U.S. Department of Veterans Affairs

VA Portland Veterans Affairs Medical Center
Draft Environmental Assessment for Seismic Upgrades and Improvement Projects

February 2022

Prepared for:
U.S. Department of Veterans Affairs
Office of Construction and Facilities Management

Executive Summary

This draft environmental assessment (EA) has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code 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 Environmental Effects of the Department of Veterans Affairs Actions (38 CFR Part 26). This EA is required to determine if the Department of Veterans Affairs' (VA's) proposed action would have significant environmental impacts. Federal agencies are required to consider the environmental and related social and economic effects of their proposed actions. This EA has been prepared in accordance with relevant guidance from VA's NEPA Interim Guidance for Projects dated September 2010.

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 Veterans Affairs Medical Center (VAMC) to meet existing needs. The seismic upgrades and improvements proposed would 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 list based on their design and the seismic characteristics of the area. There are several active faults in the region and Portland has a long history of earthquakes. The Portland VAMC is located within a high potential earthquake hazard zone with a very high risk for liquefaction of soils, according to USGS (Figure 1-3) (USGS, 2018). Further, the Portland VAMC currently operates at full capacity and space impediments are being encountered routinely in many functions, including parking. An increase in the number of hospital beds or patient capacity is not anticipated as a result of new construction. However, the proposed action will increase the capacity of existing services, such as specialty care, to meet VA workload projections and the latest health care standards. The proposed action would renovate and modernize Portland VAMC facilities while addressing capacity issues to meet the health care needs of Portland area Veterans.

Additionally, 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. For this reason, 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. Approximately 30 current VA staff commute via bicycle to the Portland VAMC. These currently implemented travel demand management programs will continue to be enhanced and expanded to further reduce the number of current and future passenger car trips to the Portland VAMC as well as the demand for parking. 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

Seismic upgrades and improvements are proposed at the Portland VAMC to specifically correct seismic deficiencies, address federal setback requirements, improve HVAC and electrical distribution systems, and to provide sufficient parking facilities. The proposed action, which would allow the VAMC to properly serve and meet the current health care needs of Portland area Veterans, includes the following project components (Figure 2-1):

- 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.

The proposed action would be implemented over an extended period of years and sequenced to minimize impacts to VAMC services and the surrounding community to the greatest extent practicable.

Alternatives

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 (Figure 2-1):

- 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. However, analysis of the no action alternative is required by CEQ regulations. It also provides a benchmark for comparing and analyzing the effects of the action alternatives.

Affected Environment and Environmental Consequences

The EA describes the baseline physical, environmental, cultural, and socioeconomic conditions at the alternative project sites and the general vicinity, with emphasis on those resources potentially impacted by the alternatives. Potential impacts on physical, environmental, cultural, and socioeconomic conditions are analyzed for each alternative. Resource areas considered in this EA are aesthetics; air quality; cultural and historic resources; geology and soils; hydrology and water quality; wildlife and habitat; noise; land use; floodplains, wetlands, and coastal zone management; socioeconomics; community services; solid waste and hazardous materials; traffic, transportation, and parking; utilities; and environmental justice. Table ES-1 summarizes the findings of the impact analysis.

Table ES-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	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	None

	would be less than significant.	would be less than significant.	
Historic Resources	The Portland VAMC, in consultation with the State Historic Preservation Office (SHPO), determined that the VA campus was not eligible for the National Register of Historic Places (NRHP), therefore the proposed upgrades and improvements will not adversely affect any historic resources. Further, the nearby roadway, SW Terwilliger Boulevard, is listed on the NRHP. Wooded areas surrounding the campus will remain intact, providing a visual buffer between campus construction and the historic SW Terwilliger Boulevard. Proposed building heights would also not exceed the height of existing structures.	The Portland VAMC, in consultation with the State Historic Preservation Office (SHPO), determined that the VA campus was not eligible for the National Register of Historic Places (NRHP), therefore the proposed upgrades and improvements will not adversely affect any historic resources. Further, the nearby roadway, SW Terwilliger Boulevard, is listed on the NRHP. Wooded areas surrounding the campus will remain intact, providing a visual buffer between campus construction and the historic SW Terwilliger Boulevard. Proposed building heights would also not exceed the height of existing structures.	None
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	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	None

	would be less than significant.	would be less than significant.	
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 than significant impacts to wildlife and habitat.	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 than significant impacts to wildlife and habitat.	None
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	No impacts to floodplains or potentially jurisdictional wetlands or waterways are anticipated. No coastal	No impacts to floodplains or potentially jurisdictional wetlands or waterways are anticipated. No coastal	None

Coastal Management	management areas exist on the VAMC campus.	management areas exist on the VAMC campus.	
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, mitigation 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, mitigation 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 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	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 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	None

	construction equipment and materials will be implemented to mitigate short-term traffic impacts.	construction equipment and materials will be implemented to mitigate 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

Agency Coordination and Public Participation

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. Similar to the notices published in the newspaper, the letters included information on the proposed action, the comment period, and instruction on submitting comments. During the public scoping period, VA received written comments from eight commenters or interest groups. For more details regarding scoping comments and public concerns, see Section 5.0.

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

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Acronyms and Abbreviations

ACM	asbestos-containing materials
amsl	above mean sea level
APE	area of potential effects
BCC	birds of conservation concern
bgs	below ground surface
BMP	best management practice
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
EA	environmental assessment
dBA	A-weighted decibels
DoD	Department of Defense
FE	federally endangered
FT	federally threatened
GHG	greenhouse gas
GSF	gross square feet
ISCP	indirect source construction permit
LBP	lead-based paint
LOS	level of service
LUCS	land use compatibility statement
LUST	leaking underground storage tank
MG	million gallons
MT	metric ton(s)
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966
NOAA	National Oceanic and Atmospheric Administration
NOx	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
ODEQ	Oregon Department of Environmental Quality
ODFW	Oregon Department of Fish and Wildlife

ODOT	Oregon Department of Transportation
OHSU	Oregon Health and Science University
PBES	Portland Bureau of Environmental Services
PBT	Portland Bureau of Transportation
PM10	particulate matter ten micrometers and smaller
PM2.5	particulate matter 2.5 micrometers and smaller
REC	recognized environmental condition
SE	state endangered
SO2	sulfur dioxide
ST	state threatened
SW	southwest
SWPPP	stormwater pollution prevention plan
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USFWS IPaC	USFWS Information for Planning and Consultation
UST	underground storage tank
VA	U.S. Department of Veterans Affairs
VAMC	VA Medical Center
VOC	volatile organic compound

1.0 Introduction

This draft environmental assessment (EA) has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA; 42 United States Code 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 Environmental Effects of the Department of Veterans Affairs Actions (38 CFR Part 26). This EA is required to determine if the Department of Veterans Affairs' (VA's) proposed action would have significant environmental impacts. Federal agencies are required to consider the environmental and related social and economic effects of their proposed actions. This EA has been prepared in accordance with relevant guidance from VA's NEPA Interim Guidance for Projects dated September 2010.

This EA identifies, analyzes, and documents the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed implementation of projects to seismically upgrade, renovate, modernize, and expand the existing Portland VA Medical Center (VAMC) facilities within the existing campus footprint. The 28.5-acre Portland VAMC is located at 3710 Southwest (SW) U.S. Veterans Hospital Road in Portland, Multnomah County, Oregon and is adjacent to the Oregon Health and Science University (OHSU). Primary access to the Portland VAMC is provided by SW Terwilliger Boulevard via SW U.S. Veterans Hospital Road (Figure 1-1 and Figure 1-2).

In accordance with the cited 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 proposed action prior to making these decisions, identifies measures the federal decision-maker could implement to reduce potential environmental effects, and documents the NEPA process.

Final design activities cannot be advanced prior to a NEPA determination. This EA and environmental analysis herein is based upon preliminary designs which serve to define the project location and general design concepts. The NEPA determination for the Portland VAMC Seismic Upgrades and Improvement Projects will be evaluated with final engineering designs to determine the need for any future supplemental NEPA documentation.

1.1 Background

The Portland VAMC serves the Veterans of the greater Portland region, including northern Oregon and southern Washington. The VA Portland Health Care System consists of the Portland VAMC; the Vancouver VAMC in Vancouver, Washington; and ten outpatient clinics across central and northwest Oregon. The health care system provides inpatient, outpatient, long-term, and emergency care services to Veterans in the region. The Portland VAMC is intimately connected to the OHSU physically and through academic partnerships with shared research efforts; training of health care professionals; and use of shared staff, scientists, clinician-educators, and clinician-researchers.

In 1927, the Oregon Medical School donated 25 acres of land on Marquam Hill to the U.S. Veterans Bureau to establish a Veterans Hospital. Ground was broken in 1927 and construction began in 1928. The first 15 buildings were completed and dedicated in 1929. A new administration building was added in 1932 and additional structures were constructed from 1946 to 1949. In 1981, Building T-51 was constructed to move services out of the footprint of a newly proposed hospital. Construction of the existing main hospital building (Building 100) started in 1982 and the main hospital was opened to patients in 1988. As a result, old structures at the Portland VAMC were demolished with the exception of Buildings 6 and 16. The 600-foot-long pedestrian skybridge was constructed in 1991 to connect the Portland VAMC and OHSU. In 1999, the Cancer Research Center (Building 103) was opened followed by Building 104, which provides primary care services.

The Portland VAMC has been previously expanded and the number of Veterans being served continues to increase. The Portland VAMC campus is limited by the available horizontal space, development area, zoning, and steepness of the terrain. The available development area of the existing site is quite constrained. Furthermore, the configuration and interconnected layout of the existing buildings, parking structures, roadways, and ramps increases the complexity of proposed future development.

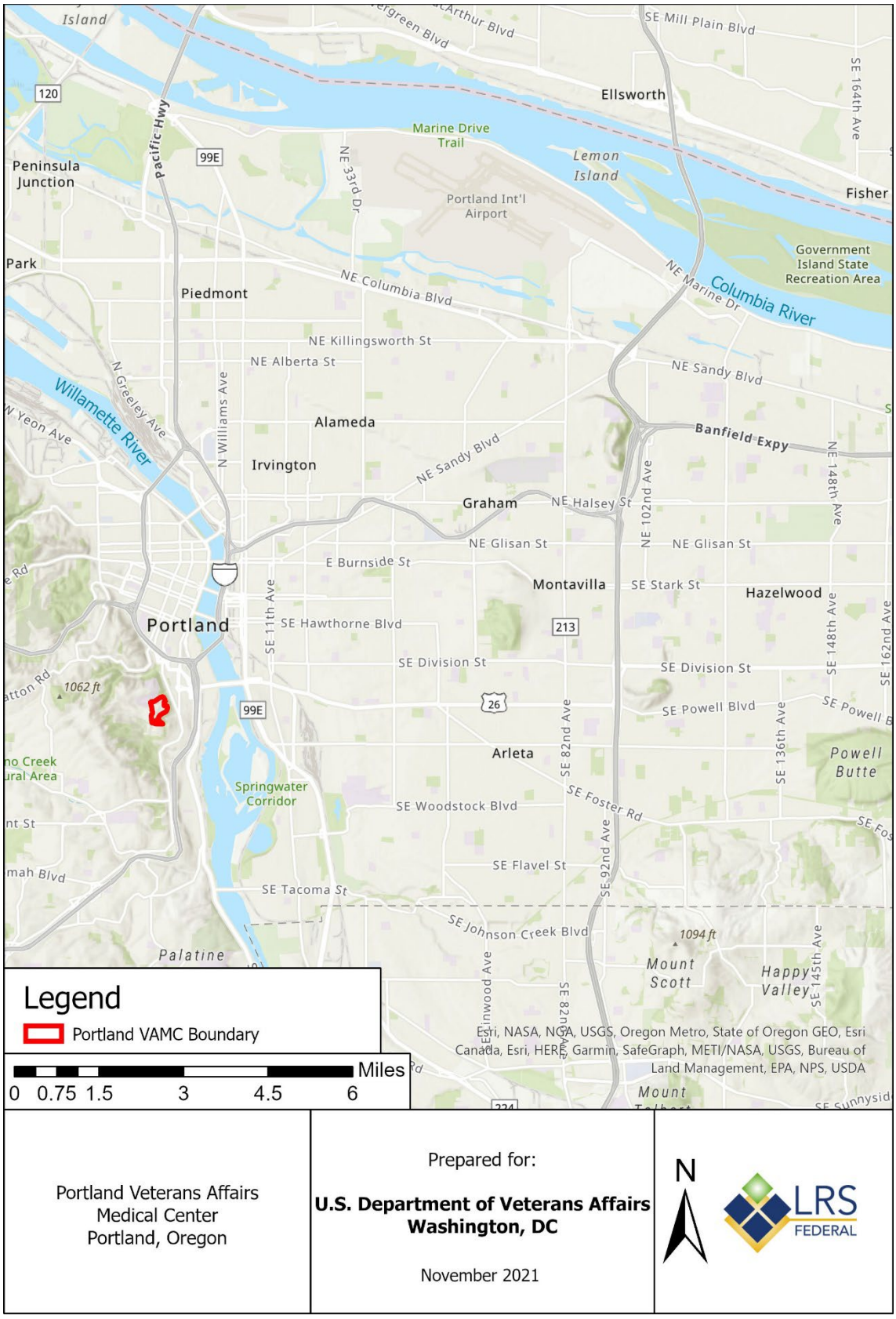

Figure 1-1. Site Vicinity Map of the Portland VAMC

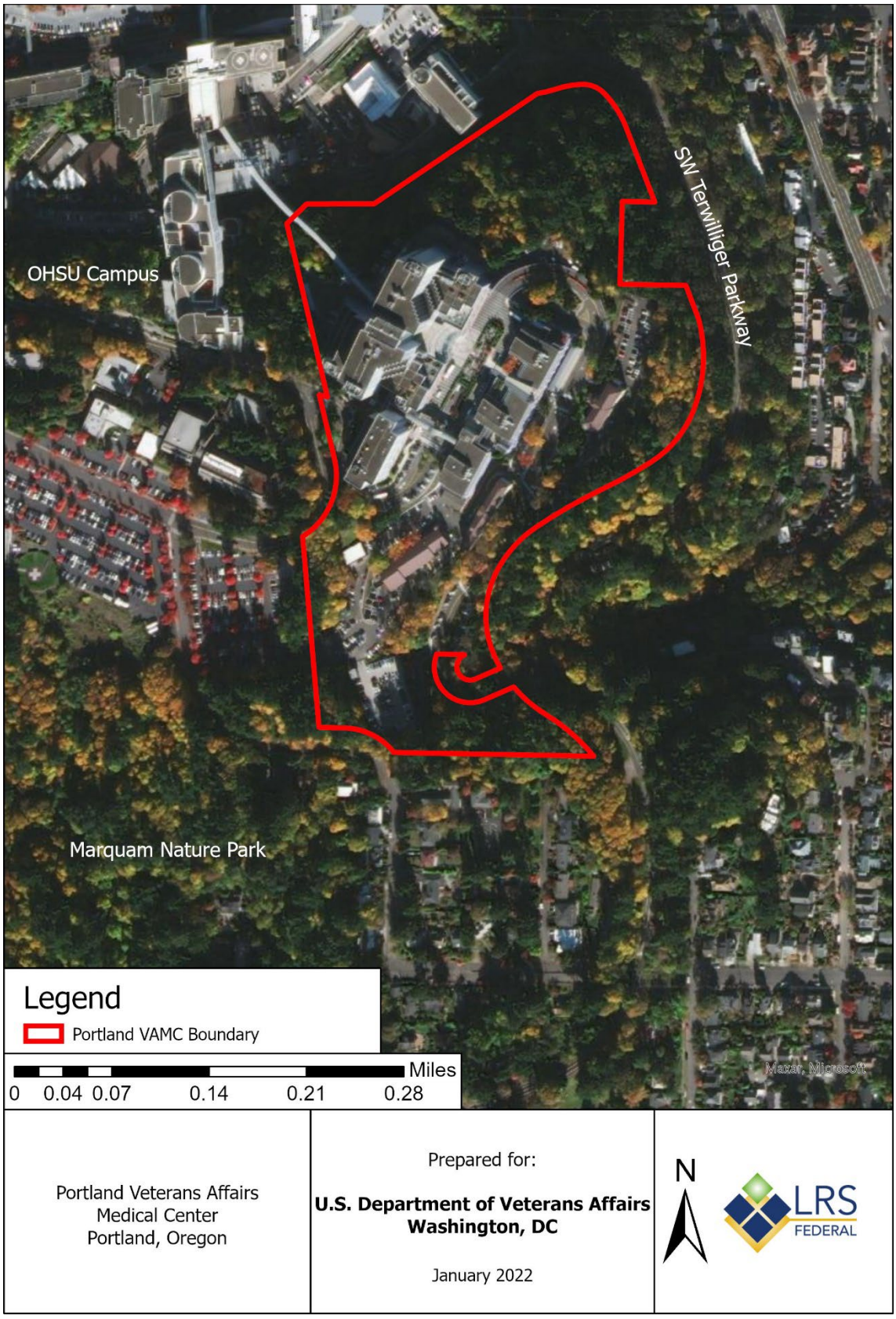

Figure 1-2. Aerial Image of the Portland VAMC

Due to the age of many of the Portland VAMC buildings and changes to rules, standards, and design criteria over the years, many of the existing buildings are considered nonconforming with current building seismic structural performance and physical security requirements. Current VA standards and codes require that site designs be modified to an extent that is functional and practical to conform with current standards.

The surrounding community consists of the OHSU campus and residential single-family homes built into the forested hillsides, the Shriners Hospital, Doernbecher's, and the Casey Eye Institute. In addition, the VAMC is located adjacent to SW Terwilliger Boulevard, a scenic and historic roadway, which brings interest from the Friends of Terwilliger non-profit organization. Section 3.15 Potential for Generating Substantial Controversy further details input received following the VA's solicitation for input from federal, state, and local agencies as well as community organizations.

1.2 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. The seismic upgrades and improvements proposed would 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 list based on their design and the seismic characteristics of the area. There are several active faults in the region and Portland has a long history of earthquakes. The Portland VAMC is located within a high potential earthquake hazard zone with a very high risk for liquefaction of soils (Figure 1-3). Further, the Portland VAMC currently operates at full capacity and space impediments are being encountered routinely in many functions, including parking. An increase in the number of hospital beds or patient capacity is not anticipated as a result of new construction. However, the proposed action will increase the capacity of existing services, such as specialty care, to meet VA workload projections and the latest health care standards. The proposed action would renovate and modernize Portland VAMC facilities while addressing capacity issues to meet the health care needs of Portland area Veterans.

Additionally, parking expansion is needed at the VAMC to meet current staff and patient demand. The VAMC employs a large workforce of approximately 4,500 employees with only 1000 staff-designated parking spaces. For this reason, 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. Approximately 30 current VA staff commute via bicycle to the Portland VAMC. The currently implemented travel demand management programs will continue to be enhanced and expanded to further reduce the number of current and future passenger car trips to the Portland VAMC as well as the demand for parking. 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.

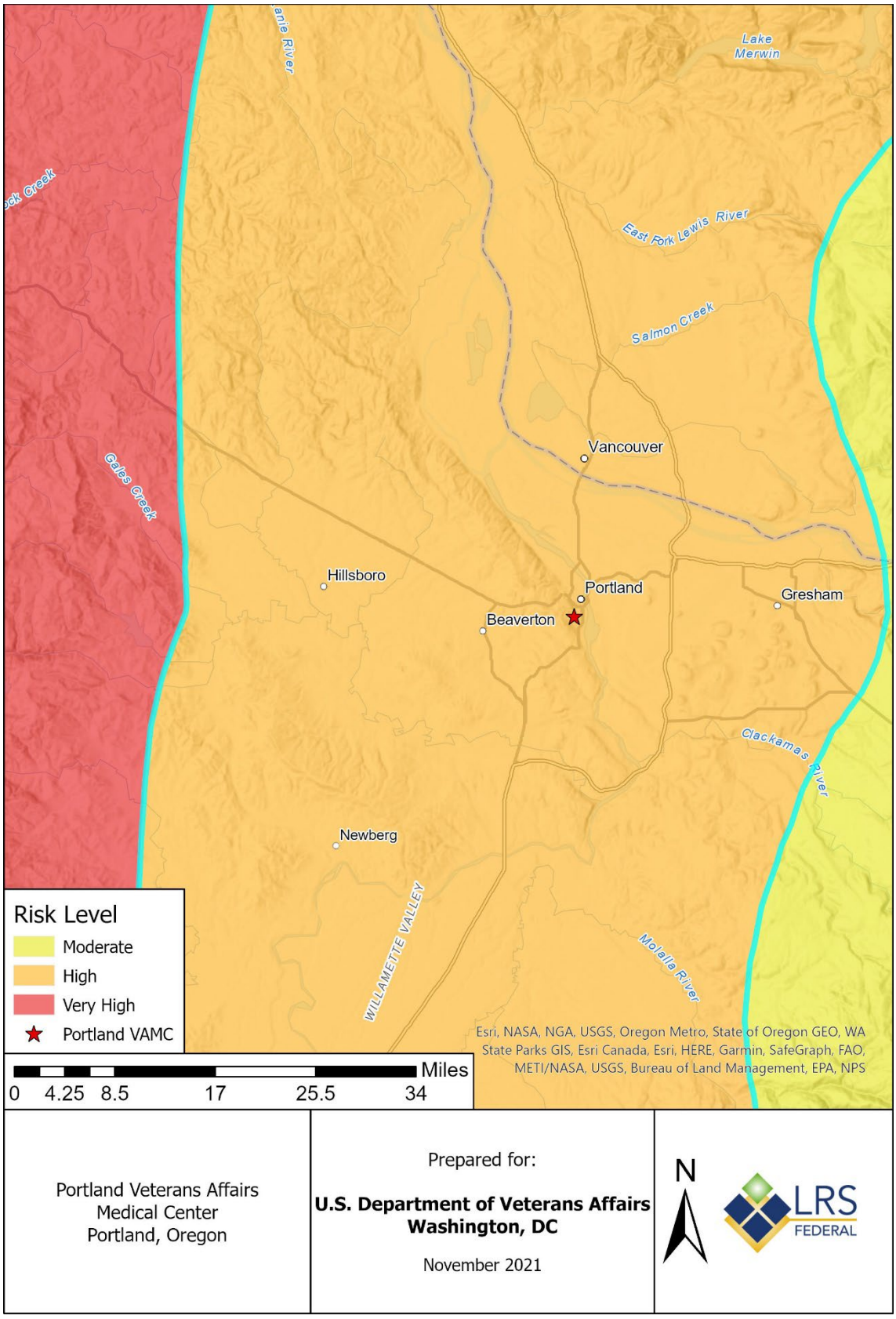

Figure 1-3. Seismic Hazards Map for the Portland VAMC (USGS, 2018)

2.0 Alternatives

This section describes the proposed action and alternatives considered by VA, including those alternatives eliminated from further analysis. NEPA and VA-specific NEPA regulations require all reasonable alternatives to be rigorously explored and objectively evaluated.

