ENVIRONMENTAL ASSESSMENT

OF THE PROPOSED TRANSFER OF LAND AND FUNDING FOR THE CONSTRUCTION OF A WASHINGTON STATE VETERANS HOME

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PREPARED BY:
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18 JUNE 2014
ENVIRONMENTAL ASSESSMENT

ABSTRACT

LEAD AGENCY: U.S. Department of Veterans Affairs (VA)

COOPERATING AGENCIES: None

TITLE OF PROPOSED ACTION: Transfer of Land and Funding for the Construction of a Washington State Veterans Home

AFFECTED JURISDICTION: Walla Walla, Washington

POINT OF CONTACT: Mr. Paul Rau, VA Project Manager, Department of Veterans Affairs, Office of Construction & Facilities Management, Real Property Service, 425 I Street, NW, Washington, DC 2001; Tel.: (202) 632-5693

PROONENTS: U.S. Department of Veterans Affairs (VA) and Washington Department of Veteran’s Affairs (WDVA)

DOCUMENT DESIGNATION: Draft Environmental Assessment (Draft EA)

ABSTRACT: This Draft Environmental Assessment (Draft EA) evaluates the Proposed Action of VA to transfer approximately 11 acres of land within the Jonathan M. Wainwright Memorial VA Medical Center (VAMC) campus to the State of Washington and to partially fund the Washington State Department of Veteran Affairs’ (WDVA’s) construction of a new 80-resident State Veterans Home on the transferred land. This EA discusses two alternatives: (1) the Preferred Action Alternative – the transfer of the approximately 11 acres of mostly grassy, mostly vacant land located in the southeastern portion of the VAMC to the State of Washington and partially funding the construction of the proposed State Veterans Home on the Site and (2) the No Action Alternative. The EA evaluates possible effects to aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat, including threatened and endangered species; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomic; community services; solid and hazardous materials; transportation and parking; utilities; and environmental justice. The EA concludes there would be no significant direct, indirect, or cumulative impacts to the local environment or quality of life associated with implementing the Preferred Action Alternative, provided the management measures, Best Management Practices (BMPs), and mitigation measures identified in this EA are implemented. Therefore, this EA concludes that a mitigated Finding of No Significant Impact (FONSI) is appropriate, and that an Environmental Impact Statement (EIS) is not required.
EXECUTIVE SUMMARY

This Environmental Assessment (EA) has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with the 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. 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 U.S. Department of Veterans Affairs (VA). Preparation of this 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). This EA has also been prepared in accordance with VA NEPA Interim Guidance for Projects dated 30 September 2010.

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 the WDVA’s construction of a new 80-resident State Veterans Home on the transferred land.

PURPOSE AND NEED

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.

ALTERNATIVES

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 Predesignd 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 best met their purpose and need.

Once WDVA 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.

This EA examines 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 long-term resident care without traveling at least 120 miles to one of the other Washington State Veterans Homes. Eligible Veterans in southeast Washington would be placed in area skilled nursing facilities. Space shortages for Veterans 65 year 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 is assessed in this EA to provide a comparative baseline analysis, as required under the CEQ Regulations.

**Affected Environment and Environmental Consequences**

The affected environment of the Preferred Action Alternative Site and its immediate surroundings, or the Region of Influence (ROI) of the Proposed Action, is discussed in Section 3 of this EA.

The two considered alternatives, including the Preferred Action Alternative and the No Action Alternative, are evaluated in this EA to determine their potential direct or indirect impact(s) on the physical, environmental, cultural, and socioeconomic aspects of the Proposed Action’s ROI. Technical areas evaluated in this EA include:

- Aesthetics
- Air Quality
- Cultural Resources
- Geology, Topography, and Soils
- Hydrology and Water Quality
- Wildlife and Habitat
- Noise
- Land Use
- Floodplains, Wetlands, and Coastal Zone Management
- Socioeconomics
- Community Services
- Solid and Hazardous Materials
- Transportation and Parking
- Utilities
- Environmental Justice
- Cumulative Impacts
- Potential for Generating Substantial Controversy

Implementation of the Preferred Action Alternative would result in the impacts identified throughout Section 3. These effects primarily include 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 throughout Section 3 and summarized in Section 5. 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 examines the potential cumulative effects of implementing each of the considered alternatives. This analysis finds that implementation of the Preferred Action Alternative, with the management and mitigation measures specified in this 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.

**Agency and Public Involvement**

Agencies consulted for this EA include: US Fish and Wildlife Service (USFWS); US Environmental Protection Agency (USEPA); US Army Corps of Engineers (USACE); Washington State Department of Ecology (WSDE); Washington Department of Fish and Wildlife (WDFW); Washington State Department of Transportation (WDOT); Washington Department of Archaeology and Historic Preservation (SHPO); Natural Resources Conservation Service (NRCS); Walla Walla County Conservation District (WWCCD); City of Walla Walla Department of Parks and Recreation (WWDPR); Fort Walla Walla Museum (FWWM); City of Walla Walla; Walla Walla Joint Community Development Agency (WWJCD); Walla Walla Public Works Administration (WWPWA); Port of Walla Walla (PW); and Walla Walla Historic Preservation Commission (WWHPC). Agency information
and comments have been incorporated into this EA. Copies of relevant correspondence can be found in Appendix A.

The following summarizes information provided by the agencies consulted:

- The USFWS indicated that information pertaining to Federally listed threatened and endangered species and associated habitat requirements is included on their website. According to the USFWS Endangered Species Program database, one Federally-threatened species (Bull Trout), one recovery species (Gray Wolf), and one candidate species (Washington Ground Squirrel) have been identified for Walla Walla County. According to the USFWS Species Profile Reports for these species, habitat requirements for these species are unlikely to be found on the Site or surrounding properties, primarily due to the developed nature of the area, but also due to the lack of water resources required to support Bull Trout populations. As such, it is not anticipated that any of these three species would be present on the Site or surrounding properties.

- The WSDE stated that proper erosion and sediment control measures must be used on construction sites and adjacent areas to prevent upland sediments from entering surface waters, as detailed in the local stormwater ordinance and the Stormwater Management Manual for Eastern Washington. All ground disturbances by construction activities must be stabilized and native vegetation used.

The WSDE also stated that any operations that would generate a waste discharge or have the potential to impact the quality of state waters must receive prior authorization from the WSDE.

The WSDE stated that routine inspections and maintenance of all erosion and sediment control BMPs are recommended during and after development activities, and a Stormwater Pollution Prevention Plan (SWPPP) may be required.

The WSDE noted that proper disposal of construction debris must be in such a manner that debris cannot enter the natural stormwater drainage system or cause water quality degradation of surface waters.

WSDE stated that the operator of a construction site that disturbs one acre or more of total land area and which has or will have a discharge of stormwater to a surface water or storm sewer, must apply for coverage under the WSDE Construction Stormwater General Permit.

- The WDFW indicated that available information pertaining to threatened and endangered species is located on their Priority Habitat and Species (PHS) internet mapping database. According to the PHS internet mapping database, no priority habitats or special species are known to occur at or adjoining to the Site. Wetlands were identified to the west and southwest of the VAMC, at least 1,300 feet from the Site. In addition, Garrison Creek was identified approximately 1,000 feet south of the Site.

- The WDOT stated that the Site is not adjacent to the State highway and did not have any comments or concerns regarding the Proposed Action.

The WWCCD stated that they have no significant comment pertaining to the Proposed Action.

- The WWCCD stated that they have no significant comment pertaining to the Proposed Action. The WWCCD further stated that a high water table is a common occurrence in the area, except on high ground, and indicated that past construction to the north located at Blue Ridge School and to the east located at Blue Mountain Mall encountered problems with a high water table.

- The WWJCDA stated that the Site falls within the City of Walla Walla Critical Areas Code for having a moderate to high potential for liquefaction susceptibility and that the Site has a low to moderate potential for liquefaction susceptibility. The WWJCDA also stated that the southern
hill on the Site may have the potential for slope erosion and noted that Garrison Creek is located south of the Site.

- The City of Walla Walla stated that it had no information on file regarding environmental concerns or issues at the Site. The City indicated that there is no indication of surface or ground resources at the Site and that the Site is not included in a mapped floodplain. The City noted that Mill Creek and various streams are located within one mile of the VAMC and that Mill Creek has been listed as priority habitat due to the presence of Chinook Salmon, Steelhead Trout, and Bull Trout. The City also noted that wetlands and ponds are present adjoining to the VAMC. The City stated that the Site is adjacent to Fort Walla Walla Park, and provided the November 2003 Fort Walla Walla Inventory and Analysis and the 2004 Fort Walla Walla Master Plan. The City requested that the eastern extent of the Site be provided to the City of Walla Walla so they can determine if the City's walking trail easement would be included in the proposed real estate transfer (it is not included). The City also stated that they are monitoring the continued development of the VAMC to determine the timing and appropriate scope of right-of-way improvements, up to and including lane changes and a traffic signal, at the intersection of West Poplar and Avery Street, and provided a copy of a February 2013 Transportation Impact Analysis prepared by Kittelson and Associates, Inc.

The Washington State Department of Health (WSDOH) has jurisdiction authority of reviewing and approving design and major changes to public water systems. The WSDOH concurrence letter is also found in Appendix A.

Six federally recognized Native American Tribes were identified as having possible ancestral ties to the Site and were contacted by VA as part of the Section 106 consultation, in letters dated from December 2011 to September 2013, for input regarding the Proposed Action. As described above, the CTUIR is considered a signatory party for the MOA related to cultural resources. The other tribes were invited to consult, but did not participate.

VA, as the proponent of the Proposed Action, will publish and distribute the Draft EA for a 30-day public comment period, as announced by a Notice of Availability (NOA) published in Walla Walla Union-Bulletin, a local newspaper of general circulation. A digital copy of the Draft EA will be available for viewing or downloading at the following web address: http://www.wallawalla.va.gov. Paper copies of the Draft EA will also be made available for public review at the Jonathan M. Wainwright Drive VAMC and at the City of Walla Walla Library. VA will respond to provided public comments within the Final EA and will issue a Finding of No Significant Impact (FONSI), presuming there are no substantive public comments that would warrant further analysis and no significant, unmitigable effects are identified.

CONCLUSIONS

The Preferred Action Alternative would result in the effects identified throughout Section 3 of this EA. These include 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 effects would be maintained at less-than-significant levels through careful coordination and implementation of general BMPs and management measures, and compliance with regulatory requirements.

The implementation of the Preferred Action Alternative would result in cultural resources impacts. The Walla Walla VAMC campus, including the Site, is located within the 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.
VA has actively engaged the SHPO, ACHP, the CTUIR and other consulting parties throughout the cultural resource investigations of the Site. As a result, VA has drafted a MOA pursuant to Section 106 to address the adverse cultural resources effects associated with the State Veterans Home construction and water tower demolition of the Proposed Action. A second MOA for the construction of the new water tower is being prepared. The MOAs will detail the appropriate mitigative actions and strategies that would be undertaken to minimize the cultural resources effects. Implementation of the MOAs and consultation with the Consulting Parties would result in compliance with the NHPA and would mitigate the adverse cultural resources effects associated with the Preferred Action Alternative.

The analysis performed in this EA concludes there would be no significant adverse impact, either individually or cumulatively, to the local environment or quality of life associated with implementation of the Preferred Action Alternative, provided the mitigation, management and regulatory compliance measures described in this EA are implemented. This EA’s analysis determines, therefore, that an Environmental Impact Statement (EIS) is unnecessary for implementation of the Preferred Action Alternative, and that a mitigated FONSI is appropriate.
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DEPARTMENT OF VETERANS AFFAIRS

JUNE 2014
SECTION 1: INTRODUCTION

1.1 Introduction

This Section provides the reader with necessary introductory and background information concerning the Proposed Action for proper analytical context and identifies the purpose of and need for the Proposed Action and the Federal decision to be made. A summary of public/agency involvement (and key issues identified) is provided in Section 4. Federal, State, and local regulations applicable to the Proposed Action are identified in Section 11.

This EA has been 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), a Federal agency, proposed transfer of approximately 11 acres of land within the southeastern portion of the Jonathan M. Wainwright Memorial VA Medical Center (VAMC) campus to the State of Washington for the Washington State Department of Veteran Affairs’ (WDVA’s) construction and operation of a new 80-resident State Veterans Home. Major elements of the Federal Proposed Action 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 approximately 11-acre Site consists of the southeastern portion of an 88-acre parcel owned by the Federal government since 1858. The Site was unimproved vacant land associated with Fort Walla Walla, a military reservation established in 1858 that originally contained 640 acres. Barracks and Officers’ Quarters, a hospital, stables, ancillary buildings and Parade Ground were constructed throughout the reservation from 1859 until the 1880s. In 1910, Fort Walla Walla was shut down. In the 1920s, VA took possession of the reservation, including the Site. Over the following 50 years, operations were shifted from the Site to other parts of the VAMC campus where medical center buildings were constructed. The majority of the buildings at the Site were removed by the late 1960s/early 1970s. Since the early 1970s, the Site has been mostly grassy vacant land with some trees, a water tower that services the VAMC, a small transformer/generator building, a portion of a garage, and two paved drives. The Site location and features are illustrated on Figures 1 through 3.

Upon completion of the proposed real estate land transfer of the approximately 11-acre Site, WDVA would remove the approximately 100,000-gallon existing water tower from the Site and VA would construct an approximately 150,000-gallon new water tower on VAMC-retained land near the northeast corner of the Site. As part of the water tower relocation, VA would install new water lines at the campus and abandon existing water lines. In addition, VA would connect the VAMC buildings to the existing City of Walla Walla water system for temporary use until the new water tower is constructed.

The new State Veterans Home would accommodate approximately 80 residents and would include eight, one-story, slab-on-grade 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 facility would be designed and constructed in accordance with the VA Office of
INTRODUCTION

Facilities and Management, Community Living Center Design Guide, dated 2011 and the 38 Code of Federal Regulations (CFR), Part 59 (Grants to States for Construction or Acquisition of State Homes), Sections 59.130 through 59.160.

As part of WDVA’s planning process and in accordance with 38 CFR, Part 59, WDVA sought land from the Federal government and applied for a grant from VA for funding a portion of the construction costs for the State Veterans Home. As a result of the proposed real estate land transfer from the Federal government and the Federal funding request, preparation of this 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). This EA has been prepared in accordance with VA’s NEPA Interim Guidance for Projects (2010).

In accordance with the above regulations, this EA: allows for public input into the Federal decision-making process; provides Federal decision-makers with an understanding of potential environmental effects of their decisions, before making these decisions; identifies measures the Federal decision-maker could implement to reduce potential environmental effects; and documents the NEPA process.

1.2 Background

The WDVA currently operates three State Veterans Homes in Washington, with a combined total of 575 beds. These facilities are located in western (Washington Veterans Home in Retsil and Washington Soldiers Home in Orting) and northeastern (Spokane State Veterans Home in Spokane) Washington (Figure 4). Occupancy at these facilities currently exceeds 95 percent. WDVA is currently experiencing a significant shortfall of available space in the State for long-term care and needs to increase its capacity to meet the current and projected future long-term resident care demands. The VA Office of Geriatrics Extended Care found Washington State currently has an unmet State Home bed need of 642 beds. There are currently no State Veterans Homes in the 7-county area (Asotin, Benton, Columbia, Franklin, Garfield, Walla Walla and Yakima counties) of southeastern Washington and long-term resident care is no longer provided by the VAMC.

The current unmet State Home bed need and unequal distribution of State Veterans Homes in Washington does not allow WDVA to provide adequate long-term care to meet the current and projected future long-term care needs of Veterans. With the increasing need for long-term care, and the lack of facilities in southeastern Washington, WDVA requires a new facility that would be able to provide long-term care needs of Veterans in southeastern Washington.

As of 2011, approximately 17,200 Veterans were located in the 7-county area of southeastern Washington. The nearest Washington State Veterans Home is the Spokane Veterans Home, located approximately 120 miles north of Walla Walla. The Washington Soldiers Home in Orting and Washington Veterans Home in Retsil are both located approximately 200 miles northwest of Walla Walla near Seattle and Tacoma. With this data, WDVA demonstrated that the proposed State Veterans Home in the vicinity of Walla Walla would be located within a reasonable proximity to a sufficient concentration of Veterans that are 65 years of age and older, and that there is a reasonable basis to conclude that the proposed State Veterans Home would be fully occupied once completed.
FIGURE 1
SITE AND VICINITY TOPOGRAPHIC MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED WDVA STATE VETERANS HOME
WALLA WALLA, WASHINGTON

PREPARED FOR
U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C.

TTL PROJECT NO. 11012.02

DEPARTMENT OF VETERANS AFFAIRS
INTRODUCTION
FIGURE 2
SITE AND VICINITY AERIAL PHOTOGRAPH
ENVIRONMENTAL ASSESSMENT
PROPOSED WDVA STATE VETERANS HOME
WALLA WALLA, WASHINGTON

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WASHINGTON, D.C.

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DRAFT ENVIRONMENTAL ASSESSMENT
PROPOSED WDVA STATE VETERANS HOME
WALLA WALLA, WASHINGTON

JUNE 2014

FIGURE 4
LOCATIONS OF STATE VETERANS HOMES IN WASHINGTON

WALLA WALLA, WA
WASHINGTON VETERANS HOME
RETSIL, WA
WASHINGTON SOLDIERS HOME
ORTING, WA
SPokane VETERANS HOME
SPokane, WA
WASHINGTON
OREGON
IDAHO
WASHINGTON SOLDIERS HOME
ORTING, WA
WASHINGTON VETERANS HOME
RETSIL, WA
SPokane VETERANS HOME
SPokane, WA
WASHINGTON
OREGON
IDAHO
WASHINGTON
SPOKANE VETERANS HOME
SPOKANE, WA

ENVIRONMENTAL ASSESSMENT
PROPOSED WDVA STATE VETERANS HOME
WALLA WALLA, WASHINGTON

PREPARED FOR
U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C.

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DEPARTMENT OF VETERANS AFFAIRS
1.3 Purpose and Need

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.

WDVA determined the general location for the proposed State Veterans Home through a strategic analysis. WDVA's analysis determined the estimated long-term care requirements for the State’s approximately 17,200 Veterans in southeastern Washington and projected the future needs of those Veterans. WDVA used the number of existing long-term care beds, the current unmet State Veteran Home bed need, and their unequal geographic distribution to determine location and size requirements for the proposed State Veterans Home. Through this process, WDVA established the proposed size of the State Veterans Home (designed to accommodate 80 residents).

1.4 Decision-Making

This EA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with VA’s proposed transfer of approximately 11 acres of land that is currently part of the Walla Walla VAMC to the State of Washington for WDVA's proposed construction and operation of a new State Veterans Home. VA intends to provide a grant for approximately 65 percent of the funds required for the construction of the proposed State Veterans Home. VA, as a Federal agency, is required to incorporate environmental considerations into their decision-making process for the actions they propose to undertake, including the proposed land transfer and State Veterans Home construction grant. This is done in accordance with the regulations identified in Section 1.1.

Ultimately, VA will decide, in part based on the analysis presented in this EA and after having taken potential environmental, cultural, and socioeconomic effects into account, whether VA will implement the Proposed Action, and, as appropriate, carry out mitigation and/or management measures to reduce effects on the environment. VA will also consider other factors, such as cost, time, engineering feasibility, and the like in their decision-making process.

1.5 Related Environmental Documents

Related Environmental Documents include:

• Transportation Impact Analysis, Walla Walla Medical Center Expansion, prepared by Kittelson and Associates, Inc. and dated February 2013.

• Skilled Nursing Facility, Walla Walla Predesign Study, prepared for the WDVA and dated 2008.

• Conceptual Water Main Exhibit, prepared by Anderson Perry and Associates, Inc. and dated December 2013.

• Draft Environmental Assessment, Proposed Walla Walla Veterans Home, prepared by NBBJ and dated July 2013.

• Environmental Assessment, Proposed Multi-Specialty Care Outpatient Clinic, prepared by Terracon Consultants, Inc. (Terracon) and dated April 2011.

• Environmental Assessment, EUL, prepared by Dyson Environmental Management and Compliance (Dyson) and dated March 2013.

• Geotechnical Engineering Investigation, prepared by GeoEngineers and dated May 2012.

• Memorandum of Agreement, Regarding Construction of a Skilled Nursing Facility Adjacent to the VA Medical Center, Walla Walla, Washington, prepared by VA and dated March 2014.

• Phase I Cultural Resources Investigation Plan, Medical Center BURR-EUL Parcel, prepared by the Fort Walla Walla Museum and dated June 2012.

• Phase I Cultural Resources Survey for the Washington Department of Veterans Affairs Skilled Nursing Facility, prepared by Archeological and Historical Services, Eastern Washington University (AHS) and dated May 2013.

• Phase II Cultural Resources Survey for the Washington Department of Veterans Affairs Skilled Nursing Facility, prepared by AHS and dated April 2014.

• Phase I Cultural Resources Survey Addendum for the Washington Department of Veterans Affairs Skilled Nursing Facility Utility Corridor, prepared by AHS and dated April 2014.

