FINDING OF NO SIGNIFICANT IMPACT
U.S. DEPARTMENT OF VETERANS AFFAIRS
PROPOSED SEISMIC PROGRAM PROJECTS
JONATHAN M. WAINWRIGHT MEMORIAL VA MEDICAL CENTER
WALLA WALLA, WASHINGTON

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 corrections for eight buildings (Buildings 1, 68, 69, 74, 75, 77, 78 and 80) at the Jonathan M. Wainwright Memorial VA Medical Center (VAWW), located at 77 Wainwright Drive in Walla Walla, Washington. The PEA was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. 4321 et seq.), the President's Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 C.F.R. § 1500-1508) and Environmental Effects of the Department of Veterans Affairs Actions (38 C.F.R. § 26).

VA is currently in the pre-design, information-gathering phase of the proposed seismic correction project. The PEA evaluated the potential impacts associated with broad seismic correction methods being considered by VA and will be reviewed once additional building-specific seismic correction details are available. Where the impacts of the proposed building-specific corrections are identified and analyzed within the PEA, no further NEPA analysis would be necessary.

Prior to implementation of the building specific corrections under the Proposed Action and upon technical review of the PEA, VA would perform supplemental, tiered NEPA analyses, if necessary, to address and to complete the evaluation of the potential effects of the proposed building-specific correction, if not accurately covered in the PEA.

Purpose and Need

The purpose of the Proposed Action is to address seismic deficiencies for eight buildings on the VAWW campus to support VA's mission to provide continuing health care and administrative services to area Veterans.

Executive Order (EO) 12941, Seismic Safety of Existing Federally Owned or Leased Buildings (1994) required all federal agencies to develop an inventory of their owned and leased buildings to identify and mitigate unacceptable seismic risks to those buildings. It was revoked in 2016 by EO 13717, Establishing a Federal Earthquake Risk Management Standard, was issued in 2016 and requires federal agencies to adhere to seismic design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, Seismic Safety of VA Buildings, 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. On November 1, 2019, VA Office of Construction & Facilities Management (CFM) released VA Handbook 18-8, Seismic Design Requirements to help inform facility planning with regard to seismic standards, which was revised May 1, 2020.

Walla Walla, Washington is identified on the Federal Emergency Management Agency (FEMA) Earthquake Hazard Map for the Western United States 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 International Building Code (IBC) Seismic Design Class C (may experience strong shaking) requirements.

The Proposed Action is needed to ensure that VAWW campus facilities can provide life-safety 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 EO 13717, VA Directive 7512 and CFM's VA Handbook 18-8 identified eight buildings at the VAWW campus (the Seismic Program project buildings) as Seismic Deficiency Category 1 (in danger of collapse) or 2 (may not collapse but may be heavily damaged). The eight project 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 or design criteria for building seismic structural performance and are at risk for significant damage or failure from a seismic event.

The PEA evaluated in depth two alternatives: the Proposed Action (seismic corrections alternatives) and the No Action Alternative.

Proposed Action

VA proposes to rectify the eight seismically deficient buildings (Buildings 1, 68, 69, 74, 75, 77, 78 and 80) at the VAWW campus to meet current VA seismic standards. Seismic correction methods being considered include:

- **Seismic Retrofit** – retrofit and renovation of seismically deficient buildings to meet VA seismic standards.
- **Replacement** – demolition and replacement of seismically deficient buildings with new buildings in their current locations that meet the VA seismic standards.
- **Consolidation** – demolition of multiple seismically deficient buildings and consolidation of their building functions into a new singular building that meets the VA seismic standards.

While one method may be selected for all of the buildings, VA anticipates a combination of seismic correction methods would be used.

The interior spaces of the buildings would be modified/constructed to suit VA's planned use of the buildings and new mechanical systems would be installed. Following the completion of the proposed seismic corrections, VA would use the retrofitted/new buildings for administrative support functions for the VAWW, similar to their existing uses.

Other than Buildings 1 and 75, the eight seismic project buildings are mostly occupied, and house administrative and support services required for the operation of the facility. Consequently, it is anticipated that the seismic correction projects would be conducted in phases over a period of up to 10 years to minimize campus disruption and to support continued campus operations. Temporary swing space (rented office trailers) would be required for the duration of the construction project.

The Proposed Action would include the seismic retrofit, replacement and/or consolidation of the eight seismically deficient project buildings. Seven of the eight seismic project buildings are contributing resources to the National Register of Historic Places (NRHP)-listed Fort Walla Walla Historic District. VA is considering various combinations of these seismic correction methods for the project buildings based on VAWW's operational needs, cost, timing and potential impact to the Historic District. The following paragraphs briefly describe the anticipated elements of the various seismic correction methods being considered.

Seismic Retrofit

Seismic retrofit correction would include the demolition of the interior of the project building, installation of seismic upgrades in the building interior to meet the seismic standards and new interior construction/build out designed for the planned future use of the building. Little to no exterior building modification would be conducted to retain the historic integrity of the project building and the architectural cohesiveness of the Historic District.

