U.S. DEPARTMENT OF VETERANS AFFAIRS
FINDING OF NO SIGNIFICANT IMPACT:
SEISMIC UPGRADES AT WHITE CITY VETERANS AFFAIRS MEDICAL CENTER SOUTHERN OREGON REHABILITATION CENTER & CLINICS, WHITE CITY, OREGON

Introduction

The U.S. Department of Veterans Affairs (VA) prepared an Environmental Assessment (EA) to identify, analyze, and document the physical, environmental, cultural, and socioeconomic impacts associated with the implementation of proposed seismic upgrades at the White City VA Medical Center Southern Oregon Rehabilitation Center & Clinics (SORCC), located in White City, Oregon.

Purpose and Need

The purpose of the Proposed Action is to address existing seismic deficiencies at the SORCC. The Proposed Action is needed to improve safety for Veterans, staff, and visitors, and to ensure the continuity of health care services to Veterans at the SORCC.

Implementation of the Proposed Action would address seismic and associated safety risks at the SORCC, enhance VA services to Veterans at the SORCC, and meet VA's goal of having all essential facilities remain in operation after an earthquake.

Proposed Action

The Proposed Action is to implement a phased program of demolition, renovation, and construction activities over several years to address seismic deficiencies at the existing SORCC. The Proposed Action includes the following project components:

- Perform a seismic retrofit/renovation of Building 200.
- Renovate or demolish Buildings 201, 201A, 202, 219, and 224.
- Demolish Buildings 209, 210, 211, 212, 213, 214, 222, 223, 227, 228, 229, 234, 235, 239, 240, 241, 242, 243, 248, and 262.
- Renovate or demolish the connecting corridors to Buildings 201, 201A, and 202.
- Demolish the connecting corridors to Buildings 209, 210, 211, 212, 213, 214, 219, 222, 223, 224, 227, 228, 229, 234, 235, 239, 240, 241, 242, 243, 248 and 262.
- Construct new Buildings 300 (Facilities Management), 301 (Clinical Support), and 302 (Mental Health).
- Construct new Parking Lots A, B, and C.
- Upgrade, repair, and replace utilities and utility corridors throughout the SORCC.

The Proposed Action would occur in multiple phases and have a total project duration of approximately nine years. By phasing the upgrades over several years VA would ensure continuity of care to Veterans.

Alternatives Considered

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

- **Proposed Action:** Implement a phased program consisting of demolition, renovation, and construction activities over several years to address seismic deficiencies at the SORCC.
- **No Action Alternative:** Under the No Action Alternative, VA would not implement the Proposed Action. Existing seismic issues and associated seismic risks would persist at the SORCC. The No Action Alternative does not meet the purpose of and need for the Proposed Action. However, as required by VA National Environmental Policy Act (NEPA) regulations (38 Code of Federal Regulations Part 26), the No Action Alternative is evaluated in VA NEPA documents and provides a benchmark against which VA can compare the impacts of the Proposed Action.

Potential Environmental Effects

Based on the analysis in the Final EA, implementation of the proposed seismic upgrades would result in less than significant impacts. Table 1 summarizes the findings of the impact analysis by resource area for the Proposed Action and No Action Alternative.

Table 1. Summary of Impact Analysis

Resource Area	Proposed Action	No Action Alternative
Aesthetics	*Less than significant impact.* Construction equipment may be visible for approximately nine years at the SORCC. New construction would be visually consistent with the overall visual setting of the SORCC.	No impact
Air Quality and Climate Change	*Less than significant impact.* Construction activities would generate negligible amounts of emissions and fugitive dust. Combined construction and operation emissions would be substantially below the General Conformity *de minimis* and greenhouse gas thresholds.	No impact
Cultural Resources	*Less than significant impact.* Demolition would result in an adverse effect to the historic district. VA resolved the adverse effects of the Proposed Action in a Memorandum of Agreement signed by the Oregon State Historic Preservation Office and VA on December 6, 2022.	No impact