• Phase I Cultural Resources Investigation at the Jonathan M. Wainwright Memorial Veterans Affairs Medical Center for the Proposed Campus-Wide Sewer and Water Infrastructure Replacement, completed by Fort Walla Walla Museum and dated June 2013.

• Phase I ESA, Walla Walla VA Medical Center Enhanced Use Lease Project, Argo Systems, LLC, dated May 2009.


• Phase II ESA, Jonathan M. Wainwright Memorial VA Center New Outpatient Center, Terracon Consultants, Inc. dated September 2011.

• Various correspondences between VA, WDVA, and SHPO, 2011 through 2013.

• Walla Walla Community Living Center (State Veterans Home) Conceptual Site Plan, prepared by NBBJ and dated June 2013.
SECTION 2: DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

This Section provides the reader with necessary information regarding the Proposed Action and its alternatives. The screening criteria and process developed and applied by WDVA to select a viable site for the proposed State Veterans Home are described, providing the reader with an understanding of WDVA’s rationale in ultimately selecting, the Preferred Action Alternative Site.

2.2 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.

There are currently no State Veterans Homes in southeastern Washington. WDVA currently operates State Veterans Homes in Retsil, Orting and Spokane. The nearest State Veterans Home is the Spokane Veterans Home, located approximately 120 miles north of Walla Walla.

The Proposed Action would provide long-term residency and address quality, access, and capacity needs for high quality nursing care of Veterans in southeastern Washington. The proposed 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.

The new State Veterans Home would be designed and constructed in accordance with the VA Office of Facilities and Management, Community Living Center Design Guide, dated 2011, and 38 CFR, Part 59 (Grants to States for Construction or Acquisition of State Homes), Sections 59.130 through 59.160. The facility would be ADA compliant and meet all requirements set forth in EO 13423: Strengthening Federal Environmental, Energy, and Transportation Management. The facility would be designed and built to VA design criteria and in accordance, to the extent practicable, with local building and zoning codes. WDVA, as a State agency, is not subject to local regulations, but would comply with local agency requirements to the extent practicable.

The State Veterans Home would operate 24 hours per day, seven days per week, 365 days per year. The facility would be designed to provide space for up to 80 Veteran residents. The facility would be staffed by approximately 100 administrative and health care professionals, and support staff (in shifts), partly comprised of existing WDVA staff. The majority of the staff would be drawn from non-WDVA sources. The State Veterans Home would be available to US Veterans and service members from all branches of the US Armed Forces who meet the criteria for care.

2.3 Alternatives Analysis

The NEPA, CEQ Regulations, and 38 CFR Part 26 require all reasonable alternatives to be rigorously explored and objectively evaluated. Alternatives that are eliminated from detailed
study must be identified along with a brief discussion of the reasons for eliminating them. For purposes of analysis, an alternative was considered “reasonable” only if it would enable WDVA to accomplish the primary mission of providing a suitable long-term resident care facility that meets the purpose of and need for the Proposed Action. “Unreasonable” alternatives would not enable WDVA to meet the purpose of and need for the Proposed Action.

2.3.1 Alternatives Development

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 of 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 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.
2.3.2 Evaluated Alternatives

Preferred Action Alternative

Based on the above analysis, 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. The site location and features are shown on Figures 1 through 3. 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.

Upon completion of the proposed real estate land transfer of the approximately 11-acre Site, WDVA would remove the approximately 100,000-gallon existing water tower from the Site and VA would construct an approximately 150,000-gallon new water tower on VAMC-retained land near the northeast corner of the Site. The new water tower would extend approximately 185 feet above grade; however, would only be approximately 40 feet higher in total elevation as the existing approximately 125 feet all water tower, which was built on a hill. As part of the water tower relocation, VA would install new water lines at the campus and abandon existing water lines. In addition, VA would connect the VAMC buildings to the existing City of Walla Walla water system for temporary use until the new water tower is constructed.

Initial construction activities would involve demolition of the existing water tower and associated supply and distribution lines, demolition of the small on-site transformer/generator building, and the installation of three sediment traps in the northeastern, north-central, and northwestern portions of the Site and new water detention facility in the northeastern portion of the Site. Minor landscaping elements and approximately 20 trees would also be removed.

As part of the existing water tower removal, WDVA would abandon or remove the existing water lines that are located between the existing water tower and Well House #1, located approximately 50 feet north of the Site; between the existing tower and Well House #2, located approximately 50 feet east of the Site; and the distribution line that runs from the existing water tower to the west towards the rest of the VAMC campus. In addition and as part of the construction of the new water tower, VA would install new water lines between Well Houses #1 and #2 and the new water tower; and a new distribution line that would run from the new water tower to the north towards Wainwright Drive and then run west along Wainwright Drive and connect to the rest of the VAMC campus.

During the water tower relocation, VA would connect the VAMC campus buildings to the existing City of Walla Walla water system for temporary use until the new water tower is constructed. This would be accomplished through the connection of the existing VAMC main to the City of Walla Walla water system at Chestnut Street at east end of the VAMC campus. The VAMC campus also has a City of Walla Walla water system connection at Poplar Street, located north of the VAMC campus. Once the new water tower is constructed and operational, the City of Walla Walla water system would only be used as emergency water supply, as it is presently.

VA would provide partial funding for the construction of a WDVA State Veterans Home on the transferred land. The proposed State Veterans Home would house approximately 80 residents and would include eight paired, one-story, slab-on-grade residential buildings, each housing up to 10 residents, and 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 facility would be constructed, owned and operated by WDVA. The State Veterans Home campus would be developed on the relatively level elevated plateau located in the central portion of the Site. This area would be graded to accommodate the siting of all buildings while creating accessible grades amongst all buildings. The grading would result in a general balance of cutting and filling. Along the boundaries of the plateau to the north, east, and south, the ground surface slopes steeply down toward the Site boundaries. It is anticipated that these steep slopes would be mostly maintained during the redevelopment. An access road from Wainwright Drive would be constructed in the northern, lower elevation portion of the Site and would run east-west across the northern portion of the Site to access the State Veterans Home campus from the east end. An additional access point would be constructed at the western boundary of the Site. Staff, administration and visitor parking would be proportionately provided for all buildings in the eastern portion of the Site. Approximately 70 vehicular parking spaces, including accessible spaces would be provided for the State Veterans Home development.

The State Veterans Home would be serviced by commercial electrical and communication providers and by water and sanitary sewers from the City of Walla Walla. A new water supply line for domestic and fire service would be extended to the State Veterans Home from the municipal water main located near Wainwright Drive at the east end of the VAMC campus. The State Veterans Home would be served with a domestic water service and a fire service line for building fire protection and a fire loop for hydrants along access roads.

The State Veterans Home campus area and access road would be moderately landscaped with indigenous species of trees that would integrate well with the surrounding areas of the Site. The proposed State Veterans Home development and the location of the proposed new water tower are depicted on Figure 5.

It is anticipated that the land transfer would occur in late 2014 and the proposed State Veterans Home would be constructed during 2015. Once operational, this facility would provide long-term resident care to Veterans ages 65 years and older in southeastern Washington. Services at the proposed State Veterans Home would include long-term residency and access to high quality nursing care.

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 year 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 No Action Alternative would limit the capability of WDVA to provide the necessary long-term care services to US Veterans in southeastern Washington, and would not meet the purpose of or need for the Proposed Action. However, this alternative was retained to provide a comparative baseline analysis as required under CEQ Regulations.

Alternatives Eliminated From Further Consideration

As described in Section 2.3.1, the Preferred Action Alternative Site meets WDVA’s site criteria for State Veterans Homes. WDVA originally considered several options to address the need for a new long-term care facility in southeast Washington, including the purchase of an existing
nursing home for conversion to a State Veterans Home, and building a new State Veterans Home on purchased land away from the VAMC campus. However, these options were eliminated from further consideration early in the process as they were determined not to meet WDVA’s purpose and need and/or were not considered to be cost-effective.

Two tracts of land at the VAMC campus were originally considered, including an area north of Wainwright Drive located northeast of the parade grounds. WDVA determined that the land north of Wainwright Drive was not suitable for the State Veterans Home due to the requirement 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, this other tract of land at the VAMC was eliminated from further consideration.
FIGURE 5
PROPOSED STATE VETERANS HOME SITE PLAN

ENVIRONMENTAL ASSESSMENT
PROPOSED WDVA STATE VETERANS HOME WALLA WALLA, WASHINGTON

PREPARED FOR
U.S. DEPARTMENT OF VETERANS AFFAIRS WASHINGTON, D.C.

CHECKED APPROVED

TTL PROJECT NO. 11012.02

1 – PROPOSED STATE VETERANS HOME STRUCTURES
2 – PROPOSED WATER TOWER
3 – PROPOSED ACCESS ROAD
RP – PROPOSED RETENTION POND
ST – PROPOSED SEDIMENT TRAP
WH – WELL HOUSE
AF – ATHLETIC FIELDS
SECTION 3: AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.1 Introduction

This Section describes the baseline (existing) environmental, cultural, and socioeconomic conditions at the 11-acre proposed WDVA State Veterans Home Site located in the southeastern portion of the Jonathan M. Wainwright Memorial VAMC in Walla Walla, Washington, and its general vicinity, with emphasis on those resources potentially impacted by the Proposed Action. Appendix B provides photographs, with captions, of the Site and its vicinity. Under each resource area, the potential direct and indirect effects of implementing the Preferred Action Alternative and the No Action Alternative on this environment are identified.

In this EA, impacts are identified as either significant, less than significant (i.e., common impacts that would not be of the context or intensity to be considered significant under the NEPA or CEQ Regulations), or no impact. As used in this EA, the terms “effects” and “impacts” are synonymous. Where appropriate and clearly discernible, each impact is identified as either adverse or positive.

The CEQ Regulations specify that in determining the significance of effects, consideration must be given to both “context” and “intensity” (40 CFR 1508.27):

- **Context** refers to the significance of an effect to society as a whole (human and national), to an affected region, to affected interests, or to just the locality. In other words, the context measures how far the effect would be “felt.”

- **Intensity** refers to the magnitude or severity of the effect, whether it is beneficial or adverse. Intensity refers to the “punch strength” of the effect within the context involved.

In this EA, the significance of potential direct, indirect, and cumulative effects has been determined through a systematic evaluation of each considered alternative in terms of its effects on each individual environmental resource component.

Significance criteria for resource areas considered in this EA are as follows:

- **Aesthetics.** An alternative could significantly affect visual resources if it resulted in abrupt changes to the complexity of the landscape and skyline (i.e., in terms of vegetation, topography, or structures) when viewed from points readily accessible by the public.

- **Air quality.** An alternative could have a significant air quality effect if it would result in substantially higher air pollutant emissions or cause established air quality standards to be exceeded.

- **Cultural resources.** An alternative could have an adverse effect on cultural resources under NHPA if it would: result in damage, destruction, or demolition to an archaeological site or building that is eligible or listed on the National Register of Historic Places; promote neglect of such a resource, resulting in resource deterioration or destruction; introduce audio or visual intrusion to such a resource; or decrease access to resources of value to federally recognized Native American tribes. An adverse effect under NHPA does
not necessarily equal a significant impact under NEPA. Impact assessment for cultural resources focuses on properties that are listed in or considered eligible for the National Register of Historic Places or are National Historic Landmarks.

- **Geology and Soils.** If an alternative would result in an increased geologic hazard or a change in the availability of a geologic resource, it could have a significant effect. Such geologic and soil hazards would include, but not be limited to, seismic vibration, land subsidence, and slope instability.

- **Hydrology and Water Quality.** If an alternative would result in a reduction in the quantity or quality of water resources for existing or potential future use, it could have a significant effect. A significant effect could occur if the demand exceeded the capacity of the potable water system.

- **Wildlife and Habitat.** The effect of an alternative on biological resources and ecosystems could be significant if it would disrupt or remove any endangered or threatened species or its designated critical habitat. The loss of a substantial number of individuals of any plant or animal species (sensitive or non-sensitive species) that could affect the abundance or diversity of that species beyond normal variability could also be considered significant. The measurable degradation of sensitive habitats, particularly wetlands, could also be significant.

- **Noise.** An alternative could have a significant noise effect if it would generate new sources of substantial noise, increase the intensity or duration of noise levels to sensitive receptors, or result in exposure of more people to unacceptable levels of noise.

- **Land use.** If an alternative would conflict with adopted plans and goals of the affected community or if it would result in a substantial alteration to the present or planned land use of an area, it could have a significant direct effect. If an alternative would result in substantial new development or prevent such development elsewhere, it could have a significant indirect effect. In addition, an alternative could significantly affect visual resources if it resulted in abrupt changes to the complexity of the landscape and skyline (i.e., in terms of vegetation, topography, or structures) when viewed from points readily accessible by the public.

- **Floodplains, Wetlands, and Coastal Zone Management.** An alternative could have a significant effect on water resources if it would cause substantial flooding or erosion, if it would subject people or property to flooding or erosion, or if it would adversely affect a significant water body, such as a stream or lake.

- **Socioeconomics.** If an alternative would substantially alter the location and distribution of the population within the geographic “region of influence (ROI),” cause the population to exceed historical growth rates, or substantially affect the local housing market and vacancy rates, the effect would be significant. Significant effects could occur if an alternative caused disproportionate risks to children that resulted from environmental health risks or safety risks. In addition, an alternative could have a significant effect if it would create a need for new or increased fire or police protection, or medical services, beyond the current capability of the local community, or would decrease public service capacities so as to jeopardize public safety. It is important to note that, per CEQ Regulations (40 CFR 1508.14), social or economic effects are not intended by themselves to require preparation of an EIS. Only when social or economic effects are interrelated with natural or physical environmental effects would all of these effects be analyzed as part of the NEPA process.
Community Services. An alternative could have a significant effect on infrastructure if it would increase demand over capacity, requiring a substantial system expansion or upgrade, or if it would result in substantial system deterioration over the current condition.

Solid and Hazardous Materials. An alternative could have a significant effect if it would result in a substantial increase in the generation of hazardous substances, increase the exposure of persons to hazardous or toxic substances, increase the presence of hazardous or toxic materials in the environment, or place substantial restrictions on property use due to hazardous waste, materials, or site remediation. Data provided in the site-specific ESAs and other prior studies helps to identify these potential impacts, as well as their significance.

Transportation and Parking. An alternative could have a significant effect on infrastructure if it would increase demand over capacity, requiring a substantial system expansion or upgrade, or if it would result in substantial system deterioration over the current condition. For instance, an alternative could have a significant effect on traffic if it would increase the volume of traffic beyond the existing road capacity, cause parking availability to fall below minimum local standards, or require new or substantially improved roadways or traffic control systems.

Utilities. An alternative could have a significant effect on infrastructure if it would increase demand over capacity, requiring a substantial system expansion or upgrade, or if it would result in substantial system deterioration over the current condition.

Environmental Justice. Significant effects could occur if an alternative would disproportionately affect minority or low-income populations.

3.2 Aesthetics

The Site is located in the southeastern portion of the VAMC campus and has been owned by the Federal Government since 1858. The Site is currently mostly grassy, unimproved vacant land with an approximately 125 feet tall, 100,000-gallon water tower, a small transformer/emergency generator building, a portion of an eight-car garage, a paved drive with cul-de-sac in the central portion, and paved drive along the southern boundary.

The Site was unimproved vacant land associated with Fort Walla Walla, a military reservation established in 1858 that originally contained 640 acres. Barracks and Officers’ Quarters, a hospital, stables, ancillary buildings and Parade Ground were constructed throughout the reservation from 1859 until the 1880s. In 1910, Fort Walla Walla was shut down. In the 1920s, VA took possession of the reservation, including the Site. Over the following 50 years, operations were shifted from the Site to other parts of the VAMC campus where medical center buildings were constructed. The majority of the buildings at the Site were removed by the late 1960s/early 1970s. Since the 1970s, the Site has been mostly vacant grassy land with some trees.

The central portion of the Site, where the former buildings were located and the State Veterans Home is proposed to be constructed, is the top of a relatively level plateau. The ground surface slopes steeply down from the plateau to the north, south and east toward the Site boundaries.

The area north of the Site is currently occupied by a VAMC well pump house, two athletic fields and an associated clubhouse, and Wainwright Drive. The area across Wainwright Drive is occupied by unimproved land and parking areas associated with the VAMC. Farther north is Blue Ridge Elementary School. The area east of the Site is currently unimproved land associated with the VAMC with a well pump house, beyond which is a small paved pedestrian
The City of Walla Walla County maintains aesthetics through the Walla Walla Municipal Code (WWMC), Title 20 (Zoning).

### 3.2.1 Effects of the Preferred Action Alternative

The Preferred Action Alternative would result in less-than-significant short-term aesthetic impacts associated with Site development and construction activities. These activities would include demolition of the existing water tower and the small site buildings, site grading, the installation of underground utilities, and the construction of the State Veterans Home and replacement water tower. Minor landscaping elements and approximately twenty trees would also be removed; however, none of these trees have been designated for preservation according to a VAMC Tree Inventory Report dated 2010.

The proposed State Veterans Home would consist of eight, one-story, slab-on-grade residential buildings and a central Community Center building constructed on the top of the plateau in the west-central portion of the Site. The buildings would be situated so that only two or three buildings would be seen from most vantage points. In addition, two surface parking lots (approximately 70 stalls in total) and a small maintenance building would be constructed on the plateau. The buildings would be connected by exterior sidewalks and landscaped areas. The State Veterans Home design incorporates brick and cement board siding in keeping with the architectural aesthetics of the VAMC campus. Roofs would include both flat and shed roof forms. The final State Veterans Home design would be developed in accordance with the Section 106 Memorandum of Agreement (MOA) as detailed in Section 3.4. As a result, the facility would be in keeping with the architectural character of the VAMC campus and would not have a significant aesthetic impact.

Concurrent with construction of the State Veterans Home, VA would construct an approximately 150,000-gallon new water tower on VAMC-retained land near the northeast corner of the Site. The water tower would extend approximately 185 feet above grade, which is necessary to meet the hydraulic demands throughout the VAMC campus. Although the proposed water tower would have a greater structural height than the existing 125 feet tall water tower, it would be situated at a location with a lower elevation, resulting in a total elevation only approximately 40 feet higher than the existing water tower, which was built on the top of the plateau. The new water tower would result in long-term aesthetic impacts; however, the proposed water tower would be a replacement for the existing water tower of a similar elevation. VA proposes to install a slender pedestal style tower to minimize the profile and mass of the structure and lessen the visual impact of the tower and would paint it blue to closely match the color of the existing tower. The water tower would also be designed and constructed in accordance with the MOA requirements.

In 2011, VA held a public meeting to notify members of the community of the planned removal of the existing water tower and its replacement with a new water tower farther to the east. Opinions of this action were mixed with no significant input in support of or against the action received. After the 50 percent completion of design plans, VA addressed the aesthetic impacts of the removal of the existing water tower and the construction of the replacement water tower with the City of Walla Walla and the SHPO. The City stated that they did not have any objections to the action and were not aware of any public opposition to the action. SHPO stated that they did not have any objections to the action and were supportive of the move of the new water tower to the east and farther from the historic Fort Walla Walla district core, to minimize views of the new water tower from the historic district. VA indicated that other
Section 106 consulting parties expressed disappointment in the water tower design. However, with the implementation of an approved water tower design in accordance with the MOA, cultural resources impacts would be reduced to less-than-significant levels.

The residential properties to the south are at least 800 feet away from the proposed water tower location (the same distance as the existing water tower); as such views of the water tower would be limited and would be similar to their views of the existing water tower. The new water tower would be located approximately 800 feet closer to the residential and commercial properties east of the VAMC. However, the residential properties would remain at least 400 feet to the east and northeast of the new water tower. As such, the aesthetic impacts would be less-than-significant. VA would plant trees along the eastern boundary of the VAMC property, closest to residential properties, to further minimize aesthetic impacts.

3.2.2 Effects of the No Action Alternative

Under the No Action Alternative, the Site would remain largely undeveloped and no additional aesthetics impacts would occur. Should the Site ultimately be developed for another use, aesthetics impacts could result from that changed land use.

3.2.3 Mitigation/Management Measures

No project-specific mitigation measures are required.

Aesthetic impacts would be maintained at less-than-significant levels through the following:

- Project planning and development in accordance with, to the extent practicable, the City of Walla Walla Zoning Code.
- Project design and development consistent with the character of the remainder of the VAMC campus and in accordance with the terms of the MOAs.
- Planting trees along the eastern boundary of the VAMC property near the off-site residential properties.

3.3 Air Quality

3.3.1 Regulatory Background

Ambient Air Quality

The ambient air quality in an area can be characterized in terms of whether or not it complies with the primary and secondary National Ambient Air Quality Standards (NAAQS). The Clean Air Act, as amended (CAA and CAAA) requires the USEPA to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS are provided for the following principal pollutants, called “criteria pollutants” (as listed under Section 108 of the CAA):

- Carbon monoxide (CO)
- Lead (Pb)
- Nitrogen oxides (NO\textsubscript{x})
- Ozone (O\textsubscript{3})
- Particulate matter (PM), divided into two size classes:
  - Aerodynamic size less than or equal to 10 micrometers (PM\textsubscript{10})
  - Aerodynamic size less than or equal to 2.5 micrometers (PM\textsubscript{2.5})
- Sulfur dioxide (SO\textsubscript{2})
Areas are designated by the USEPA as “attainment”, “non-attainment”, “maintenance”, or “unclassified” with respect to the NAAQS. Regions in compliance with the standards are designated as “attainment” areas. In areas where the applicable NAAQS are not being met, a “non-attainment” status is designated. Areas that have been classified as “non-attainment” but are now in compliance can be re-designated “maintenance” status if the state completes an air quality planning process for the area. Areas for which no monitoring data is available are designated as “unclassified”, and are by default considered to be in attainment of the NAAQS. According to the USEPA Green Book, Walla Walla County is currently designated as a full attainment area for the principal pollutants listed above.

