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**FINDING OF NO SIGNIFICANT IMPACT (FONSI)**  
**DEPARTMENT OF VETERANS AFFAIRS**  
**PROPOSED TRANSFER OF LAND AND FUNDING FOR THE CONSTRUCTION OF A**  
**WASHINGTON STATE VETERANS HOME**  
**JONATHAN M. WAINWRIGHT MEMORIAL VA MEDICAL CENTER**  
**77 WAINWRIGHT DRIVE**  
**WALLA WALLA, WASHINGTON**

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**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 Department of Veterans Affairs' (VA's) proposed transfer of approximately 11 acres of land within the Jonathan M. Wainwright Memorial VA Medical Center (VAMC) campus to the State of Washington for the construction and operation of a new 80-resident State Veterans Home on the transferred land. The proposed State Veterans Home would be constructed, owned, and operated by the Washington Department of Veterans Affairs (WDVA); the facility construction would be partially funded by the VA. Preparation of the EA is required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 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 38 CFR Part 26 (*Environmental Effects of the Department of Veterans Affairs Actions*).

The *purpose* of the Proposed Action is to establish a new, 80-resident State Veterans Home in southeastern Washington. The proposed State Veterans Home would provide long-term residency and address quality, access, and capacity needs for high quality nursing care of Veterans in southeastern Washington. The proposed WDVA State Veterans Home would reduce the current unmet State Home bed needs and would begin to balance the current unequal geographic distribution of State Veterans Homes within the State.

A new State Veterans Home is *needed* to meet the current and projected Veteran demands for long-term resident care and to better serve the needs of Veterans in southeastern Washington, who currently do not have access to long-term residency and high quality nursing care without travelling at least 120 miles to the closest Washington State Veterans Home (Spokane Veterans Home). There are currently no State Veterans Homes in the 7-county area of southeastern Washington and long-term resident care is no longer provided by the VAMC. In addition, WDVA is experiencing a significant shortfall of available space for long-term care and needs to increase its capacity to meet the current and projected future Veteran long-term resident care demand. The VA Office of Geriatrics Extended Care found Washington State currently has an unmet State Home bed need of 642 beds.

**1. Description of the Proposed Action and Alternatives**

**Proposed Action**

VA's Proposed Action is to transfer approximately 11 acres of land within the Jonathan M. Wainwright Memorial VAMC campus to the State of Washington and to partially fund WDVA's construction of a new 80-resident State Veterans Home on the transferred land.

**Alternatives Considered**

After identifying the need for a new long-term care facility in southeastern Washington, the WDVA prepared the Skilled Nursing Facility, Walla Walla Predesign Study (Predesign Study) in 2008. The Predesign Study identified four potential options to provide long-term residency and address quality, access, and capacity needs for high quality nursing care for Veterans in southeastern Washington, including:

- *Buying an existing nursing home in southeastern Washington and converting it into a State Veterans Home.* This alternative was not considered viable. Because of the special needs of Veterans requiring nursing care, the WDVA would be unable to create a supportive nursing environment without extensive renovation.
- *Building a State Veterans Home on purchased land away from the VAMC campus.* This alternative was not considered economically feasible due to the need to purchase the land. In addition, a location off the VAMC campus prohibits integrated, centralized health care services.
- *Continuing with the existing conditions and having to find placement for eligible Veterans in existing area skilled care facilities (i.e., No Action).* This alternative was not considered economically feasible because WDVA would lose significant resident per diem support provided by VA.
- *Building a State Veterans Home on land at the VAMC campus.*

WDVA determined that the construction of a State Veterans Home at the VAMC campus was the only reasonable alternative. The other three alternatives would not meet WDVA's needs for a new long-term care facility.

WDVA identified two tracts of land at the VAMC campus that potentially could be utilized for the construction and operation of a new State Veterans Home, including:

- Land north of Wainwright Drive and northeast of the parade grounds.
- Approximately 11 acres of land south of Wainwright Drive in the southeastern portion of the VAMC campus.

WDVA determined that the land north of Wainwright Drive and northeast of the parade grounds was not suitable for the State Veterans Home due to the need to demolish three VA structures and displace ongoing VAMC operations. In addition, this tract of land would have required a two-story structure that would have negatively affected the aesthetic views from the historically significant parade grounds adjoining to the west of this tract of land and would have resulted in inadequate operational assumptions and evacuation strategies associated with a two-story nursing home structure. As such, WDVA concluded that the approximately 11 acres of land south of Wainwright Drive in the southeastern portion of the VAMC campus (the Site) best met their purpose and need.