VA is considering the implementation of several undertakings at the Portland VAMC. The various projects, if authorized and approved, would occur over an extended duration (six or more years) to continue to provide the necessary health care services to Portland area Veterans. These projects would consist of a series of components that would seismically upgrade, renovate, modernize, and expand the existing Portland VAMC facilities within its existing footprint. The proposed upgrades and improvements to Portland VAMC would also further enhance patient and employee safety and accessibility while serving to meet the existing health care needs of Portland area Veterans.

2.1 Proposed Action

Seismic upgrades and improvements are proposed at the Portland VAMC to specifically correct seismic deficiencies, address federal setback requirements, improve HVAC and electrical distribution systems, and to provide sufficient parking facilities. The proposed action, which would allow VAMC to properly serve and meet the current needs of Portland area Veterans, includes the following project components (Figure 2-1):

- 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. B100 improvements would include a new service elevator.
- Demolition of Building T-41, Building T-51, and Trailer 1 to provide space for the new 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 325,000 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.

The proposed action would be implemented over an extended period of years and sequenced to minimize impacts to VAMC services and surrounding community to the greatest extent practicable. Construction for Building 108 additional parking levels is anticipated to begin by December 2022 and last approximately one year. Building 110 and Building 111 construction is proposed to commence by December 2025 with all renovations and upgrades being completed by January 2028. The overall construction timeline is dependent upon availability of funding, authorization, contract procurement, permitting, and design schedules for the various components.

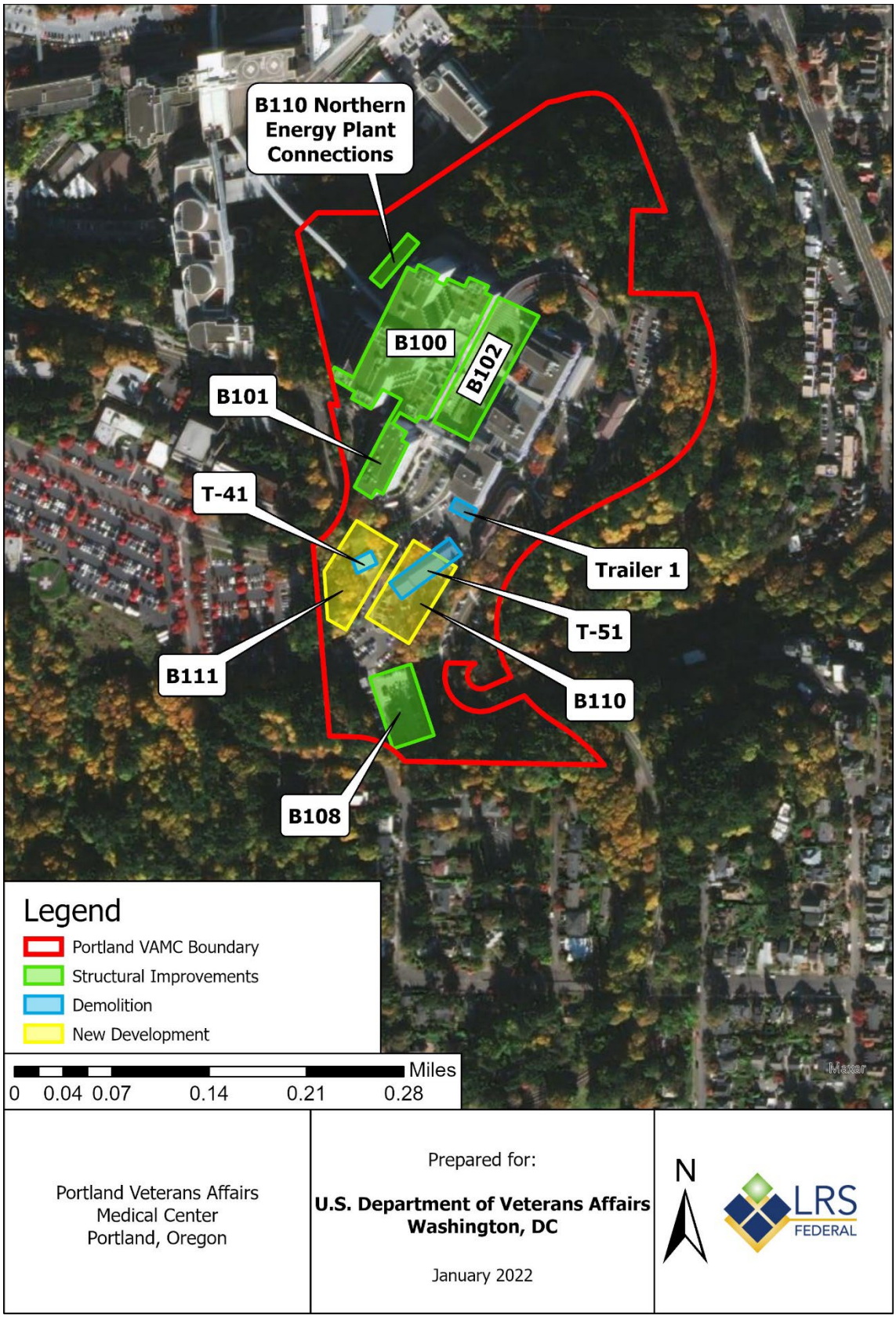

Figure 2-1. Project Component Map

2.2 Alternatives Evaluated

This EA examines two action alternatives for the implementation of the proposed action (Alternative A and Alternative B) and the no action alternative.

2.2.1 Alternative A

Alternative A will comprise the following project components to correct 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 (Figure 2-1):

- 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 325,000 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.

2.2.2 Alternative B

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 Section 2.1 Proposed Action.

2.2.3 No Action Alternative

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. However, analysis of the no action alternative is required by CEQ regulations. It also provides a benchmark for comparing and analyzing the effects of implementing the proposed action under each alternative.

2.3 Alternatives Eliminated from Further Consideration

After identifying deficiencies of the existing Portland VAMC facilities, VA examined alternatives. These alternatives were not viable or failed to meet the purpose and need for the proposed action. The following provides a brief discussion of these alternatives and VA's rationale for eliminating them from further consideration.

Development of a New VAMC at a New Location in the Portland Area

VA would acquire land then design and develop a new, modern medical center at a new site in the Portland area. This alternative would maintain the continuity of health care provided by VA during the new medical center construction and would provide a modern VA health care facility that would meet Portland area Veterans' needs for the foreseeable future. The cost of purchasing a new site and constructing an entirely new VA medical center facility would be far greater than the renovation and modernization of the existing Portland VAMC. In addition, this alternative would relocate the Portland VAMC away from OHSU. OHSU is a strategic partner and invaluable resource to the Portland VAMC.

VA leverages OHSU to efficiently procure medical services that the Portland VAMC is unable to provide patients, such as nuclear medicine treatments. While it might be possible to maintain this relationship from afar, distance would make sharing personnel and other resources with OHSU challenging and would impact the continuity of health care provided to Portland area Veterans. Consequently, this alternative was eliminated from further consideration.

Lease Off-Campus Space and Close Buildings 100 and 101

VA would lease space at an off-VAMC location to house clinical and other services. The seismically deficient Buildings 100 and 101 would be effectively decommissioned. More than 1,200,000 gross square feet (GSF) of leased space would be required to mitigate the loss of the two existing buildings and accommodate Portland's patient growth projections. This alternative would put many clinical and ancillary support functions too far from the medical center to effectively interact with services that would continue to be offered on campus. The cost of this option is prohibitive, even if acceptable space could be located near the Portland VAMC. While suitable space could possibly be leased in the greater Portland area, it would likely be impossible to find adequate contiguous clinical (inpatient and outpatient) space. The solution would likely be several leased buildings scattered across the area, which would result in operational inefficiencies and loss of coordinated health care services for Veterans. Due to both cost and loss of critical space adjacencies, this alternative was eliminated from further consideration.

Contract Out Core Medical/Support Services and Close Buildings 100 and 101

VA would send Veteran patients to other existing medical facilities in the Portland metropolitan area where they could receive health care. The seismically deficient Buildings 100 and 101 would then be decommissioned. While Veterans may, with many exceptions (Veteran special needs care), receive the care they require under this alternative, this alternative would not allow VA to fulfill its purpose of providing the best and most comprehensive medical care possible to Veterans. In addition, VA would not be able to effectively control the quality and consistency of outsourced medical care and the high cost of outsourcing would be cost-prohibitive. This alternative does not meet the purpose of or need for the proposed action and does not address existing space and care deficiencies at the Portland VAMC. As such, this alternative was not considered reasonable and was eliminated from further consideration.

Acquisition of an Existing Medical Facility Through Purchase

VA considered acquiring an existing medical facility in the local community that would be suitable for renovation and fit all other project requirements in the same manner as the proposed action. However, high-level market research and interviews with local VA planners have indicated that a suitable facility for possible acquisition and subsequent renovation that would meet all project requirements does not exist in the Portland area. As such, this alternative was eliminated from further consideration.

Collaboration with the Department of Defense for a Joint Lease Project

VA also considered collaboration with the Department of Defense (DoD) for a Joint Lease Project; however, there are currently no active DoD facilities or other VA/DoD operations in the Portland area. As such, this alternative was eliminated from further consideration.

3.0 Affected Environment and Environmental Consequences

This section describes the baseline physical, environmental, cultural, and socioeconomic conditions at the proposed project site and the general vicinity, with emphasis on those resources potentially impacted.

CEQ guidelines and regulations encourage agencies to streamline environmental analyses in their EAs (CEQ, 2012) by focusing on significant issues and discussing insignificant issues only briefly, discussing impacts in proportion to their significance, and incorporating by reference other environmental analyses (40 CFR 1500.4(c), 1502.2(b), and 1502.21).

Impacts are identified as either significant or less than significant. The terms "effects" and "impacts" are synonymous in this EA. Where possible, impacts are identified as short-term, temporary, or long-term in relation to the length of the effect of the impact.

Resource areas considered in this EA are aesthetics; air quality; cultural and historic resources; geology and soils; hydrology and water quality; wildlife and habitat; noise; land use; floodplains and wetlands; socioeconomics; community services, solid waste and hazardous materials; traffic, transportation, and parking; utilities; and environmental justice. This section also addresses cumulative impacts and the potential for generating substantial controversy.

3.1 Aesthetics

3.1.1 Affected Environment

The Portland VAMC campus is located on approximately 28.5 acres of land and includes 12 buildings, one below-grade parking garage (Building 102), one above-grade parking garage (Building 108), and ten surface-level parking lots (Figure 1-2). The campus, first constructed in the early 1900s, sits near the top of Marquam Hill, south of downtown Portland and within a mile of the Willamette River. The northern, eastern, and southern perimeter of the VAMC campus is wooded and slopes steeply toward SW Terwilliger Boulevard, a scenic roadway, listed in the National Register of Historic Places (NRHP) in March 2021. The VAMC campus is located in a mixed use, institutional, residential, and recreational urban area. Residences are located across SW Terwilliger Boulevard and south of the campus. Adjacent northwest of the campus is the OHSU campus, and approximately 175 feet southwest of the VAMC campus is Marquam Nature Park, across SW 6th Avenue Drive. The OHSU and VAMC medical campuses have similar aesthetics.

3.1.2 Environmental Consequences

3.1.2.1 Alternative A and Alternative B

The seismic upgrade and improvement projects would be implemented over a period of approximately six years and would include activities such as site preparation, grading, excavation, vehicle traffic, movement of heavy equipment, and paving roadways and parking areas. The improvement projects would require construction activities which would temporarily disrupt the aesthetics of the Portland VAMC campus. Demolition activities would be limited to T-41, T-51, and Trailer 1, and construction activities would be limited to Building 108, the energy plant, Building 110, and Building 111. Building 108, a parking garage located on the southern portion of the VAMC campus, would be vertically expanded to add two additional levels of parking. This action would increase the height of the parking structure; however, the building would still be within the height range of other buildings on the campus. Energy plant improvements would primarily impact the interior of the building. The design of Building 110, the new Specialty Care Building, and Building 111, the new parking structure, would be consistent with the

surrounding buildings on the campus. Construction of Building 111 would require some tree removal within the interior portion of campus along existing retaining walls as well as removal of some ornamental landscape trees. All disturbed areas around the new parking structure would be landscaped following the completion of construction to preserve aesthetics at the campus. Tree removal would be in accordance, to the maximum extent practicable, with the City of Portland tree removal process. This would apply to trees 12 inches in diameter at 4.5 feet (breast height) above the ground. Aesthetic impacts to the campus during demolition and construction activities would be temporary, and due to the steeply sloping and wooded hillsides surrounding the VAMC campus, it is unlikely that they would be seen by residential areas located northeast, east, and south of the campus. Impacts to aesthetics described under Alternatives A and B would be less than significant.

The Portland VAMC and SW Terwilliger Boulevard are separated by steep, wooded slopes with a fairly dense understory and canopy. New buildings would be designed to be architecturally and visually consistent with the existing Portland VAMC campus buildings and forested areas around the perimeter of the campus would remain largely intact. As such, physical changes to the VAMC campus, such as the addition of the Specialty Care Building and new parking structures, would not detract from the aesthetics of SW Terwilliger Boulevard or surrounding area.

3.1.2.2 No Action Alternative

Under the no action alternative, construction of the proposed action projects would not occur. No impacts to the aesthetics of the site would occur as a result of VA's actions.

3.2 Air Quality

3.2.1 Affected Environment

Ambient air quality in an area is characterized by compliance with the primary and secondary National Ambient Air Quality Standards (NAAQS). The U.S. Environmental Protection Agency (USEPA) sets standards for pollutants considered harmful to public health and the environment. Areas are then classified as attainment, non-attainment, or maintenance with respect to compliance with NAAQS. The USEPA Green Book provides information about the area NAAQS designations and non-attainment status. According to USEPA Green Book, Multnomah County, Oregon is designated as a maintenance area for carbon monoxide (CO) and is therefore subject to the General Conformity Rule of the Clean Air Act for the proposed action. Multnomah County, Oregon is an attainment area for the remaining NAAQS. Maintenance designations indicate that the state completed an air quality planning process for an area which was previously designated as non-attainment (USEPA, 2021).

The Portland VAMC Final Air Quality Resource Report (2021) presents air quality monitoring data which indicates that local air quality meets federal and state standards and is considered good in the project area. USEPA and the Oregon Department of Environmental Quality (ODEQ) have designated air quality in the project area as either attainment or maintenance for all federal and state standards (Jacobs Engineering Group Inc. and LRS Federal LLC, 2021a).

Sensitive air quality receptors in the vicinity of the Portland VAMC include residences northeast and east of the VAMC campus, located 300 feet or more from the proposed construction areas, and residences south of the campus, located 100 feet or more from the proposed construction areas. The project would be constructed within a hospital and, therefore, be co-located with sensitive receptors which include an onsite childcare facility. The nearest school is OHSU, located across the street from the facility which includes OHSU Hospital, as well as the Doernbecher Children's Hospital, the Casey Eye Institute, the School of Nursing, and other learning, research, and treatment facilities (Jacobs Engineering Group Inc. and LRS Federal LLC, 2021a).

3.2.2 Environmental Consequences

3.2.2.1 Alternative A and Alternative B

The Portland VAMC Final Air Quality Resource Report (2021) was prepared for the VAMC campus to estimate the total emissions that would be generated by the proposed action from construction and operations. Construction activities for both alternatives are anticipated to occur intermittently between 2022 and 2028 (Jacobs Engineering Group Inc. and LRS Federal LLC, 2021a).

Construction projects would result in air pollutant emissions from the following:

- Fugitive dust from soil disturbance, demolition, and other construction activities;
- Engine exhaust from vehicle trips traveled by construction workers, haul trucks, and concrete trucks;
- Fuel combustion in off-road construction equipment.

Short-term air quality impacts from fugitive dust generated during construction would require monitoring to ensure that contractors implement best management practices (BMPs) mandated by the State of Oregon. Mitigation measures to control fugitive dust from construction equipment and vehicles include (Jacobs Engineering Group Inc. and LRS Federal LLC, 2021a):

- Use, where possible, of water for control of dust during construction, the grading of roads, or clearing of land.
- Application of water or on unpaved roads, materials stockpiles, and other surfaces which could create airborne dusts.
- Full or partial enclosure of materials stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter from becoming airborne.
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials.
- Proper containment during sandblasting or other similar operations.
- Covering, at all times when in motion, open-bodied trucks transporting materials likely to become airborne.
- Prompt removal from paved streets of earth or other material that does or may become airborne.

The proposed action would also cause a potential net increase in long-term stationary combustion emissions because of increased boiler and emergency generator capacity. Operational emissions associated with future project-related vehicle use and maintenance would be negligible. Upgrading energy utilities to potentially include renewable energy sources and/or improve efficiency of energy utilities could help to offset any anticipated increases in operational emissions (Jacobs Engineering Group Inc. and LRS Federal LLC, 2021a).

The proposed action would not result in the VAMC becoming a major source for actual or potential emissions at or above any Clean Air Act (CAA) air pollutant threshold, therefore, a Title V CAA operating permit is not anticipated to be required for the VAMC. A new indirect source construction permit (ISCP) is not likely to be required since the proposed 600 new parking spaces do not exceed the threshold of 1,000 or more parking spaces within a location defined as a maintenance area for carbon monoxide. VA would obtain a Title V operating permit and a new ISCP from ODEQ, if required.

An asbestos inspection and lead-based paint survey were conducted for the VAMC in November 2020. The structures to be renovated or demolished include materials that contain asbestos and lead-based paint.

An ODEQ Permit for Asbestos Abatement would be required for demolition or renovation projects involving asbestos-containing materials (LRS Federal LLC, 2021e). Demolition work would need to be performed by licensed contractors, and mitigation and disposal requirements would be implemented. Standard demolition measures to control dust would reduce lead-based paint dust emissions during demolition (LRS Federal LLC, 2021b).

Though not subject to General Conformity, emissions are anticipated to be substantially below the General Conformity maintenance area de minimis threshold of 100 tons per year for all pollutants and all years (2022 to 2028); however, the overall construction timeline is dependent upon availability of funding, authorization, contract procurement, permitting, and design schedules for the various components. The proposed improvements would not likely result in a significant increase of air emissions or interfere with the attainment of air quality standards in the area. The projects would not adversely affect regional air quality and would comply with applicable federal and state air quality permitting and regulatory requirements (Jacobs Engineering Group Inc. and LRS Federal LLC, 2021a).

Currently, there are no applicable quantitative emission thresholds to evaluate the significance of greenhouse gases (GHG) and climate change impacts associated with individual projects under NEPA. As an indicator of the magnitude of GHG emissions considered worthy of regulatory development and tracking for stationary sources of emissions, USEPA's Mandatory GHG Reporting Rule has a threshold for rule applicability of 25,000 metric tons (MT) of carbon dioxide equivalent (CO_2e) emissions per year (40 CFR Part 98) from stationary fuel combustion. Since the proposed projects will likely generate CO_2e emissions in excess of the 25,000 MT per year threshold established by USEPA, VA will likely be required to report its CO_2e emissions (Jacobs Engineering Group Inc. and LRS Federal LLC, 2021a).

The maximum annual estimated emissions for volatile organic compounds (VOCs), nitrogen oxides (NOx), CO, sulfur dioxide (SO2), particulate matter ten micrometers and smaller (PM10), particulate matter 2.5 micrometers and smaller (PM2.5), and CO_2e from the construction and operation of the proposed action projects under Alternatives A and B are presented in Table 3-1. Based on the location's attainment or maintenance status for all federal and state standards, the increase in emissions anticipated to be substantially below the General Conformity maintenance area de minimis threshold, and the mitigation measures that would be enforced to protect sensitive receptors in the area, the proposed action under both alternatives is considered to have a less than significant impact on air quality.

Table 3-1. Total and Maximum Annual Estimated Emissions for Alternative A and Alternative B

Alternative and Emission Summary Category		Emissions (tons per year)						
		VOC	NOx	CO	SO2	PM10	PM2.5	CO_2e (MT)
A	Maximum Annual	2.3	49.6	31.5	0.2	3.1	3.0	37,037
B	Maximum Annual	2.4	50.9	32.2	0.2	3.2	3.1	37,219

3.2.2.2 No Action Alternative

Under the no action alternative, construction of proposed action projects would not occur. No impacts to air quality would occur as a result of VA's actions.

3.3 Cultural and Historic Resources

Historic properties are defined by the National Historic Preservation Act (NHPA) as properties including prehistoric and historic sites, structures, buildings, objects, districts, or any other physical evidence of

human activity associated with important historic events, with persons important in history, representing the work of a master or exemplary as a type, or have or may yield information important to history or prehistory. Cultural resources are protected through several federal laws and associated regulations, including the NHPA of 1966, the Archaeological and Historic Preservation Act of 1974, the American Indian Religious Freedom Act of 1978, the Archaeological Resources Protection Act of 1979, and the Native American Graves Protection and Repatriation Act of 1990.

Section 106 of the NHPA and its implementing regulations, 36 CFR Part 800, requires an assessment of the potential impact of an undertaking on historic properties that are within the proposed project's area of potential effect (APE), which is defined as the geographic area "within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist."

3.3.1 Affected Environment

The APE for the proposed action consists of the Portland VAMC campus, encompassing approximately 28 acres of land and SW Terwilliger Boulevard located to the east (Figure 3-1). SW Terwilliger Boulevard was listed on the NRHP in March 2021. Pursuant to VA's NHPA Section 10 responsibilities, which require VA on an ongoing basis to evaluate its properties for eligibility to the National Register of Historic Places (NRHP), VA transmitted a determination in 2020 to the Oregon State Historic Preservation Office (OR SHPO) stating that there are no properties eligible for the NRHP at the Portland VA Medical Center. The OR SHPO concurrence letter, dated November 16, 2020, which specifically addresses above-ground historic properties, is included in Appendix B. Wooded areas surrounding the campus will remain intact, providing a buffer between campus construction and the historic SW Terwilliger Boulevard. No ancillary activities are proposed outside of the VAMC campus boundary or APE. Proposed building heights would also not exceed the heights of existing structures.

