

## **APPENDIX A - LIST OF ENVIRONMENTAL PERMITS REQUIRED**

# LIST OF ENVIRONMENTAL PERMITS REQUIRED

## A.1 REGULATORY FRAMEWORK

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

- Endangered Species Act of 1973, as amended (7 USC 136; 16 USC 1531 et seq.).
- Energy Independence Security Act Section 438.
- Executive Order 11988, *Floodplain Management* (24 May 1977).
- Executive Order 11990, *Protection of Wetlands* (24 May 1977).
- Executive Order 12898, *Environmental Justice* (11 February 1994).
- Executive Order 13834, *Efficient Federal Operations* (17 May 2018).
- Farmland Protection Policy Act (7 USC 4201, et seq.)
- Federal Clean Air Act of 1990 (42 USC 7401 et seq., as amended).
- Federal Clean Water Act (Federal Water Pollution Control Act) of 1948, as amended (1972, 1977) (33 USC 1251 et seq.); Sections 401 and 404.
- Migratory Bird Treaty Act (MBTA; 16 USC 703-712, 3 July 1918; as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986, and 1989).
- Native American Graves Protection and Repatriation Act, as amended (25 USC 3001 et seq.).
- National Historic Preservation Act (NHPA) of 1966, as amended (36 CFR Part 800).
- Washington State Department of Ecology, National Pollution Discharge Elimination System (NPDES).
- Washington Administrative Code, Title 18, Air Pollution.
- Washington Administrative Code, Title 25, Archaeology and Historic Preservation, Department of.
- Revised Code of Washington, Title 70A, Environmental Health and Safety
- Washington Administrative Code, Title 173, Ecology, Department of.
- Washington Administrative Code, Title 197, Ecology, Department of (Environmental Policy, Council on).
- Washington Administrative Code, Title 220, Fish and Wildlife, Department of.
- Washington Administrative Code, Title 232, Fish and Wildlife, Department of (Wildlife).
- Washington Administrative Code, Title 254, Historic Preservation, Advisory Council on.
- Washington Administrative Code, Title 256, Historical Society, Eastern Washington State.
- Washington Administrative Code, Title 372, Ecology, Department of (Water Pollution).
- Washington Administrative Code, Title 508, Ecology, Department of (Water Resources).
- Stormwater Management Manual for Eastern Washington.
- Walla Walla Stormwater Management Program Plan (2017).

- City of Walla Walla Municipal Code, Title 8, Chapter 8.13, Noise Control.
- City of Walla Walla Municipal Code, Title 13, Chapter 13.06, Stormwater Management Utility – Regulations and Rates.
- City of Walla Walla Municipal Code, Title 13, Chapter 13.16, Construction and Post-Construction Stormwater.
- City of Walla Walla Municipal Code, Title 20, Zoning.
- City of Walla Walla Municipal Code, Title 21, Environment.

## **A.2 ENVIRONMENTAL PERMITS REQUIRED**

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*, federal, state, and/or local environmental permits that may be required as part of this Proposed Action include:

- WSDE, Water Quality Program (WQP), National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit.
- USEPA and WSDE Notification of Intent to Renovate/Demolish Form for asbestos abatement and building renovation/demolition.
- WSDE, Air Quality Program Notice of Construction.
- WSDE UST Section Permanent Closure Notice for Underground Storage Tanks for the removal of existing USTs.
- WSDE UST Section registration for new emergency generator USTs.

## **APPENDIX B – AGENCY CORRESPONDENCE**

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**From:** VACO Environment <VACOEnvironment@va.gov>  
**Sent:** Thursday, June 16, 2022 8:01 AM  
**Subject:** Notice of Scoping and Stakeholder Involvement for the Proposed Seismic Upgrades at the Jonathan M. Wainwright Memorial VA Medical Center, 77 Wainwright Drive, Walla Walla, Washington  
**Attachments:** Walla Walla VAMC Sesimic NEPA Scoping Stakeholder Letter.pdf

Dear Valued Stakeholder,

The U.S. Department of Veterans Affairs (VA) is proposing a project to perform seismic upgrades at the Jonathan M. Wainwright Memorial VA Medical Center (Walla Walla VAMC), located at 77 Wainwright Drive in Walla Walla, Washington. As part of the decision-making process, VA will prepare an Environmental Assessment (EA) to comply with the National Environmental Policy Act (NEPA). VA seeks your input on issues to be addressed during the NEPA process, including environmental concerns.