Gases that trap heat in the atmosphere are often called greenhouse gases. Some greenhouse gases, such as carbon dioxide, occur naturally and are emitted to the atmosphere through natural processes and human activities. Other greenhouse gases (e.g., fluorinated gases) are created and emitted solely through human activities. The principal greenhouse gases that enter the atmosphere because of human activities are:

- Carbon dioxide (CO₂)
- Methane (CH₄)
- Nitrous oxide (N₂O)
- Fluorinated gases (e.g., hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride)

Gases in the atmosphere can contribute to the greenhouse effect both directly and indirectly. Direct effects occur when the gas itself absorbs radiation. Indirect radiative forcing occurs when chemical transformations of the substance produce other greenhouse gases, when a gas influences the atmospheric lifetimes of other gases, and/or when a gas affects atmospheric processes that alter the radiative balance of the earth. Other than USEPA requirements for Mandatory Reporting of Greenhouse Gases Rule (74 FR 56260), which requires reporting of greenhouse gas data and other relevant information from large sources and suppliers in the United States, no regulatory guidelines are in place. The purpose of the rule is to collect accurate and timely GHG data to inform future policy decisions. In addition, Executive Orders (EOs) 13423 and 13514 require Federal agencies to improve energy efficiency and reduce GHG emissions. No significant human sources of greenhouse gases are located at the Site.

Operating Permits

The CAA regulates criteria pollutants as well as 188 specifically listed hazardous air pollutants (HAPs). The Title V Operating Permit Program under 40 CFR 70 requires sources that meet the definition of a “major source” of criteria pollutants or HAPs to apply for and obtain a Title V operating permit. A major source of HAPs has the potential to emit (PTE) more than 10 tons per year (tpy) of any individual HAP, or 25 tpy of any combination of HAPs. The definition of major source for criteria pollutants is dependent on the air quality attainment status of the region where the source is located (i.e., areas that are in attainment or non-attainment with the NAAQS). Major sources have a PTE more than 100 tpy of any criteria pollutant in an attainment area or lower levels in various classifications of non-attainment (i.e., marginal, moderate, serious, severe, and extreme).

No significant sources of air emissions exist at the Site. The Site does not have and is not required to have a Title V operating permit.

State and Local Regulations

The Washington State Department of Ecology (WSDE), Air Quality Program (AQP), coordinates State-wide air compliance and enforcement activities through the Washington Administrative Code (WAC), Chapters 173-400 through 173-495. The AQP promotes air compliance through
Conformity with State Implementation Plans

The General Conformity Provision of the CAA of 1970 (42 USC 7401 et seq.; 40 CFR Parts 50-87) Section 176(c), including the USEPA's implementation mechanism, the General Conformity Rule (40 CFR Part 51, Subpart W), prohibits the Federal government from conducting, supporting, or approving any actions that do not conform to a USEPA-approved State Implementation Plan (SIP). A SIP is a state's self-authored blueprint for achieving and maintaining compliance with the goals of the CAA. Federal agencies prepare written Conformity Determinations for Federal actions in or affecting NAAQS non-attainment areas or maintenance areas when the total direct and indirect emissions of non-attainment pollutants (or their precursors) exceed specified thresholds. Conformity with the SIP is demonstrated if project emissions fall below threshold values.

Walla Walla County is designated as a full attainment area for pollutants.

3.3.2 Sensitive Receptors

The Site is adjoined to the north and west by the VAMC campus, which is largely presented in a park-like and residential-like setting. In addition, Blue Ridge Elementary School is located approximately 550 feet north of the Site and athletic fields on VAMC property are located north of the Site. The Site is adjoined to the east by unimproved land associated with the VAMC; however, residences are located approximately 400 feet to the east and northeast of the Site. The Site is adjoined to the south by Fort Walla Walla Park with a residential neighborhood approximately 800 feet to the south. Additional residential neighborhoods, schools, and parks are located at least 1,000 feet east Site. No other sensitive air quality receptors were identified in the vicinity of the Site, except for the VAMC.

3.3.3 Effects of the Preferred Action Alternative

The Preferred Action Alternative would have less-than-significant direct and indirect, short-term and long-term impacts to the existing air quality environment around the proposed Site. Impacts would include short-term and long-term increased air emission levels as a result of: 1) Construction activities and 2) Operation of the State Veterans Home and onsite activities.

Demolition and construction activities would be performed in accordance with Federal and State air quality requirements. Demolition and construction-related emissions are generally short-term, but may still have adverse impacts on air quality, primarily due to the production of dust. Dust can result from a variety of activities, including excavation, grading, and vehicle travel on paved and unpaved surfaces. Dust from demolition and construction can lead to adverse health effects and nuisance concerns, such as reduced visibility on nearby roadways. Implementing dust control measures (BMPs) significantly reduces dust emissions from demolition and construction. The amount of dust is dependent on the intensity of the activity, soil type and conditions, wind speed, and dust suppression activities used. Implementation of BMPs, discussed below, would further minimize these anticipated less-than-significant adverse, short-term impacts.

WDVA anticipates that the Proposed Action would result in approximately 95 vehicle round-trips to and from the State Veterans Home on any given day, including staff, volunteers and visitors. Based on these low traffic volumes, no significant long-term increase in regional vehicle miles (and associated emissions) is anticipated. In addition, there would be some reduction in air emissions as a result of having a regional State Veterans Home in southeast...
Washington (reduced travel times and associated automobile emissions to more distant facilities).

The Site is located in a full attainment area; as such, a Record of Non-Applicability (RONA) under the Clean Air Act of 1990 is not required. A Title V operating permit is not anticipated to be required for the proposed facility’s boilers, generators, and other minor equipment as they are not anticipated to emit more than 100 tpy of any individual HAP or combination of HAPs. However, WDVA would secure any required, individual minor air emissions permits from WSDE, as appropriate and based on the final design.

### 3.3.4 Effects of the No Action Alternative

Under the No Action Alternative, no significant air quality impacts would result. Should the Site ultimately be developed for another use, additional air emissions could result from that changed land use.

### 3.3.5 Mitigation/Management Measures

No project-specific mitigation measures are required. Implementing BMPs to reduce fugitive dust emissions during construction would further minimize the potential impacts on air quality. To minimize the potential for adverse, short-term air quality impacts, the construction contractors would implement the following typical dust control BMPs, as applicable, and in accordance with State and local requirements:

- Use appropriate dust suppression methods during onsite construction activities. Available methods include application of water, dust palliative, or soil stabilizers; use of enclosures, covers, silt fences, or wheel washers; and suspension of earth-moving activities during high wind conditions.
- Maintain an appropriate speed to minimize dust generated by vehicles and equipment on unpaved surfaces.
- Cover haul trucks with tarps.
- Stabilize disturbed areas with vegetation or mulching if such area would be inactive for several weeks or more (unlikely).
- Visually monitor all construction activities regularly, and particularly during extended periods of dry weather, and implement dust control measures when appropriate.

These dust-reducing BMPs would be briefed to the construction contractors at the construction kick-off meeting. In addition, the construction contractors would be informed that open burning is prohibited. The onsite construction manager would be responsible to address air quality issues if they arise. Implementation of these BMPs would reduce the potential for short-term adverse air quality impacts to acceptable levels.

In addition, WDVA would secure any required, individual minor air emissions permits from WSDE, as appropriate and based on the final design and prior to operation of the proposed facility.

### 3.4 Cultural Resources

Cultural resources are the physical evidence of our heritage. Cultural resources are: historic properties as defined in the National Historic Preservation Act (NHPA), cultural items as defined in the Native American Graves Protection and Repatriation Act (NAGPRA), archeological resources as defined in the Archaeological Resources Protection Act (ARPA),
sacred sites as defined in EO 13007 to which access is provided under the American Indian Religious Freedom Act (AIRFA), and collections as defined in 36 CFR 79, Curation of Federally Owned and Administered Collections. Requirements set forth in NEPA, NHPA, ARPA, NAGPRA, AIRFA, 36 CFR 79, EO 13007, and Presidential Memorandum on Government-to-Government Relations with Native American Tribal Governments define the basis of VA’s compliance responsibilities for management of cultural resources. Regulations applicable to VA’s management of cultural resources include those promulgated by the Advisory Council on Historic Preservation (ACHP) and the National Park Service (NPS).

3.4.1 Architectural and Archaeological 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 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 (the Consulting Parties).

State Veterans Home and Water Tower Demolition

In July 2012, VA submitted a Finding of Adverse Effect to SHPO and the consulting parties indicating that the State Veteran Home project would result in adverse effects on the Fort Walla Walla Historic District due to its impact on the cultural landscape (significant alteration of a contributing resource), the existing water tower (removal of a contributing resource), and the transfer of ownership from the Federal Government to the State of Washington. VA also indicated that there was a high probability that archaeological resources would be identified and that archaeological surveys would be conducted. The letter also indicated that VA would address adverse effects to contributing resources and determine appropriate mitigation measures to minimize the adverse effects through a MOA between VA and the Consulting Parties.

In a letter dated July 30, 2012, SHPO concurred with VA’s July 2012 Finding of Adverse Effect and noted that a MOA would be necessary to address the adverse effects. In addition, SHPO recommended modifications to the design plans to make sure that the State Veterans Home is designed and constructed in concert with the historic district.

In May 2013, a Phase I Cultural Resources Survey (May 2013 CRS) for the 11-acre Site was prepared by Archeological and Historical Services, Eastern Washington University (AHS). The May 2013 CRS included a literature review and shovel tests in a 15-meter grid across the Site. The May 2013 CRS stated that historic land uses at the Site, including buried utility installations and building construction and subsequent demolition, have disturbed much of the ground and cultural deposits in near surface sediments. The Site was identified as Archeological Site 45WW341 and a total of 690 artifacts were recovered from 193 shovel test excavations. The May 2013 CRS stated that the vast majority of the artifacts recovered were related to former building construction debris; however, “residential and professional” artifacts were discovered, including two Minie Balls (bullets) in the eastern portion of the Site. In addition, limited prehistoric cultural materials were identified on the northwest and southeast
facing slopes of the East Ridge (the plateau), including a single tertiary lithic flake in the eastern portion of the Site and a fire-cracked rock in the southwestern portion of the Site. The May 2013 CRS also indicated that historical resources show the ridgeline in the northern portion of the Site as a “bank”. In addition, two deep cuts were observed on a 1921 contour map; however, the cuts have been filled and are no longer present. The May 2013 CRS shovel test locations are depicted on Figure 6.

AHS completed a Draft Phase II Cultural Resources Survey for the 11-acre Site in April 2014 (April 2014 Phase II CRS). The Phase II CRS field investigation, conducted in late 2013, included additional shovel testing in the southern portion of the Site and 14 test pits in areas where anomalies were identified during magnetometer survey to further evaluate the historic and prehistoric artifacts identified in the May 2013 CRS. In addition, trenches were advanced at locations along the northern ridgeline at the Site, the location of the former reservoir and in the vicinity of three former buildings. The additional shovel tests generally identified translocated fill or landscaping materials associated with the removal of the former buildings and remnants of former building foundations. Further shovel testing on the southeast facing slope of the East Ridge also identified a single layer of well-rounded pebbles and cobbles which appeared to have been heavily fire-affected and have fractured in situ (prehistoric). The April 2014 Phase II CRS investigation locations are depicted on Figure 7.

In March 2014, AHS conducted 14 additional shovel test excavations in the proposed State Veterans Home utility corridor located east and north of the Site. This investigation was conducted to supplement the previous investigations completed for the proposed State Veterans Home development and previous archaeological investigations conducted in the same general area by VA in 2013 for the proposed VAMC water system improvements (discussed below). AHS primarily found fragments of building construction debris within the test excavations. The materials identified were determined not to be significant cultural resources. No further cultural resources work was recommended for the proposed utility corridor. Figure 8 depicts the March 2014 test pitting locations.

In March 2014, VA submitted a Draft MOA to WDVA, SHPO, ACHP, the CTUIR and other Consulting Parties to address the adverse effects to cultural resources associated with the State Veterans Home and the water tower demolition. 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) archeological investigations to recover data sufficient to document and describe NRHP eligible site and features and resolve adverse 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 archeological 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 will require a Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) recordation submitted to the National Parks Service (NPS). All materials are to be recycled.

**Replacement Water Tower and Water System Improvements**

In June 2013, a Phase I Cultural Resources Investigation at the VAMC for the Proposed Campus-Wide Sewer and Water Infrastructure Replacement (June 2013 CRI) was completed by Fort Walla Walla Museum. The June 2013 CRI included a literature review, selective shovel testing, and monitoring of geophysical tests. The June 2013 CRI identified a sparse quantity of buried cultural materials associated with the known uses of the VAMC dating to the late 1800s and early 1900s. Shovels tests and test monitoring were completed along the area of potential effect of the proposed Phase I Water System Replacement, including the northern boundary of the Site, the location of the proposed water tower, and the location of the proposed water distribution line running from the water tower to Wainwright Drive and then southwest along the northern side of Wainwright Drive. Historical artifacts were recovered in 16 of 59 shovel tests, the largest concentrations (characterized as low-density scatter of historic construction materials) being located in the vicinity of the proposed water tower and near the area where the proposed water distribution line approaches and intersects Wainwright Drive. No prehistoric artifacts were identified. The identified scattered historic artifacts were not considered eligible for listing in the NRHP. The June 2013 CRI recommended monitoring during ground-disturbing activities for construction of the Phase I Water System Replacement. The June 2013 CRI shovel test locations are depicted in Figure 9.

In July 2013, VA submitted an Addendum to the Notice of Undertaking, 50% Design Development of a New Water Tower, Determination of Eligibility, and Finding of No Adverse Effect for the Water System Improvement Project to SHPO and the Consulting Parties. VA retracted this notice in an additional letter in August 2013 for Reconsideration of Effect of the Proposed Water Tower Construction on Historic Resources and Finding of Adverse Effect of the Water System Improvement Project. In these notices, VA determined that the new water tower would have a visual adverse effect on the Fort Walla Walla Historic District and that the water system improvement project would not have an adverse effect on archaeological resources. In August 2013, SHPO concurred with VA’s finding that a there would be an adverse effect on a NRHP property and stated that the development of a MOA would be necessary to address the adverse effect.

In September 2013, VA submitted a Proposed Water Tower Design and Water System Project letter to SHPO and the Consulting Parties. The letter indicates that several consulting party representatives voiced their disappointment with the proposed water tower design. No details of the consulting party responses were available; however, VA stated that several factors were critical components that influenced the water tower design. VA stated that a buried reservoir was not an alternative because of the annual permitting requirements, special staff training, associated equipment installation, and burdensome maintenance schedule which must be upheld. VA also stated that the height of the tower (184 feet) was dictated by the hydraulic requirements to enable gravity-fed service to the highest care units throughout the campus and that the reservoir capacity was dictated by user demand and storage needs. VA stated
that the blue color of the proposed water tower would closely match the color of the existing
tower. In addition, VA stated that cost and security were also considerations.

VA provided numerous examples of different types of elevated tanks and indicated that the
water tower design was completed with the historic and scenic aspects of the campus in mind.
VA indicated that a slender pedestal tower was proposed to minimize the profile and mass of
the structure and lessen the visual impact. Other types of towers would be bulkier and would
result in greater viewshed impacts. VA also stated that they would be submitting a MOA to
address the adverse impacts associated with the new water tower to the Consulting Parties.
The Draft MOA to address the adverse effects to cultural resources of the new water tower is
currently being drafted.

3.4.2 Native American Consultation/Coordination

VA consulted with six recognized Native American Tribes as part of the Section 106
consultation process, in accordance with 36 CFR 800.2 and EO 13175, Consultation and
Coordination with Indian Tribal Governments, 6 November 2000. These tribes, identified as
having possible ancestral ties to the area by the Native American Consultation Database, were
14, 2013, and September 25, 2013 for input regarding the Proposed Action. Section 10
includes a list of each of the tribes contacted. As described above, the CTUIR has agreed to
be a signatory to the MOA related to cultural resources at the Site. The other tribes were
invited to consult, but were not active participants (VA 2014).
FIGURE 6
MAY 2013 CRS SHOVEL TEST
LOCATIONS MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED WDVA STATE VETERANS HOME
WALLA WALLA, WASHINGTON

PREPARED FOR
U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C.

TTL PROJECT NO. 11012.02
FIGURE 7
APRIL 2014 PHASE II CRS INVESTIGATION LOCATIONS MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED WDVA STATE VETERANS HOME
WALLA WALLA, WASHINGTON

PREPARED FOR
U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C.

TTL PROJECT NO.
11012.02
FIGURE 9
JUNE 2013 CRI SHOVEL TEST LOCATIONS MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED WDVA STATE VETERANS HOME
WALLA WALLA, WASHINGTON

PREPARED FOR
U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C.

TTL PROJECT NO. 11012.02

ANDERSON PERRY
Jonathan M. Wainwright Memorial VA Medical Center
Shovel Tests along Proposed Phase I Waterline Route
NAD 83 UTM Zone 11
Fort Walla Walla Museum
Heritage Research Services
GCC 6/6/2013

○ Negative STP
● Positive STP
— Proposed Route of Phase I
3.4.3 Effects of the Preferred Action Alternative

The Preferred Action Alternative could have a significant adverse effect to resources. The Walla Walla VAMC campus, including the 11-acre Site, is located within the 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, archeological investigations at the Site have identified numerous historic and limited prehistoric artifacts.

VA determined that the proposed construction of the State Veterans Home 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.

VA has actively engaged the SHPO and other Consulting Parties regarding the Preferred Action Alternative. The results of the cultural resource investigations and consultation with applicable parties have resulted in a Draft MOA between VA, WDVA, SHPO, ACHP, and CTUIR to address and mitigate cultural resource effects associated with the State Veterans Home construction and the demolition of the existing water tower. Details of the Draft MOA are described in Section 3.4.1. A second MOA will be prepared for the new water tower construction.

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

3.4.4 Effects of the No Action Alternative

Under the No Action Alternative, no construction or demolition by VA or WDVA would occur and there would be no cultural resources impacts. Should the Site be transferred and/or redeveloped in the future, cultural resources impacts would likely occur.

3.4.5 Mitigation/Management Measures

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 would:

- 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 would further minimize potential impacts to local cultural resources. All contractors involved in site preparation and ground disturbing construction would 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). Implementation of this BMP would further reduce potential impacts to cultural resources.

3.5 Geology and Soils

Topography

The Walla Walla, Washington-Oregon United States Geological Survey (USGS) Topographic Quadrangle (dated 1998) indicates that surficial topography in the site vicinity [elevation approximately 900 feet above mean sea level (amsl)] slopes down from the site to the southeast. The nearest surface water body is Bryant Creek, located off-site near the southern Site boundary. The USGS topographic map of the Site area is shown on Figure 2.

A topographic survey of the Site was completed by Permit Surveying, Inc. on behalf of WDVA. The survey indicates that the central portion of the Site is the top of a relatively level plateau (elevation approximately 915 feet amsl). The ground surface slopes steeply down from the plateau to the Site boundaries to the north, east, and south. The steepest slopes (20 to 25 percent) are to the north and south, where the ground surface drops 20 to 30 feet below the plateau. The relatively level area of the Site below the plateau ranges from 895 to 900 feet amsl.

Geology

According to the Groundwater Atlas of the United States, published by the USGS, the surficial materials in the Site area include primarily unconsolidated alluvial deposits that consist of well-sorted particles that range in size from clay to boulders ranging from 200 feet to 400 feet thick. Walla Walla County, Washington regionally lies in the Columbia Plateau geophysical province.

During a geotechnical engineering investigation of the Site by GeoEngineers in 2012 for the proposed State Veterans Home, subsurface soil conditions below four to six inches of topsoil included sandy silt to 22 feet below ground surface (bgs) in the central and western portions of the Site (on the plateau) underlain by fine to coarse gravel with variable silt, sand and cobbles between 22 and 28.5 feet bgs. Soil borings in the eastern and northern portions of the Site (below the plateau) generally included fine to coarse gravel with variable silt, sand and cobbles to 28.5 feet bgs. The identified soils were reported to represent natural soil deposits. Fill materials (silt and sand) were encountered in one soil boring in the central portion to approximately three feet bgs and were determined to represent a former roadway bed. GeoEngineers reported that the plateau area consists of Quaternary-aged Touchet Beds, which are glacial slack-water flood deposits containing bedded sand at their base and grading upward to silt. Touchet Beds are typically covered by a layer of loess (wind deposited silt). GeoEngineers indicated that the lower portions of the Site contain Quaternary-aged alluvium consisting of deposits of clay, silt, fine sand and gravel found within floodplains adjacent to streams on the valley floor.