Review of available archaeological, historical, and geological data shows that there is low potential for encountering significant pre-contact cultural resources and historic period cultural resources in the project APE due to the natural and cultural settings. Construction of the original medical center required significant excavation on campus to establish a level grade, effectively removing cultural horizon of soils. Further, structures identified to be 50 years or older were Buildings 6, 16, 41, and the stone masonry walls within the campus. These structures have been determined not eligible for the NRHP with Oregon SHPO concurrence due to previous renovations of the structures. As a result, there are no known cultural resources identified within the direct or indirect APE on the VAMC campus (LRS Federal LLC, 2021a). VA has requested subsequent concurrence from the Oregon SHPO for a finding of no adverse effect to historic properties and archeological resources, including SW Terwilliger Boulevard, based upon project components and the alternatives further considered in this EA.

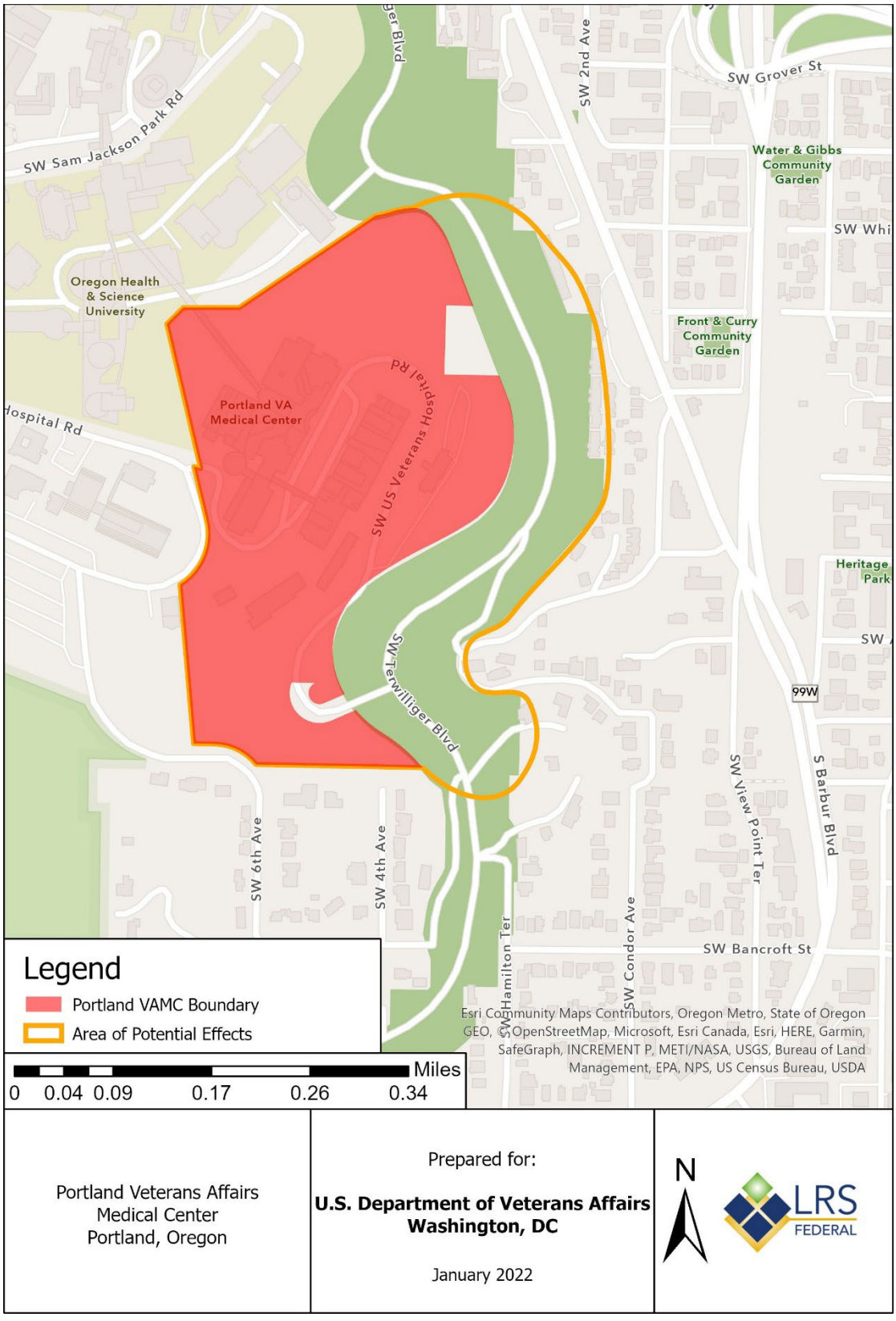

Figure 3-1. Map Depicting the Portland VAMC Campus and Area of Potential Effects

3.3.2 Environmental Consequences

3.3.2.1 Alternative A and Alternative B

The proposed projects under both Alternative A and Alternative B would not impact historic buildings since there are no historic buildings on the Portland VAMC campus, and construction activities would be almost entirely limited to previously developed portions of the campus (LRS Federal LLC, 2021a). While the proposed undertaking may negligibly increase traffic on historic-period SW Terwilliger Boulevard, this change will not likely have negative impacts to the roadway. The roadway has undergone numerous maintenance activities since the early 1900s and traffic has steadily increased on the historical road over time. The Portland VAMC and SW Terwilliger Boulevard are separated by steep, wooded slopes with a fairly dense understory. Under Alternatives A and B, building heights would still be in the range of other buildings on the campus. Physical changes to the VAMC campus proposed would not detract from the aesthetics of the scenic roadway while also considering that surrounding forested areas would remain intact. Therefore, SW Terwilliger Boulevard would not be affected by the proposed action under Alternatives A or B.

The proposed project on the Portland VAMC campus would lead to a low risk for inadvertent discovery of pre-contact cultural resources and a low risk for uncovering below-ground cultural resources, and it is therefore unlikely that the proposed action under Alternatives A or B would impact archeological resources (LRS Federal LLC, 2021a). It is unlikely that the proposed projects would affect previously undisturbed sediments within the direct APE as the Portland VAMC campus has been significantly altered through time. Based on the known prior disturbance and the absence of historic buildings at the Portland VAMC campus, impacts to cultural resources from the proposed action would be less than significant. However, it is recommended a project-related inadvertent discovery plan be created, outlining procedures on what to do and who to contact if there is an inadvertent discovery as a result of any project-related minor ground-disturbing activities in previously undisturbed locations within the APE during construction (LRS Federal LLC, 2021a). Future Section 106 consultation with the Oregon SHPO or Native American Tribes would be required if ground-disturbing activities (e.g., ground disturbance for ancillary locations, terrain reconfigurations, staging areas or excavations for utilities) are proposed in areas outside of the direct APE for the VAMC. Likewise, further consultation would be required if an inadvertent discovery occurred during construction.

3.3.2.2 No Action Alternative

Under the no action alternative, construction of the proposed action projects would not occur. No impacts to cultural or historic resources would occur as a result of VA's actions.

3.4 Geology and Soils

3.4.1 Affected Environment

The Portland VAMC campus is located within the lower Willamette Basin geological region. Elevations at the Portland VAMC range from as high as 560 feet above mean sea level (amsl) near the southwest corner to as low as 350 feet amsl near the north end. Generally, topography at the Portland VAMC slopes down from the west to the east and from the south to the north. Areas along the northern, eastern, and southern perimeter of the Portland VAMC are steeply sloping (25 percent [%] or greater) (LRS Federal LLC, 2021b).

The Portland VAMC is located in Portland Hills fault zone. Central and southern portions of the Portland VAMC are located in a high potential relative earthquake hazard zone. Northern, eastern, and southeast portions of the campus are located in a moderate potential relative earthquake hazard zone. The Portland area, located in the Cascadia subduction zone, has several active faults and a long history of earthquakes.

The entire Portland VAMC is located in the City of Portland Title 33 Potential Landslide Hazard Area. Risk for liquefaction of soils is very high (LRS Federal LLC, 2021b).

According to the U.S. Department of Agriculture (USDA) Natural Resources Conservation Service, there are four distinct soil series at the Portland VAMC. The soil series identified at the Portland VAMC are Goble-Urban Land Complex (3 to 15% slopes), Goble Silt Loam (30 to 60% slopes), Goble-Urban Land Complex (15 to 30% slopes), and Haplumbrepts (very steep). A geotechnical investigation of the Portland VAMC found the soils in the central portion generally consist of fill material (sand to silty sand with gravel) underlain by clay or silt to depths up to 100 feet below ground surface (bgs), underlain by basalt bedrock. In some places, clayey sand or silty sand is located above or below the clay or silt layer, or the clay/silt layer may be absent. In the area of Buildings 100, 101, and 102, bedrock is estimated to range from approximately 15 to 75 feet bgs (LRS Federal LLC, 2021b).

3.4.2 Environmental Consequences

3.4.2.1 Alternative A and Alternative B

Construction activities would have minimal changes to topography. The proposed Specialty Care Building and proposed parking garage would be partially located in moderately sloping areas which may necessitate the use of BMPs, such as temporary shoring and retaining walls. The proposed disturbance of more than one acre of land would require an erosion and sediment control plan including BMPs, such as earth berms and vegetative buffers (LRS Federal LLC, 2021e). A geotechnical investigation conducted in 2019 indicated that basalt bedrock may be located close to ground surface in some areas, which could require removal prior to proposed construction activities. Additional investigations would be needed to determine the depth to bedrock in previously uninvestigated soils (LRS Federal LLC, 2021b).

Since the Portland VAMC campus is located in a moderate potential relative earthquake hazard zone with a very high risk for liquefication of soils, the construction of new structures on the campus would be designed to the current seismic standards (LRS Federal LLC, 2021b).

Based on the prior disturbance of soils and the BMPs that would be implemented during construction, the proposed action under Alternatives A and B would have less than significant impacts to soils and geology at the Portland VAMC.

3.4.2.2 No Action Alternative

Under the no action alternative, construction of the proposed action projects would not occur. No impacts to geology or soils would occur as a result of VA's actions.

3.5 Hydrology and Water Quality

3.5.1 Affected Environment

The Portland VAMC campus is located in the Marquam-Woods sub-watershed of the Willamette River Watershed. The nearest traditional navigable water (TNW) to the Portland VAMC is the Willamette River, located approximately 0.6 miles east of the campus. Soils onsite are classified as hydrologic soils Group Type C, which is typified by slow infiltration rates when thoroughly wet and slow rates of water transmission. This group consists of soils with either a layer that impedes the downward movement of water or layers of moderately fine to fine texture soils. Moderately high runoff potential is inherent in these types of soils. The stormwater runoff from the VAMC site is directed to separated stormwater inlets and conveyed to the city's combined stormwater-sanitary sewer network downgradient, eventually discharging indirectly into the Columbia River following treatment at the Columbia Boulevard Wastewater Treatment Plant.

Figure 3-2. VAMC Hydrologic Drainage Feature Map depicts two surface drainage features previously identified onsite and the combined stormwater-sanitary sewer network that conveys stormwater runoff to the Columbia Boulevard Wastewater Treatment Plant (Jacobs Engineering Group Inc. and LRS Federal LLC, 2021b). The City of Portland operates the Columbia Boulevard Wastewater Treatment Plant. Wastewater is treated and discharged to the Columbia River in accordance with the applicable National Pollutant Discharge Elimination System (NPDES) wastewater discharge permit (Permit No. 101505) (State of Oregon Department of Environmental Quality, 2020) and ODEQ Water Quality Standards (WQS).

The two drainage features that convey stormwater runoff from adjacent roads, paved parking lots, and adjacent uplands downgradient to stormwater inlets are further detailed under Section 3.9 Floodplains, Wetlands and Coastal Zone Management. Surface water features and the combined stormwater-sanitary conveyance system located on the VAMC campus are depicted on Figure 3-2. An abandoned section of storm sewer pipeline is located at the northern section of the Portland VAMC campus. During a site visit conducted in June 2018, flow was observed through the storm sewer pipeline assumed to be abandoned. The City of Portland Bureau of Environmental Services (PBES) would need to be notified if this line is later determined to be active in order to update their GIS system maps (LRS Federal LLC, 2021e).

The proposed action is subject to the City of Portland 2020 Storm Water Management Manual (SWMM). The SWMM maintains current standards with BMPs and regulatory requirements, as well as analysis and design standards relative to Portland's water quality goals. Low-impact development and/or treatment for pollution reduction are required, as is flow reduction depending on the discharge point. The SWMM defines the City's Infiltration and Discharge Hierarchy and ranks discharge systems by levels (e.g., Levels I – III) in order of preference. Level I requires treatment and infiltration where possible; Level II requires treatment and flow control for discharge to separated storm sewer systems; and Level III requires flow control for discharge to combined sewer systems that send flow to the Columbia Boulevard Wastewater Treatment Plant for treatment and discharge to the Columbia River. Other Portland technical standards, design guidelines, and policies impacting the stormwater and water quality aspects of this project include the Sewer and Drainage Facilities Design Manual (SDFDM) (City of Portland, 2020a) and the Source Control Manual (SCM) (City of Portland, 2020b).

The Portland VAMC campus is not located within a wellhead protection area, which is a drinking water source area for a public water supply. Therefore, the project is not subject to additional groundwater protections put in place by the city (Jacobs Engineering Group Inc. and LRS Federal LLC, 2021b). Further, the geotechnical investigation for the Portland VAMC did not encounter groundwater. It is unlikely that groundwater would be encountered during construction activities associated with the proposed action (LRS Federal LLC, 2021b).

3.5.2 Environmental Consequences

3.5.2.1 Alternative A and Alternative B

Proposed projects under Alternative A and Alternative B, would not significantly impact drainage features, drainage patterns, or general hydrology of the site. Post-construction stormwater would be discharged to the municipal combined sewer system for treatment reflecting current conditions. All captured combined sewer flows directed to the Columbia Boulevard Wastewater Treatment Plant will be treated in accordance with Schedule A.2 of the applicable NPDES Wastewater Discharge Permit (Permit No. 101505) (State of Oregon Department of Environmental Quality, 2020). The Columbia Boulevard plant has a two-phase treatment process. The primary phase screens out large debris for landfilling; skims off grease, oil, and floatable solids; and collects and thickens settleable solids. In the secondary phase, naturally occurring microorganisms feed on organic pollutants in the wastewater and the resulting residue is separated. After disinfection, the treated water flows into the Columbia River. Sodium hypochlorite, a strong bleach, is used to disinfect treated wastewater before it is discharged to the Columbia River. To

reduce chlorine residual to no more than one part per million, liquid sodium bisulfite is used to dechlorinate treated wastewater. Discharges from the plant must also comply with limits permitted for biological oxygen demand (BOD), total suspended solids (TSS), pH, E.coli, and chlorine among other pollutants (ODEQ Wastewater Discharge Permit No.101505). No affect to water quality within the Columbia River is anticipated following primary treatment, secondary treatment, and disinfection processes prior to discharge.

The City of Portland Bureau of Environmental Services (PBES) provides municipal combined stormwater/sanitary sewer services to the Portland VAMC. Portland VAMC would continue to maintain compliance with the applicable PBES permit No. 400.229 by following prescribed best management practices (BMPs) related to discharge of wastewater to the publicly-owned treatment system as outlined in the 2020 SWMM. Under Alternatives A and B, discharges into the combined sewer system from the VAMC campus would continue to be in accordance with NPDES regulatory requirements and permit limitations (State of Oregon Department of Environmental Quality, 2020), as well as the OAR 340—041, City of Portland's SWMM (2020), the SDFDM (City of Portland, 2020a), and the SCM (City of Portland, 2020b)

Level III SWMM requirements for offsite discharge to the combined sewer system, as defined in Section 1.3.6 of the 2020 SWMM, would be applicable to project activities. Level III only requires flow control. Onsite infiltration would be required to provide runoff control for Portland's 10-year, 24-hour design storm event (i.e., 3.4 inches of rainfall over 24 hours). Onsite stormwater engineering controls to manage stormwater flow could include below-grade detention facilities to mitigate the increased runoff. Although the City of Portland prefers infiltration through vegetated, above-grade facilities (ponds, basins, swales), the soil, topography, and available space of the Portland VAMC campus do not make this a viable option. All soils on the VAMC campus are classified as hydrologic soils Group Type C. Hydrologic soils Group Type C is typified by slow infiltration rates when thoroughly wet and slow rates of water transmission. This group consists of soils with either a layer that impedes the downward movement of water or layers of moderately fine to fine texture soils, which is not conducive for engineered, above-grade infiltration facilities (Jacobs Engineering Group Inc. and LRS Federal LLC, 2021b). The determination of capacity impacts within the receiving combined sewer networks and details of onsite infiltration facilities requires further analysis during the design phase and prior to construction. Onsite stormwater facilities would be constructed to adhere to specific operations and maintenance procedures to ensure proper, long-term functionality. Through implementation of engineering controls, no impacts to hydrology and water quality would occur as a result of the proposed action (Jacobs Engineering Group Inc. and LRS Federal LLC, 2021b). It is further anticipated that there would be an overall net reduction in existing stormwater flow into the City of Portland's combined sewer system as a result of implementing the above engineering controls in accordance with the permit requirements for 2020 SWMM.

Potential stormwater impacts during construction would be mitigated by development and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP) in accordance with ODEQ NPDES 1200-C Construction General Stormwater permit (LRS Federal LLC, 2021e). As such, downstream sedimentation and adverse impacts to stormwater conveyances due to site runoff during construction are not anticipated through the implementation of adequate perimeter controls as well as erosion and sediment controls.

3.5.2.2 No Action Alternative

Under the no action alternative, construction of proposed action projects would not occur. Therefore, no impacts to hydrology and water quality in addition to existing conditions would occur.

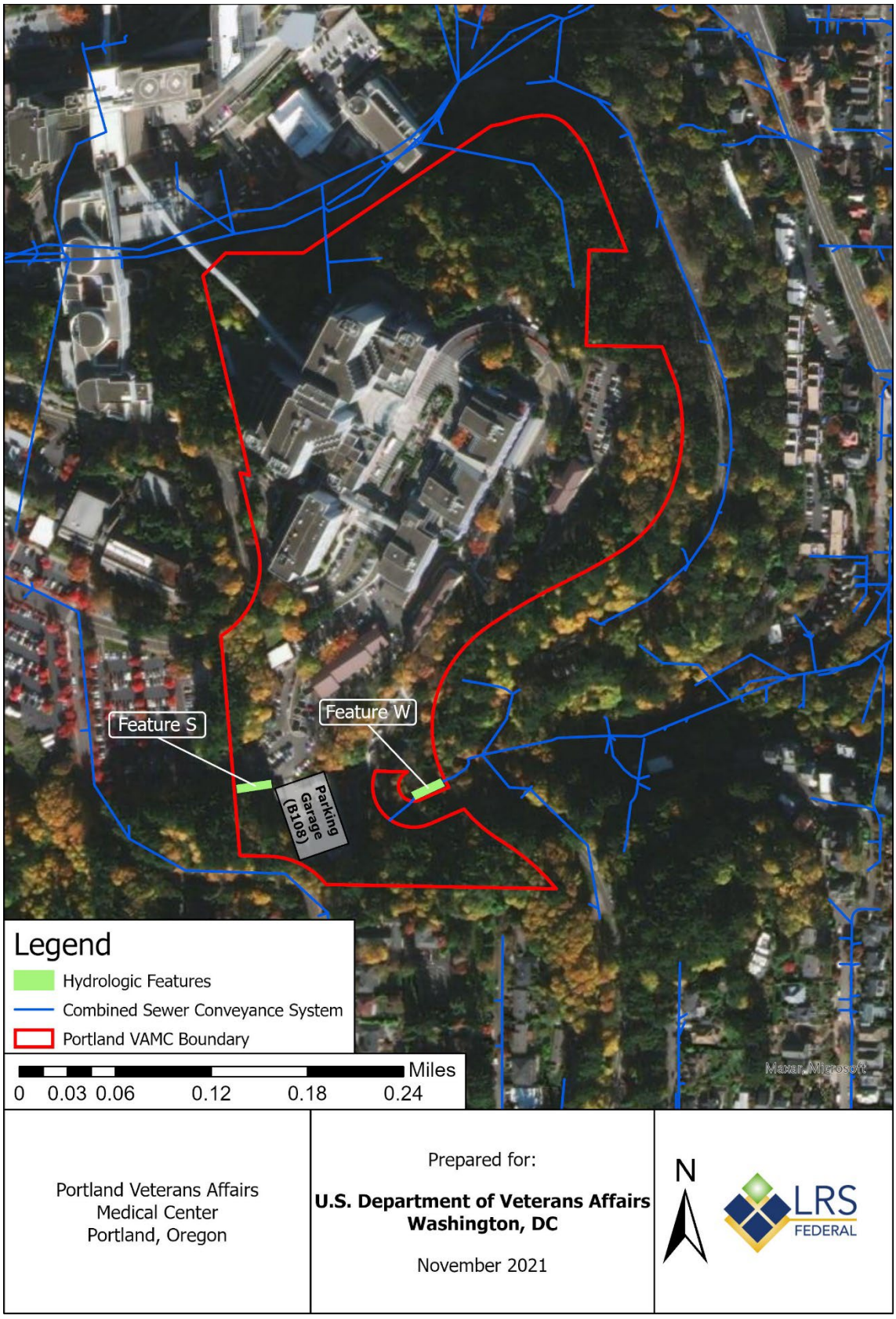

Figure 3-2. VAMC Hydrologic Drainage Feature Map

3.6 Wildlife and Habitat

3.6.1 Affected Environment

The Portland VAMC campus is mostly developed with buildings, asphalt roads, and parking lots. The perimeter, particularly the northern and eastern sides, is steeply sloped, wooded, and mostly undeveloped. This wooded area adjacent to the VAMC campus provides habitat connectivity within the surrounding Marquam Nature Park to the north and south.

A review of the U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool for migratory birds of conservation concern (BCC) identified eight species with the potential to occur on the Portland VAMC campus (USFWSa, 2021) (Table 3-2). Data maintained by eBird indicates that the Olive-sided Flycatcher, Rufous Hummingbird, and Western Screech-owl have been observed in the vicinity of the Portland VAMC campus (The Cornell Lab of Ornithology, 2020). For this reason and due to the likelihood for their habitat to occur near the site, these birds were deemed "Likely" to occur in the project study area.