Please see the attached letter for additional project details and how to submit scoping comments.

Respectfully,

Glenn Elliott  
Director, Environmental Program Office  
Office of Construction and Facilities Management

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DEPARTMENT OF VETERANS AFFAIRS  
Office of Construction & Facilities Management  
Washington DC 20001

June 16, 2022

*Sent via email*

**SUBJECT: Notice of Scoping and Stakeholder Involvement for Proposed Seismic Upgrades at the Jonathan M. Wainwright Memorial VA Medical Center, 77 Wainwright Drive, Walla Walla, Washington**

Dear Valued Stakeholder:

The U.S. Department of Veterans Affairs (VA) proposes to perform seismic upgrades at the Jonathan M. Wainwright Memorial VA Medical Center (Walla Walla VAMC), located at 77 Wainwright Drive in Walla Walla, Washington (Figure 1). The purpose of the Proposed Action is to address existing seismic deficiencies at the Walla Walla VAMC. The Proposed Action is needed to improve safety for Veterans, staff, and visitors, and to ensure the continuity of health care services and administrative operations to Veterans in the event of a major earthquake.

Eight buildings within the central portion of the Walla Walla VAMC campus (Buildings 1, 68, 69, 74, 75, 77, 78, and 80), all constructed prior to modern seismic building codes, have been identified as structurally deficient and at risk of significant damage or failure from a seismic event. The locations of the eight seismic project buildings are shown on Figures 2 and 3. All eight project buildings, except Building 74, are considered contributing resources to the Fort Walla Walla National Register of Historic Places (NRHP) Historic District. VA proposes to rectify the seismically deficient buildings to meet current VA seismic standards through various combinations of seismic correction. Seismic correction methods being considered would include:

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

VA is preparing an Environmental Assessment (EA) to assess the potential environmental impacts associated with the Proposed Action in compliance with the requirements of the National Environmental Policy Act (NEPA). The EA will evaluate the potential direct and indirect impacts to the environment resulting from the Proposed Action, as well as cumulative impacts with other actions and projects.

Valued Stakeholder

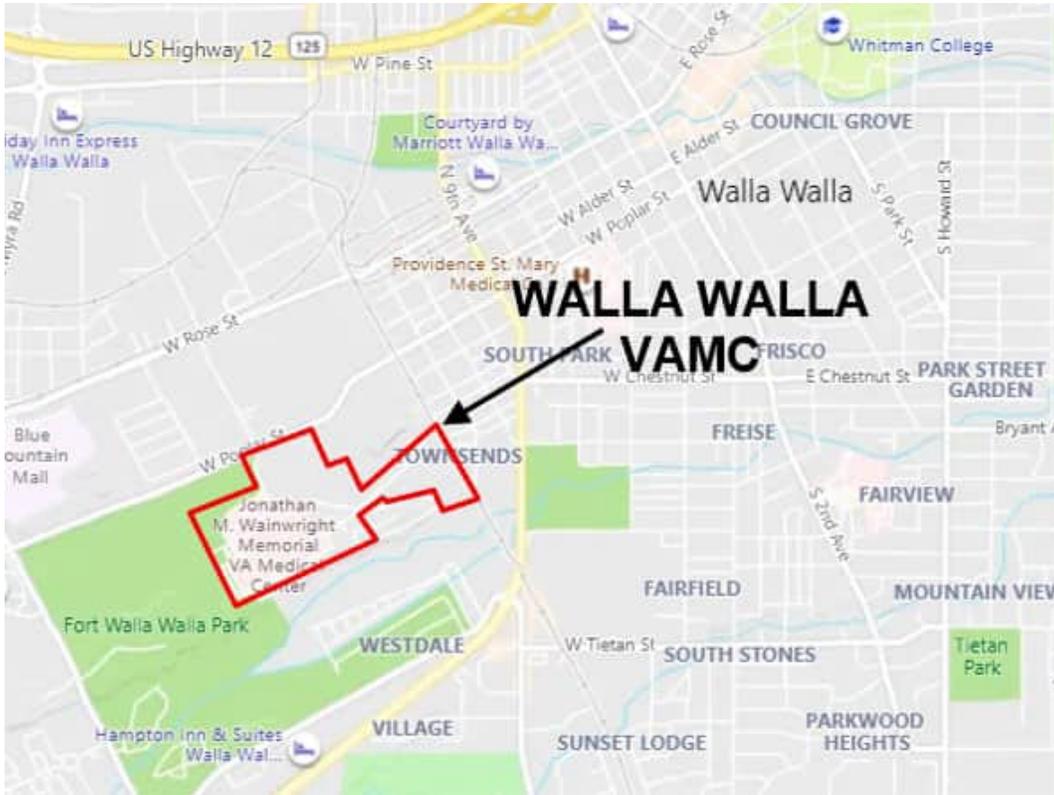
VA is also currently conducting National Historic Preservation Act Section 106 consultation with the WA State Historic Preservation Office, federally recognized tribes, and other parties regarding potential effects to historic properties as a result of the proposed undertaking and seeking ways to avoid, minimize or mitigate potential adverse effects. The Section 106 consultation process and conclusions will provide the major contribution to the EA's analysis of potential effects to historic and cultural resources.