Geotechnical soil borings conducted for the proposed water tower identified gravels with silt to 57 feet bgs, a silt layer from 57 to 62 feet bgs, underlain by gravels with silt to at least 65 feet bgs.

According to the USGS, Walla Walla County contains two major fault systems, which intersect just southeast of the City of Walla Walla in the northeastern part of Umatilla County, Oregon. These two fault systems are the Wallula Fault Zone and the Hite Fault System. Other minor fault systems also exist in the area. The USGS Quaternary Fault and Fold database outlines the closest mapped active fault to the site is an unnamed (Fault Number 578B) Class B fault located about four miles northeast of the Site. A Class B fault is defined by the USGS as “Geologic evidence demonstrates the existence of Quaternary deformation, but either (1) the
fault might not extend deeply enough to be a potential source of significant earthquakes, or (2) the currently available geologic evidence is too strong to confidently assign the feature to Class C but not strong enough to assign to Class A.

The WWJCDA stated that the Site falls within the City of Walla Walla Critical Areas Code for having a moderate to high potential for liquefaction susceptibility and that the Site has a low to moderate potential for liquefaction susceptibility. The WWJCDA also stated that the southern hill on the Site may have the potential for slope erosion and noted that Garrison Creek is located south of the Site.

Soils

According to the United States Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey, the Site soils consist of Walla Walla silt loam, lacustrine substratum, 0 to 8 percent slopes; Walla Walla silt loam, lacustrine substratum, 8 to 30 percent slopes, eroded; and Yakima gravelly silt loam, 0 to 3 percent slopes. The Walla Walla silt loam soils are located on the plateau and slopes; the Yakima gravelly silt loam is located in the low area below the plateau. Soils are depicted on Figure 10. The Walla Walla silt loam soils are characterized as well drained soils with moderately high permeability. The Yakima gravelly silt loam soils are characterized as somewhat excessively drained soils with high permeability. In addition, the Yakima gravelly silt loam soils are characterized as having restrictive features between 10 and 20 inches bgs due to strongly contrasting textural stratification (i.e., gravelly and cobbley outwash).

During the Cultural Resources Investigations of the Site in 2013, soils encountered included surficial, fine-grained Holocene sediments, underlain by Pleistocene, coarse, cobbly alluvium. In addition, fill materials associated with existing and former Site improvements, utilities, and roads were identified at various locations across the Site, with increased concentrations along and adjoining to the ridgeline in the northern and eastern portions. Much of the fill material observed included building materials that were reportedly associated with former structures on the Site and used to stabilize the ridgeline in high erosional areas (i.e., washouts). Construction/demolition debris was also identified in the former location of structures (root cellar and ice house) near the northern ridgeline.

3.5.1 Prime and Unique Farmland Soils

Prime and Unique Farmlands are regulated in accordance with the Farmland Protection Policy Act (FPPA) (7 USC 4201, et seq.) to ensure preservation of agricultural lands that are of Statewide or local importance. Soils designated as prime farmland are capable of producing high yields of various crops when managed using modern farming methods. Prime farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oilseed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, and without intolerable soil erosion. Unique farmlands are also capable of sustaining high crop yields and have special combinations of favorable soil and climate characteristics that support specific high-value foods or crops.

According to the USDA NRCS, the Walla Walla silt loam, lacustrine substratum (0 to 8 percent slopes) is classified as a prime farmland soil (approximately 45 percent or 5 acres of the Site). The Walla Walla silt loam, lacustrine substratum (8 to 30 percent slopes) is classified as a farmland soil of statewide importance (approximately 45 percent or 5 acres of the Site). The Yakima gravelly silt loam (0 to 3 percent slopes) is not classified as prime farmland soil (NRCS 2014).
FIGURE 10
SOILS MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED WDVA STATE VETERANS HOME
WALLA WALLA, WASHINGTON

PREPARED FOR
U.S. DEPARTMENT OF VETERANS AFFAIRS
WASHINGTON, D.C.

TTL PROJECT NO.
11012.02

DRAFT ENVIRONMENTAL ASSESSMENT
PROPOSED WASHINGTON STATE VETERANS HOME
WALLA WALLA, WASHINGTON
JUNE 2014
### 3.5.2 Soil Erosion and Stormwater Management

The USEPA has authorized the WSDE, Water Quality Program (WQP) to implement the National Pollutant Discharge Elimination System (NPDES) stormwater permitting program in Washington. The USEPA’s authority to administer the NPDES program is set forth in Title III and Title IV of the Clean Water Act. The WSDE stormwater program regulates point source discharges of stormwater into surface waters of the United States from certain municipal, industrial, and construction activities. As the stormwater permitting authority, the WSDE WQP is responsible for promulgating rules and issuing permits, managing and reviewing permit applications, and performing compliance and enforcement activities. The applicable WDSE WQP is identified as the Construction Stormwater General Permit (CSWGP).

The WSDE stated that proper erosion and sediment control measures must be used on construction sites and adjacent areas to prevent upland sediments from entering surface waters, as detailed in the local stormwater ordinance and the Stormwater Management Manual for Eastern Washington. All ground disturbances by construction activities must be stabilized and native vegetation used.

The WSDE stated that routine inspections and maintenance of all erosion and sediment control BMPs are recommended during and after development activities, and a Stormwater Pollution Prevention Plan (SWPPP) may be required.

The WSDE noted that proper disposal of construction debris must be in such a manner that debris cannot enter the natural stormwater drainage system or cause water quality degradation of surface waters.

WSDE stated that the operator of a construction site that disturbs one acre or more of total land area and which has or will have a discharge of stormwater to a surface water or storm sewer, must apply for coverage under the WSDE Construction Stormwater General Permit.

The City of Walla Walla maintains the Illicit Discharge, Detection and Elimination Code (WWMC Chapter 13.15), Construction and Post-Construction Stormwater Code (WWMC Chapter 13.16), and Mill Creek – Pollution (WWMC Chapter 13.28) to manage surface water runoff, erosion prevention, and sedimentation control.

### 3.5.3 Effects of the Preferred Action Alternative

No significant changes to topography or drainage would be expected at the Site due to the Preferred Action Alternative.

The State Veterans Home campus has been designed in concert with current topography and drainage. The campus area would be graded to result in a general balance of cut and fill materials. The State Veterans Home campus would be developed on the plateau in the central portion of the Site. An access road would be constructed in the northern, lower elevation portion of the Site and would run east-west across the northern portion of the Site to access the campus from the east end. An additional access point would be constructed at the western boundary of the Site. Three sediment traps and a retention pond would also be constructed in the northern portion of the Site. Planned excavations are generally less than 6 feet deep, but may be up to 10 feet deep to install new utility lines. Excavations greater than 10 feet bgs are not anticipated. Figure 5 illustrates the proposed development.

Stormwater runoff would be conveyed from the developed areas to biofiltration swales in the eastern and western portions of the State Veterans Home campus, and on to the sediment traps and the retention pond by a series of pipes and catch basins. The system would be designed according to WSDE methodology to infiltrate the 100-year, 24-hour peak storm
event. No routine overflow to existing systems is anticipated; however, an emergency overflow would be provided to an existing surface water infiltration area on the VAMC campus.

The construction of the new water tower would require an excavation of approximately 15 feet bgs for the installation of new concrete foundation. The materials excavated for the new foundation would be used to balance of cut and fill materials at the Site.

The removal of existing water lines and the installation of new water lines on and around the Site and off-site areas as necessary for the Proposed Action would require temporary excavations up to 10 feet bgs; however, materials excavated would be backfilled and original grades would be replicated.

Less-than-significant impacts to geology are anticipated. Based on currently available data, geologic fault zones are located in the Site region. However, the nearest fault is located approximately four miles from the Site and is a Class B fault, a fault that is not likely to be a potential source of significant earthquakes. As such, no significant impacts associated with seismic hazards are anticipated; however, the State Veterans Home and water tower would need to comply with Federal and state seismic requirements. The Site is located in an area of low to moderate potential for liquefaction. The potential for liquefaction has been considered and evaluated by the geotechnical engineers in their design of the foundations for the State Veterans Home and new water tower. No significant impacts to mineral resources are anticipated, as the Proposed Action would not involve the commercial extraction of mineral resources, nor affect mineral resources considered important on a local, State, national, or global basis.

During construction, less-than-significant, direct and indirect, short-term soil erosion and sedimentation impacts would be possible as the proposed buildings, parking areas, entrance road, water tower removal and replacement, utility line removal and replacement, and other project components are demolished or constructed. Construction activities would remove the vegetative cover, disturb the soil surface, and compact the soil. The soil would then be susceptible to erosion by wind and surface runoff. Exposure of the soils during construction has the potential to result in discharges of sediment-laden runoff. However, such potential adverse erosion and sedimentation effects would be prevented through utilization of appropriate BMPs, including the erosion prevention and sedimentation control measures described in Section 3.5.5, and adherence to the terms of the WSDE CSWGP. These permit standards would be adhered to, as applicable, during all construction activities.

As part of the initial State Veterans Home development activities at the Site, three sediment traps and a retention pond would be constructed in the northern portion of the Site. These structures would function throughout the construction activities and would also manage surface runoff during the operation of the State Veterans Home. All post-construction surface water runoff would be directed to these structures. In addition, all construction area boundaries would be demarcated with silt fencing to prevent any off-site runoff of sediment laden surface water.

During the removal of existing water lines and installation of new water lines on the Site and in off-site areas as necessary for the Proposed Action, erosion and sedimentation effects would be prevented through utilization of appropriate BMPs, including the erosion prevention and sedimentation control measures described in Section 3.5.5, and adherence to the terms of the WSDE CSWGP.

Once construction is complete, no long-term erosion and sedimentation impacts would be anticipated due to the nature of the Proposed Action. Surface water runoff from the developed portion of the Site would be directed to the sediment traps and retention basin.
The Site contains prime farmland soils and farmland soils of statewide importance. However, as this area has not been farmed for over 100 years, the loss of prime farmland soils at the Site is considered to be a less-than-significant adverse impact. Where construction would impact prime farmland, VA would document impacts to these soil resources by completing the USDA Farmland Conservation Impact Rating Form (Form AD-1066). This form would be submitted to the local NRCS office and VA would follow the procedural request associated with this form in accordance with the Farmland Protection Policy Act (FPPA; 7 CFR 658).

3.5.4 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA or WDVA would occur. No impacts to soils, topography, or geology would occur. However, should the Site ultimately be developed for another use, impacts similar to those identified under the Preferred Action Alternative would likely occur.

3.5.5 Mitigation/Management Measures

No project-specific mitigation measures are required.

As the Site is located in a region with documented seismic activity, the construction of the State Veterans Home and new water tower would need to comply with Federal and state seismic requirements.

VA would document impacts to prime farmland soils by completing the USDA Farmland Conservation Impact Rating Form and would submit the form to the local NRCS office.

Implementing BMPs to reduce erosion and sedimentation impacts during construction would minimize the potential impacts on local soils and water quality. These erosion and sedimentation control BMPs include developing and submitting the CSWGP permit application to WSDE and the implementation of erosion prevention and sedimentation control measures in accordance with the WSDE CSWGP. The WSDE CSWGP permit would require stormwater runoff and erosion management using BMPs, earth berms, detention basins, vegetative buffers and filter strips, and spill prevention and management techniques. The construction contractor would implement the following as appropriate and necessary to protect surface water quality, as part of WSDE CSWGP permit:

- Install and monitor erosion-prevention measures, such as silt fences and water breaks, detention basins, filter fences, sediment berms, interceptor ditches, straw bales, rip-rap, and/or other sediment control structures; re-spread stockpiled topsoil; and seed/re-vegetate areas temporarily cleared of vegetation.
- Retain on-site vegetation to the maximum extent possible.
- Plant and maintain soil-stabilizing vegetation on disturbed areas.
- Use native vegetation to re-vegetate disturbed soils.
- VA and WDVA would also comply with the City of Walla Walla codes, to the extent practicable, pertaining to stormwater management, erosion prevention, sedimentation control, and post-construction runoff.

The construction contractor would obtain all required permits before any proposed activities commence and would adhere to permit conditions during all onsite activities.

If measures in the WSDE CSWGP are approved and correctly utilized for development, direct soil erosion and resulting indirect sedimentation impacts would be minimized to less-than-
significant levels. Successful implementation of these measures would ensure that the Proposed Action is in compliance with local, State, and Federal water quality standards and minimizes both the short- and long-term potential for erosion and sedimentation.

3.6 Hydrology and Water Quality

3.6.1 Surface Waters

Bryant Creek, an intermittent stream, flows through Fort Walla Walla Park to the south of the Site. The creek bed meanders and ranges from less than 50 feet to approximately 300 feet south of the Site boundary. Bryant Creek flows to the east and connects with Garrison Creek approximately 900 feet southeast of the Site. Garrison Creek, in turn, flows northeast and connects with Mill Creek approximately four miles from the Site. No other surface water bodies were identified within 1,500 feet of the Site.

The WSDE WQP regulates point source discharges of storm water into surface waters of the State of Washington from certain municipal, industrial, and construction activities. As the NPDES storm water permitting authority, WSDE is responsible for promulgating rules and issuing permits, managing and reviewing permit applications, and performing compliance and enforcement activities, as detailed in Section 3.5.

The WSDE also stated that any operations that would generate a waste discharge or have the potential to impact the quality of state waters must receive prior authorization from the WSDE.

The City of Walla Walla maintains the Illicit Discharge, Detection and Elimination Code (WWMC Chapter 13.15), Construction and Post-Construction Stormwater Code (WWMC Chapter 13.16), and Mill Creek – Pollution (WWMC Chapter 13.28) to manage surface water runoff, erosion prevention, and sedimentation control.

3.6.2 Groundwater

According to the Groundwater Atlas of the United States, the Site region is underlain by unconsolidated deposit aquifers, which consist primarily of sand and gravel. These shallow aquifers are underlain by the Columbia Plateau Regional Aquifer System, comprised of Grande Ronde Basalt (basaltic rocks).

During the 2012 geotechnical engineering investigation for the State Veterans Home, groundwater was not encountered in any of the soil borings and groundwater was estimated to be between 25 and 30 feet bgs based on water well reports from the site vicinity. Groundwater was detected in the 2013 geotechnical soil borings for the new water tower at a depth of approximately 40 feet bgs.

VA uses two water wells: Well #1 is located approximately 50 feet north of the northwestern portion of the Site and Well #2 is approximately 50 feet east of the eastern portion of the Site. Potable water is pumped from these wells to the on-site water tower and distributed throughout the VAMC campus. Well records available from WSDE indicate that Well #1 is 103 feet deep and screened in a coarse sand layer from 83 to 103 feet bgs. This 12-inch diameter well was estimated to have a capacity of 800 gallons per minute when it was installed in 1980. Well #2 is installed in the basalt bedrock and is 780 feet deep. This 12-inch diameter well was estimated to yield 500 gallons per minute when it was installed in 1982. The VAMC also has three connections to City of Walla Walla water system, two for potable water and one for fire suppression. The two potable connections points are manually valved “off” unless the VAMC campus wells or supply storage system is inoperative.
3.6.3 Effects of the Preferred Action Alternative

The Preferred Action Alternative would not result in significant impacts to surface water resources, provided the BMPs described in Section 3.5.5 and Section 3.6.5 are implemented. These BMPs would control construction-related impacts of soil erosion and sedimentation, and would provide a proper onsite stormwater management system.

It is not anticipated that groundwater would be significantly impacted by the Proposed Action. The Proposed State Veterans Home would be connected to the municipal water system; therefore, its development would not affect the quantity of the groundwater at the Site. Groundwater is estimated to occur at depths of approximately 25 to 40 feet bgs in the Site area and the anticipated maximum depth of construction activities is approximately 10 to 15 feet. As such, it is unlikely that groundwater would be encountered during the Site development. No direct discharges to groundwater are anticipated during the operation of the State Veterans Home. Indirectly, stormwater from the retention pond could infiltrate the soil and enter the groundwater. However, routine BMP for hazardous substance handling and Site development features such as biofiltration swales, would minimize indirect groundwater quality impacts.

The access drive in the northern and eastern portions of the Site would pass through the 100-foot protective well radius for two wells providing domestic water for the VAMC campus; however, stormwater runoff within the well radius would be collected and relayed to the stormwater management systems, which are located outside of the protective well radius. No stormwater would be discharged within the protective well radius. No structures, parking, storage, or other uses are proposed within the protective well radius.

A drywell, designed to receive overflow water (potable water) from the water tower, would be installed approximately 50 feet north of the new water tower. The drywell would be located outside of the 100-foot protective well radius for Well #2. Based on the nature of the water that would be discharged to the dry well (potable water from the on-site aquifer), it is not anticipated to have a significant impact on the Site's groundwater.

3.6.4 Effects of the No Action Alternative

Under the No Action Alternative, no construction activities by VA or WDVA would occur. No impacts to water resources would occur. However, should the Site be developed for another use, impacts similar to those identified under the Preferred Action Alternative would likely occur.

3.6.5 Mitigation/Management Measures

No project-specific mitigation measures are required. To minimize potential impacts to surface waters and groundwater in the Site area, VA and WDVA would implement the following BMPs:

- Implement BMPs to reduce erosion and sedimentation impacts during construction as described in Section 3.5.5.

- Ensure, as part of the WSDE CSWGP permitting process, the Proposed Action design includes sufficient stormwater management so as to not adversely affect the water quantity/quality of nearby surface waters. Post-project hydrology shall replicate pre-project hydrology through the appropriate engineering design and implementation of a proposed stormwater management system at the Site.

- Comply with, to the extent practicable, the City of Walla Walla County codes pertaining to stormwater management, erosion prevention, sedimentation control, and post-construction runoff.
Implementation of these BMPs would ensure identified water resources impacts are maintained as less-than-significant levels.

3.7 Wildlife and Habitat

3.7.1 Vegetation and Wildlife

Little of the original natural vegetation communities are present on the Site. The Site was used as part of the Fort Walla Walla Military Reservation from 1858 to the 1920s and has been part of the VAMC since the 1920s. On-site vegetation is typical of landscaped park-like areas in the Site vicinity. Such vegetation communities support wildlife species associated with suburban areas of southeastern Washington. As the Site is relatively disturbed, habitat values on the Site are low.

A Biological Resources Technical Report, prepared by ICF International and dated January 2011, was completed for the VAMC. No special-status plants or animals were found at the VAMC during a site reconnaissance and none were identified during the literature review. However, high-quality habitat was identified adjacent to the south and west of the VAMC and included wetlands and riparian areas associated with Garrison Creek (aka Bryant Creek). No wetlands or surface waters were identified at the VAMC campus.

The City of Walla Walla regulates wildlife, habitat, and landscaping and vegetation through Chapter 21.04 (Critical Areas) and Title 20 (Zoning) of the WWMC.

3.7.2 Threatened and Endangered Species

No special-status plants or animals were found at the VAMC during a site reconnaissance and none were identified during the literature review associated with the Biological Resources Technical Report for the VAMC.

As part of the preparation of this EA, the USFWS and various State agencies were contacted to identify any potential for presence of State or Federally-listed species on or in the vicinity of the Site. The following provides a summary of the information provided by these agencies:

- In a letter dated January 27, 2014, the USFWS stated that information pertaining to Federally-listed species and associated habitat requirements is included on their website [http://www.fws.gov/wafwo/species_new.html](http://www.fws.gov/wafwo/species_new.html). According to the USFWS Endangered Species Program database, one Federally-threatened species (Bull Trout), one recovery species (Gray Wolf), and one candidate species (Washington Ground Squirrel) have been identified for Walla Walla County.

According to the USFWS Species Profile Reports for these species, the habitat requirements for these species are unlikely to be found on the Site or surrounding properties, primarily due to the developed nature of the area, but also due to the lack of water resources required to support Bull Trout populations. As such, it is not anticipated that any of these three species would be present on the Site or surrounding properties.

- The Washington Department of Fish and Wildlife (WDFW) indicated that available information pertaining to threatened and endangered species is located on their Priority Habitat and Species (PHS) internet mapping database [http://wdfw.wa.gov/mapping](http://wdfw.wa.gov/mapping). According to the PHS internet mapping database, no priority habitats or special species are known to occur at or adjoining to the Site. Wetlands were identified to the west and southwest of the VAMC, at least 1,300 feet from the Site. In addition, Garrison Creek was identified approximately 1,000 feet south of the Site.
The Migratory Bird Treaty Act of 1918 (MBTA) is a Federal law that was enacted in to implement the Convention for the Protection of Migratory Birds between the United States and Canada. The statute makes it unlawful to pursue, hunt, take, capture, kill or sell birds listed in the MBTA. The statute does not discriminate between live or dead birds and also grants full protection to any bird parts including feathers, eggs and nests. Washington is included in the MBTA Pacific Flyway.

3.7.3 Effects of the Preferred Action Alternative

The Preferred Action Alternative would have less-than-significant adverse effects on biological resources. The construction activities would include the removal of vegetated areas, including trees and landscaping features; however, no special status species or priority habitat are anticipated to occur in these areas.

Based on the habitat requirements of the Federal and State-listed species identified by USFWS and the disturbed nature of the Site, it is unlikely that Federal-listed species identified by USFWS are present at the Site or surrounding properties.