Table 3-2. Migratory Bird Species of Conservation Concern

Common Name	Scientific Name	Listing Status	Habitat Description	Potential for Occurrence
California Thrasher	*Toxostoma redivivum*	BCC Rangewide	Chaparral (shrubs and small trees) with copious underbrush	Not likely
Great Blue Heron	*Ardea Herodias fannini*	BCC – Bird Conservation Regions	Freshwater and saltwater wetlands, grasslands, and agricultural fields	Not likely
Lesser Yellowlegs	*Tringa flavipes*	BCC Rangewide	Fresh and brackish, vegetated wetlands	Not likely
Olive-sided Flycatcher	***Contopus cooperi***	**BCC Rangewide**	**Open woodlands**	**Likely**
Rufous Hummingbird	***selasphorus rufus***	**BCC Rangewide**	**Open or shrubby areas, forest openings, yards, and parks, and sometimes in forests, thickets, swamps, and meadows**	**Likely**
Semipalmated Sandpiper	*Calidris pusilla*	BCC Rangewide	Shorelines	Not likely
Short-billed Dowitcher	*Limnodromus griseus*	BCC Rangewide	Wetlands, often near the edges of bogs (muskegs), small lakes, or wet meadows; some also nest in river floodplains	Not likely
Western Screech-owl	***Megascops kennicottii***	**BCC – Bird Conservation Regions**	**Forested habitats, especially in bands of deciduous trees along canyons and other drainages**	**Likely**

Available information from USFWS and the Oregon Department of Fish and Wildlife (ODFW) was reviewed to identify potential federally and state listed protected species on or in the vicinity of the Portland VAMC campus. ODFW's COMPASS mapping tool was also used to evaluate the potential of occurrence of listed species. Federally listed protected species include federally endangered (FE) and federally threatened (FT) species, and state listed protected species include state endangered (SE) and state threatened (ST) species. The USFWS IPaC tool was reviewed for federally listed species, and a list of state identified threatened or endangered species for Oregon was reviewed to incorporate any additional species of interest. The species identified from these sources and the potential for habitat at the site are listed in Table 3-3. Federally and state listed fish species potentially occurring within the Lower Willamette River and Lower Columbia River are identified in Table 3-4 (USFWSa, 2021) (ODFW, 2021).

Table 3-3. Federally and State Listed Protected Species

Common Name	Scientific Name	Listing Status	Habitat Description	Potential Habitat Present
Birds				
California Brown Pelican	*Pelecanus occidentalis californicus*	SE	Sea coasts	No
Northern Spotted Owl	*Strix occidentalis caurina*	FT, ST	Old-growth forests	Potential for flyover only
Streaked Horned Lark	*Eremophila alpestris strigata*	FT	Prairie and open coastal habitat	Potential for flyover only
Yellow-billed Cuckoo	*Coccyzus americanus*	FT	Wooded habitat with dense cover and water nearby	Potential for flyover only
Mammals (Terrestrial)				
Kit Fox	*Vulpes macrotis*	ST	Chaparral, halophytic regions, and grasslands	No
Washington Ground Squirrel	*Urocitellus washingtoni*	SE	Shrub-steppe	No
Wolverine	*Gulo*	ST	Open forests and alpine areas	No
Flowering Plants				
Kincaid's Lupine	Lupinus sulphureus ssp. kincaidii	FT	Upland prairies	No
Nelson's Checker-mallow	Sidalcea nelsoniana	FT	Soils that become saturated during the rainy season, with plants frequently becoming inundated for several weeks or longer	No
Willamette Daisy	Erigeron decumbens	FE	Deschampsia Caespitosa Valley prairie; clay soiled prairie in valley bottoms, often by creek drainages	No

Table 3-4. Federally and State Listed Fish Species Potentially Occurring within the Lower Willamette and Lower Columbia Rivers

Common Name	Scientific Name	Listing Status	Designated Critical Habitat
Bull Trout	*Salvelinus confluentus*	FT	Yes
Eulachon/Smelt	*Thaleichthys pacificus*	FT	Yes
Green Sturgeon	*Acipenser medirostris*	FT	Yes
Columbia River Chum Salmon	*Oncorhynchus keta*	FT	Yes
Lower Columbia River Chinook Salmon	*Oncorhynchus tshawytsha*	FT	Yes
Lower Columbia River Coho Salmon	*Oncorhynchus kisutch*	SE, FT	Yes
Lower Columbia River Steelhead	*Oncorhynchus mykiss*	FT	Yes
Sockeye Salmon	*Oncorhynchus nerka*	FT	Yes

The National Oceanic and Atmospheric Administration (NOAA) Fisheries website was also utilized to identify threatened and endangered species in the area. Per NOAA Essential Fish Habitat (EFH) Mapper, fisheries resources for the Lower Willamette River and Columbia River are the Chinook Salmon and Steelhead Trout; both listed as "threatened" under the Endangered Species Act (ESA). The Willamette River, the closest water body with EFH, is located approximately 0.6 miles east of the Portland VAMC campus. There is no EFH located on the site or within the City of Portland's combined sewer system network upstream of the Columbia Boulevard Wastewater Treatment Plant. The species identified from these sources and the potential for habitat at the site are listed in Table 3-5.

Table 3-5. National Oceanic and Atmospheric Administration Fisheries Threatened and Endangered Species

Common Name	Scientific Name	Listing Status	Habitat Description	Habitat Distance from VAMC
Chinook Salmon	*Oncorhynchus tshawytscha*	FT	Lower Willamette River	0.6 miles
Steelhead Trout	*Oncorhynchus mykiss*	FT	Lower Willamette River	0.6 miles

3.6.2 Environmental Consequences

3.6.2.1 Alternative A and Alternative B

Construction projects would occur on previously developed land and would require limited removal of vegetation. After reviewing information from USFWS and ODFW, it was determined that the site does not contain essential habitats for any of the state or federally listed species (USFWSa, 2021) (ODFW, 2021). Data maintained by eBird identifies the Olive-sided Flycatcher, Rufous Hummingbird, and Western Screech-owl as migratory bird species of conservation concern occurring near the Portland VAMC campus (The Cornell Lab of Ornithology, 2020). These bird species live and forage in forested and open woodland habitats.

Construction activities proposed under Alternative A and Alternative B and the continued operation of the Portland VAMC are not anticipated to significantly impact avian species or habitats. Nesting bird season for these species in Oregon is primarily between April 15 and July 31. Disturbance of vegetation will be avoided during this time in accordance with the Migratory Bird Treaty Act (MBTA) to avoid impacts to nesting birds, and limits of clearing will be clearly defined prior to construction activities. No measures (i.e., architectural features or deterrents) are proposed under either alternative to address the potential for bird collisions. Building 111 will require minimal tree removal with the anticipated footprint of the parking structure being approximately 27,000 square feet. No impacts to the wooded areas surrounding the campus that provide habitat connectivity with Marquam Nature Park are anticipated. As such, Alternative A and B would both have less than significant impacts to state or federally listed terrestrial species.

There is potential for federal and state listed fish species to occur within both the Lower Willamette River and Lower Columbia River. Based on the NOAA National Marine Fisheries Service (NMFS) EFH Mapper, EFH for the Chinook Salmon and Steelhead Trout is also located within these two rivers. No effects to EFH, listed species, or designated critical habitat are anticipated as a result of improvements described under the alternatives considered. This determination is based on the proximity of the project to aquatic habitat and the known stormwater pretreatment and BMP implementation as detailed under Section 3.5 Hydrology and Water Quality and wastewater NPDES treatment processes provided by the Columbia Boulevard Wastewater Treatment Plant before discharge to the Columbia River.

The Columbia Boulevard Wastewater Plant is operated in accordance with Oregon's NPDES Wastewater Discharge Permit Requirements and is required to meet state WQS as further described under Section 3.5 Hydrology and Water Quality. Many of Oregon's state WQS are derived from water quality criteria developed from research on salmonids, and Oregon's standards also require that water quality conditions protect species listed under the ESA Oregon Administrative Rule. Discharges and effluent associated with the proposed action into Portland's combined sanitary stormwater system will continue to be in accordance with the City of Portland's Columbia Boulevard Wastewater Treatment Plant NPDES wastewater discharge permit and self-monitoring program, which ensure ODEQ WQS are met and in accordance with OAR 340-041-0004 WQS: Beneficial Uses, Policies, and Criteria for Oregon 340-041-0004 Antidegradation Policy such that compliance with the ESA is maintained.

A further description of VA's determination of no effect to federally and state listed protected species is provided in Appendix C: VA CFM Project Review File - Endangered Species Act Section 7 Determination of No Effect.

3.6.2.2 No Action Alternative

Under the no action alternative, construction of the proposed action projects would not occur. Therefore, no additional impacts to wildlife or habitat over existing conditions would occur as a result of VA's continued actions.

3.7 Noise

3.7.1 Affected Environment

The existing noise environment around the Portland VAMC campus is dominated by vehicle traffic/parking, mechanical equipment, and routine landscaping and maintenance. In addition, there is intermittent, occasional noise associated with the helicopter pads at the OHSU Marquam Hill Campus, located approximately 500 feet north and 750 feet west of the Portland VAMC campus. No other notable noise-generating sources are present in the immediate vicinity. Sensitive noise receptors that could be affected by construction and operational noise from the Portland VAMC campus include Portland VAMC patients, visitors, and staff; nearby residences, parks, and churches; and the patients, visitors, and staff of the OHSU medical center. Residences located northeast and east of the VAMC campus are located 300 feet or more from the proposed construction areas. Residences south of the campus are located 100 feet or more from the proposed construction areas. Indoor noise levels with windows closed typically would be 15 decibels lower than outdoor levels (Jacobs and LRS Federal LLC, 2021).

The City of Portland enforces construction noise regulations. Construction noise is permissible from the hours of 7:00 a.m. to 6:00 p.m. from Monday through Saturday. Permissible construction noise levels are 85 decibels at a 50-foot distance. The few types of equipment which cannot meet the permissible level, such as jack hammers, concrete saws, and pile drivers, are exempt from this standard during this time period. The exempted equipment of Portland City Code Section 18.10.060 are not exempted from night, weekend, and legal holiday limitations that include from 6:00 p.m. to 7:00 a.m. the following morning, 6:00 p.m. Saturday to 7:00 a.m. the following Monday, and on legal holidays. Outside of regulated construction hours, construction noises must meet the baseline permitted decibel levels of the area in which the work is taking place (LRS Federal LLC, 2021e). For activities that make more noise than the code allows, or if construction takes place outside of the permitted construction hours, VA would apply for a noise variance to obtain permission via the City of Portland (City of Portland, Oregon).

3.7.2 Environmental Consequences

3.7.2.1 Alternative A and Alternative B

Construction and demolition activities associated with the proposed projects will require the use of a variety of noise-generating equipment, including cranes, excavators, and compactors. The seismic retrofit activities included under Alternative B will include the installation of additional piles and new pile-supported foundations which will require the use of pile drivers. Pile driving has the potential to emit a noise level of 101 A-weighted decibels (dBA) at 50 feet (Jacobs and LRS Federal LLC, 2021).

Compliance with the City of Portland's construction noise regulations would only allow construction-related noise to occur between 7:00 a.m. and 6:00 p.m. Monday through Saturday, with the exception of emergency work. Although it is not anticipated that any work would generate noise outside of the City of Portland's construction noise regulations, permissible construction noise regulations would require VA to apply for a noise variance and obtain permission via the City of Portland (City of Portland, Oregon). BMPs would be incorporated into the proposed action to mitigate noise, including complying with VA's "Temporary Environmental Controls" specifications and the City of Portland Noise Regulations. Additional BMPs would include:

- coordinating proposed construction activities in advance with nearby sensitive receptors;
- limiting construction and associated heavy truck traffic to occur between 7:00 a.m. and 6:00 p.m. on Monday through Saturday;
- locating stationary operating equipment as far away from sensitive receptors as possible;

- selecting material transportation routes as far away from sensitive receptors as possible;
- shutting down noise-generating heavy equipment when it is not needed;
- maintaining equipment per manufacturer's recommendations to minimize noise generation;
- utilizing broadband, self-adjusting backup alarms in lieu of backup-beepers consistent with applicable safety requirements;
- encouraging construction personnel to operate equipment in the quietest manner practicable (Jacobs and LRS Federal LLC, 2021).

There are no significant long-term operational noise impacts associated with the proposed projects. Minor increases to noise levels generated by employee and patient vehicular traffic, HVAC systems, ground maintenance equipment and activities, emergency vehicles, and infrequent use of generators are not anticipated to generate a significant noise impact for the area surrounding the Portland VAMC campus (Jacobs and LRS Federal LLC, 2021).

3.7.2.2 No Action Alternative

Under the no action alternative, construction of the proposed action projects would not occur. No impacts to noise levels in the region would occur as a result of VA's actions.

3.8 Land Use

3.8.1 Affected Environment

The Portland VAMC campus is located on approximately 28.5 acres of developed land and includes 12 buildings, one below-grade parking garage (Building 102), one above-grade parking garage (Building 108), and ten surface-level parking lots. The VAMC campus is located adjacent to the OHSU campus in a mixed use, institutional, residential, and recreational urban area. The northern, eastern, and southern perimeter of the VAMC campus is wooded and slopes steeply toward a scenic roadway called SW Terwilliger Boulevard.

The Portland VAMC is currently zoned Central Employment (EX) Institutional Campus (IC) with a Design (d) Overlay District. The mostly wooded northern, eastern, and southern portions of the Portland VAMC also include Environmental Conservation (c) or Environmental Protection (p) Overlay Districts. The Portland VAMC is a suitable use for the EX IC zoning district. The Design Overlay District is intended to conserve and enhance areas of the City of Portland with special scenic, architectural, or cultural value. Environmental Conservation/Protection (c/p) Overlay Districts are intended to conserve important resources while allowing environmentally sensitive development. According to the Portland Bureau of Development Services, local zoning related regulations within the City of Portland do not apply to federally owned land such as the Portland VAMC campus (LRS Federal LLC, 2021b).

3.8.2 Environmental Consequences

3.8.2.1 Alternative A and Alternative B

The proposed projects would include construction of a Specialty Care Building and a parking garage which are partially located within the Environmental Protection Overlay District; however, the proposed building locations are mostly developed with asphalt-paved parking lots. Although local zoning related regulations do not apply to federally owned land such as the VAMC, the VA intends to comply with the intent of these regulations, to the extent practicable. Only minor disturbance to undeveloped areas is anticipated, resulting in less than significant impacts to land use (LRS Federal LLC, 2021b). Figure 3-3 below shows the local zoning codes for the Portland VAMC and surrounding areas.

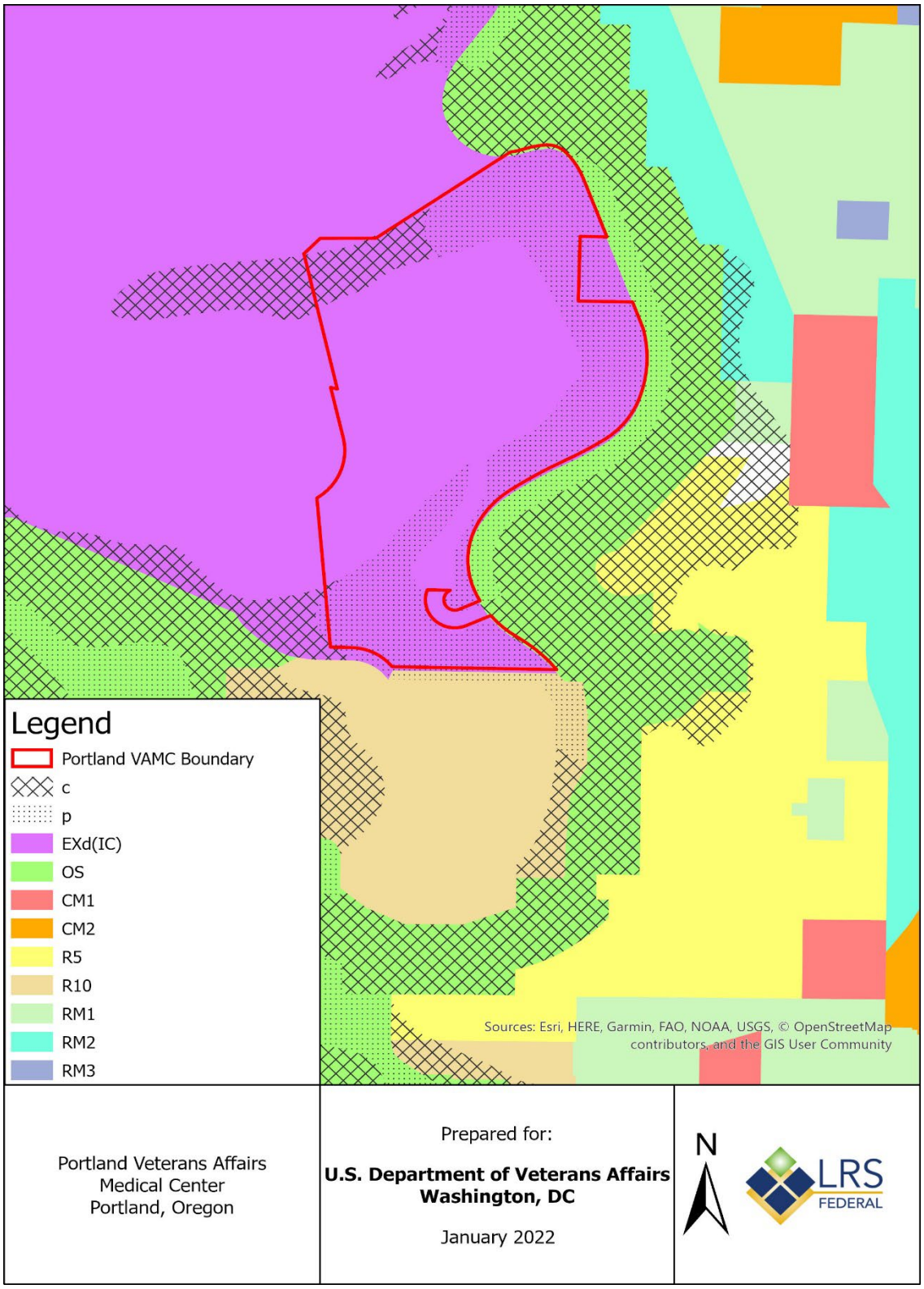

Figure 3-3. Portland Zoning Map

Although VA is not subject to local zoning regulations or restrictions, the proposed action projects would be consistent with the Portland VAMC campus and surrounding area developments and the overall land use and land use compatibility statement (LUCS) would not change as a result of the proposed action (LRS Federal LLC, 2021e). A LUCS may be provided by VA as part of the ODEQ permitting process in order to demonstrate consistency with the existing LUCS process.

3.8.2.2 No Action Alternative

Under the no action alternative, construction of the proposed action projects would not occur. No impacts to land use of the site would occur as a result of VA's actions.

3.9 Floodplains, Wetlands, and Coastal Zone Management

3.9.1 Affected Environment

According to the Federal Emergency Management Agency (FEMA) floodplain mapping, the Portland VAMC campus and surrounding properties are not located in the 100-year or 500-year floodplains (LRS Federal LLC, 2021b). The Portland VAMC is not located within the designated coastal zone boundary (Oregon.gov, 2021).

The Portland VAMC campus is in the Marquam-Woods sub-watershed of the Willamette River Watershed. The nearest traditional navigable water (TNW) to the Portland VAMC is the Willamette River, located approximately 0.6 miles east of the campus. Two drainage features were identified on site that discharge directly into the combined stormwater-sanitary sewer system, which conveys stormwater runoff to the Columbia Boulevard Wastewater Treatment Plant (LRS Federal LLC, 2021b). The drainage features [feature W and feature S (Parametrix Engineering, Planning, Environmental Sciences, 2020)] convey stormwater runoff from adjacent roads, paved parking lots, and adjacent uplands downgradient to stormwater inlets. Surface water features and the combined stormwater-sanitary conveyance system located on the VAMC campus are depicted on Figure 3-2.

3.9.2 Environmental Consequences

3.9.2.1 Alternative A and Alternative B

No impacts to potentially jurisdictional drainage features or wetlands are anticipated as a result of construction activities proposed under Alternatives A and B. Feature S is located near the southwestern boundary of the VAMC campus and approximately 75 feet northwest of the proposed construction footprint for Building 108. Feature W is located along the southeastern boundary of the VAMC campus and approximately 325 feet east of the proposed Building 108 (Figure 2-1 and Figure 3-2). In the event that impacts to drainage features previously identified onsite are proposed during the design phase, a formal wetland and waters delineation would be required.

Level III requirements for offsite discharge to the combined sewer system, as defined in Section 1.3.6 of the 2020 SWMM, will require engineered controls to manage stormflow and connections to the receiving combined stormwater-sanitary system network. No significant impacts to floodplains, wetlands, or jurisdictional drainage features are anticipated as a result of construction or stormwater management controls proposed under Alternatives A and B. As described under Section 3.5 Hydrology and Water Quality, a site-specific SWPPP in accordance with ODEQ NPDES 1200-C Construction General Stormwater permit (LRS Federal LLC, 2021e) will be implemented during construction to mitigate the potential for downstream sedimentation and impacts to potentially jurisdictional drainage features. If any impacts are proposed in potentially jurisdictional water features or wetlands, a wetland/water delineation will be required for Clean Water Act permitting.

3.9.2.2 No Action Alternative

Under the no action alternative, construction of the proposed action projects would not occur. No impacts to floodplains, wetlands, and coastal zone management would occur as a result of VA's actions.

3.10 Socioeconomics

3.10.1 Affected Environment

Socioeconomics can be characterized as the demographics, employment, and income of a region. U.S. Census Bureau data from the 2019 American Community Survey 5-year estimates were used (U.S. Census Bureau, 2019). Oregon, Multnomah County, and Portland have similar demographic characteristics (Table 3-6). The percentage of individuals under 18 years of age is greatest for the State of Oregon and lowest for the City of Portland. The percentage of individuals over the age of 65 is roughly the same for the county and city and higher for the state. The percentage of minorities is roughly the same for the county and city and lower for the state. The percentage of Veterans is higher in the state than the county or city (U.S. Census Bureau, 2019).

Table 3-6. Population and Veteran Status

Geographic Area	Population	Population Under 18 Years	Population 65 Years and Over	Minority	Veterans
Oregon	4,129,803	21%	17.2%	24.3%	6.8%
Multnomah County	804,606	19%	13%	30.3%	4.6%
Portland	645,291	17.8%	12.8%	29.4%	4.4%

The median household income in Oregon is lower than the income for Multnomah County and the City of Portland (Table 3-7). The percent of households below the poverty level and unemployment rates are comparable for the state, county, and city (U.S. Census Bureau, 2019).

Table 3-7. Income, Poverty, and Employment

Geographic Area	Number of Households	Median Household Income	Percent Below Poverty Level	Unemployment Rate
Oregon	1,611,982	$62,818	13.2%	5.5%
Multnomah County	326,229	$69,176	13.8%	4.9%
Portland	268,718	$71,005	13.7%	4.8%

The only grade school within 0.5 miles of the campus is the Cedarwood Waldorf School (3030 SW 2nd Avenue), which is a private school located approximately 800 feet to the northeast. Additionally, there is a daycare facility, where children are present, located on the VAMC campus.

3.10.2 Environmental Consequences

3.10.2.1 Alternative A and Alternative B

Construction associated with the proposed action under Alternatives A and B would likely result in short-term, direct, and beneficial impacts to local employment and personal income. Construction would provide temporary construction jobs and could have short-term socioeconomic benefits to the immediate area and local economy.