If you have any of the following: comments on the scope of issues for analysis, input on potential alternatives, information or existing analyses relevant to the proposed action, information concerning historic properties at the Walla Walla VAMC please submit your comments or input via email to [vacoenvironment@va.gov](mailto:vacoenvironment@va.gov) with the subject line "Walla Walla VAMC Seismic Upgrade EA" by July 18, 2022. For additional information or questions, please contact Patrick Read, VA Environmental Engineer, at [patrick.read@va.gov](mailto:patrick.read@va.gov). Reference "Walla Walla VAMC Seismic Upgrade EA" in your correspondence. A copy of this scoping notice is also available online at the below website.

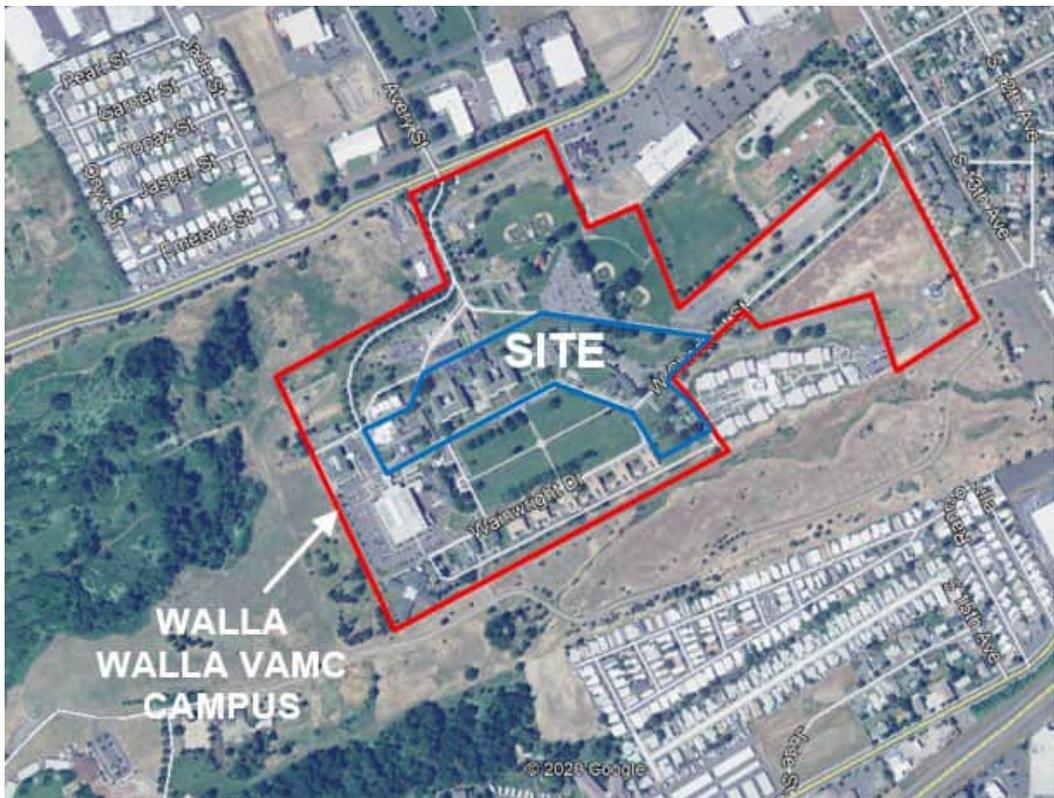
VA anticipates publishing the Draft EA for a 30-day public review and comment period in the Summer of 2022. VA will notify stakeholders via email/mail, publish a notice of availability of the Draft EA in the Walla Walla Union-Bulletin and solicit comments at that time. The Draft EA will be available for review at the City of Walla Walla Public Library (located at 238 E. Alder Street in Walla Walla, WA) and via the VA CFM website: <https://www.cfm.va.gov/environmental/>.