Once WVDA concluded that the Site best met their purpose and need, they sought the real estate transfer of the approximately 11-acre Site from the Federal government and applied for a grant from VA for funding a portion of the construction costs for the State Veterans Home.

The EA examined in-depth two alternatives, the Preferred Action Alternative and the No Action Alternative, defined as follows:

- **Preferred Action Alternative:** VA's Preferred Action Alternative is to transfer approximately 11 acres of mostly grassy, mostly vacant land located in the southeastern portion of the VAMC campus to the State of Washington for WDVA's construction and operation of a State Veterans Home. Major elements of the Federal Proposed Action would include:
  - Transferring approximately 11 acres of land from the Federal government to the State of Washington.
  - Partially funding the construction of the proposed State Veterans Home.
  - Relocating the water tower on the 11-acre Site to another part of the VAMC campus.

The State Veterans Home campus would be constructed on the relatively level elevated plateau located in the central portion of the Site. The proposed State Veterans Home would house approximately 80 residents and would include eight paired, one-story, slab-on-grade residential buildings, totaling approximately 84,940 gross square feet. Resident amenities, gathering space

and administrative support functions would be located in a central Community Center building. In addition, two surface parking lots (approximately 70 stalls in total) and a maintenance building would be constructed on the Site. The existing 100,000-gallon water tower would be removed from the site and replaced with an approximately 150,000-gallon water tower on VAMC-retained land located east of the Site.

- **No Action Alternative:** Under the No Action Alternative, the Proposed Action would not be implemented. WDVA would continue to provide all long-term care services at the existing State Veterans Homes in western and northeastern Washington. Veterans in southeastern Washington would not have access to WDVA long-term resident care without traveling at least 120 miles to one of the other State Veterans Homes. Eligible Veterans in southeast Washington would be placed in area skilled nursing facilities. Space shortages for Veterans 65 years of age and older in need of long-term care would continue. This deficiency would likely increase over time as demand increases. The Site would remain owned by the Federal government and would remain mostly undeveloped.

The Preferred Action Alternative effectively provides the best combination of land, location, and proximity to Veteran populations in southeastern Washington, overcoming the deficiencies associated with the current unmet State Home bed need and unequal distribution of State Veterans Homes in Washington. The No Action Alternative would not enable WDVA to carry out its assigned mission to provide adequate long-term care to US Veterans in southeastern Washington and would not meet the purpose of or need for the Proposed Action. However, the No Action Alternative was assessed in the EA to provide a comparative baseline analysis, as required under the CEQ Regulations.

## 2. Environmental Analysis

Based on the analysis contained in the Final EA, VA concludes that the Preferred Action Alternative would result in potential less-than-significant adverse impacts to aesthetics, air quality, geology and soils, hydrology and water quality, wildlife and habitat, noise, solid and hazardous materials, transportation, and utilities. All of these impacts would be further reduced through careful implementation of the general best management practices (BMPs), management measures, and compliance with regulatory requirements as identified in the EA. The Preferred Action Alternative would result in cultural resources impacts. Adverse cultural resources impacts would be mitigated to less-than-significant levels as described below. Note: An adverse cultural resources effect under the National Historic Preservation Act (NHPA) does not necessarily equal a significant impact under NEPA.

- **Cultural Resources.** The Walla Walla VAMC campus, including the 11-acre Site, is located within the National Register of Historic Places (NRHP)-listed Fort Walla Walla Historic District. The existing water tower at the Site and the cultural landscape of the Site are considered to be contributing resources to the Fort Walla Walla Historic District. In addition, archaeological investigations at the Site have identified numerous historic and limited prehistoric artifacts.

In 2011 and 2013, VA issued two Notices of Undertaking to the Washington Department of Archaeology and Historic Preservation (State Historic Preservation Office or SHPO) pursuant to Section 106 of the NHPA related to the Proposed Action. The 2011 Notice pertained to the proposed construction of the State Veterans Home at the Site and included the demolition of the existing water tower and the installation of buried utilities and access roads associated with the new facility. The 2013 Notice was associated with the construction of the new replacement water tower and the associated water system improvements (new buried water lines). The Notices were also sent to federally recognized Native American Tribes identified as having possible ancestral ties to the Site area, the Advisory Council on Historic Preservation (ACHP), Fort Walla Walla Museum, and various Walla Walla agencies (Consulting Parties).