Long-term beneficial impacts associated with the proposed projects include enhancing the health care experience for Veterans in the region.

It is not likely that there would be any impacts to child populations as a result of the proposed projects. The construction sites would be secured to prevent unauthorized access by children and others. BMPs would be implemented during construction to minimize and control construction noise, fugitive dust, and limit access to construction areas which would minimize adverse impacts to child populations, resulting in less than significant impacts.

3.10.2.2 No Action Alternative

Under the no action alternative, construction of the proposed action projects would not occur. No impacts to socioeconomics would occur as a result of VA's actions.

3.11 Community Services

3.11.1 Affected Environment

The Portland VAMC campus is located within the Portland Public Schools District. The only grade school within 0.5 miles of the campus is the Cedarwood Waldorf School (3030 SW 2nd Avenue), which is a private school located approximately 800 feet to the northeast.

The Portland Police and Fire Departments provide police and fire protection and emergency medical services to the Portland VAMC campus and its vicinity.

The Oregon Department of Transportation (ODOT) and Portland Bureau of Transportation (PBT) provide maintenance to primary roads and bridges in the vicinity of the Portland VAMC campus.

There are two recreational areas/parks that are located within the vicinity of the VAMC campus: SW Terwilliger Boulevard and Marquam Nature Park. SW Terwilliger Boulevard is a scenic roadway east and northeast of the campus and includes an overlook and a pedestrian/biking path. Marquam Nature Park is a 178-acre park located approximately 175 feet southwest of the campus.

The OHSU medical center and Doernbecher Children's Hospital (located on the OHSU campus) are the only major medical facilities located in the vicinity of the Portland VAMC campus. OHSU has two helipad areas, located approximately 500 feet north and 750 feet west of the Portland VAMC campus. These facilities are utilized for medical emergencies. The Portland VAMC does not provide emergency medical services, so construction activities on the campus would not impact these services for the area.

The Portland TriMet System provides public transportation to the vicinity of the Portland VAMC campus. The Portland Aerial Tram transports staff, patients, and visitors from the South Waterfront to the OHSU campus.

3.11.2 Environmental Consequences

3.11.2.1 Alternative A and Alternative B

The proposed Alternative A and Alternative B projects are not expected to place additional substantial demands on police, fire, emergency services, and other community services. There could be an increase in the use of public transportation, including the Portland TriMet System and Portland Aerial Tram. During construction, any potential partial road closures would be temporary and short-term. Closures would be coordinated with the Portland Police and Fire Departments and TriMet to prevent significant disruption to their services. Impacts to community services are anticipated to be less than significant as a result of the proposed action.

3.11.2.2 No Action Alternative

Under the no action alternative, construction of the proposed action projects would not occur. No impacts to community services would occur as a result of VA's actions.

3.12 Solid Waste and Hazardous Materials

3.12.1 Affected Environment

A Phase I Environmental Site Assessment (ESA) was conducted by LRS in January 2021. There are two recognized environmental concerns (RECs) associated with the Portland VAMC campus. The report identified a REC regarding the presence of asbestos-containing materials (ACMs) in Buildings 6, 16, 100, 101, T-41, T-51, and underground steam line vaults. There is also a REC associated with lead-based paint (LBP) present in Buildings 6, 16, and T-41. The known presence of radon and mercury on the VAMC campus was not further evaluated as they are not considered RECs by definition. Further, the proposed activities would not present conditions that pose a material threat of further release (LRS Federal LLC, 2021b).

There are four diesel fuel underground storage tanks (USTs) located on the Portland VAMC campus near the Energy Center and seven USTs are located within 0.25 miles of the campus; however, there are no leaking underground storage tank (LUST) cases associated with the USTs located on the VAMC campus, and there are no leaks or violations reported regarding the USTs at the surrounding facilities. Therefore, the Phase I ESA did not identify RECs in connection with USTs located on or in the vicinity of the VAMC campus (LRS Federal LLC, 2021b).

A Spill Prevention, Control, and Countermeasures (SPCC) Plan currently addresses the Department of Veterans Affairs' intent to prevent the discharge of chemicals and petroleum-based products into navigable waters and follows the guidelines described in 40 CFR 112 Final Rule for Oil Pollution Prevention and Response: Non-Transportation-Related Onshore and Offshore Facilities July 17, 2002, and related amendments to 40 CFR 112.

3.12.2 Environmental Consequences

3.12.2.1 Alternative A and Alternative B

The Alternative A and Alternative B proposed construction projects would not impact the USTs located on the Portland VAMC campus. During construction, the presence and use of petroleum and hazardous substances could increase the potential for accidental release or spill of oil, diesel, gasoline, and antifreeze. Standard construction BMPs would be implemented to mitigate and minimize potential impacts, including proper storage and appropriate labeling of petroleum products and hazardous materials in approved containers; storage of containers on a level and impervious surface; and use of secondary containment systems around fuel storage containers during refueling activities. Should a spill or release occur, any impacted soil would be properly handled per federal and state laws and regulations.

There are buildings containing ACMs and LBP which would need to be demolished as part of the proposed projects. ACM abatement would be handled by licensed contractors. Demolition of buildings containing LBP would require implementation of standard demolition BMPs to control dust to reduce dust emissions to less than significant levels.

Following construction there would not be a long-term and significant increase in the amount of hazardous waste generated by the Portland VAMC campus. Wastes generated after construction and during operation of the Portland VAMC would be managed in compliance with federal and state laws and regulations. Further, the applicable SPCC Plan must be reviewed and amended to reflect the proposed changes in facility design, construction, operation, and maintenance.

Based on the enforcement of BMPs during construction activities and the absence of long-term increases in hazardous waste at the site, the proposed actions are anticipated to result in less than significant impacts from solid waste and hazardous materials to the Portland VAMC and surrounding areas.

3.12.2.2 No Action Alternative

Under the no action alternative, construction of the proposed action projects would not occur. No impacts from solid waste or hazardous materials would occur as a result of VA's actions.

3.13 Traffic, Transportation, and Parking

3.13.1 Affected Environment

Traffic studies were completed in February 2021 and January 2022 for the Portland VAMC campus (LRS Federal LLC, 2021c) and (LRS Federal LLC, 2022). The January 2022 traffic study was conducted to reflect the project components further considered in this EA, including the elimination of parking garage B112 from the proposed action. Major roads and roadways in the vicinity of the VAMC campus include:

- SW Terwilliger Boulevard
- SW U.S. Veterans Hospital Road
- SW Capitol Highway
- SW Sam Jackson Park Road
- SW Campus Drive
- S Gaines Street

The Portland VAMC is primarily accessed via SW Terwilliger Boulevard with secondary access from South Gaines Street. Traffic studies conducted for the Portland VAMC describe the current capacity of the roads and the existing level of service (LOS) for the study intersections. The LOS is based on the estimated delay at the intersection and ranges from A, the best, to F, which is the worst. For unsignalized intersections, the City of Portland's operational standards are an LOS of E or better, and for signalized intersections, the City of Portland's operational standards are an LOS or D or better. Table 3-8 lists the description of each level of service rating (LRS Federal LLC, 2022).

The current LOS (2020) is shown for each major intersection in the vicinity of the Portland VAMC campus (Table 3-5). The intersections of SW Terwilliger Boulevard with SW U.S. Veterans Hospital Road and SW Campus Drive currently perform at failing levels (LRS Federal LLC, 2022).

Table 3-8. Level of Service Descriptions

Level of Service	Description
A	Little or no delay
B	Little to no delay
C	Average delay
D	Delay is increasing and noticeable
E	Limit of acceptable delay
F	Major delay; characteristic of oversaturated conditions

3.13.2 Environmental Consequences

3.13.2.1 Alternative A and Alternative B

As shown in Table 3-9, the intersection of SW Terwilliger Parkway and SW Campus Drive and the intersection of SW Terwilliger Boulevard and SW U.S. Veterans Hospital Road do not meet Portland's minimum LOS requirements of an E or better, as specified above, in either the 2030 no-build or 2030 build scenarios (LRS Federal LLC, 2022).

Table 3-9. Level of Service at Major Intersections for Current (2020 conditions), No-build scenario and Proposed Action in 2030

Intersection	2020 (AM/PM)	2030 LOS, No-build (AM/PM)	2030 LOS, Build (AM/PM)
SW Terwilliger Boulevard and SW Sam Jackson Park Road	B/B	B/B	B/C
SW U.S. Veterans Hospital Road and S Gaines Street	A/A	B/A	B/B
SW 6th Avenue Drive and S Gaines Street	A/A	A/B	A/B
SW U.S. Veterans Hospital Road and SW Terwilliger Boulevard	F/E	F/F	F/F
SW Terwilliger Boulevard and SW Campus Drive	F/D	F/F	F/F
SW U.S. Veterans Hospital Road and Shipping/Receiving Access	A/A	A/A	A/B
SW U.S. Veterans Hospital Road and Building T-51	B/B	B/B	B/B
SW U.S. Veterans Hospital Road and Building 108 Driveway	A/A	A/B	A/C

Alternative A and Alternative B would provide an increase in parking capacity of approximately 600 additional parking spaces. These improvements would increase the available parking spaces for staff, patients, and visitors and improve access to the Portland VAMC while improving traffic flow on the campus (LRS Federal LLC, 2021c). Existing traffic conditions at the intersections described above are already not meeting traffic standards as a result of steady traffic on SW Terwilliger Boulevard. The proposed action could result in minor impacts to existing conditions with the projected increased traffic, but it would not be the primary cause of the failing LOS on the adjacent roadways in the project area. As such, the projected 2030 no-build scenario, when assuming one percent annual growth, would result in 10,831 average daily traffic (ADT) on SW Terwilliger Boulevard, an increase from 8,965 trips in 2011 for comparison. The proposed action is projected to result in a maximum of approximately 746 new trips for a total of 11,577 ADT on SW Terwilliger Boulevard, which would account for only 6.89% of the projected ADT in 2030. (LRS Federal LLC, 2021c). As a result, the proposed action would lead to minor impacts on traffic ADT along on SW Terwilliger Boulevard and associated intersections in 2030. Regardless of whether the proposed action is to be implemented, VA recognizes and supports the planning, discussion, and potential implementation of future non-VA traffic mitigation measures, in conjunction with the local communities and the City of Portland Bureau of Transportation, to address the existing operational issues at these intersections and improve traffic conditions.

Construction activities would result in short-term, minor to moderate traffic impacts. Prior to project construction, Traffic Management/Circulation and Mitigation Plans would be reviewed and approved by the VAMC for implementation. The plans would include traffic and parking management and mitigation measures, traffic flow plans, parking reconfigurations, schedules for off-peak delivery hours for construction equipment and supplies, and designated shuttle services for contractors as well as for VAMC staff as required. This would help to alleviate traffic issues and congestion during construction. Although not anticipated, VA would coordinate and obtain approval from the City of Portland on any temporary partial road closures resulting from construction activities.

3.13.2.2 No Action Alternative

Under the no action alternative, construction of the proposed action projects would not occur. No impacts to traffic, transportation, and parking would occur as a result of VA's actions.

3.14 Utilities

3.14.1 Affected Environment

A Utilities Identification and Capacity Report was completed in January 2021 for the Portland VAMC campus (LRS Federal LLC, 2021d). A description of the availability of utilities, including electric, natural gas, water, sewer, and telecommunications services, to the campus is summarized below.

Main data and backup data services are delivered to the Portland VAMC via 24 fiber optic lines. Voice services are delivered to the Portland VAMC via copper lines. Patient data services are delivered to the Portland VAMC via a single mode, 12 strand fiber optic line. There are four circuits in use with eight strands on the first cable and none on the second. Cable television service is only provided to Building T51 at the Portland VAMC. Dish television service is only provided to Building 100.

Electricity is provided to the Portland VAMC via two 12.47 kilovolts, 3 phase, 60 hertz feeders. The Preferred Feeder (GAINES) is an aerial No. 4/0 American Wire Gauge aluminum feeder. The Alternate Feeder (OHSU) is a No. 2 AWG aluminum feeder. The two feeders are sized to meet the existing peak demand of 5.041 megawatts.

Potable water is provided to the Portland VAMC via two, 8-inch connections located at S Gaines Street. The two, 8-inch connections feed a 10-inch ductile iron pipe, which provides a service loop to the Portland VAMC. Between the years 2014 to 2018, the most water used in one month by the Portland VAMC was 5,265,000 gallons. This is an average flow rate of approximately 118 gallons per minute which equates to a peak flow demand of approximately 472 gallons per minute. An 8-inch pipe can easily convey approximately 625 gallons per minute at a pipe velocity of 4 feet per second. Therefore, the connection to the Portland VAMC appears to be large enough to meet demand. Stormwater is discharged from the Portland VAMC via an 8-inch pipe and a 21-inch pipe. The 8-inch pipe discharges 7.85 cubic feet per second and the 21-inch pipe discharges 38.5 cubic feet per second of stormwater (KPFF Consulting Engineers Survey, 2019). Wastewater is discharged from the Portland VAMC via 8-inch and 15-inch pipes that feed into a 15-inch pipe and an 8-inch pipe that transitions to a 12-inch pipe. The 15-inch pipe discharges 35.8 cubic feet per second and the 12-inch pipe discharges 38.2 cubic feet per second of wastewater (KPFF Consulting Engineers Survey, 2019). The Portland Bureau of Environmental Services regulates industrial discharges to the Columbia Boulevard Wastewater Treatment Plant. Facilities that are major dischargers of wastewater other than sanitary wastes into the Columbia Boulevard Wastewater Treatment Plant are required to obtain a permit. The VAMC facility has previously corresponded with the City Bureau and does not require a Pretreatment Permit with the Portland Bureau of Environmental Services for discharges to sanitary sewers but must follow the City's Ordinance Title 17.34.070 Industrial Wastewater Discharge Permits.

Natural gas is provided to the Portland VAMC via a 4-inch diameter pipe. The 4-inch pipe has a capacity of up to 5,250 cubic feet per hour on a total developed length of 100 feet. The average monthly gas consumption at the Portland VAMC is 91,841 therms per month.

Steam is generated at the Portland VAMC via three, 500 horsepower boilers. The majority of steam produced at the Portland VAMC is intended for the supply of mechanical services within Buildings 100 and 101. The highest capacity on record for steam production at the Portland VAMC is 35,000 pounds per hour (LRS Federal LLC, 2021d).

3.14.2 Environmental Consequences

3.14.2.1 Alternative A and Alternative B

Proposed projects under Alternative A and Alternative B would increase the consumption of utilities, including electricity, natural gas, potable water, and stormwater/sanitary sewer discharges. These major utilities are already provided to the Portland VAMC campus and would likely have the capacity to meet forecasted demands; however, each utility provider would be required to review final designs and plans to determine if anticipated demands for utilities can be met. There are no significant impacts to utilities anticipated as a result of the proposed projects.

Also, the projects could include the installation of renewable energy systems; however, the design details are not currently available. Renewable energy sources could partially offset the increased consumption of electricity and natural gas.

3.14.2.2 No Action Alternative

Under the no action alternative, construction of the proposed action projects would not occur. No impacts to utilities would occur as a result of VA's actions.

3.15 Environmental Justice

3.15.1 Affected Environment

The USEPA-developed environmental justice screening and mapping tool, EJSCREEN, was used to identify and compare minority and low-income populations. These populations in the vicinity of the sites were compared to statewide data. A 5-mile buffer was applied around the Portland VAMC campus, located in USEPA Region 10. Table 3-10 summarizes the data from EJSCREEN (EPA, 2020).

Table 3-10. Summary of Environmental Justice Data

Demographic Indicator	Oregon	Portland VAMC Campus
Minority Population	24%	21%
Low-income Population	33%	24%

Based on the population data, the Portland VAMC campus is not located in an area with disproportionately high minority or low-income populations when compared to the State of Oregon.

3.15.2 Environmental Consequences

3.15.2.1 Alternative A and Alternative B

The Alternative A and Alternative B proposed projects would have less than significant environmental justice impacts. Minority and low-income populations within the vicinity of the Portland VAMC campus are comparable to that of the state. There would be short-term beneficial impacts to local employment and personal income during construction. Long-term effects of construction, including facilitation of high-

quality health care to Veterans in the region, would be beneficial to Veterans in the region, including those in minority and low-income populations.

3.15.2.2 No Action Alternative

Under the no action alternative, construction of the proposed action projects would not occur. No environmental justice impacts would occur as a result of VA's actions.

3.16 Cumulative Impacts

As defined by the CEQ Regulations in 40 CFR 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 action, without regard to the agency (Federal or non-Federal) or individual who 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)." 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 on resources that may often be manifested only at the cumulative level to the extent reasonable and practical. The land surrounding the Portland VAMC campus is primarily used for commercial and residential development. Aside from Marquam Nature Park and the wooded areas surrounding the VAMC, much of the land has already undergone ground disturbance. There are no additional projects or activities proposed in the immediate vicinity of the VAMC campus that would significantly impact the above-referenced wooded areas or surrounding vegetative communities. These projects are not anticipated to significantly impact any resource areas. Short-term and minor cumulative impacts to traffic are further discussed, as the future non-VA construction projects may impact some roadways in the vicinity of the Portland VAMC campus. The available development area of the VAMC campus is also quite constrained. Furthermore, the configuration and interconnected layout of the existing buildings, parking structures, roadways, and ramps increases the complexity of proposed future development.

There are a couple of upcoming sewer line construction projects proposed within 0.5 miles of the Portland VAMC campus. The purpose of these projects is to replace or repair aging infrastructure; restore Portland's watersheds; and reduce the possibility of sewage releases into homes, streets, rivers, and streams. Notably, the Woods Trunk Sewer Project would repair 1,700 feet of aging, large-diameter brick sewer pipes in South Portland, approximately 700 feet east of the VAMC campus. This project is anticipated to begin in early 2023 and last approximately one year. Construction activities for this project will be concentrated at existing manholes along the sewer alignment. Some project activities will require parking restrictions and road closures, leading to minor and temporary traffic delays. Impacted roads as a result of the Woods Trunk Sewer Project are located east of SW Terwilliger Boulevard. It is unlikely that there would be any cumulative impacts to SW Terwilliger Boulevard or roadways surrounding the VAMC campus.

The Sheridan Trunk Sewer Project is also scheduled to begin in 2023 and will relocate a mainline public sewer pipe from private property south of Sam Jackson Road near Duniway Park to improve sewage flows and increase accessibility for future maintenance. This project intersects SW Terwilliger Boulevard and may require restricting parking and closing travel lanes. Investigative activities will be performed to gather information and minimize construction impacts on residents, park users, and businesses. It is possible that construction related to this project could impact SW Terwilliger Boulevard, producing short-term, negligible traffic impacts due to concurrent construction.

These projects are primarily repair projects to existing infrastructure and will not produce considerable operational air emissions. Since they occur in areas of previous ground disturbance, it is unlikely that

there would be impacts to cultural or historical resources or geology and soils. Construction activities proposed at the Portland VAMC will not impact downstream stormwater conveyances or combined sewer line capacities. Beneficial cumulative impacts associated with the proposed action in conjunction with past, current, and future projects and development include negligible short- and long-term increased job opportunities associated with construction proposed between 2023 and 2024.

3.17 Potential for Generating Substantial Controversy

VA solicited input from various federal, state, and local government agencies regarding the proposed action. Several agencies provided input; none of which identified opposition to the proposed action.

It was recommended by Friends of Terwilliger, Homestead Neighborhood Association, and private citizens to perform additional NEPA review, especially related to traffic impacts to SW Terwilliger Boulevard and the surrounding area. There were additional concerns related to preserving the aesthetics of Marquam Hill and SW Terwilliger Boulevard and protecting the associated local wildlife corridors. VA has committed to minimizing tree removal to maintain the area's aesthetics and wildlife habitats that surround the VAMC campus. Additionally, existing local traffic volumes already exceed capacity, and traffic associated with upgrades to the Portland VAMC campus would minimally contribute to existing traffic volumes. During construction, VA will coordinate with the City of Portland to address short-term road closures or traffic delays.

4.0 Protection and Mitigation Measures

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, OR 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 as part of the ODEQ NPDES 1200-C Construction Stormwater permit to address erosion and sediment disturbance during construction.	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 per the 1200-C permit.	Regulatory requirement
	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 best management practices (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
	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
	Necessary traffic mitigation measures, such as engineered traffic control plans in coordination with the City of Portland Bureau of Transportation and/or ODOT, will be implemented.	Regulatory requirement
	Prior to construction, Traffic Management/Circulation and Mitigation Plans would be reviewed and approved by VA for implementation.	BMP
Utilities	Follow the City's Ordinance Title 17.34.070 for Industrial Wastewater Discharge Permits.	Regulatory requirement
Environmental Justice	None required.	

5.0 Public Participation

VA invites public participation in decision-making on new proposals through the NEPA process. Public participation is guided by the VA NEPA regulations (38 CFR Part 26) and with additional guidance provided in VA's NEPA Interim Guidance for Projects. Agencies, organizations, and members of the public with a potential interest in the proposed action are encouraged to participate.

5.1 Agency Coordination

VA coordinated with agencies regarding the proposed construction projects at the Portland VAMC starting in 2019. In May 2021, VA sent scoping letters to agencies, state, county, and municipal governments, including USEPA, U.S. Army Corps of Engineers, USDA, USFWS, NOAA, and ODEQ. There has been no additional correspondence with agencies or government officials.

In addition to the regulatory framework of NEPA, the CEQ Regulations Implementing the Procedural Provisions of NEPA, VA's NEPA regulations (38 CFR Part 26), and VA's NEPA Interim Guidance for Projects, various federal, state, and/or local environmental permits and approvals are required as part of the proposed action. This list may not be exhaustive and additional compliance requirements permits may be necessary. Appendix A provides the Regulatory Requirements Report for the proposed action.

5.2 Native American Consultation

VA sent scoping letters to federally-recognized Native American Tribes in the vicinity of the Portland VAMC campus, including Confederated Tribes of Siletz Indians of Oregon, Confederated Tribes of the Grand Ronde Community of Oregon, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation of Oregon, Cowlitz Indian Tribe, and Nez Perce Tribe. The Tribes did not respond to the scoping letters or submit scoping comments. There has been no additional correspondence with Native American Tribes.

5.3 Scoping

VA provided federal, state, and local agencies; the public; and potentially affected parties with an opportunity to participate in scoping. Scoping is a tool for identifying the issues that should be addressed during the NEPA and NHPA compliance processes. Scoping allows the agencies, public, and stakeholders to help define priorities and express stakeholder and community issues to the agency through oral and written comments.