Respectfully,

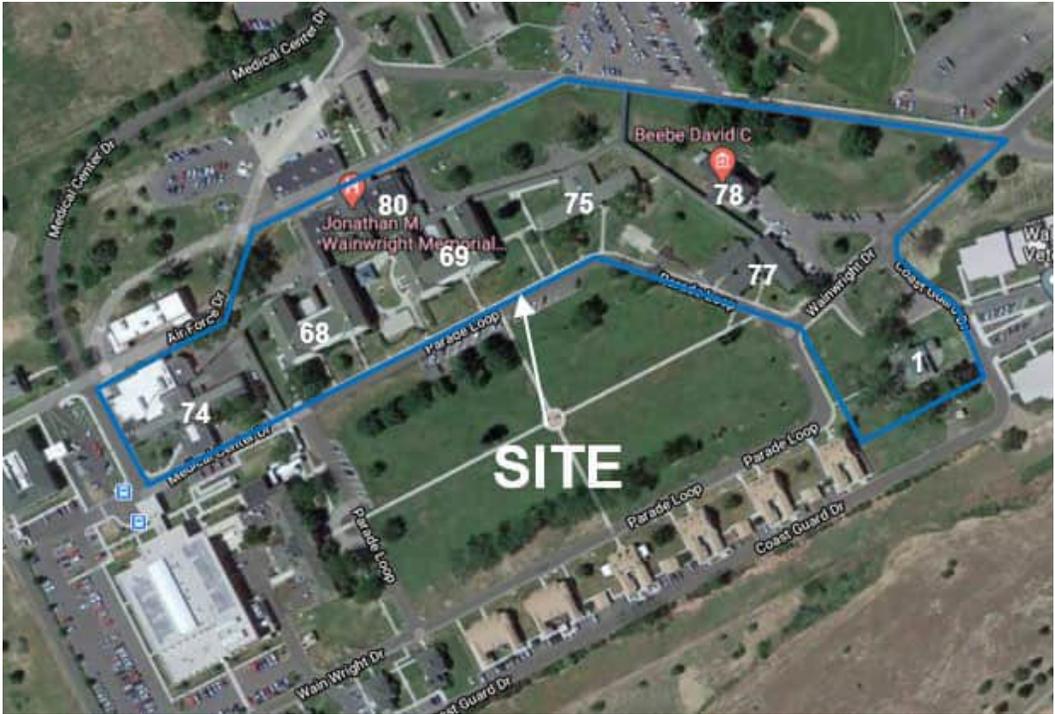
Glenn Elliott  
Director, Environmental Program Office  
Office of Construction and Facilities  
Management