Resource Area	Proposed Action	No Action Alternative
Geology and Soils	*Beneficial impact.* Construction activities would result in minimal changes to topography. Erosion and sediment controls would be implemented. New stormwater infrastructure and control measures would reduce the potential for erosion, turbidity, and sediment transport. Seismic upgrades would decrease the risk of seismic-related impacts to people and property.	Adverse impact
Hydrology and Water Quality	*Beneficial impact.* No impacts to surface water features. Stormwater engineering controls would retain and manage stormwater flow would be implemented, and permit requirements would be met. Improvements to site hydrology and water quality and a reduction in the amount of impervious surface,	No impact
Wildlife and Habitat	*Less than significant impact*. Indirect and temporary impacts to wildlife species. No impacts to federally listed species or habitat. Work would occur outside of the bird breeding season or implement avoidance measures as needed.	No impact
Noise and Vibration	*Less than significant impact.* Construction would generate localized noise levels typical of demolition and construction activities. Construction-related noise would occur in phases over a nine-year period.	No impact
Land Use	*No impact.* No change services or land use at the SORCC.	No impact
Floodplains, Wetlands, and Coastal Zone Management	*No impact.* No floodplains, wetlands, or coastal zones are at the SORCC.	No impact
Socioeconomics	*Less than significant impact.* Construction-related increase in spending by workers on food, lodging, and equipment.	No impact
Community Services	*Beneficial impact.* No additional demand on police, fire, or emergency services. Improvement in safety of Veterans, staff, and visitors and provision of affordable health care services to Veterans.	Adverse impact

Resource Area	Proposed Action	No Action Alternative
Solid Waste and Hazardous Materials	*Beneficial impact*. Potential for accidental release of hazardous materials during construction. Removal of lead based paint containing materials in accordance with regulations. No increase in the amount solid waste or hazardous materials.	No impact
Transportation and Parking	*Beneficial impact.* Parking management plan would manage vehicle trips and parking during phased construction activities. Increase in available parking spaces and improved vehicle circulation.	Adverse impact
Utilities	*Beneficial impact*. Energy-efficient buildings and fixtures would reduce utility demand.	No impact
Environmental Justice	*Less than significant impact*. No disproportionate impacts to minority or low-income populations or to the health and safety of children.	No impact

The project-specific protection, mitigation, and compliance measures listed in Attachment A would be incorporated into the Proposed Action, to the extent practicable, and would ensure the impacts would be less than significant.

Agency and Public Comment

VA published a project scoping notice in the *Mail Tribune* on June 6 and 7, 2021. VA mailed scoping letters to federal, state, and local agencies; public officials; federally recognized Tribes; and special interest groups. The letters included information on the proposed action, the comment period, and instruction on submitting comments. VA did not receive any scoping comments.

VA published the Draft EA for a 30-day public comment period (October 24, 2021 to November 24, 2021). VA announced the availability of the Draft EA by publishing a notice of availability of the Draft EA in the Mail Tribune and posting the notice of availability to the VA CFM website (https://www.cfm.va.gov/environmental/index.asp). In addition, agencies, Tribes, elected officials, and other stakeholders were notified via email of the availability of the Draft EA. The Klamath Tribes provided an email stating they had no comments on the Draft EA. No other comments were received.

VA initiated Section 106 consultation with Oregon SHPO, federally recognized Native American Tribes in the vicinity of the SORCC, and Jackson County, OR. The Tribes and Jackson County either did not respond to the request to participate or elected not to participate. VA resolved the adverse effects of the Proposed Action in a Memorandum of Agreement signed by the Oregon SHPO and VA on December 6, 2022.

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 the NEPA of 1969. Therefore, preparation of an environmental impact statement is not required.

PATRICK READ

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Attachment A. Protection, Mitigation, and Compliance Measures Incorporated into the Proposed Action

VA would implement the following measures as part of the Proposed Action to avoid or minimize impacts to each of the following resource areas. Resource areas not listed did not have any measures identified.