VA determined that the proposed construction of the State Veterans Home at the Site would have adverse effects under NHPA due to the transfer of the land to the State, the removal of the historic water tower, the alteration of the historic cultural landscape by the proposed construction, and the presence of archaeological resources on the 11-acre Site. In addition, VA determined that the construction of the new water tower on VAMC property east of the Site would constitute an

adverse effect under NHPA. ACHP, SHPO, Confederated Tribes of the Umatilla Indian Reservation (CTUIR) were invited and agreed to be signatories to a Memorandum of Agreement (MOA) to address and resolve adverse effects. VA and WDVA are also signatories.

In March 2014, VA submitted a Draft MOA to the Consulting Parties to address the cultural resources adverse effects associated with the State Veterans Home construction and the water tower demolition. Other parties were invited to consult, but did not participate. The MOA details appropriate mitigative actions and strategies to be undertaken to minimize the cultural resources effects, including:

- The transfer of land from the Federal Government to the State of Washington would include a Historic Preservation Covenant obligating the land owner (State of Washington) to comply with the conditions of the MOA.
- Upon transfer of the land, the State of Washington would be solely responsible for meeting the terms of the MOA.
- VA would conduct additional (Phase III) archaeological investigations to recover data sufficient to document and describe NRHP eligible site and features and resolve adverse archaeological effects.
- Establish and implement a Monitoring Plan and Discovery Protocol document to be used during all activities at the Site.
- Establish and implement communication and coordination with the consulting parties.
- Curate and report on any archaeological resources.
- VA would treat human remains and items of religious and cultural importance in accordance with its Discovery Protocol and the WDVA would treat human remains and items of religious and cultural importance in accordance with the Historic Preservation Covenant.
- Provide opportunities for the consulting parties to participate in the new building construction design review process (WDVA has provided opportunities for comment during various stages of the design).
- Solicit proposals for the reuse of the existing water tower on or off-site through the consulting parties and community and regional organization and agency outreach efforts. Demolition of the existing water tower would require a Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) recordation submitted to the National Parks Service (NPS).

VA is drafting a second MOA to address the adverse cultural resources effects of the new water tower.

Compliance with the terms of the MOAs would satisfy VA's requirements under Section 106 of the NHPA and would mitigate adverse cultural resources effects associated with the Preferred Action Alternative.

Under the Preferred Action Alternative, positive short-term and long-term impacts to the local socioeconomic environment would be anticipated. Most notably, a significant long-term positive effect to the health of Veterans living in southeastern Washington would occur should the State Veterans Home be constructed. No health or safety risks to children are anticipated.

Under the No Action Alternative, the Proposed Action would not be implemented and no improvements to the current level of WDVA's long-term services or capability in southeastern Washington would occur. No positive impacts attributable to the Proposed Action would occur, and a significant adverse effect to the socioeconomic environment would occur. Specifically, WDVA's ability to provide sufficient, requisite long-term care services to the State's Veterans would be compromised.

The EA also examined the potential cumulative effects of implementing each of the considered alternatives. This analysis found that implementation of the Preferred Action Alternative, with the management and mitigation measures specified in the EA, would not result in significant adverse cumulative impacts to onsite or regional natural or cultural resources, and would maintain or enhance the socioeconomic environment of the area through the provision of long-term resident care services to the region's Veterans. The No Action Alternative would not produce these potential positive socioeconomic gains.

### **Mitigation**

The Preferred Action Alternative could cause adverse effects to historic and archaeological resources. VA has actively engaged with the SHPO and other appropriate consulting parties, and through this consultation, has developed plans to mitigate the adverse effects to less-than-significant levels. VA will:

- Finalize and implement the MOA for the State Veterans Home construction and water tower demolition.
- Complete and implement the MOA for the new water tower construction.
- Perform archaeological monitoring during ground disturbing activities associated with the construction of the State Veterans Home, demolition of the existing water tower, and the new water tower and water line construction.

In addition, implementing BMPs to reduce impacts during construction will further minimize potential impacts to local cultural resources. All contractors involved in site preparation and ground disturbing construction will be advised that all work must stop immediately in the event that archaeological features, artifacts, or remains are discovered during project construction. The construction contractor would immediately cease work until VA, WDVA, a qualified archaeologist, and the SHPO are contacted to properly identify and appropriately treat discovered items in accordance with the MOAs and applicable State and Federal law(s).

