U.S. DEPARTMENT OF VETERANS AFFAIRS
FINDING OF NO SIGNIFICANT IMPACT:
SEISMIC UPGRADES AND IMPROVEMENT PROJECTS
PORTLAND, OREGON

Introduction

A Final Environmental Assessment (EA) was prepared to identify, analyze, and document the physical, environmental, cultural, and socioeconomic impacts associated with the U.S. Department of Veterans Affairs' (VA's) proposed action to design and construct seismic upgrades and improvements at the Portland Veterans Affairs Medical Center (VAMC) in Portland, Oregon.

Purpose and Need

The purpose of the proposed action is to correct seismic deficiencies, address federal setback and physical security requirements, while providing sufficient patient and staff parking facilities at the Portland VAMC to meet existing needs, enhance patient, staff, and visitor safety and ensure the continued operation of the Portland VAMC in the aftermath of a major earthquake. No new operational programs or additional health care services are being proposed as part of the proposed action.

The proposed action is needed because the Portland VAMC facilities do not meet VA design criteria and seismic and physical security standards. The existing main hospital (Building 100), the administrative and research building (Building 101), and the underground parking garage (Building 102) were constructed in the 1980s and are not designed to modern VA seismic standards. Buildings 100 and 101 are listed on VA's extremely high-risk seismic inventory based on their design and the seismic characteristics of the area.

Currently, the Portland VAMC operates at full capacity and space impediments are being encountered routinely in many functions, including parking. The proposed action would increase the capacity of existing services, such as specialty care, to meet VA workload projections and the latest health care standards. The new Specialty Care Building would provide adequate space for outpatient services along with primary VA business functions.

Parking expansion is needed at the VAMC to meet current staff and patient demand. The VAMC employs a large work force of approximately 4,500 employees with only 1000 staff-designated parking spaces. VA has implemented several alternative transportation incentives and subsidies, such as the extensive use and promotion of public transportation; government funded transport options, including the Portland Vancouver shuttle; and carpooling to reduce single-occupancy vehicle trips to the VAMC campus. Even with the success of the VA travel demand programs, the Portland VAMC still has a deficiency of parking spaces for current staff, patients, and visitors. The proposed action would add approximately 600

additional parking spaces to help meet the current parking demand and would aide in improving traffic flow on the VAMC campus by increasing parking efficiency.

Proposed Action

The proposed action includes the following project components:

- Design and construction for required seismic upgrades and improvements to Building 102 (underground parking garage that supports the road in front of Buildings 100 and 101) including a new water tank and realignment of the associated plaza and roadway to address physical security concerns.
- Design and construction for a complete seismic upgrade to Building 100 (main hospital building) and nearby Building 101 (research and administration building) including the replacement of the façade on both buildings. Building 100 improvements would also include a new service elevator.
- Demolition of Building T-41, Building T-51, and Trailer 1 to provide adequate working space for the proposed construction and site layout.
- Design and construction of two additional parking levels at Building 108 (existing parking structure) to add approximately 150 parking spaces. An elevator extension would serve the top two floors.
- Design and construction of Building 111 (parking garage), an approximately 650-space parking structure in the area south of Building 101.
- Design and construction of Building 110, an approximately 300,000 gross square foot Specialty Care Building.
- Energy plant improvements and upgrades such as boilers, chillers, cooling towers, and the electrical distribution system.
- Remaining structural and non-structural seismic upgrades, including HVAC upgrades, and the full renovation and modernization of Buildings 100 and 101.

Alternatives Considered

Two alternatives are being considered.

Alternative A will comprise the following project components to address seismic deficiencies, address federal setback requirements, improve HVAC and electrical distribution systems, and provide sufficient parking facilities at the Portland VAMC to properly serve Portland area Veterans:

- Demolition of Building T-41, Building T-51, and Trailer 1 to provide space for the new construction.
- Design and construction of two additional parking levels at Building 108 to add approximately 150 parking spaces. An elevator extension would serve the top two floors.
- Design and construction of Building 111, an approximately 650-space parking structure in the area south of Building 101.

- Design and construction of Building 110, an approximately 300,000 gross square foot Specialty Care Building and related energy plant upgrades
- Energy plant improvements and upgrades would include new boilers, chillers, cooling towers, and the electrical distribution system.