3.7.4 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA or WDVA would occur. No impacts to wildlife and habitat would occur. However, should the Site ultimately be developed for another use, effects on biological resources would likely be similar to those for the Preferred Action Alternative.

3.7.5 Mitigation/Management Measures

No project-specific mitigation measures are required. VA and WDVA would implement the following management measures to reduce wildlife and habitat impacts during construction and operation:

- Construction should be timed to avoid nesting periods of migratory birds on the Site and protected under the Migratory Bird Treaty Act. Tree removal at the Site would be conducted outside the migratory bird nesting season of April through July so that nests are not disturbed. If it is not practicable to remove the trees outside of this timeframe, a qualified biologist should survey the Site before clearing to ensure that no active nests are disturbed.

- Native species should be used to the extent practicable when re-vegetating land disturbed by facility construction to avoid the potential introduction of non-native or invasive species.

3.8 Noise

The existing noise environment around the Site is dominated by vehicle traffic along Wainwright Drive (northern boundary) and South 9th Avenue (950 feet east). In addition, there is occasional railroad noise associated with the Union Pacific Railroad, located approximately 350 feet east of the Site. No other notable noise-generating sources are present in the immediate vicinity of the Site. As such, the Site's noise environment can be characterized as that typical of a peripheral suburban area.

Walla Walla County maintains a noise ordinance under Chapter 8.13 of the WWMC.
3.8.1 Effects of the Preferred Action Alternative

The Preferred Action Alternative would have short-term impacts to the existing noise environment due to demolition and construction activities. Noise generating sources during construction activities would be associated primarily with standard construction equipment and construction equipment transportation. These increased noise levels could directly affect the neighboring area. The Site is adjoined to the north and west by the VAMC campus, which is largely presented in a park-like and residential-like setting. In addition, Blue Ridge Elementary School is located approximately 550 feet north of the Site. The Site is adjoined to the east by unimproved land associated with the VAMC campus; however, residences are located approximately 400 feet to the east and northeast of the Site. The Site is adjoined to the south by the Fort Walla Walla Park and a residential neighborhood is located approximately 800 feet south of the Site. No other sensitive noise receptors (residents, schools, churches, etc.) are located in the immediate Site area.

Construction activities generate noise by their very nature and are highly variable, depending on the type, number, and operating schedules of equipment. Construction projects are usually executed in stages, each having its own combination of equipment and noise characteristics and magnitudes. Construction activities are expected to be typical of other similar construction projects and would include mobilization, site preparation, excavation, placing foundations, utility development, heavy equipment movement, and paving roadways and parking areas. The most prevalent noise source at typical construction sites is the internal combustion engine. General construction equipment using engines includes, but is not limited to: heavy, medium, and light equipment such as excavators; roller compactors; front-end loaders; bulldozers; graders; backhoes; dump trucks; water trucks; concrete trucks; pump trucks; utility trucks; cranes; sheet pile drivers; man lifts; forklifts; and lube, oil, and fuel trucks.

Peak noise levels vary at a given location based on line of sight, topography, vegetation, and atmospheric conditions. In addition, peak noise levels would be variable and intermittent because each piece of equipment would only be operated when needed. However, peak construction noise levels would be considerably higher than existing noise levels. Relatively high peak noise levels in the range of 93 to 108 dBA (decibels, A-weighted scale) would occur on the active construction site, decreasing with distance from the construction areas. Table 1 presents peak noise levels that could be expected from a range of construction equipment during proposed construction activities.

Generally speaking, peak noise levels within 50 feet of active construction areas and material transportation routes would most likely be considered “striking” or “very loud”, comparable to peak crowd noise at an indoor sports arena. At approximately 200 feet, peak noise levels would be loud - approximately comparable to a garbage disposal or vacuum cleaner at 10 feet. At 0.25 mile, construction noise levels would generally be quiet enough so as to be considered insignificant, although transient noise levels may be noticeable at times.

Combined peak noise levels, or worst-case noise levels when several loud pieces of equipment are used in a small area at the same time as described in Table 1, are expected to occur rarely, if ever, during the project. However, under these circumstances, peak noise levels could exceed 90 dBA within 200 feet of the construction area, depending on equipment being used.

Although noise levels would be quite loud in the immediate area, the intermittent nature of peak construction noise levels would not create the steady noise level conditions for an extended duration that could lead to hearing damage. Construction workers would follow standard Federal Occupational Safety and Health Administration (OSHA) requirements to prevent hearing damage.
Areas that could be most affected by noise from construction include those closest to the construction footprint. Indoor noise levels would be expected to be 15-25 dBA lower than outdoor levels. The nearest sensitive noise receptors to the Site are the users of the VAMC and the south adjoining park. Blue Ridge Elementary School and residences located east and northeast of the Site would also be noise receptors. However, any sound pressure levels would likely be diminished based on the actual distances from activities at the Site.

Indirect impacts include noise from workers commuting and material transport. Area traffic volumes and noise levels would increase slightly as construction employees commute to and from work at the project area, and delivery and service vehicles (including trucks of various sizes) transit to and from the Site. Because trucks are present during most phases of construction and leave and enter the Site via local thoroughfares, truck noises tend to impact more people over a wider area. For this Proposed Action, persons in the areas near the Site would experience temporary increases in traffic noise during day-time hours. These effects are not considered significant because they would be temporary and similar to existing traffic noise levels in the area.

### Table 1. Peak Noise Levels Expected from Typical Construction Equipment

<table>
<thead>
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<th>Source</th>
<th>Peak Noise Level (dBA, attenuated)</th>
<th>Distance from Source (feet)</th>
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<tr>
<td>Grader</td>
<td>108</td>
<td>88-91</td>
</tr>
<tr>
<td>Pile driver</td>
<td>105</td>
<td>95</td>
</tr>
<tr>
<td>Forklift</td>
<td>100</td>
<td>95</td>
</tr>
</tbody>
</table>

**Worst-Case Combined Peak Noise Level (Bulldozer, Jackhammer, Scraper)**

<table>
<thead>
<tr>
<th>Combined Peak Noise Level</th>
<th>Distance from Source</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>50 feet</td>
</tr>
<tr>
<td></td>
<td>103</td>
</tr>
</tbody>
</table>

Source: Tipler 1976

Operational noise generating activities at the State Veterans Home would include primarily vehicle traffic to and from the facility. The facility would be a quiet nursing home facility. These activities would not produce excessive noise, and would not produce a significant noise impact on surrounding land uses.
3.8.2 Effects of the No Action Alternative

Under the No Action Alternative, the noise environment surrounding the Site would not change. The noise environment of the Site would not be altered by activities of VA or WDVA. However, should the Site ultimately be developed for another use, noise impacts would occur. The extent of the noise impacts would depend upon the nature of the development.

3.8.3 Mitigation/Management Measures

No project-specific mitigation measures are required. Implementing BMPs to reduce noise emissions during construction would further minimize the potential impacts on the local noise environment. To minimize the potential for adverse, short-term noise impacts, the construction contractor would implement the following typical noise control BMPs, as applicable. These measures would be briefed to the contractor at the construction kick-off meeting, and daily at tailgate safety meetings. The onsite construction manager would be responsible to immediately address noise issues, if they arise.

- Coordinate proposed construction activities in advance with any adjacent sensitive receptors. Post signage at the entry points of the site providing current construction information, including schedule and activity.

- Limit, to the extent possible, construction and associated heavy truck traffic to occur between 7:00 a.m. and 6:00 p.m. on Monday through Friday, or during normal, weekday, work hours. This measure would reduce noise impacts during sensitive night-time hours.

- Locate stationary equipment as far away from sensitive receptors as possible.

- Select material transportation routes as far away from sensitive receptors as possible.

- Shut down noise-generating heavy equipment when it is not needed.

- Maintain noisy equipment per manufacturer’s recommendations.

- Encourage construction personnel to operate equipment in the quietest manner practicable (e.g., speed restrictions, retarder brake restrictions, engine speed restrictions, etc.).

- Comply with, to the extent practical, the requirements of the WWMC Noise code.

Implementation of these BMPs would reduce the potential for short-term adverse noise impacts to acceptable levels.

3.9 Land Use

The Site is located in the southeastern portion of the VAMC campus and has been owned by the Federal Government since 1858. The Site is currently mostly grassy, unimproved vacant land with an approximately 125 feet tall water tower, a small transformer/emergency generator building, a portion of an eight-car garage, a paved drive with cul-de-sac in the central portion, and paved drive along the southern boundary. The land to be retained by VA for the water tower relocation is unimproved grassy land. The Site lies within the Fort Walla Walla Military Reservation that was established in 1858 and has been a part of the VAMC campus since 1921. The Site was developed with a hospital building, Officers Quarters and various Fort-related structures beginning in the 1880s. The majority of the buildings on the Site were repurposed for housing in the 1920s and were demolished by the late 1960s/early 1970s. Since the 1970s, the Site has been mostly vacant grassy land.
The area north of the Site is currently occupied by a VAMC well pump house, two athletic fields on VAMC property and an associated clubhouse, and Wainwright Drive. The area across Wainwright Drive is occupied by unimproved land and parking areas associated with the VAMC. Farther north is Blue Ridge Elementary School. The area east of the Site is currently unimproved land associated with the VAMC with a well pump house, beyond which is a paved pedestrian walkway and residential and commercial properties. The area to the south is currently occupied by Fort Walla Walla Park (a City of Walla Walla park) with a residential neighborhood farther south (approximately 800 feet from the site). The area to the west is currently occupied by residential buildings and landscaped areas associated with the VAMC, with the remainder of the VAMC farther to the west.

All of the 88 acres that comprise the VAMC, including the Site and the adjacent areas to the north, east, and west, are zoned Public Reserve (PR) by the City of Walla Walla. The surrounding properties to the south (Fort Walla Walla Park) and the Blue Ridge Elementary School property to the north are also zoned PR. The areas owned by the Federal Government are not subject to the City of Walla Walla Zoning code; however, the PR zoning designation is intended to protect and preserve certain areas of land devoted to existing and future use for civic, cultural, educational and similar facilities; provide for the social needs of the community as those needs relate to public services, open space and institutions, whether publicly or privately sponsored; enhance the identity and image of the community as a desirable place for human growth and development; provide opportunities and facilities for the various activities and needs of a diverse and dynamic population; and provide and protect parks, open space and other natural, physical assets of the community to improve the aesthetic and functional features of the community. The current and proposed use of the Site is consistent with the PR zoning designation.

Areas farther to the north beyond the boundaries of the VAMC campus and the elementary school are zoned Light Industrial/Commercial (IL). Areas farther to the east and south beyond the boundaries of the VAMC and the Fort Walla Walla Park are zoned Multi-Family Residential (RM). Areas farther to the west are still part of the VAMC and are zoned PR. Zoning designations for the Site and surrounding properties are depicted on Figure 11.

3.9.1 Effects of the Preferred Action Alternative

The Proposed Action would result in less-than-significant, long-term land use effects within the vicinity of the Site. The Site is currently zoned PR, which is consistent with the proposed Site use and is consistent and/or compatible with surrounding land uses. In addition, no adverse onsite building function or architecture impacts are anticipated. The proposed State Veterans Home would be designed with exterior facades that are consistent with the architectural character of the area.

Short-term dust and noise from construction have the potential to affect adjacent offsite areas and land uses. BMPs would be used to reduce construction dust and noise emissions to the maximum extent possible; no long-term noise or dust effects are anticipated. Implementation of these BMPs would result in a short-term, less-than-significant effects to adjacent land uses. Potential air quality (dust) and noise effects to off-site land uses are discussed in Sections 3.3 and 3.8.

3.9.2 Effects of the No Action Alternative

Under the No Action Alternative, no land use impacts due to VA’s Proposed Action would occur and the Site use would not change. The land use impacts (and associated community benefits) of any future proposed site development would depend upon the use proposed.
3.9.3 Mitigation/Management Measures

No project-specific mitigation or management measures are required.
FIGURE 11
ZONING MAP

ENVIRONMENTAL ASSESSMENT
PROPOSED WDVA STATE VETERANS HOME
WALLA WALLA, WASHINGTON

PREPARED FOR
U.S. DEPARTMENT OF VETERANS
AFFAIRS
WASHINGTON, D.C.

TTL PROJECT NO. 11012.02

DEPARTMENT OF VETERANS AFFAIRS
AFFECTED ENVIRONMENT/ENVIRONMENTAL CONSEQUENCES

DRAFT ENVIRONMENTAL ASSESSMENT
PROPOSED WASHINGTON STATE VETERANS HOME
WALLA WALLA, WASHINGTON

JUNE 2014
3.10 Wetlands, Floodplains, and Coastal Zone Management

3.10.1 Wetlands

This section discusses wetlands at or near the Site and surface waters (streams) as they pertain to wetlands. Additional information regarding surface waters is provided in Section 3.6.

No wetlands or surface water are located at the Site. No wetlands were identified at the Site or adjacent properties on the USFWS National Wetland Inventory (NWI) maps. Wetlands were identified by the USFWS and WDFW at least 1,300 feet west and southwest of the Site and Garrison Creek was identified approximately 1,000 feet south of the Site.

Bryant Creek is located approximately 50 to 300 feet south of the Site on the Fort Walla Walla Park property. Bryant Creek appears to be intermittent; however, a surficial connection to Garrison Creek and ultimately Mill Creek would likely make Bryant Creek a Water of the US, as defined by the USACE.

3.10.2 Floodplains

According to available Federal Emergency Management Agency (FEMA) floodplain mapping, the City of Walla Walla is not mapped with respect to floodplains; however, based on the elevated nature of the majority of the Site with respect to the surrounding areas, including Bryant Creek, the Site is not likely to be included in an existing floodplain.

3.10.3 Coastal Zone

The Coastal Zone Management Act (CZMA) was promulgated to control nonpoint pollution sources that affect coastal water quality. The CZMA of 1990, as amended (16 USC 1451 et seq.) encourages States to preserve, protect, develop, and where possible, restore or enhance valuable natural coastal resources such as wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as the fish and wildlife using those habitats. The State of Washington participates in the National Coastal Zone Management Program (CZMP) through efforts of the WSDE. According to the WSDE, Walla Walla County is not included in a designated coastal zone (NOAA 2014).

3.10.4 Effects of the Preferred Action Alternative

The Site and immediate surrounding areas are not likely included in the 100-year or 500-year floodplain, are not located within a designated coastal zone, and do not contain wetlands. No impacts to wetlands, floodplains, or coastal zones would occur with the implementation of the Preferred Action Alternative. Potential less-than-significant impacts to Bryant Creek due to erosion and sediment are discussed in Section 3.5 and 3.6 and would be minimized through routine BMPs.

3.10.5 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to wetlands, floodplains, or coastal zones would occur.

3.10.6 Mitigation/Management Measures

No project-specific mitigation or management measures are required.
3.11 Socioeconomics

The following subsections identify and describe the socioeconomic environment of the City of Walla Walla, Walla Walla County, and the State of Washington. Presented data provide an understanding of the socioeconomic factors that have developed the area. Socioeconomic areas of discussion include the local demographics of the area, regional and local economy, local housing, and local recreation activities. Data used in preparing this section were collected from the 2010 Census of Population and Housing (US Census Bureau), subsequent US Census Bureau data, and the US Department of Commerce Bureau of Economic Analysis (BEA).

3.11.1 Demographics

The City of Walla Walla’s population in 2012 was 31,864. Walla Walla County’s estimated population in 2012 was 59,404 citizens. The estimated population total for the State of Washington was 6,895,318 residents in 2012. Population totals for the City of Walla Walla, Walla Walla County, and Washington have increased from 1990 to 2012 (see Table 2).

<table>
<thead>
<tr>
<th>Area</th>
<th>1990</th>
<th>2000</th>
<th>2012 (estimate)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington</td>
<td>4,866,692*</td>
<td>5,894,121+</td>
<td>6,895,318</td>
</tr>
<tr>
<td>Walla Walla County</td>
<td>48,439*</td>
<td>55,180+</td>
<td>59,404</td>
</tr>
<tr>
<td>Walla Walla</td>
<td>27,280*</td>
<td>30,519+</td>
<td>31,864</td>
</tr>
</tbody>
</table>

* – 1990 Census, Profile of General Demographic Characteristics.
+ – 2000 Census, Profile of General Demographic Characteristics.

Baseline information identified that the City of Walla Walla and Walla Walla County have lower Asian or Pacific Islander populations and higher Hispanic or Latino populations than the State of Washington as a whole (Table 3). Otherwise, the City and County have similar minority populations as the State of Washington as a whole.

<table>
<thead>
<tr>
<th>Area</th>
<th>All Individuals</th>
<th>White (%)</th>
<th>African-American (%)</th>
<th>American Indian and Alaska Native (%)</th>
<th>Asian or Pacific Islander (%)</th>
<th>Other Race (%)</th>
<th>Hispanic or Latino* (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington</td>
<td>6,895,318</td>
<td>81.6</td>
<td>3.9</td>
<td>1.8</td>
<td>8.4</td>
<td>4.3</td>
<td>11.7</td>
</tr>
<tr>
<td>Walla Walla County</td>
<td>59,404</td>
<td>92.7</td>
<td>1.9</td>
<td>1.3</td>
<td>1.7</td>
<td>2.4</td>
<td>20.7</td>
</tr>
<tr>
<td>Walla Walla</td>
<td>31,864</td>
<td>81.6</td>
<td>2.7</td>
<td>1.3</td>
<td>1.7</td>
<td>3.6</td>
<td>22.0</td>
</tr>
</tbody>
</table>

Note: People of Hispanic or Latino origin may be of any race.
Note: The six percentages reported by the US Census Bureau for each geographic region may total more than 100% because individuals may report more than one race.

According to the US Census statistics, the City of Walla Walla, Walla Walla County, and the State of Washington as a whole, have similar percentages of high school graduates. The City of Walla Walla has a slightly lower percentage of bachelor’s degrees (or higher) compared to Walla Walla County, which has a slightly lower percentage of bachelor’s degrees (or higher) compared to the State of Washington as a whole. Educational attainment data are presented in Table 4.

Table 4. Educational Attainment: Walla Walla, Walla Walla County, and Washington

<table>
<thead>
<tr>
<th>Educational Attainment</th>
<th>Walla Walla (%)</th>
<th>Walla Walla County (%)</th>
<th>Washington (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>High school graduate (incl. equivalency)</td>
<td>87.9</td>
<td>87.6</td>
<td>90.0</td>
</tr>
<tr>
<td>Bachelor's degree or higher</td>
<td>22.7</td>
<td>25.7</td>
<td>31.6</td>
</tr>
</tbody>
</table>


3.11.2 Employment and Income

The primary employment sectors in the City of Walla Walla and Walla Walla County include the healthcare and services (17.5 percent), education services (11.5 percent), retail trade (10 percent), public administration (9.5 percent), accommodation and food services (9.5 percent), manufacturing (6 percent), and construction (5 percent).

Unemployment rates for the City of Walla Walla and Walla Walla County are similar to Washington as a whole as depicted in Table 5. Median household income and per capita income for the City of Walla Walla and Walla Walla County residents are lower than that of the rest of Washington. The City of Walla Walla and Walla Walla County also have a higher population below poverty level than the rest of Washington.

Table 5. Regional Income

<table>
<thead>
<tr>
<th>Area</th>
<th>Number of Households</th>
<th>Median Household Income ($)</th>
<th>Per Capita Income ($)</th>
<th>Population Below Poverty Level (%)</th>
<th>Unemployment Rate (%) January 2014</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington</td>
<td>2,619,995</td>
<td>59,374</td>
<td>30,661</td>
<td>12.9</td>
<td>6.5</td>
</tr>
<tr>
<td>Walla Walla County</td>
<td>21,497</td>
<td>47,166</td>
<td>23,698</td>
<td>17.8</td>
<td>6.6</td>
</tr>
<tr>
<td>Walla Walla</td>
<td>11,734</td>
<td>42,032</td>
<td>21,430</td>
<td>20.4</td>
<td>6.6</td>
</tr>
</tbody>
</table>

Source: US Census Bureau 2010 Census, Profile of General Demographic Characteristics.

3.11.3 Commuting Patterns

Residents of the City of Walla Walla are largely dependent on personal automobiles for transportation to and from work. Other methods of transit include carpooling, walking, and public transportation. The commuting times of Walla Walla residents using private automobiles typically average approximately 15 minutes due to the size of the City and the fact that most residents live and work in the Walla Walla area.
Public transportation is provided to the region by Walla Walla Valley Transit (WWVT). There is currently one public transportation stop on the western portion of the VAMC campus (Route 6); however, both Route 5 and Route 6 include stops in the vicinity of the VAMC (Dales Military Road and South 14th Avenue, respectively).

### 3.11.4 Housing

Rates of owner-occupied housing in the City of Walla Walla and Walla Walla County are similar to the rest of Washington (see Table 6). The median value of houses in the City of Walla Walla and Walla Walla County are significantly lower the rest of Washington as a whole. This may be attributed to its relatively isolated location with respect to larger, coastal metropolitan areas.