Resource Area	Measure Description	Measure Type
Air Quality	To minimize fugitive dust emissions, the construction contractor(s) would implement dust control best management practices (BMPs) such as ensuring all equipment has pollution prevention devices, limiting construction debris stockpiles, and limiting dust generating activities during high winds.	Protection
Cultural Resources	VA resolved the adverse effects of the Proposed Action in a Memorandum of Agreement (MOA) signed by the Oregon State Historic Preservation Office (SHPO) and VA on December 6, 2022. In accordance with the executed MOA between VA and OR SHPO, VA will conduct the following mitigation measures, which come from the MOA. Manual for Built Resources: • VA will manage extant historic properties on the SORCC campus in accordance with the SORCC *Manual for Built Resources* (MBR), which was approved by the SHPO in 2010, to retain their historic character while continuing to meet its primary operation mission. • Any undertaking affecting a historic property at SORCC not identified for renovation or demolition that is not to be managed in accordance with the MBR remains subject to review under Section 106 of the National Historic Preservation Act (NHPA) (36 Code of Federal Regulations [CFR] 800). • VA will update the MBR within one (1) year prior to the completion of the ten (10) year life lifespan of the MOA.	Mitigation
	Compatible Design: • Future replacement structures will meet all applicable provisions of the MBR specifically, but not limited to scale, placement, use of material, and roof pitch, relying principally upon the model established by replacement Building 204. • Specialized buildings designed for specific functions may require modifications to the original layout, materials, placement, and roof pitch to meet program needs, but will still follow all applicable provisions of the MBR as it relates to compatible design. There is no expressed intent to copy or replicate historic facilities.	Mitigation

Resource Area	Measure Description	Measure Type
	• VA will initiate consultation for any renovation and/or new construction projects that do not conform to the MBR. Any determination of conformity with the MBR will be completed by SORCC in consultation with a person who meets the Secretary of the Interior's (SOI's) Professional Qualification Standards (36 CFR Part 61).	
Cultural Resources	Re-Evaluation of the District: • The SORCC will re-evaluate the eligibility of the District for listing in the National Register of Historic Places (NRHP) and provide this information to SHPO for concurrence in compliance with Section 106 of the NHPA within one (1) year prior to the completion of the ten (10) year lifespan of the MOA.	Mitigation
	Documentation: <u>Oregon State Level Documentation</u> • Historic buildings proposed for demolition or renovations for which previous mitigation was not completed (i.e., Buildings 201, 202, 209, 210, 211, 212, and associated corridors), will be documented following the Oregon State Level Documentation and Photo Documentation Guidelines before the buildings are demolished or renovated or within five (5) years from the execution of the MOA, whichever comes first. <u>Historic American Buildings Survey (HABS)</u> • Building 250 will be documented for submittal to the HABS prior to any alteration and/or demolition or within five (5) years from the execution of the MOA, whichever comes first. • The work will be conducted by a professional meeting appropriate *SOI Professional Qualification Standards*. • Documentation will fully adhere to current National Park Service (NPS) HABS Guidelines for the format as agreed upon by VA, NPS, and the SHPO. • Draft documentation will be submitted to SHPO and the NPS for review and approval. VA will assure that any required modifications or revisions necessary for NPS approval of the HABS submittal are accomplished in a timely manner. • Once NPS has reviewed and accepted the final documentation, VA will duplicate it electronically and supply it for addition to the public record to NPS, SHPO, the Oregon Historical Society, and the University of Oregon Knight Library Special Collections. If the listed repositories cannot accept	Mitigation