### **Management Measures**

VA will also implement the following routine BMPs and management measures identified in the Final EA to reduce identified potential effects:

- ***Aesthetics.*** Design and develop the project consistent with the character of the VAMC campus and the terms of the MOAs, and, to the extent practicable, the City of Walla Walla Zoning Code. Plant trees along the eastern boundary of the VAMC property, near the off-site residences.
- ***Air Quality.*** Control fugitive dust emissions during construction and obtain minor air emissions permits, if applicable.
- ***Geology and Soils.*** Control stormwater, soil erosion and sedimentation impacts during construction and comply with the Washington State Department of Ecology (WSDE) National Pollutant Discharge Elimination system (NPDES) permitting process and comply, to the extent practicable, with City of Walla Walla Codes for stormwater management, erosion prevention and sediment control. Document impacts to prime and unique farmland in accordance with the Farmland Protection Policy Act (FPPA).
- ***Hydrology and Water Quality.*** Control stormwater, soil erosion and sedimentation impacts during construction and operation by complying with the WSDE NPDES permitting process and, to the extent practicable, City of Walla Walla City Codes for stormwater management, erosion prevention and sediment control. Provide a proper onsite stormwater management system.
- ***Wildlife and Habitat.*** Avoid potential impacts to nesting and migratory birds and plant native species.

- **Noise.** Minimize noise effects during Site construction activities.
- **Solid and Hazardous Materials.** Excavate the abandoned steam tunnel/pipe chase and remove and properly dispose of any identified asbestos-containing materials (ACM) pipe insulation. Remove and properly dispose of the identified lead-impacted soil that exceeds the WSDE Model Toxic Control Act (MTCA) Method A unrestricted land use cleanup level during Site redevelopment and submit a Remediation Completion Report to WSDE as required for an Independent Cleanup Action. Develop and implement a Soil Management Plan for construction activities. Properly characterize and manage soil excavated during redevelopment in accordance with the Soil Management Plan. Implement construction and operational BMPs to minimize effects and to comply with applicable regulations.
- **Transportation and Parking.** Manage construction to avoid impacts to local roads.
- **Utilities.** Coordinate with the local utilities and obtain necessary approvals for connections.

### 3. Regulations

The Proposed Action will not violate the NEPA, the CEQ Regulations, 38 CFR Part 26, or other Federal, State, or local environmental regulations. This will be achieved by implementing the management and mitigation measures summarized above.

### 4. Commitment to Implementation

VA affirms its commitment to implement the management and mitigation measures identified in the Final EA and this FONSI, in accordance with the NEPA, the CEQ Regulations, and 38 CFR Part 26. Implementation is dependent on funding. VA will ensure that adequate funds are requested in future years' budget(s) to achieve the goals and objectives set forth in the Final EA and this FONSI, and to fund the commitments described above.

### 5. Agency and Public Involvement

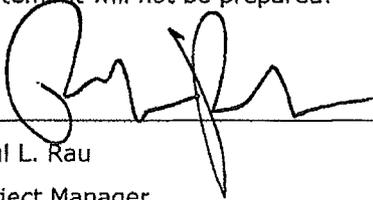
VA has consulted with appropriate Federal, State, and local regulatory agencies, and has attempted to consult with federally recognized Native American Tribes identified as having ancestral ties to the Walla Walla, Washington area, including potentially the Preferred Action Alternative Site. This consultation is documented in the Final EA. Concerns expressed by pertinent regulatory agencies and tribes have been addressed in the Final EA.

In addition, VA published and distributed the Draft EA for a 30-day public comment period, as announced by a Notice of Availability (NOA) published in *Walla Walla Union-Bulletin* from June 29, 2014 to July 1, 2014. A digital copy of the Draft EA was made available for viewing or downloading at the VAMC internet web site. Paper copies of the Draft EA were also made available for public review at the Jonathan M. Wainwright Drive VAMC and at the City of Walla Walla Library. VA received no comments from the public during the public comment period.

## 6. Finding of No Significant Impact

After careful review of the Final EA, I have concluded that implementation of the Proposed Action would not generate significant controversy or have a significant impact on the quality of the human or natural environment, provided VA and WDVA implement the management and mitigation measures identified in the Final EA.

Therefore, per the NEPA, the CEQ Regulations, and 38 CFR Part 26, I am signing this FONSI. This analysis fulfills the requirements of the NEPA and the CEQ Regulations. An Environmental Impact Statement will not be prepared.



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