<table>
<thead>
<tr>
<th>Area</th>
<th>Total Housing Units</th>
<th>Occupied (%)</th>
<th>Owner-Occupied (%)</th>
<th>Median Value ($)</th>
<th>Renter-Occupied (%)</th>
<th>Median Contract Rent ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Washington</td>
<td>2,914,607</td>
<td>63.8</td>
<td>n/a</td>
<td>272,900</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Walla Walla County</td>
<td>23,635</td>
<td>62.5</td>
<td>n/a</td>
<td>206,300</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>Walla Walla</td>
<td>12,514</td>
<td>59.8</td>
<td>n/a</td>
<td>189,500</td>
<td>n/a</td>
<td>n/a</td>
</tr>
</tbody>
</table>


### 3.11.5 Protection of Children

Because children may suffer disproportionately from environmental health risks and safety risks, EO 13045, *Protection of Children From Environmental Health Risks and Safety Risks*, was introduced in 1997 to prioritize the identification and assessment of environmental health risks and safety risks that may affect children and to ensure that Federal agencies’ policies, programs, activities, and standards address environmental risks and safety risks to children. This section identifies the distribution of children and locations where numbers of children may be proportionately high (e.g., schools, childcare centers, family housing, etc.) in areas potentially affected by the Proposed Action.

The Site is mostly grassy, vacant land with limited development. Children are not regularly present at the Site. However, children use the athletic fields north of the Site and portions of Fort Walla Walla Park south of the Site. The percentage of the population under age 18 is similar in the City of Walla Walla and Walla Walla County as compared to Washington (see Table 7).
### Table 7. Total Population Versus Population Under Age 18

<table>
<thead>
<tr>
<th>Area</th>
<th>Total Population</th>
<th>Population Under 18</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Percent</td>
</tr>
<tr>
<td>Washington</td>
<td>6,895,318</td>
<td>1,585,923</td>
</tr>
<tr>
<td>Walla Walla County</td>
<td>59,404</td>
<td>13,188</td>
</tr>
<tr>
<td>Walla Walla</td>
<td>31,864</td>
<td>7,010</td>
</tr>
</tbody>
</table>


#### 3.11.6 Effects of the Preferred Action Alternative

The Proposed Action is anticipated to result in short-term and long-term, direct and indirect, positive socioeconomic impacts to local employment and personal income. The Preferred Action Alternative would provide up to 200 temporary construction jobs in the private sector, thus providing short-term socioeconomic benefit to the area. In addition, the operations of a new State Veterans Home would provide long-term additional employment for the area, including approximately 100 full-time staff positions. The majority of the proposed staff would likely already be living in the Walla Walla area; however, the project would also attract new residents to the area. Increased development in the region would indirectly benefit the local economy through the spending of business and personal income generated from the construction and operation of the proposed facility. As such, a long-term, indirect, positive impact to the local economy is anticipated from operation of the facility.

The Proposed Action would result in significant long-term positive socioeconomic and health impacts by providing a new State Veterans Home that would enhance the quality of life for US Veterans in southeastern Washington.

No adverse health or safety risks to children are anticipated to result from construction or operation of the proposed State Veterans Home. In addition, children would only be present at the Site as visitors. Construction areas would be secured to prevent unauthorized access by children from surrounding areas. The construction contractor would limit and control construction dust and noise as discussed in Sections 3.3 and 3.8, thereby minimizing adverse effects to children in the area.

#### 3.11.7 Effects of the No Action Alternative

The No Action Alternative would result in no construction and no increased short- or long-term economic benefit due to VA’s and WDVA’s actions. Under this alternative, no new construction associated jobs would be created, and no additional incidental spending (e.g., at local restaurants, shops, and hotels) by employees and visitors traveling to the State Veterans Home would occur.

Most importantly, the inability of WDVA to provide adequate long-term residency and high quality nursing care commensurate with the current and projected future increased need for these services in southeastern Washington would result in a significant adverse, long-term, impact to regional US Veterans.

#### 3.11.8 Mitigation/Management Measures

No project-specific mitigation or management measures are required.
3.12 Community Services

The Site is located within the Walla Walla Public Schools District (WWPSD). The school district includes 8 schools, including 6 elementary schools, 2 middle schools, and 2 high schools (WWPSD 2014).

There are no developed recreational facilities at the Site; however, Fort Walla Walla Park is located adjoining to the south, youth athletic fields on the VAMC campus are located adjacent to the north and approximately 200 feet northwest of the Site. Jefferson Park is located approximately 1,200 feet east, the Walla Walla County Fairgrounds are located approximately 1,300 feet southeast, and the Walla Walla Country Club is located approximately 2,500 feet south of the Site. No other recreational facilities are located within one-half mile of the Site.

The VAMC Security and the City of Walla Walla Police Department provide police protection for the Site area. The Walla Walla Fire Department provides fire protection and emergency medical services. The City of Walla Walla and Washington State Department of Transportation (WSDOT) provides local road and bridge maintenance.

Local major civilian hospitals and trauma centers include Fresenius Medical Care at Providence Saint Mary’s Medical Center, located approximately 3,000 feet northwest of the Site and Walla Walla General Hospital, located approximately 1 mile east of the Site. No other major civilian hospitals and trauma centers are located in the Site area.

3.12.1 Effects of the Preferred Action Alternative

Based on the small size of the proposed State Veterans Home (80 residents) and the nature of its operations (nursing home), no significant additional load is expected to be placed on the local fire or police departments, or other associated medical facilities, as the result of the Proposed Action. WDVA may request an additional bus stopping point from the WWVT; however, this would not require a significant deviation from the existing Route 6, which already stops at the VAMC campus. Use of other public or community services by the proposed State Veterans Home is not expected. As such, the Proposed Action is expected to have a negligible impact on local community services.

3.12.2 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA or WDVA would occur and no community services effects would be anticipated. Should the Site be developed in the future by others, impacts are likely to occur, depending upon the use.

3.12.3 Mitigation/Management Measures

No project-specific mitigation or management measures are required.

3.13 Solid and Hazardous Materials

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (i.e., through either physical or chemical reactions) to human health or the environment. Regulated hazardous substances are identified through a number of Federal laws and regulations. The most comprehensive list is contained in 40 CFR 302, and identifies quantities of these substances, when released to the environment, that require notification to a Federal agency. Hazardous wastes, defined in 40 CFR 261.3, are considered hazardous substances. Generally, hazardous wastes are discarded materials (e.g., solids or liquids) not otherwise excluded by 40 CFR 261.4 that exhibit a hazardous characteristic (i.e., ignitable, corrosive, reactive, or toxic), or are specifically identified within 40 CFR 261. Petroleum products are specifically exempted from 40 CFR 302, but some are also generally considered...
hazardous substances due to their physical characteristics (i.e., especially fuel products), and their ability to impair natural resources.

TTL completed a Phase I ESA and Limited Phase II ESA for the 11-acre Site from December 2013 through March 2014, including a site visit, interviews with persons knowledgeable about the Site, a review of historic information, and a review of local, State, Federal environmental regulatory information for the Site and surrounding area, and limited soil sampling.

The following summarizes the notable findings of the Phase I ESA and Limited Phase II ESA:

- VAMC representatives indicated that recent archeological investigations at the Site exposed buried construction debris that appears to be inert building material (plaster, brick, rock, ceramic and iron pipe) from former Site buildings. The fill material, including demolition debris generated from the removal of buildings on the Site, was reportedly used to fill “washout” areas along the ridgeline in the northern portion of the Site. A Phase I Cultural Resources Survey conducted by AHS in 2013 included 184 shovel test excavations on a 15-meter grid across the Site. AHS found construction and demolition debris in several of the test excavations, particularly in the vicinity of the former structures. Pieces of cement siding (transite) that was suspected to be an asbestos-containing material (ACM) were discovered in the debris at five locations during the shovel testing. The siding was encountered in three locations along the southern side of former Building T325 and at isolated locations near the southwestern corner of the Site and in the southwestern portion of the Site. During the Phase II Cultural Resources Survey, trenching and additional subsurface exploration was conducted. AHS did not report identifying suspect ACM during the additional archeological survey. Based on the relatively inert nature of construction and demolition debris and the apparent small quantity and isolated nature of the suspect ACM transite siding within the debris, the buried construction and demolition debris at the site was not considered to be a REC. However, any demolition debris or ACM encountered during the redevelopment of the site would require appropriate handling and disposal practices in accordance with Federal, state, local laws.

- Several of the buildings that were formerly located in the southern portion of the Site were heated by steam provided by the VAMC’s central boiler plant. Facility drawings indicate that a steam tunnel/pipe chase with steam line(s) was located in the southern portion of the Site, between the former buildings and the southern drive. Recent archeological work suggests that portions of the steam tunnel/pipe chase may remain on-site; however, no surface access to the steam tunnel/pipe chase is available. VAMC representatives indicated that similar steam tunnels in other parts of the VAMC campus were found to contain steam lines with friable ACM pipe insulation. It is unknown if the steam lines and possible ACM pipe insulation have been removed from the abandoned steam tunnel/pipe chase on the southern portion of the Site. The possible presence of abandoned steam lines with friable ACM pipe insulation was considered to be a recognized environmental condition (REC).

- A 2009 Phase I ESA that included the majority of the VAMC campus stated that several of the VAMC buildings tested positive for lead-based paint (LBP) and that soil testing conducted between the roof drip line and foundations of several of the older buildings at the VAMC in 2002 identified elevated concentrations of lead in soil. However, no sampling was conducted at the Site. It is likely that LBP was also used on the former on-site buildings and the on-site water tower, which has likely been painted and repainted several times since its construction in 1928. VAMC representatives provided information regarding the 2009 sandblasting (with full containment) and repainting of the water tower. No information was available regarding the previous water tower repainting activities.
As part of a Limited Phase II ESA, TTL collected surface soil samples at the Site from areas where current and former structures were located and near the water tower to screen for possible elevated lead concentrations. Paint chips were noted in the surface soil surrounding the water tower and near Building 97 and demolition debris was noted in the soil in the northern portion of the site. Seven of the 34 soil samples contained lead in excess of the WSDE Model Toxic Control Act (MTCA) Method A unrestricted land use soil cleanup level (250 parts per million or ppm), including three locations around the base of the water tower, one location near former Building 46, two locations near former Building 30, and one location near Building 97.

The elevated lead concentrations appeared to be associated with LBP on the current and former on-site buildings and water tower. Some of the elevated levels may also be associated with remnant demolition debris associated with these buildings. The Phase I ESA identified the presence of elevated lead concentrations in soil, above the MTCA Method A soil cleanup levels for unrestricted land use as a REC.

- One pad-mounted transformer with three 37.5-gallon oil canisters was observed in the on-site transformer building and did not appear to be leaking or damaged. The transformer equipment is owned by the VAMC. VAMC personnel stated that no release has known to occur from the transformer equipment. Some minor staining was observed on a concrete pad outside of the transformer building; however, the staining did not appear to be associated with the transformer equipment. The staining observed was de minimis in nature. In addition, soil testing around the transformer building did not identify any polychlorinated biphenyls (PCBs). Based on Site observations and the soil sample analytical results, the transformer equipment was not considered to be a REC.

- One 300-gallon diesel aboveground storage tank (AST) was observed adjacent to the east side transformer building and was associated with a small emergency generator located within the building. The AST was situated on a concrete pad with a roof and was in good condition with no evidence of a release. The AST appeared to be empty. Minor staining was observed on the concrete floor beneath the emergency generator; however, the staining was de minimis in nature. The AST and minor staining associated with the generator were not considered to be RECs during the Phase I ESA.

- The VAMC was identified on environmental regulatory agency databases as an underground storage tank (UST), Underground Injection Wells Listing (UIC), Resource Conservation and Recovery Act Conditionally Exempt Small Quantity Generator (RCRA-CESQG), Washington Facility/Site Identification System (WA-FSIS) facility and sites of interest to the WSDE (ALLSITES), hazardous waste manifest (MANIFEST), and SPILLS facility. Although the Site is included in the 88-acre VAMC property, all of the database listings are associated with the operations located off-site to the north and west of the Site. Based on the available information, none of the regulatory agency database listings associated with the VAMC were considered to be RECs in association with the Site.

TTL recommended the excavation of the abandoned steam tunnel in the southern portion of the Site to determine if abandoned steam lines with ACM insulation are present. TTL further recommended that if ACM pipe insulation is found, it should be properly abated (removed) by licensed asbestos abatement contractors.

The Limited Phase II ESA soil sampling identified lead in shallow soil at the Site at concentrations exceeding the MTCA Method A cleanup level for unrestricted land use, cleanup levels most applicable to the planned use of the Site as a State Veterans Home. TTL concluded that additional action would likely be necessary to prevent contact with the elevated lead concentrations, such as excavation and off-site disposal of the soil exceeding the cleanup level, the use of site development features such as pavement or buildings as engineered
barriers to prevent contact with the soil, a risk assessment to calculate site-specific cleanup levels, and/or institutional controls to prevent certain uses of the site.

In addition, TTL noted that although buried construction and demolition debris at the Site was not considered to be REC, any demolition debris or ACM encountered as part of the redevelopment of the Site would require appropriate handling and disposal in accordance with Federal, state, local laws.

VA submitted a copy of the Phase I and Limited Phase II ESA report to WSDE to report the lead-impacted soil, as required under MTCA. In response to receiving the report, Mr. Phil Leinart, a WSDE Toxic Cleanup Program representative, conducted a site visit on April 22, 2014. In May 2014, Mr. Leinart sent VA a letter that acknowledged VA’s reporting of the lead-impacted soil and provided information regarding the administrative process under MTCA (Appendix A).

3.13.1 Effects of the Preferred Action Alternative

The Preferred Action Alternative could have short-term adverse solid and hazardous materials effects. Specifically, redevelopment of the Site could increase the exposure of persons to lead and/or asbestos during ground-disturbing activities. However, the Preferred Action Alternative would have long-term positive solid and hazardous materials effects. As part of the development, soil remediation would be completed and/or engineered barriers would be installed to protect future Site occupants from potential exposure to Site contaminants. Effects of this alternative are discussed below.

Abatement of identified ACM and remediation/management of the identified soil impacts during redevelopment would be key components of the Proposed Action. The abandoned steam tunnel/pipe chase on the southern portion of the Site would be excavated to determine if steam lines with ACM insulation is present. All identified ACM pipe insulation would be removed by a licensed asbestos abatement contractor.

In April 2014, VA and WDVA discussed the analytical results of the Limited Phase II ESA soil sampling and options to address the identified lead-impacted soil with WSDE. As a result of this discussion, VA and WDVA plan to address the lead-impacted soil through a MTCA Independent Cleanup Action during the site redevelopment. WDVA’s redevelopment plans include the removal of approximately one to two feet of soil from the area of the existing water tower, where much of the lead-based paint chip impacted soil was identified. WDVA would also remove shallow soil from the other areas where lead impacts in excess of the MTCA Method A unrestricted land use cleanup levels were identified. Soil removed from the existing water tower area and other impacted areas of the Site would be stockpiled, sampled, and properly disposed of off-site. Soil samples would be collected from the excavated areas where elevated lead levels were detected during the Limited Phase II ESA to confirm and demonstrate the completion of the soil remediation. Following the completion of the impacted soil removal, WDVA would submit a Remediation Completion Report to WSDE that documents remediation activities and compliance with the MTCA criteria. Although it is anticipated that the impacted soil would be removed during the redevelopment, certain development features associated with the State Veterans Home, such as paved parking and drive areas and building foundations could also be used as engineering controls to prevent exposure to lead-impacted soils in some areas.

A Soil Management Plan (SMP) would be developed for the Site redevelopment activities. The SMP would consider soil impacts and would ensure on-site personnel and visitors are not at risk from the impacts. The SMP would also specify construction activities that would be implemented to prevent the exacerbation of these impacts and to protect the local population from potential exposure. Disposal of ACMs and lead-impacted soil would require appropriate handling and disposal practices in accordance with Federal, state, local laws.
The Proposed Action would also result in short-term, less-than-significant adverse impacts due to the increased presence and use of petroleum and hazardous materials during demolition and construction. During these activities, an increase in construction vehicle traffic would increase the likelihood for the release of vehicle operating fluids (e.g., oil, diesel, gasoline, antifreeze, etc.) and maintenance materials. As such, a less-than-significant, direct, short-term adverse impact is possible. Implementation of standard construction BMPs would serve to ensure this impact is further minimized.

No significant adverse long-term impacts during operation of the State Veterans Home are anticipated; long-term operational petroleum and hazardous materials, and biohazardous and solid wastes would be managed in accordance with WDVA's SOPs and applicable Federal and State laws. The Preferred Action Alternative would have a long-term positive impact as a result of the ACM removal and lead-impacted soil remediation conducted as part of the Proposed Action.

3.13.2 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA or WDVA would occur, no petroleum or hazardous substances would be handled, and no solid or hazardous waste would be generated. In addition, the ACM removal and lead-impacted soil remediation activities that would be conducted associated with the Proposed Action would not occur. Should the Site be developed in the future by others, similar short-term and long-term solid waste and hazardous materials impacts and benefits as realized under the Proposed Action could occur, depending upon the use.

3.13.3 Mitigation/Management Measures

No project-specific mitigation measures are required. To reduce potentially adverse solid and hazardous materials effects, VA and WDVA would implement the following management measures and BMPs. Implementation of these measures, including complying with all regulatory agency requirements, would maintain potential adverse effects at less-than-significant levels:

- Complete test excavations in the southern portion of the Site to expose the abandoned steam tunnel/pipe chase and determine if abandoned steam lines with ACM insulation is present. Remove and properly dispose of any identified ACM using licensed asbestos abatement contractors.
- Remove the identified lead-impacted soil that exceeds the MTCA Method A unrestricted land use cleanup level during site redevelopment as an Independent Cleanup Action under MTCA. Document the completion of these activities and submit a Remediation Completion Report to WSDE for their records.
- Develop and implement a site-specific Soil Management Plan for Site construction activities.
- Properly characterize and manage soils excavated during redevelopment in accordance with the Soil Management Plan. Dispose of impacted soil in accordance with Federal, State and local law.
- Implement standard construction BMPs to ensure construction equipment and activities do not result in releases to the environment.

During operation, the State Veterans Home would comply with existing WDVA SOPs and applicable Federal and State laws governing the use, generation, storage, or transportation of hazardous materials and solid, hazardous or biohazardous wastes.
3.14 Transportation and Parking

Access to the VAMC and the Site is provided from Wainwright Drive, a two-lane asphalt-paved road, via Chestnut Street from the east and Avery Street from the north. A Transportation Impact Analysis (TIA) for the proposed Walla Walla VAMC expansion was prepared by Kettelson and Associates, Inc. in February 2013. The TIA examined the current (2012) traffic conditions and potential future traffic conditions in 2015 and 2035, with and without VA’s planned VAMC expansion. The 2015 expansion conditions included the proposed State Veterans Home at the Site, the addition of 40 leased apartment units with the VAMC campus, and three new medical buildings that are being constructed on the western portion of the campus. The 2035 expansion conditions also included the reuse of existing medical buildings on the campus that will be vacated by the western campus expansion. The TIA focused on the weekday p.m. peak traffic period (4-6 pm) since this time would represent the most critical period with respect to traffic. The TIA examined four intersections in the vicinity of the VAMC that would be impacted by the Proposed Action and the other proposed VAMC expansion activities:

- Poplar Street/Myra Road (west of the VAMC)
- Poplar Street/Avery Street (northern VAMC entrance)
- Poplar Street/9th Avenue (northeast of the VAMC)
- Chestnut Street/9th Avenue (eastern VAMC entrance)

The TIA found that all of the intersections surrounding the VAMC currently operate at acceptable Level of Service (LOS), with a LOS rating of C, and are forecasted to maintain acceptable LOSs in 2015 and 2035 under the background (no VAMC expansion condition).

The WSDOT stated that none of the roads adjacent to the Site are under the jurisdiction of the WSDOT and had no comments or concerns pertaining to the Proposed Action. The City of Walla Walla regulates and maintains the roads in the Site area. The City of Walla Walla provided a copy of the TIA and stated that they are monitoring the continued development of the VAMC to determine the timing and appropriate scope of right-of-way improvements, up to and including, lane changes and a traffic signal at the intersection of West Poplar Street and Avery Street.

3.14.1 Effects of the Preferred Action Alternative

Under the Preferred Action Alternative, short-term and long-term, direct and indirect, less-than-significant adverse transportation impacts are anticipated.

Construction traffic, consisting of trucks, workers’ personal vehicles, and associated equipment, would increase traffic volumes in the local area, and could cause delays if this occurred during morning and evening peak periods. Removal, installation and connection of utilities at the VAMC and surrounding roadways could also impact local roadways. These activities could result in additional short-term traffic congestion. However, surrounding roadways currently operate at acceptable LOSs. Thus, only less-than-significant, short-term impacts would be anticipated. Implementation of BMPs, as described in Section 3.14.3, would further reduce these impacts.