Resource Area	Measure Description	Measure Type
	the document, SHPO and VA will work together to find alternative repositories. • Proof of submittal of the NPS-approved HABS documentation to each of the above repositories is required before the stipulation will be considered complete.	
Cultural Resources	Public Interpretation: • Within five (5) years of the MOA's execution, VA will develop online content specific to the history of SORCC and the District, utilizing information and materials from the NRHP nomination form for Building 200, MBR, archival materials (e.g., photos, plans, etc.) maintained by SORCC, and documentation produced and add it to a publicly accessible webpage hosted and maintained for the duration of the MOA by VA for public benefit. • This public material will include an overview of the history and significance of SORCC and the District, differentiating its history from the broader history of the Veterans Health Administration. • VA will provide the SHPO the opportunity to review and comment on the draft content prior to finalization for a thirty (30) calendar day review period. VA will consider any timely written comments submitted by the SHPO in finalizing the online content. Should the SHPO not submit comments within thirty (30) calendar days, VA may proceed with finalizing and publishing the online content. • Scanned materials will be provided to Northwest Digital Heritage (NDH) and will be compatible with NDH Metadata Requirements. • VA will notify and provide the online content to any local museums, libraries, schools, veterans groups, and/or friends groups that are interested.	Mitigation
	Archaeological Monitoring: • VA will ensure that any ground disturbance associated with demolition and renovation (e.g., staging areas and utility corridors) that is exterior to the existing foundations of extant buildings in previously undisturbed soils is monitored by an archaeologist meeting the SOI Professional Qualification Standards for Archeology. VA will ensure that the monitor will prepare a report on the work and that copies of the monitor's report will be submitted to the SHPO. • VA will ensure that any ground disturbance associated with new construction (e.g., staging areas and utility corridors) is monitored by an	Mitigation

Resource Area	Measure Description	Measure Type
	archaeologist meeting the SOI Professional Qualification Standards for Archeology. VA will ensure that the monitor will prepare a report on the work and that copies of the monitor's report will be submitted to the SHPO.	
Hydrology and Water Quality	VA construction contractor(s) would prepare a SWPPP. The SWPPP would include BMPs to control erosion associated with grading and other ground surface-disturbing activities. The construction contractor(s) would implement BMPs as necessary to minimize erosion and sedimentation. BMPs could include the installation of silt fencing, sediment traps, and storm drain inlet protection.	Compliance
Wildlife and Habitat	The Proposed Action would comply with the Migratory Bird Treaty Act by initiating construction/demolition during the non-nesting season (the non-nesting season is September 1 through January 31) to the extent feasible. If project activities start during the nesting season (February 1 through August 31), a qualified biologist would first conduct pre-disturbance surveys to identify any nesting birds. Surveys should occur no more than 15 days prior to the initiation of disturbance. If the biologist or workers detect nesting birds near (that is, within 50 feet of) disturbance areas, or raptors within 150 feet, a no-work buffer area would be established around active nests. The protective buffer area around an active bird nest is typically 75- 250 feet, determined at the discretion of the qualified biologist. To avoid inadvertent impacts to an active bird nest, no construction activities would occur within the protective buffer area(s) until the juvenile birds have fledged (left the nest), and there is no evidence of a second attempt at nesting, as determined by the qualified biologist.	Compliance
Solid Waste and Hazardous Materials	The construction contractor(s) would treat and abate locations known to contain asbestos containing materials and/or lead based paint in accordance with applicable Occupational Safety and Health Administration, U.S. Environmental Protection Agency, VA, and state regulations.	Compliance
Transportation and Parking	The construction contractor(s) would develop and implement phase-specific Traffic Control Plan(s) and single Maintenance of Parking Plan for the entire campus to deconflict and minimize Proposed Action-specific and cumulative impacts to transportation and parking. The Traffic Control Plan(s) would include measures such as a flow plan, flaggers, staggered delivery times, re-routing worker and delivery trips, and worker carpooling. Depending on the timing of the Proposed Action, VA would initiate one overall Traffic Control Plan or have the contractors develop phase or project-specific plans.	Protection

The following federal, state, and/or local environmental permits and approvals were identified as potentially being required as part of the Proposed Action. This list may not be exhaustive, and the selected construction contractor(s) will be responsible for any additional compliance and permits.

- To comply with the Clean Water Act, the construction contractor would obtain a Construction General Permit from the Oregon Department of Environmental Quality. The contractor would also prepare a Stormwater Pollution Prevention Plan and implement BMPs prior to construction.
- VA may need to obtain a permit from the Oregon Department of Environmental Quality for the six new generators, depending on the final engine size selected.