Alternative B would include all projects under Alternative A, including the design and construction for the required seismic upgrades in addition to structural, energy, and facility related improvements to Buildings 100, 101, and 102; full renovation and modernization of Buildings 100 and 101; and minor roadway realignments as further detailed under the proposed action.

Under the no action alternative, the proposed seismic upgrade and improvement projects would not be implemented. VA would continue to provide services at existing buildings at the Portland VAMC. This alternative would limit VA's ability to provide needed health care services to Veterans in the region. The no action alternative does not meet the purpose and need of the proposed action.

Potential Environmental Effects

Based on the analysis in the Final EA, construction and operation of the proposed seismic upgrades and improvements at the Portland VAMC, under either Alternative A or Alternative B, would result in less than significant impacts. Table 3-1 summarizes the findings of the impact analysis by resource area.

Table 3-1. Summary of Impact Analysis

Resource Area	Alternative A	Alternative B	No Action Alternative
Aesthetics	The proposed physical changes to the VAMC campus would not detract from the aesthetics. Aesthetic impacts during construction activities would be temporary and less than significant. Physical changes to the VAMC campus would be consistent with existing architecture. Aesthetic impacts would be less than significant.	The proposed physical changes to the VAMC campus would not detract from the aesthetics. Aesthetic impacts during construction activities would be temporary and less than significant. Physical changes to the VAMC campus would be consistent with existing architecture. Aesthetic impacts would be less than significant.	None
Air Quality	Construction activities would have short-term minor impacts related to emissions and fugitive dust. Combined construction and operation emissions would be substantially below the General Conformity maintenance area de minimis threshold. Air quality impacts would be less than significant.	Construction activities would have short-term minor impacts related to emissions and fugitive dust. Combined construction and operation emissions would be substantially below the General Conformity maintenance area de minimis threshold. Air quality impacts would be less than significant.	None
Historic Resources	The Portland VAMC, in consultation with the State Historic Preservation Office (SHPO), determined that the VA campus was not eligible for the	The Portland VAMC, in consultation with the State Historic Preservation Office (SHPO), determined that the VA campus was not eligible for the	None

	National Register of Historic Places (NRHP), therefore the proposed upgrades and improvements will not adversely affect any historic resources. Further, Terwilliger Parkway, a nearby scenic linear park and roadway, is listed on the NRHP. Wooded areas surrounding the campus will remain intact, providing a visual buffer between campus construction and the historic Terwilliger Parkway. Proposed building heights would also not exceed the height of existing structures.	National Register of Historic Places (NRHP), therefore the proposed upgrades and improvements will not adversely affect any historic resources. Further, Terwilliger Parkway, a nearby scenic linear park and roadway, is listed on the NRHP. Wooded areas surrounding the campus will remain intact, providing a visual buffer between campus construction and the historic Terwilliger Parkway. Proposed building heights would also not exceed the height of existing structures.	
Archeological Resources	Consultation with the SHPO for archeological resources is underway. Construction will primarily occur on previously disturbed ground, and the Portland VAMC campus is a low risk for inadvertent discovery of pre-contact cultural resources and a low risk for uncovering historic-period cultural resources.	Consultation with the SHPO for archeological resources is underway. Construction will primarily occur on previously disturbed ground, and the Portland VAMC campus is a low risk for inadvertent discovery of pre-contact cultural resources and a low risk for uncovering historic-period cultural resources.	None.
Geology and Soils	Construction activities would have minimal changes to topography. Ground disturbances would be stabilized during operation and all permit requirements would be met. New construction of buildings and structures would be designed to current seismic standards. Impacts to geology and soils would be less than significant.	Construction activities would have minimal changes to topography. Ground disturbances would be stabilized during operation and all permit requirements would be met. New construction of buildings and structures would be designed to current seismic standards. Impacts to geology and soils would be less than significant.	None
Hydrology and Water Quality	On-site stormwater engineering controls to retain and manage stormwater flow would be implemented, and permit requirements would be met, resulting in less than significant impacts to hydrology and downgradient water quality.	On-site stormwater engineering controls to retain and manage stormwater flow would be implemented, and permit requirements would be met, resulting in less than significant impacts to hydrology and downgradient water quality.	None
Wildlife and Habitat	The VAMC campus does not contain any critical or suitable habitat for state or federally listed species. Any disturbance or clearing of vegetation or trees would be avoided between April 15 and July 31 to avoid any potential impacts to nesting birds. Further, no effects to essential fish habitat (EFH), designated habitat or listed species are anticipated, resulting in less	The VAMC campus does not contain any critical or suitable habitat for any state or federally listed species. Any disturbance or clearing of vegetation or trees would be avoided between April 15 and July 31 to avoid potential impacts to nesting birds. Further, no effects to essential fish habitat (EFH), designated habitat or listed species are anticipated, resulting in less	None