During operation, public roadways in the vicinity of the proposed State Veterans Home would experience some additional traffic. As described in Section 2.2, the State Veterans Home would operate 24 hours per day, seven days per week, 365 days per year. The facility would include up to 80 residents and would be staffed by approximately 100 administrative and health care professionals, and support staff (in shifts). The State Veterans Home would include approximately 70 parking stalls, which is designed to fully accommodate the parking needs of the facility.
The TIA estimated that the proposed State Veterans Home would generate approximately 190 vehicle trips at various times throughout the day, including approximately 20 trips during the weekday p.m. peak period. The increased traffic from the State Veterans Home represents approximately one-half of the total increased traffic projected in the 2015 VAMC expansion traffic scenario. The study concluded that the intersections surrounding the VAMC would continue to operate at acceptable LOSs in 2015 (LOS rating of C). The TIA analysis indicates that the proposed State Veterans Home would result in less-than-significant traffic impacts.

The TIA indicated that under the 2035 VAMC expansion traffic scenario, all of the study intersections would continue to operate under acceptable LOS, with the exception of the Poplar Street/Avery Street intersection. However, impacts at this intersection are projected as a result of the re-use of the existing buildings on the western portion of the VAMC campus (2,790 daily trips, 285 trips during p.m. peak hours), not the proposed State Veteran Home. In addition, the City of Walla Walla indicated that they are monitoring the traffic conditions at this intersection and are prepared to make improvements, when necessary.

No adverse parking impacts would be caused by the Proposed Action. The State Veterans Home would have adequate on-site parking for staff, residents and visitors.

### 3.14.2 Effects of the No Action Alternative

Under the No Action Alternative, no construction by VA or WDVA would occur. However, should the Site ultimately be developed by others, impacts similar to those as identified under the Proposed Action would occur. The type and magnitude of transportation effects would be dependent upon that proposed future use.

### 3.14.3 Mitigation/Management Measures

No project-specific mitigation measures are required. Implementing BMPs to reduce transportation impacts would further minimize the potential impacts on local roadways. As part of the Proposed Action, transportation impacts would be maintained at acceptable levels through implementation of the following BMPs:

- During construction, maintain public traffic on local roadways through the use of temporary signals, signage, and/or other traffic control measures, as appropriate.

- Ensure that debris and/or soil is not deposited on local roadways during the construction activities.

- Time construction traffic, particularly heavy machinery and truck traffic, to avoid peak travel hours.

Implementation of these BMPs would ensure transportation impacts are maintained at less-than-significant levels.

### 3.15 Utilities

The Site is connected to VAMC campus-wide utilities. As part of the Preferred Action Alternative, the State Veterans Home would be substantially separated from the existing VAMC utility infrastructure. The following describes the existing Site utilities and planned utilities that would service the State Veterans Home.
Potable Water

As part of the VAMC campus, the Site is currently supplied potable water from the VAMC via two water supply wells located approximately 50 feet north (Well #1) and 50 feet east (Well #2) of the Site. Water from these wells is pumped to the on-site water tower and distributed throughout the VAMC campus. Under the Preferred Action Alternative, the existing water tower would be removed from the Site and replaced by a new water tower east of the Site. All existing water supply lines would be removed and new water lines would be installed between the wells and the new water tower, and between the new water tower and the remaining portions of the VAMC campus. The new water lines would be located outside the boundaries of the 11-acre Site. The new water line servicing the VAMC campus would run north from the water tower to the Wainwright Drive, then southwest along Wainwright Drive where connections would be made to the existing water supply lines on the VAMC campus.

During the water tower relocation, VA would connect the VAMC campus buildings to the existing City of Walla Walla water system for temporary use until the new water tower is constructed. This would be accomplished through the connection of the existing VAMC main to the City of Walla Walla water system at Chestnut Street at east end of campus. The VAMC campus also has a potable city connection point (normally valved “off”) and a fire connection point at Poplar Street. After the water system construction is complete, the City of Walla Walla water system connection points would remain for emergency backup water supply.

The State Veterans Home would be supplied with potable water from the City of Walla Walla. A new water supply line for domestic and fire service would be extended to the State Veterans Home from the municipal water main located near Wainwright Drive at the east end of the VAMC campus. The State Veterans Home would be served with a domestic water service and a fire service line for building fire protection and a fire loop for hydrants along access roads. WDVA would be required to submit design plans to the City of Walla Walla to obtain permits to connect to the potable water service.

The City of Walla Walla potable water is primarily sourced from the Mill Creek Watershed, with the remainder supplied by four municipal water supply wells. Approximately 80 to 90 percent of City potable water is obtained from the Mill Creek headwaters and piped to the Mill Creek Water Treatment Plant (City of Walla Walla Water Quality Report, 2012).

Stormwater

Stormwater at the Site, which is mostly grassy land, generally infiltrates into the Site soil. Minor stormwater runoff from paved areas is managed through the VAMC stormwater system.

Stormwater runoff for the State Veterans Home would be conveyed from developed areas to biofiltration swales in the eastern and western portions of the State Veterans Home campus, and on to three sediment traps and an on-site retention pond by a series of pipes and catch basins. The system would be designed according to WSDE methodology to infiltrate the 100-year, 24-hour peak storm event. No routine overflow to existing VAMC systems is anticipated; however, an emergency overflow would be provided to an existing surface water infiltration area on the VAMC campus.

Sanitary Sewer

The City of Walla Walla supplies sanitary sewer services to the VAMC. The existing sanitary sewer in the Site vicinity is likely adequate for the proposed State Veterans Home. The State Veterans Home would likely be connected to existing sanitary sewer lines at the VAMC campus. WDVA would be required to submit design plans to the City of Walla Walla to obtain permits to connect to the sanitary sewer service.
Electric

A new power service for the State Veterans Home would be provided by Columbia Rural Electrical Association. Electricity would be extended to the State Veterans Home from existing Columbia Rural Electrical Association facilities east of the VAMC campus. One or more on-site electrical transformers would be located on the Site. WDVA would be required to submit design plans to Columbia Rural Electrical Association to obtain permits to connect to the electric service.

Natural Gas

Natural gas is currently provided to the VAMC campus by a 4-inch buried gas main that serves the VAMC Boiler Plant (Building 76) and is distributed from there to other campus buildings. Gas service to the proposed State Veterans Home would be provided by Cascade Natural Gas. Gas service would be extended from the existing utility mains to the east of the Site. WDVA would be required to submit design plans to Cascade Natural Gas to obtain permits to connect to the natural gas service.

Telecommunications

Charter Cable and CenturyLink/Qwest provide telecommunication services to the VAMC campus vicinity. The telecommunications service in the vicinity is likely adequate for the proposed State Veterans Home. Detailed plans for the proposed State Veterans Home would need to be provided to Charter Cable and/or CenturyLink/Qwest in advance of construction activities in order to determine the service required.

3.15.1 Effects of the Preferred Action Alternative

The proposed WDVA State Veterans Home would result in an increase in the consumption of utilities, including electricity, natural gas, potable water, and sanitary sewer discharges. All major utility services are in close proximity to the Site. The proposed facility would not be anticipated to require extraordinary utility needs. Adequate utilities exist to supply the facility as currently proposed. However, each utility provider would require a review of the final design plans to validate these preliminary findings and to determine connection/extension requirements to service the proposed State Veterans Home. No significant impacts to local utilities are anticipated associated with the State Veterans Home.

As part of the Preferred Action Alternative, VA would temporarily connect to the City of Walla Walla’s water system to supply the VAMC with potable water until the new water tower is constructed and in operation. VA has discussed the need for this connection and the associated increased water use with the City of Walla Walla and the City indicated that it was acceptable. The Washington State Department of Health (WSDOH) has jurisdiction authority of reviewing and approving design and major changes to public water systems. Multiple design reviews were conducted with WSDOH on design, construction and planning aspects associated with the connection to the City of Walla Walla water system. WSDOH concurred with the final design; the WSDOH concurrence letter is provided in Appendix A. As such, the temporary increased municipal water use by the VAMC is not anticipated to have a significant impact on the municipal water system.

3.15.2 Effects of the No Action Alternative

Under the No Action Alternative, no construction or utilities impacts by VA or WDVA would occur. However, should the Site ultimately be developed by others, impacts similar to those identified under the Proposed Action would occur. The type and magnitude of utility effects would be dependent upon that proposed future use.
3.15.3 Mitigation/Management Measures

No project-specific mitigation measures are required. Implementing BMPs to reduce utility impacts would further minimize the potential impacts to utility services. As part of the Proposed Action, utility impacts would be maintained at acceptable levels through implementation of the following BMPs:

- VA would coordinate with the City of Walla Walla to determine the requirements necessary to temporarily connect the VAMC campus to the municipal water system and would implement the necessary requirements.

- WDVA would submit design plans to each utility provider to determine the specific connection requirements and would implement the necessary requirements.

Implementation of these BMPs would ensure utility impacts are maintained at less-than-significant levels by properly controlling and limiting impacts to utility services and infrastructure during construction and operation.

3.16 Environmental Justice

In 1994, EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, was issued to focus attention of Federal agencies on human health and environmental conditions in minority and low-income communities and to ensure that disproportionately high and adverse human health or environmental effects on these communities are identified and addressed. In order to provide a thorough environmental justice evaluation, this socioeconomics’ presentation gives particular attention to the distribution of race and poverty status in areas potentially affected by implementation of the Proposed Action. For purposes of this analysis, minority and low-income populations are defined as:

- **Minority Populations**: Persons of Hispanic origin of any race, African Americans, American Indians, Eskimos, Aleuts, Asians, or Pacific Islanders.

- **Low-Income Populations**: Persons living below the poverty level, based on a total annual income of $23,550 for a family of four persons as reported in the 2013 – 2014 Census.

Based on the information identified in Section 3.11, the City of Walla Walla has a higher percentage of Hispanic residents and a higher percentage of residents living below the poverty level than the State of Washington as a whole. However, no specific concentrations of minority or low-income populations are located in the vicinity of the Site. No low-income housing is located in the immediate vicinity of the Site.

3.16.1 Effects of the Preferred Action Alternative

Under the Preferred Action Alternative, no significant adverse environmental justice effects would be anticipated. No specific concentrations of minority or low-income populations are located in the vicinity of the Site. No local groups are known to principally rely on fish or wildlife for subsistence. Consequently, no adverse impacts to such disadvantaged segments of the population are anticipated.

The Proposed Action is not likely to have an adverse effect on the local population, but is likely to have a short-term and long-term positive socioeconomic effect on the local employment and personal income.
3.16.2 Effects of the No Action Alternative

Under the No Action Alternative, no development by VA or WDVA would occur at the Site and there would be no adverse environmental justice effects. If the Site were to be developed by others, it is unlikely to result in adverse environmental justice effects.

3.16.3 Mitigation/Management Measures

No project-specific mitigation or management measures are required.

3.17 Cumulative Impacts

As defined by CEQ Regulations in 40 CFR Part 1508.7, cumulative impacts are those which "result from the incremental impact of the Proposed Action when added to other past, present, and reasonably foreseeable future actions, without regard to the agency (Federal or non-Federal) or individual who undertakes such other actions." Cumulative impact analysis captures the effects that result from the Proposed Action in combination with the effects of other actions taken during the duration of the Proposed Action in the same geographic area. Because of extensive influences of multiple forces, cumulative effects are the most difficult to analyze.

NEPA requires the analysis of cumulative environmental effects of a Proposed Action, or set of actions, on resources that may often be manifested only at the cumulative level, such as traffic congestion, air quality, noise, biological resources, cultural resources, socioeconomic conditions, utility system capacities, and others.

3.17.1 Preferred Action Alternative

The Site is located in the southeast corner of the VAMC, which is included in the City of Walla Walla. The Region of Influence (ROI) for the Preferred Action Alternative is a mix of developed and undeveloped/unimproved park land. VA is currently in the process of making numerous improvements to the VAMC campus. Since 2010, the VAMC has added a Specialty Clinic (Building N01), an Outpatient Clinic (Building (N02), and a Regional Residential Recovery Unit (Building N03) in the western portion of the VAMC. In addition, the VAMC is in the process of converting buildings in the southern portion of the historic parade grounds (Buildings 2, 3, 4, 5, 112, 121, 124, 125, and 126) and constructing new buildings to accommodate a total of 40 affordable residential units for Veterans. Additional improvements have been proposed for the infrastructure at the VAMC, including a complete upgrade of the campus water distribution system, of which the Proposed Action is part of. No other recent or planned development projects at the VAMC or in the vicinity of the Site were identified.

The Preferred Action Alternative would result in the impacts identified throughout Section 3. These primarily include potential less-than-significant adverse impacts to aesthetics (long-term), air quality (short-term and long-term), geology and soils (short-term and long-term), hydrology and water quality (short-term and long-term), wildlife and habitat (short-term), noise (short-term), community services (long-term), solid and hazardous materials (short-term and long-term), transportation (short-term and long-term), and utilities (short-term and long-term). All of these impacts are further reduced through careful implementation of the general BMPs and management measures, and compliance with regulatory requirements as identified throughout Section 3. Given the nature of the Preferred Action Alternative and its ROI, no significant cumulative adverse effects to any of these resource areas are anticipated. As discussed in Section 3.14, the TIA projected an adverse future traffic impact at the intersection of Poplar Street and Avery Street associated with the VAMC expansion. However, the impacts at this intersection are projected as a result of the re-use of the existing building on the western portion of the VAMC campus, with very little impact from the proposed State Veterans Home. In addition, the City of Walla Walla indicated that they are monitoring traffic conditions at this intersection and are prepared to make improvements, when necessary.
No adverse effects to land use, wetlands, floodplains and coastal zones, socioeconomics, or environmental justice would occur as a result of the Preferred Action Alternative. As such, no cumulative adverse effects to any of these resource areas are anticipated.

As detailed in Section 3.4, the Preferred Action Alternative would result in adverse effects to cultural resources. The Walla Walla VAMC campus, including the 11-acre Site, is located within the NRHP-listed Fort Walla Walla Historic District. The existing water tower and the cultural landscape at 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.

VA has actively engaged various Consulting Parties throughout the cultural resource investigations at the Site. The results of the cultural resource investigations and consultations with applicable parties have resulted in a Draft MOA between VA, WDVA, SHPO, ACHP, and CTUIR for the State Veterans Home construction and the water tower removal. A second MOA is expected for the new water tower construction. As described above, other parties were invited to consult; however, did not participate. The MOAs will detail the mitigative actions and strategies that would be taken to minimize the cultural resources effects.

Compliance with the stipulations in the MOAs would satisfy VA’s requirements under the NHPA and would mitigate the cultural resources effects of the Preferred Action Alternative. Other Federal actions at the VAMC are also regulated by NEPA and the NHPA. Compliance with these regulations, as required, including consultation with SHPO and other parties, as applicable, would ensure that no significant cumulative cultural resources impacts would occur.

### 3.17.2 No Action Alternative

Under the No Action Alternative, no actions would be taken by VA or WDVA and no cumulative impacts would occur. Cumulative impacts could be similar to those identified for the Proposed Action, if the Site were to be developed for another use. The extent of cumulative effects under the No Action Alternative would depend upon that future use.

### 3.18 Potential for Generating Substantial Public Controversy

As discussed in Section 4.0, VA has solicited input from various Federal, State, and local government agencies regarding the Proposed Action. Several of these agencies have provided input; none of the input has identified opposition or controversy related to the Proposed Action. VA, as the proponent of the Proposed Action, will publish and distribute the Draft EA for a 30-day public comment period. Based on the significant positive effects of the Proposed Action and the findings of this EA (no unmitigated significant adverse environmental impact), it is not anticipated that there would be substantial public controversy regarding the Proposed Action.
SECTION 4: PUBLIC INVOLVEMENT

4.1 Public and Agency Involvement

VA invites public participation in decision-making on new proposals through the NEPA process. Public participation with respect to decision-making on the Proposed Action is guided by 38 CFR Part 26, VA’s policy for implementing the NEPA. Additional guidance is provided in VA’s NEPA Interim Guidance for Projects (VA 2010). Consideration of the views and information of all interested persons promotes open communication and enables better decision-making. Agencies, organizations, and members of the public with a potential interest in the Proposed Action, such as minority, low-income, and disadvantaged persons, are urged to participate. A record of agency coordination and public involvement associated with this EA is provided in Appendix A and Appendix D.

4.1.1 Public Review

VA, as the proponent of the Proposed Action, will publish and distribute the Draft EA for a 30-day public comment period, as announced by a Notice of Availability (NOA) published in Walla Walla Union-Bulletin, a local newspaper of general circulation. A digital copy of the Draft EA will be available for viewing or downloading at the following web address: http://www.wallawalla.va.gov. Paper copies of the Draft EA will also be made available for public review at the Jonathan M. Wainwright Drive VAMC and at the City of Walla Walla Library. VA will respond to provided public comments within the Final EA and will issue a Finding of No Significant Impact (FONSI), presuming there are no substantive public comments that would warrant further analysis and no significant, unmitigable effects are identified.

4.1.2 Agency Coordination

Interagency and Intergovernmental Coordination for Environmental Planning (IICEP) is a federally mandated process for informing and coordinating with other governmental agencies regarding Federal Proposed Actions. CEQ Regulations require intergovernmental notifications prior to making any detailed statement of environmental impacts. Through the IICEP process, VA notifies relevant Federal, State, and local agencies and allows them sufficient time to make known their environmental concerns specific to a Proposed Action. Comments and concerns submitted by these agencies during the IICEP process are subsequently incorporated into the analysis of potential environmental impacts conducted as part of the EA. This coordination fulfills requirements under EO 12372 (superseded by EO 12416, and subsequently supplemented by EO 13132), which requires Federal agencies to cooperate with and consider State and local views in implementing a Federal proposal. It also constitutes the IICEP process for this EA.

Agencies consulted for this EA include: US Fish and Wildlife Service (USFWS); US Environmental Protection Agency (USEPA); US Army Corps of Engineers (USACE); Washington State Department of Ecology (WSDE); Washington Department of Fish and Wildlife (WDFW); Washington State Department of Transportation (WDOT); State of Washington Department of Archeology and Historic Preservation (SHPO); Natural Resources Conservation Service (NRCS); Walla Walla County Conservation District (WWCCD); City of Walla Walla Department of Parks and Recreation (WWDPR); Fort Walla Walla Museum (FWWM); City of Walla Walla;
Walla Walla Joint Community Development Agency (WWJCDA); Walla Walla Public Works Administration (WWPWA); Port of Walla Walla (PWW); and Walla Walla Historic Preservation Commission (WWHPC). Agency information and comments have been incorporated into this EA. Copies of relevant correspondence can be found in Appendix A). The Washington State Department of Health (WSDOH) has jurisdiction authority of reviewing and approving design and major changes to public water systems. The WSDOH concurrence letter is also found in Appendix A.

Responses were received from the following agencies: USFWS, SHPO, WSDE, WDFW, WDOT, WWCCD, WWJCDA, and the City of Walla Walla. Input provided by these agencies is detailed in the appropriate resource sub-sections of Section 3. Written correspondence from the agencies is provided in Appendix A.

4.1.3 Native American Consultation

Six federally recognized Native American Tribes were identified as having possible ancestral ties to the Site and were contacted by VA as part of the Section 106 consultation in letters dated December 2011 to September 2013. The CTUIR is considered a signatory party for the establishment of the MOAs related to cultural resources. The other Tribes were invited to consult, but did not participate.
SECTION 5: MANAGEMENT AND MITIGATION MEASURES

This section summarizes the management and mitigation measures, if any, identified in Section 3 that are proposed to minimize and maintain adverse effects at acceptable, less-than-significant levels.

Per established protocols, procedures, and requirements, the VA, WDVA and their construction contractors would implement BMPs and would satisfy all applicable regulatory requirements in association with the design, construction, and operation of the proposed State Veterans Home. These "management measures" are described in this EA, and are included as components of the Preferred Action Alternative. "Management measures" are defined as routine BMPs and/or regulatory compliance measures that are regularly implemented as part of proposed activities, as appropriate, across the State of Washington. In general, implementation of such management measures, as identified throughout Section 3, would maintain impacts at acceptable levels for all resource areas analyzed. These are different from "mitigation measures," which are defined as project-specific requirements, not routinely implemented as part of construction projects, necessary to reduce identified potentially significant adverse environmental impacts to less-than-significant levels.

5.1 Management Measures

With implementation of routine "management measures," the Preferred Action Alternative would not result in significant adverse impacts to, and would reduce any identified potential adverse effects to, the current environmental setting associated with the following technical resource areas:

**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. Refer to Section 3.2.

**Air Quality.** Control fugitive dust emissions during construction and obtain minor air emissions permits, if applicable, as described in Section 3.3.

**Geology and Soils.** Control stormwater, soil erosion and sedimentation impacts during construction and comply with the WSDE NPDES (CSWGP) 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 FPPA. Refer to Section 3.5.

**Hydrology and Water Quality.** Control stormwater, soil erosion and sedimentation impacts during construction and operation by complying with the WSDE NPDES (CSWGP) 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, as described in Section 3.6.

**Wildlife and Habitat.** Avoid potential impacts to nesting and migratory birds and plant native species, as described in Section 3.7.
**Noise.** Minimize noise effects during Site construction activities, as described in Section 3.8.

**Solid and Hazardous Materials.** Excavate the abandoned steam tunnel/pipe chase and remove and properly dispose of any identified ACM pipe insulation. Remove and properly dispose of the identified lead-impacted soil that exceeds the 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, as described in Section 3.13.