Replacement

Replacement correction would include the demolition of the seismically deficient project building and the construction of a new replacement building that meets current seismic criteria. The replacement building would be of similar size and location as the building that it would replace but would be designed and constructed in accordance with modern building practices and codes, including the current applicable seismic standards. The building would be designed to be generally consistent/compatible with the architectural character of the Historic District, with red brick cladding on the side facing the parade grounds, to minimize the visual/aesthetic impact on the Historic District.

Consolidation

Consolidation correction would include the demolition of multiple seismically deficient project buildings and the construction of one new, larger building that meets the current seismic criteria. Functions of the existing buildings would be consolidated into the new building. The new building would be of similar size to the combined square footage of the existing consolidated buildings and would be constructed in the general location of one of the existing buildings being consolidated. The buildings would be no more than

three stories tall. The new consolidated building would be designed and constructed in accordance with modern building practices and codes, including the current applicable seismic standards. The building would be designed to be generally consistent/ compatible with the architectural character of the Historic District, with red brick cladding on the side facing the parade grounds, to minimize the visual/aesthetic impact on the Historic District.

Building Accessory Improvements
In addition to the eight seismic project buildings, other accessory building improvements such as covered connecting corridors and uncovered walkways that connect the site buildings, courtyards within and between Buildings 68 and 69, two trailer offices (Buildings T-1 and T-2) located adjacent to Building 77 and landscaped areas, may be altered, demolished and/or replaced as part of the Proposed Action. Utility infrastructure upgrades to support the seismic corrections may also be required. VA would also rent temporary office trailers for use as swing space for displaced services during construction.

No Action Alternative

Under the No Action Alternative, seismic corrections and building accessory improvements for the VAWW campus would not be implemented. VA would continue to use the eight project buildings with no seismic upgrades. The buildings would remain structurally deficient and at risk of significant damage or failure from a seismic event.

The No Action 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 or 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 provided a benchmark for comparing potential impacts of the Proposed Action.

Environmental Consequences

The Final PEA concluded that the Proposed Action would result in 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 implementation of the 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
	Seismic Retrofit	Replacement	Consolidation	
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 areas that are currently developed and would be designed to be architecturally and visually consistent/compatible with the existing VAWW campus. Less-than-significant, long-term adverse impact.			None
Air Quality	Dust and particulate matter emissions during construction managed with BMPs. Vehicle and minor equipment emissions during operation would be consistent with current site operations. Less-than-significant, short-term adverse impact.			Similar operational emissions
Cultural Resources	Seven of the eight Seismic Program project buildings are contributing resources to the NRHP Fort Walla Walla Historic District. The Proposed Action has the potential to adversely affect historic properties (the project buildings, the Historic District and archaeological sites); however, the extent of potential adverse effects cannot be determined until the seismic correction methods have been selected and designed plans have been developed. VA will execute an appropriate agreement document under Section 106 of the NHPA to avoid, minimize and/or mitigate historic property impacts from the Proposed Action. No significant impact with execution of the Section 106 agreement document and the implementation of its stipulations. In the event that an appropriate Section 106 agreement or the Section 106 agreement document stipulations cannot be reached, additional NEPA analysis would take place to analyze potentially significant impacts to the Fort Walla Walla Historic District.			None
Geology and Soils	Soil erosion and sedimentation impacts during construction managed with BMPs. The Proposed Action would have a significant beneficial effect of rectifying existing seismic building hazards at the campus. Less-than-significant, short-term adverse impact. Significant, long-term beneficial impact.			Eight project buildings would remain structurally deficient and at risk of significant damage or failure from a seismic event.

Resource Area	Proposed Action			No Action
	Seismic Retrofit	Replacement	Consolidation	
Hydrology and Water Quality	Stormwater runoff during construction managed through BMPs. Stormwater from the site would discharge to the VAWW stormwater system. Stormwater would be managed to ensure no additional impact to the existing campus stormwater management system until such time that system can be upgraded. Less-than-significant, short-term adverse impact.			None
Wildlife and Habitat	No habitat for federally or state-listed protected species is present at the site. No/negligible impact.			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 adverse impact.			None
Land Use	Proposed Action would not change the use of the use of the site. Site use would remain consistent with current zoning and compatible with surrounding land use. No/negligible impact.			None
Floodplains, Wetlands and Coastal Zone Management	No wetlands or floodplains located on the site or immediately adjacent properties. VAWW campus is not located in a designated coastal zone. No impact.			None
Socioeconomics	Minor short-term local beneficial impact to employment during construction. Significant long-term beneficial socioeconomic and safety impacts by providing life-safety protection to Veterans, employees and other occupants of the seismic project buildings and ensuring health care and administrative operations at the VAWW could be maintained in the event of a major earthquake.			Seismically deficient buildings would continue to pose life-safety and VAMC operational risks
Community Services	Proposed Action would not put an additional load on local community services. No/negligible impact.			None