**Figure 1: Regional Location of the Walla Walla VAMC**



**Figure 2: Aerial Photograph Location Map**



**Figure 3: Site Building Locations Map**

Name	Position	Organization	Address #1	Address #2	Email	Phone
Brad Thompson	State Supervisor	U.S. Fish & Wildlife Service - Washington Fish and Wildlife Office	510 Desmond Drive, Suite 102	Lacey, WA 98503-1263	WashingtonFWO@fws.gov	360-753-9440
Lt. Col. Richard T. Childers	Walla Walla District Commander	U.S. Army Corps of Engineers - Walla Walla District	201 N. 3rd Avenue	Walla Walla, WA 99362-1876	cenww-pa@usace.army.mil	509-527-7020
Casey Sixkiller	Regional Administrator	U.S. Environmental Protection Agency - Region 10	1200 6th Avenue, Suite 155	Seattle, WA 98101	sixkiller.casey@epa.gov	206-553-4470
Brook Beeler	Director	Washington State Department of Ecology - Eastern Region	4601 N. Monroe	Spokane, WA 99205-1295	brook.beeler@ecy.wa.gov	509-575-2610
Kathy Taylor	Program Manager	Washington State Department of Ecology - Air Quality	300 Desmond Drive SE	Lacey, WA 98503	kathy.taylor@ecy.wa.gov	360-407-6800
Annette Hoffman	Program Manager	Washington State Department of Ecology - Environmental Assessment Program	300 Desmond Drive SE	Lacey, WA 98503	annette.hoffmann@ecy.wa.gov	360-407-7537
Katrina Lassiter	Program Manager	Washington State Department of Ecology - Hazardous Waste and Toxics Reduction	300 Desmond Drive SE	Lacey, WA 98503	katrina.lassiter@ecy.wa.gov	360-407-6700
Joenne McGerr	Program Manager	Washington State Department of Ecology - Shorelands and Environmental Assistance	300 Desmond Drive SE	Lacey, WA 98503	joenne.mcger@ecy.wa.gov	360-407-6600
Laurie Davies	Program Manager	Washington State Department of Ecology - Solid Waste Program	300 Desmond Drive SE	Lacey, WA 98503	laurie.davies@ecy.wa.gov	360-407-6900
Carlos Clements	Program Manager	Washington State Department of Ecology - Spill Prevention, Preparedness, and Response	300 Desmond Drive SE	Lacey, WA 98503	carlos.clements@ecy.wa.gov	360-407-7455
Rebecca Lawson	Program Manager	Washington State Department of Ecology - Toxic Cleanup Program	300 Desmond Drive SE	Lacey, WA 98503	rebecca.lawson@ecy.wa.gov	360-407-7177
Vince McGowan	Program Manager	Washington State Department of Ecology - Water Quality Program	300 Desmond Drive SE	Lacey, WA 98503	vincent.mcgowan@ecy.wa.gov	360-407-6600
Mary Verner	Program Manager	Washington State Department of Ecology - Water Resources Program	300 Desmond Drive SE	Lacey, WA 98503	mary.verner@ecy.wa.gov	360-407-6872
Public Records Officer	Public Records Officer	Washington State Department of Ecology - Public Records Office	300 Desmond Drive SE	Lacey, WA 98503	PublicRecordsOfficer@ecy.wa.gov	360-407-6989
Dave Harsh	District Manager East	Washington Department of Natural Resources - Rivers Districts	P.O. Box 280	Castle Rock, WA 98611	aquaticcleaning_rivers@dnr.wa.gov	509-220-3009
Todd Walker	Manager	Washington Department of Natural Resources - Southeast Region	713 Bowers Road	Ellensburg, WA 98926-9301	southeast.region@dnr.wa.gov	509-925-8522
Joe Rocchio	Program Manager	Washington Department of Natural Resources - Natural Heritage Program	P.O. Box 047014	Olympia, WA 98504-7014	joe.rocchio@dnr.wa.gov	360-902-1041
Chris Donley	Director	Washington Department of Fish and Wildlife - Region 1	2315 North Discovery Place	Spokane Valley, WA 99216-1566	TeamSpokane@dfw.wa.gov	509-892-1001
Todd V. Trepanier	Regional Administrator	Washington State Department of Transportation - South-Central Region	2809 Rudkin Road	Union Gap, WA 98903-1648	TrepanTV@wsdot.wa.gov	509-577-1620
Tracy Hanger	District Conservationist	Natural Resources Conservation Service - Walla Walla Service Center	325 N. 13th Avenue	Walla Walla, WA 99362	Tracy.Hanger@usda.gov	509-522-2752
Renee Hadley	District Manager	Walla Walla County Conservation District	325 N. 13th Avenue	Walla Walla, WA 99362	Renee.Hadley@wwccd.net	509-956-3756
Kathy Covey	Chief Executive Office	Blue Mountain Action Council	8 E. Cherry Street	Walla Walla, WA 99362	kathyc@bmacww.org	509-529-4980
Ron Dunning	Commissioner - District 3	Port of Walla Walla - District 3	310 A Street, Walla Walla Regional Airport	Walla Walla, WA 99362-2269	rd@portwallawalla.com	509-520-1373
Adrian Sutor	Supervisor	Walla Walla Public Works - Water Distribution Services	55 E. Moore Street	Walla Walla, WA 99362	asutor@wallawallawa.gov	509-527-4380
Jason Mings	Streets Supervisor	Walla Walla Public Works - Wastewater	55 E. Moore Street	Walla Walla, WA 99362	jmings@wallawallawa.gov	509-527-4363
Jason Mings	Streets Supervisor	Walla Walla Public Works - Streets	55 E. Moore Street	Walla Walla, WA 99362	jmings@wallawallawa.gov	509-527-4363
Brian Morgenroth	Stormwater Coordinator	Walla Walla Public Works - Stormwater Program	55 E. Moore Street	Walla Walla, WA 99362	bmorgenroth@wallawallawa.gov	509-527-4363
Ki Bealey, P.E.	Director	Walla Walla Public Works	55 E. Moore Street	Walla Walla, WA 99362	pwinfo@wallawallawa.gov	509-527-4463
Andy Coleman	Director	Walla Walla Parks and Recreation	15 North 3rd Avenue	Walla Walla, WA 99362	acoleman@wallawallawa.gov	509-527-4527
J. Preston Frederickson	Director	Walla Walla Development Services	55 E. Moore Street	Walla Walla, WA 99362	echamberlain@wallawallawa.gov	509-527-4735
Tom Scribner	Mayor	City of Walla Walla	15 North 3rd Avenue	Walla Walla, WA 99362	tscribner@wallawallawa.gov	509-527-4423
Brenda Bernards	Chair	Walla Walla Planning Commission	15 North 3rd Avenue	Walla Walla, WA 99362	permits@wallawallawa.gov	509-524-4710