	than significant impacts to wildlife and habitat.	than significant impacts to wildlife and habitat.	
Noise	Construction activities would comply with the City of Portland's and VA's construction noise regulations, including applying for variances if necessary, resulting in less than significant noise impacts. There are no significant long-term operational noise impacts.	Construction activities would comply with the City of Portland's and VA's construction noise regulations, including applying for variances if necessary, resulting in less than significant noise impacts. There are no significant long-term operational noise impacts.	None
Land Use	The VAMC campus would remain compatible with surrounding land uses, resulting in less than significant impacts.	The VAMC campus would remain compatible with surrounding land uses, resulting in less than significant impacts.	None
Floodplains, Wetlands, and Coastal Management	No impacts to floodplains or potentially jurisdictional wetlands or waterways are anticipated. No coastal management areas exist on the VAMC campus.	No impacts to floodplains or potentially jurisdictional wetlands or waterways are anticipated. No coastal management areas exist on the VAMC campus.	None
Socioeconomics	There would be short-term beneficial impacts to local employment and personal income during construction activities. Additional facilities would enhance health care for Veterans in the region.	There would be short-term beneficial impacts to local employment and personal income during construction activities. Additional facilities would enhance health care for Veterans in the region.	None
Community Services	Construction activities at the VAMC campus are not expected to place additional substantial demands on police, fire, emergency services, and other community services.	Construction activities at the VAMC campus are not expected to place additional substantial demands on police, fire, emergency services, and other community services.	None
Solid Waste and Hazardous Materials	During construction, the presence and use of petroleum and hazardous substances could increase the potential for accidental release or spill; however, minimization measures would make this potential impact less than significant. There would not be a long-term and significant increase in the amount of hazardous waste generated by the VAMC campus.	During construction, the presence and use of petroleum and hazardous substances could increase the potential for accidental release or spill; however, minimization measures would make this potential impact less than significant. There would not be a long-term and significant increase in the amount of hazardous waste generated by the VAMC campus.	None
Traffic, Transportation, and Parking	Project activities are not anticipated to significantly impact existing or future traffic patterns surrounding the VAMC campus. Minor to moderate impacts to traffic patterns and flow during construction activities would be mitigated through the	Project activities are not anticipated to significantly impact existing or future traffic patterns surrounding the VAMC campus. Minor to moderate impacts to traffic patterns and flow during construction activities would be mitigated through the	None

	implementation of Traffic Management/Circulation and Mitigation Plans that would be reviewed and approved by VA for implementation. Further, shuttles for contractors and non-peak hour deliveries of construction equipment and materials will be implemented to mitigate any short-term traffic impacts.	implementation of Traffic Management/Circulation and Mitigation Plans that would be reviewed and approved by VA for implementation. Further, shuttles for contractors and non-peak hour deliveries of construction equipment and materials will be implemented to mitigate any short-term traffic impacts.	
Utilities	There would be a negligible increase in the consumption of utilities, including electricity, natural gas, potable water, and stormwater/sanitary sewer discharges. Impacts would be less than significant.	There would be a negligible increase in the consumption of utilities, including electricity, natural gas, potable water, and stormwater/sanitary sewer discharges. Impacts would be less than significant.	None
Environmental Justice	There would be no disproportionate impacts to minority or low-income populations.	There would be no disproportionate impacts to minority or low-income populations.	None

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

Agency and Public Comment

VA published a notice of scoping on May 9, 2021, in The Oregonian newspaper. The notice described the proposed action and solicited public comments with a deadline of June 11, 2021. VA mailed scoping letters to federal, state, and local agencies; public officials; federally recognized Tribes; and special interest groups, the letters included information on the proposed action, the comment period, and instruction on submitting comments.