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 letters to federal, state, and local agencies; public officials; federally recognized Tribes; and special interest groups. Similar to the notices published in the newspaper, the letters included information on the proposed action, the comment period, and instruction on submitting comments.

During the public scoping period, VA received written input from eight commenters or interest groups. Table 5-1 summarizes the comments received by resource area analyzed in this EA.

Table 5-1. Summary of Scoping Comments

Resource Area	Comment	Response
Aesthetics	Commenters expressed concern over the new parking spaces and their effect on the traffic and character of SW Terwilliger Boulevard. Stated that construction of Building 112 close to SW Terwilliger will likely cause a 'visual intrusion' on the park. Expressed concern for impacts to the visual corridor of SW Terwilliger Boulevard and from residential dwellings. Requested additional information regarding the visibility of any new structures, especially the proposed parking garages or any retaining wall or other visible structures, that can be seen from historic SW Terwilliger Boulevard.	Building 112 has been removed from the proposed action. The wooded area between SW Terwilliger Boulevard and the VAMC campus will remain intact and would provide a visual buffer between SW Terwilliger and construction and post-construction activities. All new developments will be designed to be aesthetically consistent with the surrounding buildings on the campus. See Sections 3.1, 3.3, and 3.6 for additional information.
Cultural and Historic Resources	Commenters stated that SW Terwilliger Boulevard is designated a 'Forest Corridor' and has been listed on the National Register of Historic Places and requested that all guidelines in the Marquam Hill Plan be utilized in the project. Suggested identifying potential use of Section 4(f) parks and recreational properties and the potential adverse impacts resulting from the project.	VA is aware of the 'Forest Corridor' and historic designation of SW Terwilliger Boulevard. The project will not directly impact the roadway, and the wooded area surrounding the roadway will be preserved. See Sections 3.3 and 3.6 for additional information.
Geology and Soils	Commenters recommended designing buildings for changing climate conditions and studying the potential of landslide and earthquake impacts resulting from the project. Expressed concern for soil stability and the potential for repercussions downhill of the site, including an increase in water runoff which could contribute to erosion, flooding, degradation of habitats, and potentially, landslides.	This project seeks to seismically upgrade buildings on the VAMC campus. New buildings will be designed to comply with the latest seismic standards. During construction, soil stabilization techniques will be utilized to reduce erosion. See Sections 3.4 and 3.5 for additional information.

Wildlife and Habitat	Commenters requested that all wildlife corridors be identified and studied for potential negative impacts, including potential impacts on the watershed, tree canopy, and stormwater systems in the area. Expressed concern for wildlife which use SW Terwilliger Boulevard as a migration corridor.	The wooded area surrounding the VAMC campus will remain intact. Any traffic impacts to SW Terwilliger Boulevard will be temporary. Stormwater from the site discharges to the combined sanitary-stormwater system and is treated at the Columbia Boulevard Wastewater Treatment Plant. See Sections 3.5, 3.6, and 3.13 for additional information.
Wildlife and Habitat / Land Use	Commenters expressed concern and request additional information related to potential tree removal impacts.	The proposed action would require minimal tree removal on the VAMC campus. The wooded area surrounding the campus would remain intact. See Sections 3.6 and 3.8 for additional information.
Noise	The commenter stated concern over construction noises and vibrations.	Construction activities would comply with the City of Portland's noise regulations, limiting working hours to 7:00 a.m. through 6:00 p.m. on Monday through Saturday. Although not anticipated, VA would obtain a variance for any noise generating work being proposed outside of permissible hours. See Section 3.7 for additional information.
Land Use	The commenter expressed concern for preserving the scenic and ecological values along the roadway which are intended by the open space zoning.	The wooded area surrounding the VAMC campus would remain intact. See Section 3.8 for additional information.
Community Services	The commenter expressed concern over the impact on emergency response vehicles from the addition	Any road closures as a result of the proposed action would be temporary and properly communicated with local

	of a thousand parking spaces to the VAMC campus.	emergency response services. Additionally, VA has reduced the number of new parking spaces being added as part of the proposed action to 600 parking spaces. These spaces will be created to address the current parking deficit on the campus. See Sections 3.11 and 3.13 for additional information.
Traffic, Transportation, and Parking	Commenters requested the completion of a traffic impact study, including a transportation plan, to understand the impacts of the project to SW Terwilliger Boulevard, Sam Jackson Park Road, and neighborhood streets and suggest adopting and providing alternative methods to travel to and from the hospital. Recommended a study to review the need for additional parking spaces, off-site impacts, including parking, air quality, noise, energy consumption, and neighborhood livability as a result of added traffic, and impacts to pedestrians and bicyclists. Suggested collaborating with other partners, such as OHSU, Tri-Met, and the City of Portland. Expressed concern and request additional information regarding the potential new signalized intersection or traffic controls, if any, that could negatively impact the SW Terwilliger Boulevard character, experience, and aesthetics.	A traffic study was conducted as part of the traffic impact analysis for the EA. No new signalized intersections are proposed by VA. See Section 3.13 for additional information.
Public Involvement	Commenters suggested adopting a 'Neighborhood Communication Plan' to collaborate with and inform the Homestead residents of upcoming construction impacts. Requested that the public comment period be extended to the end of the 2021 summer.	VA would communicate with the public throughout the project.

5.4 Public Review

VA will publish and distribute this Draft EA for a 30-day public comment period as announced by a Notice of Availability which will be published in The Oregonian newspaper on February 13 and February 14 of 2022**.** Review copies of the Draft EA will be available online at https://www.cfm.va.gov/environmental/index.asp and at Multnomah County Central Library. VA will respond to public comments in the Final EA.

6.0 Agencies and Persons Consulted

Affiliation	Contact	Address	Email and Phone Number
Federal Agencies			
U.S. Environmental Protection Agency, Region 10	Regional Administrator	1200 Sixth Avenue, Suite 155 Seattle, WA 98101	epa-seattle@epa.gov 206-553-1200
U.S. Army Corps of Engineers, Portland District	Bryan McClure, Project Manager	P.O. Box 2946 Portland, OR 97208-2946	Bryan.M.McClure@usace.army.mil 503-808-4206
USDA Natural Resource Conservation Service Oregon	State Conservationist	1201 NE Lloyd Blvd, Suite 900 Portland, OR 97232	jason.jeans@usda.gov 503-414-3222
U.S. Fish and Wildlife Service Oregon Fish and Wildlife Office	Paul Henson, State Supervisor	2600 SE 98th Avenue, Suite 100 Portland, OR 97266-1398	Paul_Henson@fws.gov 503-231-6179
NOAA Fisheries West Coast Region	Barry Thom, Regional Administrator	1201 NE Lloyd Blvd, Suite 1100 Portland, OR 97232	barry.thom@noaa.gov 503-231-6266
State Agencies			
Oregon Department of Environmental Quality (DEQ), Air Quality	Ali Mirzakhalili, Air Quality Division Administrator	700 NE Multnomah Street, Suite 600 Portland, OR 97232-4100	mirzakhalili.ali@deq.state.or.us 503-229-5696
Oregon DEQ, Drinking Water Protection Program	Julie Harvey, Drinking Water Program Coordinator	700 NE Multnomah Street, Suite 600 Portland, OR 97232	HARVEY.Julie@deq.state.or.us 503-229-5664
Oregon DEQ, Groundwater Protection Program	Justin Green, Water Quality Division Administrator	700 NE Multnomah Street, Suite 600 Portland, OR 97232	green.justin@deq.state.or.us 503-229-6834
Oregon DEQ, Environmental Cleanup Program	Jessika Cohen, Manager	700 NE Multnomah Street, Suite 600 Portland, OR 97232	cohen.jessika@deq.state.or.us 503-229-6258

Affiliation	Contact	Address	Email and Phone Number
Oregon DEQ, Hazardous Waste Program	David Livengood, Manager	700 NE Multnomah Street, Suite 600 Portland, OR 97232	david.livengood@state.or.us 503-229-5769
Oregon DEQ, Nonpoint Source Program	Gene Foster, Manager	700 NE Multnomah Street, Suite 600 Portland, OR 97232	FOSTER.Eugene@deq.state.or.us 503-229-5325
Oregon Department of Transportation, Region 1 – Portland Metro	Rian Windsheimer, Region 1 Manager	123 NW Flanders Portland, OR 97209	Rian.M.WINDSHEIMER@odot.state.or.us 503-731-8200
Oregon Department of Fish and Wildlife, Wildlife Division	Wildlife Division Administrator	4034 Fairview Industrial Drive SE Salem, OR 97302	ODFW.WildlifeInfo@state.or.us 503-947-6000
Oregon Health Authority, Drinking Water Services	Dave Emme, Manager	PO Box 14450 Portland, OR 97293-0450	david.h.emme@dhsoha.state.or.us 971-673-0405
Oregon State Historic Preservation Office	John Pouley, State Archaeologist	725 Summer St NE, Suite C Salem, OR 97301	john.pouley@oregon.gov 50-480-9164
Local Agencies			
Portland Bureau of Parks and Recreation	Adena Long, Director	1120 SW 5th Avenue First Floor Portland, OR 97204	parksbureaudirector@portlandoregon.gov 503-823-7529
Portland Bureau of Development Services	Rebecca Esau, Director	1900 SW 4th Avenue Portland, OR 97201	Director.Esau@portlandoregon.gov 503-823-7300
Portland Bureau of Environmental Services	Michael Jordan, Director	1120 SW 5th Avenue Suite 613 Portland, OR 97204	mike.jordan@portlandoregon.gov 503-823-7740
Portland Bureau of Planning and Sustainability	Andrea Durbin, Director	1900 SW 4th Avenue, Suite 7100 Portland, OR 97201	andrea.durbin@portlandoregon.gov 503-823-7700
Portland Water Bureau	Gabe Solmer, Director	1120 SW 5th Avenue, Suite 405 Portland, OR 97204	Gabriel.Solmer@portlandoregon.gov 503-823-7770
Portland Bureau of Transportation	Chris Warner, Director	1120 SW 5th Avenue, Suite 1331 Portland, OR 97204	Chris.Warner@portlandoregon.gov 503-823-1055
Portland Metropolitan Planning Entity (Metro)	Lynn Peterson, President	600 NE Grand Ave. Portland, OR 97232-2736	lynn.peterson@oregonmetro.gov 503-797-1700

Affiliation	Contact	Address	Email and Phone Number
Multnomah County Land Use Planning	Director	1600 SE 190th Avenue Portland, OR 97233	land.use.planning@multco.us 503-988-3043
Elected Officials			
U.S. Senate	The Honorable Jeff Merkley	531 Hart Senate Office Bldg. Washington, DC 20510	amy_amrhein@merkley.senate.gov 202-224-3753
U.S. Senate	The Honorable Ron Wyden	221 Dirksen Senate Office Bldg. Washington, DC 20510	juine_chada@wyden.senate.gov 202-224-5244
U.S. House of Representatives	The Honorable Earl Blumenauer	1111 Longworth House Office Bldg. Washington, DC 20515	liv.brumfield@mail.house.gov 202-225-4811
City of Portland	Ted Wheeler, Mayor	1221 SW 4th Ave Room 340 Portland, OR 97204	mayorwheeler@portlandoregon.gov 503-823-4120
City of Portland	Mingus Mapps, Commissioner	Portland City Hall 1221 SW 4th Ave Room 210 Portland, OR 97204	MappsOffice@portlandoregon.gov 503-823-4682
City of Portland	Carmen Rubio, Commissioner	Portland City Hall 1221 SW 4th Ave Room 220 Portland, OR 97204	Comm.Rubio@portlandoregon.gov 503-823-3008
City of Portland	Jo Ann Hardesty, Commissioner	Portland City Hall 1221 SW 4th Ave Room 230 Portland, OR 97204	joann@portlandoregon.gov 503-823-4151
City of Portland	Dan Ryan, Commissioner	Portland City Hall 1221 SW 4th Ave Room 240 Portland, OR 97204	CommissionerRyanOffice@portlandoregon.gov 503-823-3589
Tribes			
Confederated Tribes of Siletz Indians of Oregon	Delores Pigsley	PO Box 549 Siletz, OR 97380	dpigsley@msn.com 541-270-5017
Confederated Tribes of the Grand Ronde Community of Oregon	David Harrelson	8720 Grand Ronde Road Grand Ronde, Oregon 97347-9712	david.harrelson@grandronde.org thpo@grandronde.org 503-879-1630
Confederated Tribes of the	Carey L. Miller	46411 Ti'mine Way Pendleton, OR 97801	CareyMiller@ctuir.org 541-429-7234

Affiliation	Contact	Address	Email and Phone Number
Umatilla Indian Reservation			
Confederated Tribes of the Warm Springs Reservation of Oregon	Robert Brunoe	1233 Veterans Street PO Box C Warm Springs, OR 97761	robert.brunoe@ctwsbnr.org 541-553-2002
Cowlitz Indian Tribe	James Gordon	PO Box 2547 Longview, WA 98632	jgordon@cowlitz.org 360-353-9997
Nez Perce Tribe	Keith Baird	PO Box 365 Lapwai, ID 83540-0365	keithb@nezperce.org 208-621-3851
Local Community			
OHSU	Michael Harrison, Director of Local Government Relations	OHSU Government Relations, L101 3181 SW Sam Jackson Park Rd. Portland, OR 97239	harmicha@ohsu.edu 503-494-8681
Friends of Marquam Nature Park	Director	Friends of Marquam Nature Park PMB #191 6312 SW Capitol Highway Portland, OR 97239-1938	fmnp@comcast.net 971-599-3667
Friends of Southwest Terwilliger Boulevard	Director	16 SW Canby Portland, OR 97219	info@terwilligerfriends.org 503-293-1069
Homestead Neighborhood Association	Ed Fischer, President	Southwest Neighborhoods, Inc. 7688 SW Capitol Hwy. Portland, OR 97219	homestead@swni.org

7.0 List of Preparers

7.1 Department of Veterans Affairs Staff

Mr. Patrick Read
Environmental Engineer
Construction & Facilities Management
U.S. Department of Veterans Affairs

Mr. Héctor M. Abreu, AIC
Senior Historic Preservation Specialist
CFM, Historic Preservation Office
U.S. Department of Veterans Affairs

7.2 LRS Federal (Consultants)

Name	Role	Degree	Years of Experience
Jesse Byrd	Environmental Project Manager	BA, Environmental Studies	15
Kelly Culver	Project Review	MA, English	5
Karen Pearson	Project Review	MBA BS, Real Estate and Finance	25
Sara Schulkowski	Environmental Engineer	MS, Environmental Resources Engineering BS, Environmental Science and Technology	2

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9.0 Glossary

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 Clean Air Act to protect health and welfare.

Attainment area—Region that meets the National Ambient Air Quality Standard (NAAQS) for a criteria pollutant under the Clean Air Act.

Best management practices (BMPs)—Methods, measures, or practices to prevent or reduce environmental impacts.

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

Council on Environmental Quality (CEQ)—An agency in the 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. Develop and issue guidance for implementing the National Environmental Policy Act.

Cultural resources—The physical evidence of our Nation's heritage. Includes archaeological sites; historic buildings, structures, and districts; and localities with social significance to the human community.

Decibel (dB)—A unit of measurement of sound pressure level.

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 will 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 geological agents.

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.

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 materials—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 (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 the Clean Air Act.
>
> Any imminently hazardous chemical substance or mixture with respect to which the USEPA 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 CFR 302.4.

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

Listed species—Any plant or animal designated by a state or the federal government as a threatened, endangered, special concern, or candidate species.

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

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. Currently, six pollutants are regulated by primary and secondary NAAQS: carbon monoxide, lead, nitrogen dioxide, ozone, particulate matter, and sulfur dioxide.

Non-attainment area—An area that has been designated by the USEPA or the appropriate State air quality agency as exceeding one or more national or state ambient air quality standards.

Particulates or particulate matter—Fine liquid or solid particles such as dust, smoke, mist, fumes, or smog found in air.

Sensitive receptors—Include, but are not limited to 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.

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.

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.

A Appendix A: Permits

U.S. Department of Veterans Affairs

Portland Veterans Affairs Medical Center
Regulatory Requirements Report

February 2022

Prepared for:
U.S. Department of Veterans Affairs
Office of Construction and Facilities Management

Prepared by:
LRS Federal LLC

Table of Contents

Acronyms and Abbreviations

APE	area of potential effects
BMP	best management practice
CEQ	Council on Environmental Quality
dBA	decibel A
ESCP	Erosion and Sediment Control Plan
ISCP	Indirect Source Construction Permit
LRS	LRS Federal LLC
LUCS	Land Use Compatibility Statement
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NPDES	National Pollutant Discharge Elimination System
ODEQ	Oregon Department of Environmental Quality
ODOT	Oregon Department of Transportation
OHSU	Oregon Health and Science University
PBES	City of Portland Bureau of Environmental Services
PBT	Portland Bureau of Transportation
POTW	publicly-owned treatment works
PPR	Portland Parks and Recreation
Schwab	Schwab Engineering & Management
SHPO	State Historic Preservation Office
SWPPP	Stormwater Pollution Prevention Plan
TTL	TTL Associates, Inc.
U.S.	United States
VA	United States Department of Veterans Affairs
VAMC	VA Medical Center

1.0 Introduction

The United States (U.S.) Department of Veterans Affairs (VA) is considering implementation of several projects at the Portland VA Medical Center (VAMC). These potential projects, if authorized and approved, would be extended over six or more years as part of the Portland VAMC master plan. The Portland VAMC is located at 3710 Southwest U.S. Veterans Hospital Road in Portland, Multnomah County, Oregon.

1.1 Site Description

The Portland VAMC is an urban medical center located on Marquam Hill and is adjacent to the Oregon Health and Science University (OHSU) campus. The Portland VAMC is physically connected to OHSU by a pedestrian bridge. The Portland VAMC encompasses approximately 28.5 acres and is predominantly covered by buildings, paved parking lots, driveways, and forested hillsides.

Directly north and west of the Portland VAMC are OHSU and forested hillsides. Directly east and northeast of the Portland VAMC are SW Terwilliger Boulevard, residential homes, and forested hillsides. Directly south of the Portland VAMC are primarily forested hillsides and some residential homes.

1.2 Proposed Action

Seismic upgrades and improvements are proposed at the Portland VAMC to specifically correct seismic deficiencies, address federal setback requirements, improve HVAC and electrical distribution systems, and to provide sufficient parking facilities. The proposed action, which would allow the VAMC to properly serve and meet the current health care needs of Portland area Veterans, 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.

The proposed action would be implemented over an extended period of years and sequenced to minimize impacts to VAMC services and the surrounding community to the greatest extent practicable.

2.0 Regulatory Requirements

On behalf of the VA, LRS Federal LLC (LRS) identified federal environmental protection permits and authorizations required for proposed actions at the Portland VAMC. The U.S. Government is only required to apply for federal permits and authorizations; however, the U.S. Government must demonstrate, to the maximum extent practicable, consistency with state and local regulations, even if not applying for these permits and authorizations. Therefore, LRS has also identified state and local environmental protection permits and authorizations.

The Seismic Retrofit and Renovation at Buildings 100 and 101 Project Book dated 13 July 2019 (Schwab Engineering & Management [Schwab], 2019) and Draft Environmental Assessment of the Proposed Seismic Upgrade, Renovation, Modernization, and Expansion of the VA Portland Health Care System-Portland Campus dated 20 November 2019 (TTL Associates, Inc. [TTL], 2019) were referenced for the environmental protection permits and authorizations required for proposed actions at the Portland VAMC.

2.1 Environmental Protection Permits and Authorizations Required

In addition to the regulatory framework of the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA, VA's NEPA regulations (38 CFR Part 26), and VA's NEPA Interim Guidance for Projects, the following federal, state, and/or local environmental permits and approvals are required as part of the proposed action. While the federal government applies only for federal permits and authorizations, they must still demonstrate consistency with state and local regulations, even if not applying for these permits. This list may not be exhaustive and additional compliance permits may be required.

- National Pollutant Discharge Elimination System (NPDES) 1200-C Construction Stormwater Permit
    - This permit is required for land disturbances of one acre or more and includes an Erosion and Sediment Control Plan (ESCP) and a Stormwater Pollution Prevention Plan (SWPPP). Proposed improvements will likely disturb one acre or more of land.
    - The NPDES permit would require stormwater runoff and erosion management to protect surface water quality using best management practices (BMPs), such as earth berms, vegetative buffers and filter strips, and spill prevention and management techniques.
    - Additional information about this permit is available at: https://www.oregon.gov/deq/wq/wqpermits/Pages/Stormwater.aspx.
- National Emission Standards for Hazardous Air Pollutants (NESHAP)/Oregon Department of Environmental Quality (ODEQ) Permit for Asbestos Abatement
    - This permit is required for the abatement of asbestos. Proposed improvements at the Portland VAMC may require the renovation or demolition of structures containing asbestos.
    - Additional information about this permit is available at: https://www.oregon.gov/deq/Hazards-and-Cleanup/Pages/Asbestos-Forms.aspx.
- ODEQ Indirect Source Construction Permit (ISCP)
    - This permit is required for certain facilities, structures, or installations that indirectly cause air contaminant emissions by attracting vehicle activity. According to ODEQ, the Portland VAMC was issued an ISCP (Permit Number 26- 8109) in 1981 for 930 parking spaces. Oregon Rule 340-254-0040 requires an ISCP when 1,000 or more new parking spaces are developed at a facility within the boundaries of a carbon monoxide non-attainment or maintenance area. With an additional 600 spaces proposed, an ISCP will not be required.

  - Additional information about this permit is available at: https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=75684.

- City of Portland Land Use Compatibility Statement (LUCS)
  - A LUCS is used to determine if an ODEQ permit or approval will be consistent with local government plans and other regulations. According to the Portland Bureau of Development Services, local zoning related regulations within the City of Portland do not apply to federally owned land such as the Portland VAMC campus. Although VA is not subject to local zoning regulations or restrictions, the proposed action projects would be consistent with the Portland VAMC campus and surrounding area developments and the overall land use, and the LUCS would not change as a result of the proposed action.
  - To complete a LUCS, the applicant must complete Section 1 of the LUCS and submit it to a specific city or county office. After being reviewed and returned by either the city or county office, the applicant must submit a completed LUCS and any additional required information to ODEQ, along with the permit or approval request.
  - Additional information about this permit is available at: https://www.oregon.gov/deq/Permits/Pages/LUCS.aspx.

- City of Portland Bureau of Environmental Services (PBES) Stormwater/Sanitary Discharge Permit
  - PBES provides municipal combined stormwater/sanitary sewer services to the Portland VAMC. Discharge to the stormwater/sanitary sewer requires a permit from PBES in accordance with the Sewer and Drainage Facilities Design Manual and Stormwater Management Manual. Proposed projects at the Portland VAMC require discharge to the combined stormwater/sanitary sewer.
  - Additional information about this permit is available at: https://www.portland.gov/code/17/39#toc--17-39-060-discharge-permits-and-other-authorizations-.
  - Compliance with this permit is achieved by following prescribed BMPs related to discharge of wastewater to the publicly-owned treatment works (POTW).