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**From:** VACO Environment <VACOEnvironment@va.gov>  
**Sent:** Thursday, June 16, 2022 8:01 AM  
**To:** allyson.brooks@dahp.wa.gov  
**Cc:** Ferguson, Katherine A. (Walla Walla)  
**Subject:** Notice of Scoping and Stakeholder Involvement for the Proposed Seismic Upgrades at the Jonathan M. Wainwright Memorial VA Medical Center, 77 Wainwright Drive, Walla Walla, Washington  
**Attachments:** Walla Walla VAMC Sesimic NEPA Scoping Stakeholder Letter.pdf

Dear Dr. Brooks

The U.S. Department of Veterans Affairs (VA) is proposing a project to perform seismic upgrades at the Jonathan M. Wainwright Memorial VA Medical Center (Walla Walla VAMC), located at 77 Wainwright Drive in Walla Walla, Washington. As part of the decision-making process, VA will prepare an Environmental Assessment (EA) to comply with the National Environmental Policy Act (NEPA). VA seeks your input on issues to be addressed during the NEPA process, including environmental concerns.

VA initiated formal Section 106 consultation for the undertaking with your office on June 6<sup>th</sup>, 2022. VA also initiated consult on June 6<sup>th</sup>, 2022 with federally recognized Tribal Nations (Confederated Tribes of the Colville Reservation, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation of Oregon, Confederated Tribes and Bands of the Yakama Indian Nation, Nez Perce Tribe, and Wanapum Tribe). The Section 106 consultation process and conclusions will provide the major contribution to the EA's analysis of potential effects to historic and cultural resources.

Please see the attached letter for additional project details and how to submit any initial comments on the scope of issues for analysis, or input on potential alternatives or information/analyses relevant to the proposed project.