Resource Area	Proposed Action			No Action
	Seismic Retrofit	Replacement	Consolidation	
Solid Waste and Hazardous Materials	Elevated lead concentrations in soil around Building 1 (from lead-based paint) would be addressed by removal or installation of an exposure barrier during construction. Potential other lead-impacted soil, potential-impacted soil, demolition debris and abandoned steam tunnels with asbestos at the site would be properly handled and managed during construction in accordance with a Soil Management Plan. Site buildings contain asbestos and lead-based paint. Asbestos would be removed prior to renovation/ demolition. Demolition BMPs to control dust would control 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 impact from construction traffic and the temporary loss of a small number of parking spaces. Proposed Action would not increase vehicle trips or parking demand at the site following construction. Less-than-significant, short-term adverse impact.			None
Utilities	No increase in the consumption of utilities is anticipated and no utility service upgrades would likely be required. No/negligible impact.			None
Environmental Justice	Located in an area with a higher minority population and a higher low-income population. Proposed Action would have little impact on area residents. No/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.

Agency and Public Involvement

VA has consulted with appropriate federal, state and local regulatory agencies, as well as federally recognized Indian tribes identified as having possible ancestral ties to the VAWW 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 Walla Walla Union-Bulletin on October 6 and 10, 2022. The Draft PEA was also available for public review on VA CFM Environmental Program's 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 Walla Walla Public Library. VA also emailed notification of the release of the Draft PEA to the stakeholders previously contacted during the NEPA scoping and NHPA Section 106 consultation. The notice contained a link to the Draft PEA on VA's website and invited stakeholders to provide comments on the document. VA received one set of comments on the Draft PEA, from the Washington State Department of Ecology (WSDE). The comments were included and addressed in the Final PEA, as applicable.

Finding of No Significant Impact

Based on the analysis conducted in the Final PEA, which is summarized and incorporated by reference herein, VA concludes that implementing the Proposed Action would not generate significant controversy or have a significant adverse impact on the quality of the natural or human environment within the meaning of section 102(2)(c) of the National Environmental Policy Act of 1969. Therefore, preparation of an environmental impact statement is not required.

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

VA has included the BMPs; management, minimization and mitigation measures; and regulatory compliance measures summarized in Table 4-1 of the Final PEA, and provided below, into the Proposed Action.

Technical Resource Area	Measure
Aesthetics	Design new site buildings to be generally consistent/compatible with the architectural character of the Fort Walla Walla Historic District, with red brick cladding on the side facing the parade grounds.
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 demolition and construction activities.
	Stabilize disturbed areas through re-vegetation or mulching if the areas 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.
	Remove asbestos containing materials in accordance with the federal and state requirements prior to building renovation or demolition activities.
Cultural and Historic Resources	Conclude NHPA Section 106 review for the Proposed Action. Execute and implement an appropriate Section 106 agreement document to avoid, minimize and/or mitigate potential adverse effects to historic properties.
	Conduct construction activities in accordance with the concluded Section 106 agreement document and the Monitoring Plan and Cultural Resources Discovery Protocols. 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 State Historical Preservation Office 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 WSDE National Pollutant Discharge Elimination System (NPDES) stormwater permit, 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.
Hydrology and Water Quality	Control soil erosion and sedimentation impacts during construction by complying with the WSDE NPDES stormwater permit.
	Use low impact development practices, to the extent possible, during the Proposed Action design.

Technical Resource Area	Measure
	Implement stormwater control measures to ensure no additional impact to the existing VAWW campus stormwater management system until such time that system can be upgraded.
	Design improvements in accordance 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 October and March or conduct a survey for active bird nests prior to clearing.
	Use downward facing outdoor lighting.
Noise	Limit, to the extent possible, construction and associated heavy truck traffic to occur between 7:00 a.m. and 10:00 p.m., Monday through Friday and between the hours of 9:00 a.m. and 10:00 p.m. on Saturday and Sunday.
	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 Walla Walla Zoning Code 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 and recreational areas.
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 wastes.
	Remove and properly dispose of lead-impacted soil surrounding Building 1 that exceeds the applicable WSDE Model Toxic Control Act soil cleanup levels or an install barrier (pavement, vegetated clean soil layer, etc.) to prevent incidental exposure following the completion of the construction activities in this area.
	Prepare a Soil Management Plan to notify construction contractors of the possible presence of impacted soil and demolition debris at the site and ensure proper handling and disposal of impacted soil that may be encountered during construction.

Technical Resource Area	Measure
	Remove the diesel underground storage tank (UST) located near Building 78 and the diesel UST piping near Building 80 in accordance with applicable WSDE UST Program requirements.
	Remove asbestos containing materials in accordance with the federal and state requirements prior to building renovation or demolition activities.
	Implement dust control measures, such as the use of water, during building demolition to control lead-based paint emissions.
	Register, install and operate new emergency generator USTs and aboveground storage tanks in accordance with WSDE petroleum storage tank requirements, as applicable and to the extent required.
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.
	Ensure debris and/or soil is not deposited on local roadways during the demolition and construction activities.
Utilities	Submit design plans to each utility provider to determine the specific connection/extension requirements and implement the necessary requirements.
Environmental Justice	None required.

Regulations

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

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 Finding of No Significant Impact.