- Federal Aviation Administration Notice of Proposed Construction or Alteration
  - This permit is required for any construction or alterations which may affect navigable airspace. OHSU has two helipad areas, located approximately 500 feet north and 750 feet west of the Portland VAMC. Projects at the Portland VAMC may require construction in navigable airspace.
  - Additional information about this permit is available at: https://www.faa.gov/forms/index.cfm/go/document.information/documentid/186273.

- City of Portland Noise Regulations
  - Proposed projects at the Portland VAMC would generate noise. Proposed actions would require coordination in advance with nearby residences and businesses. Portland City Code Section 18.10.060, “Construction Activities and Equipment”, establishes regulations for construction noise in the City of Portland, which can be summarized as follows:
    - Permissible Hours and Noise Level – From 7 a.m. to 6 p.m. Monday through Saturday, the City permits 85 decibel A (dBA) at a 50-foot distance. Equipment that cannot readily comply (e.g., jack hammers, concrete saws, and pile drivers) are exempt from the standard during this time period.

        - Outside Permissible Hours – Work at other hours must meet the "baseline permitted decibel levels" of the area in which the work is taking place. Most activities would be in violation of the code for exterior work (e.g., clearing, grading, excavating, framing, roofing, and so forth) before 7 a.m., after 6 p.m., or on Sundays and the holidays such as New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving Day, and Christmas Day.
    - The City of Portland establishes a variance process for times when work must occur outside permissible hours. Noise regulations do not apply for emergency work, "…necessary to restore property to a safe condition following a public calamity, work to restore public utilities, or work required to protect persons or property from imminent exposure to danger." For non-emergency work outside permitted hours, projects may apply for a variance. Construction noise variances may be issued if the need is valid and there is ample notification to nearby neighbors.
    - Additional information is available at: https://www.portland.gov/code/18/10/060#:~:text=Maximum%20sound%20levels%3A%20No%20person,to%20trucks%20(see%20Section%2018.10.

2.2 Consultation Required

No permits are required from the following federal, state, and local agencies. However, consultation or coordination with the following tribes and federal, state, and local agencies could be required.

- Federally Recognized Native American Tribes
    - Proposed projects may affect Native American Tribes' land. VA should initiate consultation with Native American Tribes whose lands may be affected by the action or who may attach religious and cultural significance to affected properties. In addition, modifications to SW Terwilliger Boulevard could require consultation with Native American Tribes as they may have possible ancestral ties to the area.
    - There is a low risk of inadvertently discovering pre-contact cultural resources and a low risk for uncovering historic-period cultural resources during construction. Additional consultation with Native American Tribes could be required if an inadvertent discovery occurs.
    - Future consultation with Native American Tribes would be required if ground-disturbing activities (e.g., ground clearing for staging of materials, terrain reconfigurations or excavations) are proposed in areas outside of the direct area of potential effects (APE) for the VAMC.
- Oregon Parks and Recreation State Historic Preservation Office (SHPO)
    - No structures at the Portland VAMC are currently listed as properties eligible for the National Register of Historic Places (NRHP). The only structures identified to be 50 years old or older are Buildings 6, 16, and the stone masonry walls within the campus. However, these structures have been determined not eligible for the NRHP.
    - There is a low risk of inadvertently discovering pre-contact cultural resources and a low risk for uncovering historic-period cultural resources during construction. Additional consultation with SHPO could be required if an inadvertent discovery occurs.
    - SW Terwilliger Boulevard appears to be eligible for listing on the NRHP. Modifications to SW Terwilliger Boulevard could require a Memorandum of Agreement with the Oregon SHPO, Advisory Council on Historic Preservation, and other interested parties to mitigate adverse historic impacts to SW Terwilliger Boulevard.
    - Future consultation with SHPO would be required if ground-disturbing activities (e.g., ground clearing for staging of materials, terrain reconfigurations or excavations) are proposed in areas outside of the direct APE for the VAMC.

- Oregon Department of Transportation (ODOT), Portland Parks and Recreation (PPR), Portland Bureau of Transportation (PBT), and OHSU
    - PPR manages SW Terwilliger Boulevard and ODOT and PBT provide maintenance to primary roads and bridges in the vicinity of the Portland VAMC. OHSU is physically connected to the Portland VAMC and primary entrance is on SW Terwilliger Boulevard. Proposed improvements within the VAMC campus do not appear to impact SW Terwilliger Boulevard.
- Portland Police and Fire Departments and Portland TriMet System
    - Road improvements require coordination with the Portland Police and Fire Departments and Portland TriMet System to prevent significant disruption to their services. Proposed projects at the Portland VAMC could require temporary, partial road closures and detours.
- PBES
    - An "abandoned" section of storm sewer pipeline is located at the northern section of the Portland VAMC. During a site visit conducted in June 2018, flow was observed through the storm sewer pipeline assumed to be abandoned. PBES would need to be notified if this line is active and if there are any discrepancies so they can update their GIS maps.

3.0 References

Schwab Engineering & Management (Schwab) 2019. Seismic Retrofit and Renovation at Buildings 100 and 101 Project Book. July 13.

TTL Associates, Inc. (TTL) 2019. Environmental Assessment of the Proposed Seismic Upgrade, Renovation, Modernization, and Expansion of the VA Portland Health Care System-Portland Campus. November 20.

B Appendix B: Agency and Public Correspondence

B.1 Stakeholder Scoping Notice

DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington DC 20420

Date: May 5, 2021

Notice: Valued Stakeholders

Subject: Notice of Scoping and Stakeholder Involvement for the Proposed Seismic Upgrades and Improvements at the Portland VA Medical Center, Oregon

The U.S. Department of Veterans Affairs (VA) Office of Construction and Facilities Management (CFM) is gathering information to assist with the preparation of an Environmental Assessment (EA) as part of the Federal decision-making process for the proposed seismic upgrades and improvements at the Portland VA Medical Center (VAMC) at 3710 SW U.S. Veterans Hospital Road, Portland, Oregon (Figure 1). The proposed upgrades and improvements have been divided into multiple phases. Phase I projects have been authorized for design and potential construction (Figure 2). Phase II and Phase III projects are in conceptual development but have not been authorized for additional design or potential construction. The Phase I projects include the following:

- Design and construction of seismic upgrades to Building 100 (main hospital building), Building 101 (research/administration building), and Building 102 (underground parking garage that supports the road in front of Buildings 100 and 101).
- Replacement of the façade of Buildings 100 and 101.
- Building 102 improvements and realignment of the plaza and roadway to address physical security concerns.
- Construction of two additional parking levels at Building 108 (existing parking structure) to add approximately 150 parking spaces and resulting in a net gain of approximately 100 parking spaces for the VAMC campus.

The Phase II and Phase III projects are in the conceptual stage and may be authorized for future design and potential construction (Figure 2). These projects have limited conceptual details, they will be included and analyzed in the EA to the extent practicable. These projects include:

- Demolition of Building T-41, Building T-51, and Trailer 1 to provide space for the new construction.
- Construction of Building 110, an approximately 370,000 gross square foot

Specialty Care Building.

- Construction of Building 111, an approximately 450-space parking structure in the area south of Building 101.
- Construction of Building 112, an approximately 450-space parking structure near Building 16 and in the current location of surface parking Lot 4.
- Improvements and upgrades of the Energy Center such as boilers, chillers, cooling towers, and the electrical distribution system.
- Remaining structural and non-structural seismic upgrades including the renovation and modernization of Buildings 100 and 101 to achieve full seismic compliance.

As part of the federal decision-making process, VA will undertake an environmental assessment of the proposed action in compliance with the National Environmental Policy Act (NEPA). The VA is seeking input as part of the scoping process on issues to be addressed during the NEPA process, including environmental concerns.

NEPA requires that a federal agency provide the public with an opportunity to participate in the process of analyzing the impact of federal actions on the human environment. The purpose of this letter is to notify members of the community and other stakeholders of this opportunity to assist VA in identifying issues, including environmental concerns that may occur as a result of the proposed Federal action.

A public scoping comment period will be open through **June 11, 2021**. During this time, agencies and stakeholders are encouraged to submit written comments and input on the proposed action in order to help identify potential issues or concerns for consideration in the NEPA process. Submissions received during the scoping period will be considered in the NEPA compliance process.

Due to the on-going COVID-19 pandemic, all submissions should be sent/made via email to vacoenvironment@va.gov with the subject line “Portland VAMC Scoping.”

For more information, please contact Mr. Patrick Read at (202) 891-9713.

DARWIN G. GOODSPEED, FACHE
Director

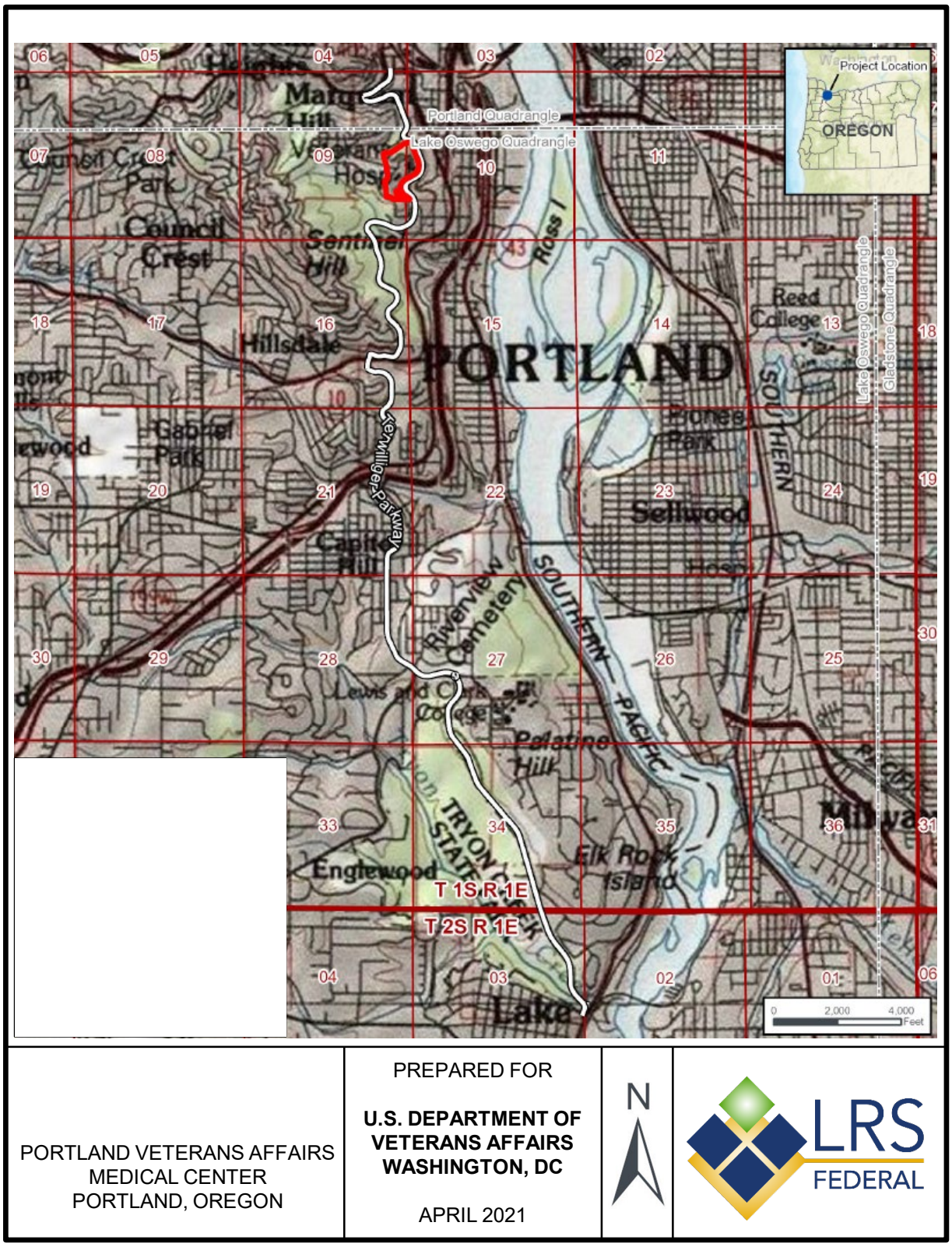

Figure 1. Topographic Map of the Portland VA Medical Center

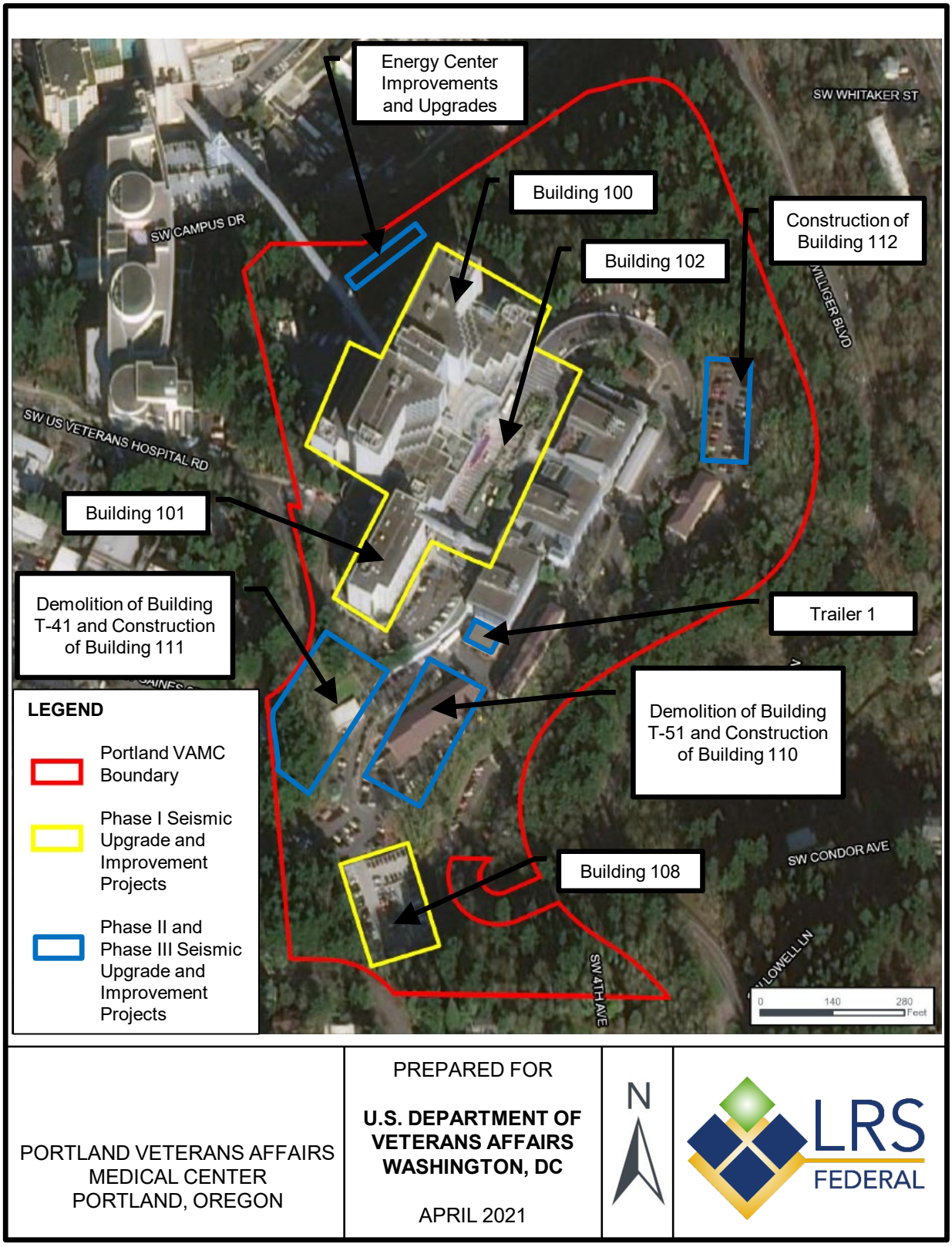

Figure 2. Aerial Image of the Portland VA Medical Center

B.2 Proof of Publication for Scoping Notice in The Oregonian

EMPLOYMENT

› GENERAL EMPLOYMENT

CONSUMER PRODUCTS

Art Director – NIKE, Inc., Beaverton, OR. Lead a team of multidisciplinary designers across multiple projects, working closely with both producers and narrators to deliver well-crafted and innovative creative designs. Apply at www.jobs.nike.com (Job #IR368).

CONSUMER PRODUCTS

Product Manager – NIKE, Inc., Beaverton, OR. Analyze data gathered and develop solutions to lead the creation of world class digital experience for athletes. Apply at www.jobs.nike.com (Job #IR375).

CONSUMER PRODUCTS

Senior Global Planner, Men's Footwear–NIKE, Inc., Beaverton, OR. Develop, integrate and provide forecasts for internal operations. Up to 25% international travel required. Apply at www.jobs.nike.com (Job #IR363).

DATA

Voice of Consumer Insights Analytics Manager – NIKE, Inc., Beaverton, OR. Collaborate with analytic teams, business partners, and external research partners to identify opportunities for improvement on consumer friction to optimize experiences. Apply at www.jobs.nike.com (Job # IR359)

ENGINEER

HDR Engineering, Inc., seeks a Traffic Engineer in Portland, OR. Req's: Master in Civil Engineering + 3mo exp in civil engineering or planning or Bach + 2 yrs exp. Req'd exp may be professional or intern and must include exp in transportation analysis & planning; Microstation; AutoCAD; GIS. PE not req'd. Background check. May be subject to pre-employment drug testing. Resumes to Allison Geiser, HDR, 1917 S 67th St, Omaha, NE 68106. Reference Job # 161453. Emp. Pd. Ad. EOE.

ENGINEERING

Electrical Engineer: Design & medium voltage systems & studies: load/flow, short/circuit, grounding, protective device coordination & arc flash; develop proposals: writing/reviewing tech specifications, drawing requirements, clarifications and exceptions & responses; interface w/team members; develop single-line/elevation drawings & schematics, arrangement & layout for protection and control, PV & wind farm collector, cable, conduit, and grounding systems; BS/Energy Engineering; PE or EIT, 7662 SW Mohawk St, Tualatin, OR; RRS, cv@5122512518.

ENGINEERING

Engineering Manager – NIKE, Inc., Beaverton, OR. Develop, configure, and test programs, systems and solutions in order to meet defined digital product specifications and direction. Apply at www.jobs.nike.com (Job #IR376).

ENGINEERING

Qorvo US, Inc. has an opening in Hillsboro, OR for Senior Design Engineer: Use simulation tools such as Agilent ADS, AWR Microwave Office and HFSS for design, and to create layout of HBT Power Amplifier, and Module laminate. Mail resumes to: Qorvo US, Inc., Attn: HR Connect, Ref# 20711.119, 2300 NE Brookwood Parkway, Hillsboro, OR 97124. Must include job Ref# 20711.119

ENGINEERING

Senior Software Engineer – NIKE, Inc., Beaverton, OR. Revolutionize the intersection of technology and the product line planning function by delivering an application ecosystem to produce, consume, and distribute data. Apply at www.jobs.nike.com (Job # IR367).

ENGINEERING

Senior Distributed Systems Data Engineer – NIKE, Inc., Beaverton, OR. Develops, configures, and tests programs, systems and solutions in order to meet defined digital data product specifications and direction. Apply at www.jobs.nike.com (Job# IR369).

ENGINEER - PRINCIPAL VERIFICATION (DESIGN)

Ampere Computing LLC is hiring a Principal Verification Engineer (Design) in Portland, OR. Subject to background check. Email resume to:careers@amperecomputing.com, Attn. B. Walls, Reference code 20210310VK.

ENGINEER

Senior Competence Engineer sought by ASML in Hillsboro, OR, to develop customer relationships, identify customer needs & how to address them & define & implement application solutions to address them. Master's degree in Applied Physics or a closely-related field & 2 yrs of exp in a semiconductor environment (within the area of lithography, patterning &/or metrology); excellent process knowledge (able to provide insight in process information, front till back end processes); technical background with ASML's tools & products; knowledge of semiconductor devices, processes & challenges; & up to 25% domestic & international travel required. Send resume to Attn: 25020-N, 2650 W. Geronimo Place, Chandler, AZ 85224.

HEALTHCARE

Mental Health Therapist (Bilingual Spanish/English), BestCare Treatment Services, Inc. Madras and Redmond, Oregon. Multiple Openings. Work as a member of a treatment team to provide a range of clinically appropriate services to adults, young people, and families. The majority of the clients served are Spanish-speaking. Diagnose and treat mental and emotional disorders related to and caused by substance abuse. Work will be performed at BestCare clinics in Madras and Redmond and will require weekly local travel within normal commuting distance. Apply at https://bestcaretreatment.org/employment-opportunities/.

IT

Amazon Web Services, Inc., an Amazon.com Company, has multiple openings in Portland, OR, for Cloud Support Engineer II positions in the following profiles/domains:
- Databases, Analytics, Big Data – Job Code: 59645-3
- Deployment, DMS – Job Code: 59645-1
- Linux – Job Code: 59645-2
- Storage & Content Delivery, Networking, Security – Job Code: 59645-5
- Windows – Job Code: 59645-4

Duties to incl: providing advanced remote tech support to customers by responding to difficult tech inquiries rel to large & production critical issues to propose solutions to/resolve root causes of cloud network/system issues; leading & overseeing documenting all varieties of corner case scenarios & troubleshooting of workflows in AWS internal knowledge databases. To apply: send resume to Amazon Web Services, Inc., ATTN: Hiring Manager – (insert applicable job code from above), PO Box 81226, Seattle, Washington, 98108-1300.

IT

Principal Solution Architect – NIKE, Inc., Hillsboro, OR. Design and develop IT architecture (integrated process, applications, data, and technology) solutions to business problems in alignment with the enterprise architecture direction and standards. Apply at www.jobs.nike.com (Job #358).