**Transportation and Parking.** Manage construction to avoid impacts to local roads, as detailed in Section 3.14.

**Utilities.** Coordinate with the local utilities and obtain necessary approvals for connections, as described in Section 3.15.

No management measures are identified by this EA’s analysis for the following technical resource areas: Land Use; Wetlands; Floodplains, and Coastal Zones; Socioeconomics; Community Services; and Environmental Justice.

### 5.2 Mitigation Measures

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 would:

- 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 would further minimize potential impacts to local cultural resources. All contractors involved in site preparation and ground disturbing construction would 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).
SECTION 6: CONCLUSIONS

This Draft EA evaluates the Proposed Action of VA to transfer approximately 11 acres of land within the Jonathan M. Wainwright Memorial VAMC campus to the State of Washington and to partially fund the WDVA’s construction of a new 80-resident State Veterans Home on the transferred land. This EA discusses two alternatives: (1) the Preferred Action Alternative – the transfer of the approximately 11 acres of mostly grassy, mostly vacant land located in the southeastern portion of the VAMC to the State of Washington and partially funding the construction of the proposed State Veterans Home on the Site and (2) the No Action Alternative. The EA evaluates possible effects to aesthetics; air quality; cultural resources; geology and soils; hydrology and water quality; wildlife and habitat, including threatened and endangered species; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomics; community services; solid and hazardous materials; transportation and parking; utilities; and environmental justice. The EA concludes there would be no significant direct, indirect, or cumulative impacts to the local environment or quality of life associated with implementing the Preferred Action Alternative, provided the management measures, BMPs, and mitigation measures (for cultural resources effects) identified in this EA are implemented. Therefore, this EA concludes that a mitigated FONSI is appropriate, and that an EIS is not required.
# SECTION 7: LIST OF PREPARERS

## TTL ASSOCIATES, INC. (CONSULTANTS)

<table>
<thead>
<tr>
<th>Name</th>
<th>Role</th>
<th>Degree</th>
<th>Years of Experience</th>
</tr>
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<tbody>
<tr>
<td>Rob Clark</td>
<td>Project Manager, Technical Lead Technical QA/QC Review, Program Management/Project Coordination</td>
<td>B.S., Aquatic Environments/Environmental Science, 1985</td>
<td>28</td>
</tr>
<tr>
<td>Cindy Paslawski</td>
<td>Site Reconnaissance</td>
<td>B.S., Earth Science/Geology, 2007</td>
<td>2</td>
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</tbody>
</table>
SECTION 8: REFERENCES CITED


City of Walla Walla 2014.

Clean Air Act of 1970 (42 USC 7401 et. seq.; 40 CFR Parts 50-87) Section 176(c).


Environmental Assessment, Proposed Multi-Specialty Care Outpatient Clinic, prepared by Terracon Consultants, Inc. (Terracon) and dated April 2011.

Environmental Assessment, EUL, prepared by Dyson Environmental Management and Compliance (Dyson) and dated March 2013.


EO 13175, Consultation and Coordination with Indian Tribal Governments. 6 November 2000.

Farmland Protection Policy Act (FFPA) (7 USC 4201, et seq.).

Fort Walla Walla Museum 2014.

Geotechnical Engineering Investigation, prepared by GeoEngineers and dated May 2012.

Memorandum of Agreement, Regarding Construction of a Skilled Nursing Facility Adjacent to the VA Medical Center, Walla Walla, Washington, prepared by VA and dated March 2014.


Phase I Cultural Resources Survey for the Washington Department of Veterans Affairs Skilled Nursing Facility, prepared by Archeological and Historical Services, Eastern Washington University (AHS) and dated May 2013.

Phase II Cultural Resources Survey for the Washington Department of Veterans Affairs Skilled Nursing Facility, prepared by AHS and dated April 2014.

Phase I Cultural Resources Survey Addendum for the Washington Department of Veterans Affairs Skilled Nursing Facility Utility Corridor, prepared by AHS and dated April 2014.
Phase I Cultural Resources Investigation at the Jonathan M. Wainwright Memorial Veterans Affairs Medical Center for the Proposed Campus-Wide Sewer and Water Infrastructure Replacement, completed by Fort Walla Walla Museum and dated June 2013.

Phase I Cultural Resources Investigation Plan, Medical Center BURR-EUL Parcel, prepared by the Fort Walla Walla Museum and dated June 2012.


Phase II ESA, Terracon Consultants, Inc. dated September 2011.

Port of Walla Walla 2014.


USDA Natural Resources Conservation Service – Walla Walla Service Center 2014.


US Environmental Protection Agency (USEPA), Region 10 2014.


US Environmental Protection Agency (USEPA) National Ambient Air Quality Standards (NAAQS) 2008.


USFWS National Wetlands Inventory Online Mapper 2014.

Walla Walla County Conservation District 2014.

Walla Walla Department of Parks and Recreation 2014.


Walla Walla Joint Community Development Agency 2014.

Walla Walla Public Works Administration 2014.
Washington Department of Archeology and Historic Preservation 2014.
Washington Department of Fish and Wildlife 2014.
Washington State Department of Transportation 2014.

**Other internet searches and data (accessed February 2014 – April 2014):**


USEPA Environmental & Compliance History Online (ECHO) e-database: [http://www.epa-echo.gov/echo/](http://www.epa-echo.gov/echo/)


Various internet mapping tools to locate properties, [www.mapquest.com](http://www.mapquest.com), [www.maps.google.com](http://www.maps.google.com), [www.google.earth.com](http://www.google.earth.com), etc.
### SECTION 9: LIST OF ACRONYMS AND ABBREVIATIONS

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</table>
## SECTION 10: AGENCIES AND INDIVIDUALS CONSULTED

### Agencies Consulted

**U.S. Fish and Wildlife Service – Washington Fish and Wildlife Office**  
510 Desmond Drive SE, Suite 102  
Lacey, Washington 98503-1263  
Phone: (360) 753-9440

**US Environmental Protection Agency, Region 10**  
Washington Operations Office  
300 Desmond Dr. SE, Suite 102  
Lacey, Washington 98503  
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**US Army Corps of Engineers – Seattle District**  
P.O. Box 3755  
Seattle, Washington 98124-3755  
Phone: (206) 764-3742

**Washington State Department of Ecology**  
Public Records Officer  
P.O. Box 47600  
Olympia, Washington 98504-7600

**Washington State Department of Ecology**  
Eastern Regional Office  
4601 N Monroe  
Spokane, Washington 99205-1295  
Phone: (509) 329-3400

**Washington Department of Fish and Wildlife**  
600 Capitol Way North  
Olympia, Washington 98501-1091  
Phone: (360) 902-2200

**Washington Department of Fish and Wildlife**  
Washington Department of Fish and Wildlife Public Disclosure Officer  
600 Capitol Way North  
Olympia, Washington 98501-1091  
Phone: (360) 902-2623

**Washington State Department of Transportation**  
Eastern Region  
2714 North Mayfair Street  
Spokane, Washington 99207-2090  
Phone: (509) 324-6000

**State of Washington Department of Archeology and Historic Preservation (SHPO)**  
P.O. Box 48343  
Olympia, Washington 98504-8343  
Phone: (360) 586-3065
**Natural Resources Conservation Service**  
Walla Walla Service Center  
325 North 13th Street  
Walla Walla, Washington 99362  
Phone: (509) 522-6347

**Walla Walla County Conservation District**  
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Walla Walla, Washington 99362  
Phone: (509) 522-6340 ext. 3

**City of Walla Walla Department of Parks and Recreation**  
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Walla Walla, Washington 99362-2797  
Phone: (509) 527-4527

**Fort Walla Walla Museum**  
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Walla Walla, Washington 99362  
Phone: (509) 525-7703

**City of Walla Walla**  
Nabel Shawa, City Manager  
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Phone: (509) 527-4422

**Walla Walla Joint Community Development Agency**  
Mr. Thomas Glover, AICP, Director  
55 East Moore Street  
Walla Walla, Washington 99362  
Phone: (509) 524-4710

**Walla Walla Joint Development Agency**  
Ms. Lauren Prentice, Planner  
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Walla Walla, Washington 99362  
Phone: (509) 524-4710

**Walla Walla Public Works Administration**  
55 East Moore Street  
Walla Walla, Washington 99362  
Phone: (509) 527-4463

**Port of Walla Walla**  
Mr. Jim Kuntz, Executive Director  
310 A Street  
Walla Walla, Washington 99362  
Phone: (509) 525-3100

**Historic Preservation Commission**  
Mr. Barry Gould  
722 Washington Street  
Walla Walla, Washington 99362  
Phone: (509) 524-4710
Native American Tribes Consulted

Confederated Tribes of the Umatilla Indian Reservation
Carey Miller, THPO/Archaeologist
Cultural Resources Protection Program
46411 Timine Way
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Confederated Tribes of the Umatilla Indian Reservation
Catherine Dickson
Cultural Resources Protection Program
46411 Timine Way
Pendleton, Oregon 97801

Colville Confederated Tribes
Guy Moura, Tribal Historic Preservation Officer
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Nespelem, Washington 99155

Nez Perce Tribe
Brooklyn Baptiste, Chairman
P. O. Box 305
Lapwai, Idaho 83540

Nez Perce Tribe
Patrick Baird, Tribal Historic Preservation Officer
Cultural Resource Program
P. O. Box 365
Lapwai, Idaho 83540-0365

Wanapum Tribe
Rex Buck, Cultural Resources Officer
P. O. Box 275
Beverly, Washington 99321-0164

Confederated Tribes and Bands of the Yakama
Kate Valdez, Tribal Historic Preservation Officer
P. O. Box 151
Toppenish, Washington 98948
SECTION 11: LIST OF ENVIRONMENTAL PERMITS REQUIRED

11.1 Regulatory Framework

This EA has been prepared under the provisions of, and in accordance with the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, and 38 CFR Part 26. In addition, the EA has been prepared as prescribed in VA’s NEPA Interim Guidance for Projects (VA 2010). Federal, State, and local laws and regulations specifically applicable to this Proposed Action are specified, where appropriate, within this EA, and include:

- Endangered Species Act (ESA) of 1973, as amended (7 USC 136; 16 USC 1531 et seq.).
- Native American Graves Protection and Repatriation Act, as amended (NAGPRA) (25 USC 3001 et seq.).
- Federal Clean Air Act (CAA) of 1990 (42 USC 7401 et seq., as amended).
- Federal Clean Water Act (Federal Water Pollution Control Act) of 1948, as amended (1972, 1977) (33 USC 1251 et seq.); Sections 401 and 404.
- Executive Order 12898, Environmental Justice (11 May 1994).
- Farmland Protection Policy Act (FPPA) (7 USC 4201, et seq.).
- City of Walla Walla Ordinances.
- Memorandum of Agreement, Regarding Construction of a Skilled Nursing Facility Adjacent to the VA Medical Center, Walla Walla, Washington, prepared by VA and dated March 2014.
- Memorandum of Agreement, Regarding Construction of a New Water Tower at the VA Medical Center, Walla Walla, Washington, (pending to be prepared by VA in near future).
11.2 Environmental Permits Required

In addition to the regulatory framework of the NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, 38 CFR Part 26, and VA’s NEPA Interim Guidance for Projects, the following Federal, State, and/or local environmental permits are required as part of this Proposed Action, and include:

- WSDE WQP CSWGP Permit.
- USDA Farmland Protection Policy Act, Farmland Conservation Impact Rating Form (Form AD-1066).
- Utility provider approvals for respective utility connections.
SECTION 12: GLOSSARY

100-Year Flood – A flood event of such magnitude that it occurs, on average, every 100 years; this equates to a one percent chance of its occurring in a given year.

Aesthetics – Pertaining to the quality of human perception of natural beauty.

Ambient - The environment as it exists around people, plants, and structures.

Ambient Air Quality Standards - Those standards established according to the CAA to protect health and welfare (AR 200-1).

Aquifer - An underground geological formation containing usable amounts of groundwater which can supply wells and springs.

Asbestos - Incombustible, chemical-resistant, fibrous mineral forms of impure magnesium silicate used for fireproofing, electrical insulation, building materials, brake linings, and chemical filters. Asbestos is a carcinogenic substance.

Attainment Area - Region that meets the National Ambient Air Quality Standard (NAAQS) for a criteria pollutant under the CAA.

Bedrock - The solid rock that underlies all soil, sand, clay, gravel and loose material on the earth's surface.

Best Management Practices (BMPs) - Methods, measures, or practices to prevent or reduce the contributions of pollutants to U.S. waters. Best management practices may be imposed in addition to, or in the absence of, effluent limitations, standards, or prohibitions (AR 200-1).

Commercial land use – Land use that includes private and public businesses (retail, wholesale, etc.), institutions (schools, churches, etc.), health services (hospitals, clinics, etc.), and military buildings and installations.

Compaction - The packing of soil together into a firmer, denser mass, generally caused by the pressure of great weight.

Contaminants - Any physical, chemical, biological, or radiological substances that have an adverse effect on air, water, or soil.

Council on Environmental Quality (CEQ) - An Executive Office of the President composed of three members appointed by the President, subject to approval by the Senate. Each member shall be exceptionally qualified to analyze and interpret environmental trends, and to appraise programs and activities of the Federal Government. Members are to be conscious of and responsive to the scientific, economic, social, aesthetic, and cultural needs of the Nation; and to formulate and recommend national policies to promote the improvement of the quality of the environment.

Criteria Pollutants - The CAA of 1970 required the USEPA to set air quality standards for common and widespread pollutants in order to protect human health and welfare. There are six "criteria pollutants": ozone (O\textsubscript{3}), carbon monoxide (CO), sulfur dioxide (SO\textsubscript{2}), lead (Pb), nitrogen dioxide (NO\textsubscript{2}), and particulate matter.

Cultural Resources - The physical evidence of our Nation's heritage. Included are: archaeological sites; historic buildings, structures, and districts; and localities with social significance to the human community.

Cumulative Impact - The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonable foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).
Decibel (dB) - A unit of measurement of sound pressure level.

Direct Impact - A direct impact is caused by a Proposed Action and occurs at the same time and place.

Emission - A release of a pollutant.

Endangered Species - Any species which is in danger of extinction throughout all or a significant portion of its range.

Environmental Assessment (EA) - An EA is a publication that provides sufficient evidence and analyses to show whether a proposed system would adversely affect the environment or be environmentally controversial.

Erosion - The wearing away of the land surface by detachment and movement of soil and rock fragments through the action of moving water and other geological agents.

Farmland - Cropland, pastures, meadows, and planted woodland.

Fauna - Animal life, especially the animal characteristics of a region, period, or special environment.

Flora - Vegetation; plant life characteristic of a region, period, or special environment.

Floodplain - The relatively flat area or lowlands adjoining a river, stream, ocean, lake, or other body of water that is susceptible to being inundated by floodwaters.

FONSI - Finding of No Significant Impact, a NEPA document.

Fugitive Dust - Particles light enough to be suspended in air, but not captured by a filtering system. For this document, this refers to particles put in the air by moving vehicles and air movement over disturbed soils at construction sites.

Geology - Science which deals with the physical history of the earth, the rocks of which it is composed, and physical changes in the earth.

Groundwater - Water found below the ground surface. Groundwater may be geologic in origin and as pristine as it was when it was entrapped by the surrounding rock or it may be subject to daily or seasonal effects depending on the local hydrologic cycle. Groundwater may be pumped from wells and used for drinking water, irrigation, and other purposes. It is recharged by precipitation or irrigation water soaking into the ground. Thus, any contaminant in precipitation or irrigation water may be carried into groundwater.

Hazardous Substance - Hazardous materials are defined within several laws and regulations to have certain meanings. For this document, a hazardous material is any one of the following:

Any substance designated pursuant to section 311(b)(2)(A) of the Clean Water Act.

Any element, compound, mixture, solution, or substance designated pursuant to Section 102 of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

Any hazardous substance as defined under the Resource Conservation and Recovery Act (RCRA).

Any toxic pollutant listed under TSCA.

Any hazardous air pollutant listed under Section 112 of CAA.

Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to Subsection 7 of TSCA.

The term does not include: 1) Petroleum, including crude oil or any thereof, which is not otherwise specifically listed or designated as a hazardous substance in a above. 2) Natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas). A list of hazardous substances is found in 40 CFR 302.4.

Hazardous Waste - A solid waste which, when improperly treated, stored, transported, or disposed of, poses a substantial hazard to human health or the environment. Hazardous wastes are identified in 40 CFR 261.3 or applicable foreign law, rule, or regulation.

Hazardous Waste Storage - As defined in 40 CFR 260.10, "...the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere".
Hydric Soil - A soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic (oxygen-lacking) conditions that favor the growth and regeneration of hydrophytic vegetation. A wetland indicator.

Indirect Impact - An indirect impact is caused by a Proposed Action that occurs later in time or farther removed in distance, but is still reasonably foreseeable. Indirect impacts may include induced changes in the pattern of land use, population density or growth rate, and related effects on air, water, and other natural and social systems. For example, referring to the possible direct impacts described above, the clearing of trees for new development may have an indirect impact on area wildlife by decreasing available habitat.

Industrial Land Use - Land uses of relatively higher intensity that are generally not compatible with residential development. Examples include light and heavy manufacturing, mining, and chemical refining.

Isolated Wetland - Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, but do not have a direct connection to the Waters of the US.

Jurisdictional Wetland - Areas that meet the wetland hydrology, vegetation, and hydric soil characteristics, and have a direct connection to the Waters of the US. These wetlands are regulated by the USACE.

Listed Species - Any plant or animal designated as a State or Federal threatened, endangered, special concern, or candidate species.

Mitigation - Measures taken to reduce adverse impacts on the environment.

Mobile Sources - Vehicles, aircraft, watercraft, construction equipment, and other equipment that use internal combustion engines for energy sources.

Monitoring - A process of inspecting and recording the progress of mitigation measures implemented.

National Ambient Air Quality Standards (NAAQS) - Nationwide standards set up by the USEPA for widespread air pollutants, as required by Section 109 of the Clean Air Act (CAA). Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), ozone (O_3), particulate matter, and sulfur dioxide (SO_2).

National Environmental Policy Act (NEPA) - U.S. statute that requires all Federal agencies to consider the potential effects of Proposed Actions on the human and natural environment.

Non-attainment Area - An area that has been designated by the EPA or the appropriate State air quality agency as exceeding one or more National or State ambient air quality standards.

Parcel - A plot of land, usually a division of a larger area.

Particulates or Particulate Matter - Fine liquid or solid particles such as dust, smoke, mist, fumes, or smog found in air.

Physiographic Region - A portion of the Earth's surface with a basically common topography and common morphology.

Pollutant - A substance introduced into the environment that adversely affects the usefulness of a resource.

Potable Water - Water which is suitable for drinking.

Prime Farmland - A special category of highly productive cropland that is recognized and described by the US Department of Agriculture's Soil Conservation Service and receives special protection under the Surface Mining Law.

Remediation - A long-term action that reduces or eliminates a threat to the environment.

Riparian Areas - Areas adjacent to rivers and streams that have a high density, diversity, and productivity of plant and animal species relative to nearby uplands.

River Basin - The land area drained by a river and its tributaries.

Sensitive Receptors - Include, but are not limited to, asthmatics, children, and the elderly, as well as specific facilities, such as long-term health care facilities, rehabilitation centers,
convalescent centers, retirement homes, residences, schools, playgrounds, and childcare centers.

**Significant Impact** - According to 40 CFR 1508.27, "significance" as used in NEPA requires consideration of both context and intensity.

Context. The significance of an action must be analyzed in several contexts such as society as a whole (human, national), the affected region, the affected interests, and the locality. Significance varies with the setting of the Proposed Action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both short- and long-term effects are relevant.

Intensity. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action.

**Small quantity generator** - A generator who generates greater than 220 pounds but less than 2,200 pounds of hazardous waste in a calendar month and who does not accumulate more than 13,200 pounds of hazardous waste at any one time (if either threshold is exceeded, the generator becomes a large quantity generator). A small quantity generator may accumulate hazardous waste up to 180 days from the accumulation start date.

**Soil** - The mixture of altered mineral and organic material at the earth's surface that supports plant life.

**Solid Waste** - Any discarded material that is not excluded by section 261.4(a) or that is not excluded by variance granted under sections 260.30 and 260.31.

**Threatened species** - Any species that is likely to become an endangered species within the foreseeable future throughout all or a significant portion of its range.

**Topography** - The relief features or surface configuration of an area.

**Toxic Substance** - A harmful substance which includes elements, compounds, mixtures, and materials of complex composition.

**Waters of the United States** - Include the following: (1) All waters which are currently being used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide. (2) All interstate waters including interstate wetlands. (3) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds; the use, degradation or destruction of which could affect interstate or foreign commerce.

**Watershed** - The region draining into a particular stream, river, or entire river system.

**Wetlands** - Areas that are regularly saturated by surface or groundwater and, thus, are characterized by a prevalence of vegetation that is adapted for life in saturated soil conditions. Examples include swamps, bogs, fens, marshes, and estuaries.

**Wildlife Habitat** - Set of living communities in which a wildlife population lives.
APPENDIX A

Agency Correspondence
APPENDIX B

Photograph Log
APPENDIX C

Other Relevant Environmental Data
APPENDIX D

Public Notices and Comments