VA published the Draft EA for a 30-day public comment period as announced by the Notice of Availability (NOA) that was published in The Oregonian newspaper on February 13 and February 14 of 2022. Review copies of the Draft EA were made available online at https://www.cfm.va.gov/environmental/index.asp and at Multnomah County Central Library. VA has responded to all public comments in the Final EA.

Following the public comment period and receipt of public comments on the Draft EA, VA notified all stakeholders of the intent to incorporate public input and that VA would conduct additional traffic analysis based on comments received. VA has incorporated the responses to public comments and the results of the additional traffic analysis into the Final EA, the additional analysis confirmed no significant impact. "VA also initiated Section 106 consultation with Oregon SHPO and federally-recognized Native American Tribes in the vicinity of the Portland VAMC campus. Oregon SHPO provided concurrence with VA's finding of no adverse effects to historic properties including Terwilliger Parkway as a result of the proposed action. The Tribes did not provide comments on the Draft EA or respond to the Section 106 consultation letters sent.

Finding of No Significant Impact

Based on the analyses in the EA, which is summarized and incorporated by reference herein, VA concludes that implementing the proposed action would not have a significant adverse impact on the quality of the natural or human environment within the meaning of Section 102(2c) of the National Environmental Policy Act (NEPA) of 1969. Therefore, preparation of an environmental impact statement is not required.

Glenn Elliott 07/25/2022

Glenn Elliott
Director, Environmental Program Office
VA Office of Construction & Facilities Management

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

Resource Area	Description	Type
Aesthetics	Design new buildings to be architecturally and visually consistent with the current buildings located on the campus.	BMP
	Minimize tree removal to the furthest extent possible.	BMP
Air Quality	Use appropriate fugitive dust suppression measures.	BMP
	Use newer construction equipment with emissions controls and maintain equipment.	BMP
	Reduce idling of construction equipment and vehicles to minimize exhaust emissions.	BMP
	Obtain Asbestos Abatement permit from ODEQ for renovation and demolition projects involving ACMs.	Regulatory requirement
	Perform all demolition work under licensed contractors.	Regulatory requirement
	Use standard measures to control dust to reduce LBP dust emissions during demolition.	BMP
Cultural and Historic Resources	Should previously unidentified historic or culturally significant items be discovered during project construction, the construction contractor would immediately cease work in the area of the discovery until VA, a qualified archaeologist, Oregon SHPO, and the consulting Tribes are contacted to properly identify and curate discovered items in accordance with applicable state and federal law(s).	Regulatory requirement
	Should human remains be identified during ground-disturbing activities, all work in the vicinity of the discovery would cease immediately. An Inadvertent Discovery Plan would be implemented, which would include the VA project representative contacting the Multnomah County coroner to evaluate any human remains.	Regulatory requirement
	Should ground disturbing be proposed in areas outside of the direct APE for the VAMC projects proposed, further Section 106 consultation with SHPO and Native American Tribes will be required.	Regulatory requirement
Geology and Soils	Implement an erosion and sediment control plan to address soil disturbance during construction that includes the implementation of erosion and sediment control devices and stabilization practices.	Regulatory requirement
Hydrology and Water Quality	Implement SWPPP and erosion and sediment control plan during construction to minimize sediment discharges and downstream contamination of receiving waters during construction. Disturbance of over an acre is not anticipated; however, if the	Regulatory requirement (if disturbing more than one acre of land)

