release of the Draft PEA to the stakeholders previously contacted during the NEPA scoping. The notice contained a link to the Draft PEA on VA's website and invited stakeholders to provide comments on the document. U.S. EPA provided comments on the Draft PEA. These comments were considered in preparing the Final PEA, as appropriate.

VA held public meetings at the Roseburg VAMC on May 21, 2024 at 10 am and 7 pm to present a summary of the Draft PEA and to receive public input and comment on the Draft PEA. Three

members of the public and five representatives of ODVA attended the 10 am meeting. No members of the public attended the 7 pm meeting. Comments on the Draft PEA received during the public meeting are also summarized and addressed in Final PEA.

6. Finding of No Significant Impact

After careful review of the Final PEA, 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.

30 September 2024

Bruce Mack, PG, REA, CHMM
Environmental Engineer
Environmental Program Office
VA Office of Construction & Facilities Management

Date

Patrick Hull, MT, MBA
Executive Director/CEO
Roseburg VA Medical Center
Roseburg VA Health Care System

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 Roseburg, Oregon Municipal Code (ROMC), to the extent practicable.
	Design Building 100 to be compatible with the character of the historic campus buildings.
Air Quality	Remove asbestos containing materials in accordance with the federal and state requirements prior to building renovation or demolition.
	Implement dust control measures during building demolition and renovation to minimize fugitive dust and control possible lead-based paint emissions.
	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.
	Obtain a new or revised ODEQ Air Contaminant Discharge Permit for new campus boilers, generators, and equipment, if necessary.
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 Oregon SHPO, Tribes, 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 ORDEQ-issued National Pollutant Discharge Elimination System (NPDES) permit required under the federal Clean Water Act, including the development and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP). The NPDES permit would require stormwater runoff and erosion management using BMPs, such as earth berms, vegetative buffers and filter strips, and spill prevention and management techniques. The construction contractor would implement the sedimentation and erosion control measures specified in the NPDES 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 ODEQ NPDES permit.
	Use low impact development practices, to the extent possible, during the Proposed Action design.
	Ensure Roseburg VAMC stormwater infrastructure affected by the Proposed Action, including the lateral that drains the main development area east of the Ellipse, is upgraded, as necessary, to meet 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 September 1 and March 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.
	Should federally-listed or state-listed protected species be identified at the Proposed Action construction area, construction activities in that area should cease until appropriate protection measures are developed and implemented in consultation with USFWS and/or ODFW, as applicable.
	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 6:00 p.m. on Saturdays.
	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 City of Roseburg zoning regulations and development standards, to the extent practicable.

Technical Resource Area	Measure
Wetlands, Floodplains, and Coastal Zone Management	Design Building 100 and the associated parking lots to maintain a buffer of undeveloped land along the sections of the drainage ditch that are waters of the State.
	Ensure that ODVA complies with state wetland regulations and obtains necessary approvals from ODSL prior to the development of the State Veterans Home on the 14-acre land transfer area. It is anticipated ODVA would design the State Veterans Home to avoid impacts to state-regulated wetlands to the extent possible.
Socioeconomics	Secure construction areas to prevent unauthorized access by children from nearby residential areas.
Community Services	Ensure construction and operational traffic associated with the Roseburg VAMC campus does not interfere with the operation of Roseburg Fire Department Station #3.
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.
	Remove asbestos containing materials in accordance with the federal and state requirements prior to building renovation or demolition.
	Implement dust control measures during building demolition and renovation to control possible lead-based paint emissions.
	Register, install, and operate new emergency generator and boiler USTs and ASTs in accordance with Roseburg VAMC's Spill Prevention, Control and Countermeasures (SPCC) Plan, and ODEQ 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 the City of Roseburg Public Works Department (RPWD) and the public in advance.
	Ensure debris and/or soil is not deposited on local roadways during the construction activities.
	Re-evaluate potential traffic impacts associated with the operation of Building 1 once the plans for its disposal are known.
Utilities	Submit design plans to each utility provider to determine the specific connection/extension requirements and implement the necessary requirements.
Environmental Justice	None required.