IT

Senior Systems Administrator, Wieden + Kennedy, Inc., Portland, OR. Maintain and administer computer networks and related computing environments. Manage design, implementation, and maintenance of all office systems and servers (hardware, software, and network infrastructure) at a global level. Oversee and set global IT initiatives to ensure IT Managers in each global office meet set initiatives. Diagnose, troubleshoot, and resolve hardware, software, and network infrastructure problems, including MediaOcean VPN/access issues. 5% domestic and international travel required. Apply online at https://www.wk.com/jobs/

› GENERAL EMPLOYMENT

IT-SOFTWARE

Advisory: KPMG LLP seeks Managers in our Portland, OR office. Positions require bachelor's degree or foreign equivalent from accredited college/university in Computer Science or related field plus 5 years experience in offered position or related occupation. Employer will accept a master's degree plus 2 years of experience in lieu of a bachelor's degree plus 5 years of experience. Any suitable combination of education, training, or experience is acceptable. Up to 100 % travel to various locations per business need. Two years of experience must include: Analyzing, identifying, designing, and implementing technology services, I.T. systems, and operational processes for state/local government clients; software Development Life Cycle (SDLC), including Agile implementations utilizing Scrum or Scaled Agile Frameworks (SAFe); business Process Model and Notation (BPMN) tools, including Sparx, Microsoft Visio, and ARIS; and project management and team collaboration tools, including SharePoint, JIRA, and Microsoft Teams. Interested? Apply online at http://us-jobs.kpmg.com/careers/FindALocation & type requisition number 58261 in the keyword search box. Should you have any difficulty in applying for this position through our website, please contact: us-hrscatsadmin@kpmg.com for assistance in the application process. If offered employment, must have legal right to work in the U.S. EOE. KPMG offers a comprehensive compensation and benefits package. No phone calls or agencies please. KPMG Affirmative Action, Equal Opportunity Employer, Minority/Female/Disability/Veteran. KPMG maintains a drug-free workplace. © 2021 KPMG LLP, a Delaware limited liability partnership and the U.S. member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity. All rights reserved.

MANAGEMENT - BUSINESS AFFAIRS

Senior Business Affairs Manager, Wieden + Kennedy, Inc., Portland, Oregon. Manage and negotiate all aspects of broadcast and digital productions. Secure legal clearances, negotiate terms, prepare contracts, and facilitate payments for commercial use of intellectual property, scale and over-scale celebrity talent, stock footage licensing, and Synchronization & Master Recording rights. 10% travel, including international, required. Apply online at https://www.wk.com/jobs/

MEDIA PRODUCTION

Broadcast Producer, Wieden + Kennedy, Inc., Portland, OR. Lead all aspects of international and domestic small and large productions, simultaneously for radio, interactive, and television media-based ad campaigns with multi-million dollar budgets. Actively manage day-to-day aspects of production projects, elevating creative tone throughout, developing detailed project schedules, managing project scope, documenting change requests, leading project meetings, reviewing all campaign deliverables for quality and accuracy, maintaining project documentation and identifying project risk. 50% travel, including international. Apply online at https://www.wk.com/jobs/

› GENERAL EMPLOYMENT

PHYSICIAN

Pacific Kidney & Hypertension, LLC d/b/a Oregon Kidney & Hypertension Clinic (Tigard, OR) seeks Physician. Reqs incl pro med deg, internal medicine residency, nephrology & transplant fellowship. Please email resumes to: Attn: HR physicianjobs@davita.com

RESTAURANT

Sushi Chef, Prepare sushi rice & sauces according to traditional Japanese sushi making methods. Select ingredients; store food and maintain supplies. Prepare sushi plates. FT, 40hrs/wk, 2pm-10pm in Portland, OR. **Min. reqmts**: Must have two years of experience in the job offered. Send resume to Mr. Masayuki Murata of Murata Corporation 200 SW Market Street P105 Portland, OR 97201

SOFTWARE

Senior Software Engineer – NIKE, Inc., Beaverton, OR. Develop, configure, and test programs, systems and solutions in order to meet defined digital product specifications and direction. Apply at www.jobs.nike.com (Job #IR365)

SOFTWARE

Senior Software Engineer – NIKE, Inc., Hillsboro, OR. Design, develop, configure, and test programs, systems and solutions in order to meet defined product roadmap deliverables. May telecommute. Apply at www.jobs.nike.com (Job #IR366)

SOFTWARE

Software Development Engineer – NIKE, Inc., Beaverton, OR. Develop, configure, and test programs, systems and solutions in order to meet defined digital product specifications and direction. Apply at www.jobs.nike.com (Job #360).

SOFTWARE

Software Engineer – NIKE, Inc., Beaverton, OR. Design, develop, configure, and test programs, systems and solutions in order to meet defined digital product specifications and direction. Apply at www.jobs.nike.com (Job #IR361).

PUBLIC NOTICES

› PUBLIC NOTICES GENERAL

Curry Health Network in Gold Beach, Oregon is soliciting RFQs for Hosted ERP Services. Email questions to rkenmark@itoptimizers.com or call 510.287.3922. The RFQ is available online at **http://www.curryhealthnetwork.com/getpage.php?name=RFP-RFQ** and the deadline for submissions is May 28, 2021.

PUBLIC NOTICES

U.S. DEPARTMENT OF VETERANS AFFAIRS
OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT

NOTICE OF SCOPING AND PUBLIC INVOLVEMENT UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT FOR THE PROPOSED SEISMIC UPGRADES AND IMPROVEMENTS AT THE PORTLAND VA MEDICAL CENTER, OREGON

The U.S. Department of Veterans Affairs (VA) Office of Construction and Facilities Management (CFM) is gathering information to assist with the preparation of an Environmental Assessment (EA) for the proposed seismic upgrades and improvements at the Portland VA Medical Center (VAMC) at 3710 SW U.S. Veterans Hospital Road, Portland Oregon. The proposed upgrades and improvements have been divided into multiple phases. Phase I projects have been authorized for design and potential construction. Phase II and Phase III projects are in conceptual development but have not been authorized for additional design nor potential construction. The Phase I projects include the following:
- Design and construction of seismic upgrades to Building 100, Building 101, and Building 102.
- Replacement of the façade of Buildings 100 and 101.
- Building 102 improvements and realignment of the plaza and roadway.
- Construction of two additional parking levels at Building 108.

The Phase II and Phase III projects are in the conceptual stage and may be authorized for future design and potential construction. These projects have limited conceptual details, however they will be included and analyzed in the EA to the extent practicable.

In accordance with the National Environmental Policy Act (NEPA), VA is seeking the public's input on issues to be addressed during the NEPA process, including alternatives and environmental concerns.

A public scoping period is open through **June 11, 2021** . During this time, the public is invited to submit comments on the proposed action and identify potential issues or concerns for consideration in the NEPA process. All submissions should be sent/made via email to vacoenvironment@va.gov with the subject line "Portland VAMC Scoping."

PUBLIC NOTICES

› PUBLIC NOTICES GENERAL

NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS
May 9, 2021
Washington County Office of Community Development
328 W. Main St., Suite 100, Hillsboro, OR 97123
(503) 846-8814 (voice); 1 (800) 735-1232 (TYY)

These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the **Housing Authority of Washington County and Washington County Office of Community Development** .

REQUEST FOR RELEASE OF FUNDS

On or about **Monday, May 24, 2021 Washington County Office of Community Development will** submit a request to the U.S. Department of Housing and Urban Development (HUD) for the release of Housing Choice Voucher Program funds as authorized by the United States Housing Act of 1937, Section 8 (c)(9), as amended, and as authorized by the 2008 Consolidated Appropriations Act, Public Law 110-161 as authorized under Section 8 (o)(19) of the United States Housing Act of 1937, as amended, for the purposes of attaching three (3) project-based Section 8 vouchers to be utilized at the Terrace Glen project located at 9640 SW Greenburg Road, Tigard Oregon.

FINDING OF NO SIGNIFICANT IMPACT

The **Washington County Office of Community Development** has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR) on file at **the Washington County Office of Community Development, 328 W. Main Street, Suite 100, Hillsboro, OR 97123**. Copies of the environmental review may be requested by calling 503-846-8814.

PUBLIC COMMENTS

Any individual, group, or agency disagreeing with this determination or wishing to comment on the project may submit written comments to the **Washington County Office of Community Development or at ann_hawkins@co.washington.or.us**. All comments received by **May 24, 2021** will be considered by the **Washington County Office of Community Development** prior to authorizing submission of a request for release of funds. Comments should specify which Notice they are addressing.

RELEASE OF FUNDS

The **Washington County Office of Community Development** certifies to HUD that Jennie H. Proctor in her capacity as **Program Manager** consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. HUD's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows the **Housing Authority of Washington County** to use Housing Choice Voucher Program funds.

OBJECTIONS TO RELEASE OF FUNDS

HUD will accept objections to its release of funds and the **Washington County Office of Community Development**'s certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of the RE; (b) the RE has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR Part 58; (c) the grant recipient has committed funds or incurred costs not authorized by 24 CFR Part 58 before approval of a release of funds by HUD; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58) and shall be addressed to HUD at 1220 SW 3rd Avenue, Suite 400, Portland, Oregon 97204. Potential objectors should contact HUD to verify the actual last day of the objection period.

Jennie Proctor, Program Manager,
Washington County Office of Community Development

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FINDING OF NO SIGNIFICANT IMPACT

The **Washington County Office of Community Development** has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR) on file at **the Washington County Office of Community Development, 328 W. Main Street, Suite 100, Hillsboro, OR 97123**. Copies of the environmental review may be requested by calling 503-846-8814.

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Jennie Proctor, Program Manager,
Washington County Office of Community Development

B.3 Oregon State Historic Preservation Office (SHPO) Correspondence

Oregon
Kate Brown, Governor

Parks and Recreation Department
State Historic Preservation Office
725 Summer St NE Ste C
Salem, OR 97301-1266
Phone (503) 986-0690
Fax (503) 986-0793
www.oregonheritage.org

November 16, 2020

Mr. Doug Pulak
Department of Veterans Affairs
Office of Construction and Facilities Management
Washington, DC 20420

RE: SHPO Case No. 20-1151
US Dept of Veterans Affairs, Seismic and Renovation Multiple Buildings
Seismic and renovations
3710 SW US Veterans Hospital Road, Portland, Multnomah County

Dear Mr. Pulak:

We have reviewed the materials submitted on the project referenced above, and we concur with the determination that Buildings 6, 16 and 41, as well as the stone masonry walls at the Portland VA Medical Center are not eligible for listing in the National Register of Historic Places. We also concur that there will be no historic properties affected for this undertaking.

This concludes the requirement for consultation with our office under Section 106 of the National Historic Preservation Act (per 36 CFR Part 800) for above-ground historic properties. Local regulations, if any, still apply and review under local ordinances may be required. Please feel free to contact me if you have any questions, comments or need additional assistance.

Sincerely,

Jason Allen, M.A.
Historic Preservation Specialist
(503) 986-0579
jason.allen@oregon.gov

cc: Alec Bennett, Department of Veterans Affairs

DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington DC 20420

September 30, 2020

Chrissy Curran
Deputy State Historic Preservation Officer
Oregon Parks & Recreation Department
725 Summer Street NE, Suite C
Salem, OR 97301

VIA EMAIL

RE: National Register of Historic Places Eligibility: Veterans Affairs Medical Center, Portland, OR

Dear Ms. Curran,

The VA Portland Health Care System, located at 3710 SW US Veterans Hospital Road, Portland, OR, is currently planning a seismic retrofit and renovation project on multiple campus buildings to address facility deficiencies and will initiate National Historic Preservation Act (NHPA) Section 106 consultation when the undertaking is more defined.

As part of project planning and overall site management, individuals meeting Secretary of the Interior Professional Qualifications at Wiss, Janney, Elstner Associates, Inc. (WJE) completed an evaluation of the Portland VA Medical Center to identify any historic properties on the campus. As the hospital was largely redeveloped in the late 1980s and 1990s, the assessment focused on the few remaining resources believed to be at least 50 years old: Buildings 6, 16, and 41, and stone site walls. Report sections 1 and 2 are the summary and detailed evaluation; sections 3 and 4 respond to the contract requirements but are not part of the evaluation. The report concludes that no resources on the site meet the criteria to be eligible for the National Register of Historic Places (NRHP) (see attached report and site map with the buildings and site walls labeled).

Pursuant to NHPA Section 110, VA is seeking concurrence from your office with its finding that there are no properties eligible for the NRHP at the Portland VA Medical Center.

Please contact me with any questions: doug.pulak@va.gov or 202/632-5462.

Sincerely,

9/30/2020

X Doug Pulak

Doug Pulak
Federal Preservation Officer
Signed by: Douglas D Pulak 106180

Attachments: Cultural and Historic Resources, Portland VAMC, November 2018; and site map

C Appendix C: VA CFM Project Review File - Endangered Species Act Section 7 Determination of No Effect

DEPARTMENT OF VETERANS AFFAIRS
Office of Construction & Facilities Management
Washington DC 20420

Date: February 3, 2022

From: Glenn Elliott, Director Environmental Programs
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management, Facilities Planning

To: CFM-Environmental project review file

Subject: Endangered Species Act Section 7: Determination of No Effect for the Portland, Oregon Veterans Affairs Medical Center Seismic Upgrades and Improvement Projects

Project Summary

The Portland Veterans Affairs Medical Center (VAMC) campus is located on approximately 28.5 acres of land and includes 12 buildings, one below-grade parking garage, one above-grade parking garage, and ten surface-level parking lots. The campus, first constructed in the early 1900s, sits near the top of Marquam Hill, south of downtown Portland and within a mile of the Willamette River. The northern, eastern, and southern perimeter of the VAMC campus is wooded and slopes steeply toward SW Terwilliger Boulevard, a scenic and historic roadway. Proposed construction projects on the campus are needed to correct seismic deficiencies, address federal setback and physical security requirements, and provide sufficient patient and staff parking facilities at the Portland VAMC to meet existing needs. This is a federal project through the Department of Veterans Affairs (VA), its actions are subject to Section 7(c) of the Endangered Species Act (ESA). This No Effect Documentation was developed on behalf of VA Office of Construction and Facilities Management (VA CFM) to address potential effects the proposed project may have on federally listed species and habitat protected by the ESA.

VA CFM has determined the proposed project would have **no effect** on species identified in the Official Species List for this site, obtained from the U.S. Fish and Wildlife Service (USFWS) and Oregon Department of Fish and Wildlife (ODFW) websites on November 16, 2021. VA CFM has determined that its proposed action will not affect a listed species designated critical habitat within the Lower Willamette River and Lower Columbia River.

Species and Habitat Information

Available information from USFWS and ODFW was reviewed to identify potential federally and state listed protected species on or in the vicinity of the Portland VAMC campus. Federally listed protected species include federally endangered (FE) and federally threatened (FT) species, and state listed protected species include state endangered (SE) and state threatened (ST) species. The USFWS Information for Planning and Consultation (IPaC) tool was reviewed for federally listed species, and a list from the ODFW website of state-identified threatened or endangered species for Oregon was reviewed to incorporate any additional species of interest. Species identified from these sources and their critical habitats are identified in Table 1. Additionally, federally and state listed fish species potentially occurring within the Lower Willamette River and Lower Columbia River are identified in Table 2.

Table 1. Federally and State Listed Species Potentially Occurring at the Proposed Site

Species	Habitat	Listing Status	Potential Habitat Present
Birds			
California Brown Pelican *Pelecanus occidentalis californicus*	Sea coasts	SE	No
Northern Spotted Owl *Strix occidentalis caurina*	Old-growth forests	FT, ST	No
Streaked Horned Lark *Eremophila alpestris strigata*	Prairie and open coastal habitat	FT	No
Yellow-billed Cuckoo *Coccyzus americanus*	Wooded habitat with dense cover and water nearby	FT	No
Mammals			
Kit Fox *Vulpes macrotis*	Chaparral, halophytic regions, and grasslands	ST	No
Washington Ground Squirrel *Urocitellus washingtoni*	Shrub-steppe	SE	No
Wolverine *Gulo*	Open forests and alpine areas	ST	No
Plants			
Bradshaw's Lomatium *Lomatium bradshawii*	Wet prairie habitats	FE	No
Kincaid's Lupine *Lupinus sulphureus ssp. Kincaidii*	Upland prairies	FT	No
Nelson's Checker-mallow *Sidalcea nelsoniana*	Soils that become saturated during the rainy season, with plants frequently becoming inundated for several weeks or longer	FT	No
Water Howellia *Howellia aquatillis*	Small vernal wetlands with firmly consolidated bottoms	FT	No
Willamette Daisy *Erigeron decumbens*	Deschampsia Caespitosa Valley prairie; clay soiled prairie in valley bottoms, often by creek drainages	FE	No

FE – Federally Endangered
FT – Federally Threatened
SE – State Endangered
ST – State Threatened

Table 2. Federally and State Listed Fish Species Potentially Occurring within the Lower Willamette and Lower Columbia Rivers

Common Name	Scientific Name	Listing Status	Designated Critical Habitat
Bull Trout	*Salvelinus confluentus*	FT	Yes
Eulachon/Smelt	*Thaleichthys pacificus*	FT	Yes
Green Sturgeon	*Acipenser medirostris*	FT	Yes
Columbia River Chum Salmon	*Oncorhynchus keta*	FT	Yes
Lower Columbia River Chinook Salmon	*Oncorhynchus tshawytsha*	FT	Yes
Lower Columbia River Coho Salmon	*Oncorhynchus kisutch*	SE, FT	Yes
Lower Columbia River Steelhead	*Oncorhynchus mykiss*	FT	Yes
Sockeye Salmon	*Oncorhynchus nerka*	FT	Yes

FT – Federally Threatened
SE – State Endangered

Additionally, the National Oceanic and Atmospheric Administration (NOAA) Fisheries website was utilized to identify Essential Fish Habitat (EFH) for threatened and endangered species in the area. Per NOAA EFH Mapper, fisheries resources identified by NOAA National Marine Fisheries Service (NMFS) for the Lower Willamette River and Lower Columbia River are the Chinook Salmon and Steelhead Trout, which are both listed as "threatened" under the ESA (Table 3). The Willamette River is located approximately 0.6 miles east of the Portland VAMC campus. There is no essential fish habitat located on the site or within the City of Portland's combined sewer system network located downgradient from the site.

Table 3. National Oceanic and Atmospheric Administration Fisheries Threatened and Endangered Species

Common Name	Scientific Name	Listing Status	Habitat Description	Habitat Distance from VAMC
Chinook Salmon	*Oncorhynchus tshawytscha*	FT	Lower Willamette River	0.6 miles
Steelhead Trout	*Oncorhynchus mykiss*	FT	Lower Willamette River	0.6 miles

FT – Federally Threatened

Regulatory Background

Stormwater discharge and site runoff requirements are regulated by both the State of Oregon's National Pollutant Discharge Elimination System (NPDES) program and the federal Environmental Protection Agency (EPA). Oregon Department of Environmental Quality (ODEQ) has also developed a Water Quality Standards (WQS) program in collaboration with NMFS and USFWS to not only comply with the requirements of the federal ESA but also to assist in salmonid recovery. Many of Oregon's state WQS are derived from water quality criteria developed from research on salmonids and require that water quality conditions protect species listed under ESA (Oregon Administrative Rule [OAR] 340-041-0042). Section 7 ESA and NMFS consultation was conducted by EPA during the development of the State of Oregon's WQS and NPDES program.

The City of Portland Bureau of Environmental Services (PBES) provides municipal combined stormwater/sanitary sewer services to the Portland VAMC. Discharge to the stormwater/sanitary sewer requires a permit from PBES in accordance with the Sewer and Drainage Facilities Design Manual and Stormwater Management Manual (2020). Portland VAMC would maintain compliance with the PBES permit by following prescribed best management practices (BMPs) related to discharge of wastewater to the publicly-owned treatment works (POTW). Stormwater design criteria and requirements for the proposed action will be in compliance with the City of Portland's Sewer and Drainage Facilities Design Manual and Stormwater Management Manual (2020). Both manuals require stormwater treatment technologies that meet water quality, infiltration, and/or flow control requirements to protect the integrity of the downstream stormwater system.

Discharges and effluent associated with the proposed action into Portland's combined stormwater/sanitary system will also continue to be in accordance with the City of Portland's Columbia Boulevard Wastewater Treatment Plant NPDES wastewater discharge permit and self-monitoring program, which ensure ODEQ WQS are met and in accordance with OAR 340-041-0004 WQS: Beneficial Uses, Policies, and Criteria for Oregon 340-041-0004 Antidegradation Policy such that compliance with the ESA is maintained.

The NPDES 1200-C Construction Stormwater Permit is required for land disturbances of one acre or more and includes an Erosion and Sediment Control Plan (ESCP) and a Stormwater Pollution Prevention Plan (SWPPP). Proposed improvements will likely disturb one acre or more of land. The NPDES permit would require stormwater runoff and erosion management to protect surface water quality using BMPs, such as earth berms, vegetative buffers and filter strips, and spill prevention and management techniques during construction.

Analysis of Effects

VA CFM determined that the site does not contain essential habitats for any of the state or federally listed species. Construction projects would occur on previously developed land on the Portland VAMC campus and would require limited removal of vegetation during construction. Construction activities proposed during the continued operation of the Portland VAMC are not anticipated to adversely impact state or federally listed avian species. Nesting bird season in Oregon is primarily between April 15 and July 31. Disturbance of vegetation will be avoided during this time to ensure no impacts to nesting birds occur and limits of clearing will be clearly defined prior to construction activities in accordance with the Migratory Bird Treaty Act (MBTA) requirements. No impacts to the wooded areas that border the VAMC campus are anticipated.

As of April 7, 2021, all projects must meet 2020 Storm Water Management Model (SWMM) requirements for project authorization. The SWMM contains local requirements that apply to all development, redevelopment, and improvement projects on private and public property and in the public right-of-way to protect the public stormwater system and meet clean water goals. Resulting effluent being deposited into the existing combined stormwater/sanitary conveyance system will continue to meet all applicable pretreatment requirements as specified in the 2020 SWMM and in accordance with the NPDES stormwater permit for the City of Portland. During construction the combined stormwater/sanitary conveyance system will be safeguarded from sediment loads and site runoff through the implementation of an approved site-specific ESCP and SWPPP in accordance with ODEQ NPDES 1200-C Construction General Stormwater permit.

Stormwater and sanitary discharges from the Portland VAMC are currently conveyed to the City of Portland's combined sewer system and discharged into the Columbia River following treatment at the Columbia Boulevard Wastewater Treatment Plant. The quality of effluent discharged from the treatment plant into the Columbia River meets Oregon and EPA NPDES waste discharge requirements and WQS, under NPDES permit number 101505. Stormwater from the VAMC will continue to meet these standards during and after the proposed construction and therefore, will not impact any federally or state listed species or designated critical habitats in the Lower Columbia River or Lower Willamette River.

Conclusions and Effect Determinations

Construction activities and improvements to the Portland VAMC campus and the continued operation of the Portland VAMC are not anticipated to affect federally or state listed species or critical habitats. Further, no effects to EFH or aquatic species are anticipated based on the proximity of the proposed projects to habitats for aquatic species, known stormwater treatment processes, and BMP implementation that occurs before indirect discharge to the Columbia River.