	proposed action exceeds one acre of land, coverage under the 1200-C permit will be obtained.	
	If shallow groundwater is encountered during construction, implement appropriate groundwater control and dewatering measures, such as sump pumps, wellpoint systems, or deep well systems.	BMP
	Implement SWMM Level III flow controls to provide runoff control for the City's 10-year, 24-hour design storm event (3.4 inches of rainfall over 24 hours). Onsite stormwater engineering controls to manage stormwater flow may include below-grade detention facilities to mitigate the increased runoff.	Regulatory requirement
	Maintain compliance with the applicable PBES permit by following prescribed BMPs related to discharge of wastewater to the publicly-owned treatment works.	Regulatory requirement
Wildlife and Habitat	Limit disturbance of wooded area habitats.	BMP
	Avoid disturbance of vegetation between April 15 and July 31 to avoid impacts to nesting birds.	BMP
	Clearly demarcate limits of clearing prior to construction activities to avoid impacts to wooded areas and wildlife corridors surrounding the VAMC campus.	BMP
Noise	Comply with the City of Portland's construction noise regulations, only allowing construction-related noise to occur between 7:00 a.m. and 6:00 p.m. Monday through Saturday, with the exception of emergency work. Obtain a variance for any noise generating work being proposed outside of permissible hours.	Regulatory requirement
	Limit construction-related noise near sensitive receptors and coordinate proposed construction activities in advance with any nearby sensitive receptors.	BMP
	Shut down noise-generating heavy equipment when it is not needed and maintain equipment per manufacturer's recommendations to minimize noise generation.	BMP
	Utilize broadband, self-adjusting backup alarms in lieu of backup-beepers consistent with applicable safety requirements and encourage construction personnel to operate equipment in the quietest manner practicable.	BMP
	Locate stationary operating equipment as far away from sensitive receptors as possible.	BMP
	Select material transportation routes as far away from sensitive receptors as possible.	BMP

	Maintain equipment per manufacturer's recommendations to minimize noise generation.	BMP
Land Use	Comply with local land use regulations. The LUCS may be sent to and signed by a City of Portland planner to confirm that the project is complying with local land use.	Regulatory requirement
Floodplains, Wetlands, and Coastal Zone Management	Implement a SWPPP as part of the ODEQ NPDES 1200-C Construction Stormwater permit to address stormwater runoff during construction.	Regulatory requirement (if disturbing more than one acre of land)
	Clearly demarcate designated work areas	BMP
Socioeconomics	Secure the construction area to prevent unauthorized access to the property and to reduce the potential of health and safety risks.	Protection measure
	Implement site-specific SWPPP and erosion and sediment control plan to minimize and avoid fugitive dust.	Regulatory requirement
	Comply with the City of Portland's City Code Section 18.10.060.	Regulatory requirement
Community Services	Coordinate any short-term road closures with the Portland Police and Fire Departments and TriMet to prevent significant disruption to their services.	BMP
Solid Waste and Hazardous Materials	Ensure the proper storage and appropriate labeling of petroleum products and hazardous materials in approved containers.	BMP
	Implement and update, as needed, the SPCC for the VAMC.	Regulatory requirement
	Store containers on a level and impervious surface.	BMP
	Provide a secondary containment system around fuel storage containers and during refueling activities.	BMP
	Manage and dispose of solid waste, hazardous materials, and medical waste in compliance with federal, state, and local regulations. The wastes would be collected and properly disposed of by a waste disposal company at approved disposal facilities.	Regulatory requirement
Traffic, Transportation, and Parking	Coordination with the City of Portland on any temporary road closures during construction.	BMP
	Sequence construction to the extent feasible to minimize impacts to traffic or transportation patterns.	BMP
	Implement engineered traffic control plans in coordination with the City of Portland Bureau of Transportation and/or ODOT.	Regulatory requirement

	Prior to construction, Traffic Management/Circulation and Mitigation Plans would be reviewed and approved by VA for implementation.	BMP
	The VA will create and implement an NCP to notify and communicate directly with nearby residents regarding potential construction schedule and especially those construction activities on campus that may impact traffic flow.	BMP
Utilities	Follow the City's Ordinance Title 17.34.070 for Industrial Wastewater Discharge Permits.	Regulatory requirement
Environmental Justice	None required.	
Other	The VA government team will deploy an environmental representative responsible for ensuring commitments and BMPs identified in the EA are met.	BMP

The following federal, state, and/or local environmental permits and approvals were identified as potentially being required as part of the proposed action. This list may not be exhaustive, and the selected developer will be responsible for any additional compliance and permits.

- National Pollution Discharge Elimination System (NPDES) 1200-C Construction Stormwater Permit
- National Emission Standards for Hazardous Air Pollutants (NESHAP)/Oregon Department of Environmental Quality (ODEQ) Permit for Asbestos Abatement
- ODEQ Indirect Source Construction Permit (ISCP)
- City of Portland Land Use Compatibility Statement (LUCS)
- City of Portland Bureau of Environmental Services (PBES) Stormwater/Sanitary Discharge Permit
- Federal Aviation Administration Notice of Proposed Construction or Alteration
- City of Portland Noise Regulations