Respectfully,

Glenn Elliott  
Director, Environmental Program Office  
Office of Construction and Facilities Management

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**From:** VACO Environment <VACOEnvironment@va.gov>  
**Sent:** Thursday, June 16, 2022 8:01 AM  
**To:** guy.moura@colvilletribes.com  
**Cc:** Ferguson, Katherine A. (Walla Walla)  
**Subject:** Notice of Scoping and Stakeholder Involvement for the Proposed Seismic Upgrades at the Jonathan M. Wainwright Memorial VA Medical Center, 77 Wainwright Drive, Walla Walla, Washington  
**Attachments:** Walla Walla VAMC Sesimic NEPA Scoping Stakeholder Letter.pdf

Dear THPO Moura,

The U.S. Department of Veterans Affairs (VA) is proposing a project to perform seismic upgrades at the Jonathan M. Wainwright Memorial VA Medical Center (Walla Walla VAMC), located at 77 Wainwright Drive in Walla Walla, Washington. As part of the decision-making process, VA will prepare an Environmental Assessment (EA) to comply with the National Environmental Policy Act (NEPA). VA seeks your input on issues to be addressed during the NEPA process, including environmental concerns.

VA initiated formal Section 106 consultation for the undertaking on June 6<sup>th</sup>, 2022 with the Colville Confederated Tribes. The Section 106 consultation process and conclusions will provide the major contribution to the EA's analysis of potential effects to historic and cultural resources.

Please see the attached letter for additional project details and how to submit any initial comments on the scope of issues for analysis, or input on potential alternatives or information/analyses relevant to the proposed project. In particular, we invite you to provide preliminary information on any properties of historic, religious, or cultural significance that may be affected by our proposed undertaking.

Respectfully,

Glenn Elliott  
Director, Environmental Program Office  
Office of Construction and Facilities Management

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**From:** VACO Environment <VACOEnvironment@va.gov>  
**Sent:** Thursday, June 16, 2022 8:00 AM  
**To:** keithb@nezperce.org  
**Cc:** Ferguson, Katherine A. (Walla Walla)  
**Subject:** Notice of Scoping and Stakeholder Involvement for the Proposed Seismic Upgrades at the Jonathan M. Wainwright Memorial VA Medi Seismic Upgrades at the Jonathan M. Wainwright Memorial VA Medical Center, 77 Wainwright Drive, Walla Walla, Washington  
**Attachments:** Walla Walla VAMC Sesimic NEPA Scoping Stakeholder Letter.pdf

Dear THPO Baird,

The U.S. Department of Veterans Affairs (VA) is proposing a project to perform seismic upgrades at the Jonathan M. Wainwright Memorial VA Medical Center (Walla Walla VAMC), located at 77 Wainwright Drive in Walla Walla, Washington. As part of the decision-making process, VA will prepare an Environmental Assessment (EA) to comply with the National Environmental Policy Act (NEPA). VA seeks your input on issues to be addressed during the NEPA process, including environmental concerns.

VA initiated formal Section 106 consultation for the undertaking on June 6<sup>th</sup>, 2022 with the Nez Perce Tribe. The Section 106 consultation process and conclusions will provide the major contribution to the EA's analysis of potential effects to historic and cultural resources.

Please see the attached letter for additional project details and how to submit any initial comments on the scope of issues for analysis, or input on potential alternatives or information/analyses relevant to the proposed project. In particular, we invite you to provide preliminary information on any properties of historic, religious, or cultural significance that may be affected by our proposed undertaking.

Respectfully,

Glenn Elliott  
Director, Environmental Program Office  
Office of Construction and Facilities Management

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**From:** VACO Environment <VACOEnvironment@va.gov>  
**Sent:** Thursday, June 16, 2022 8:01 AM  
**To:** CareyMiller@ctuir.org  
**Cc:** Ferguson, Katherine A. (Walla Walla)  
**Subject:** Notice of Scoping and Stakeholder Involvement for the Proposed Seismic Upgrades at the Jonathan M. Wainwright Memorial VA Medical Center, 77 Wainwright Drive, Walla Walla, Washington  
**Attachments:** Walla Walla VAMC Sesimic NEPA Scoping Stakeholder Letter.pdf

Dear THPO Miller,

The U.S. Department of Veterans Affairs (VA) is proposing a project to perform seismic upgrades at the Jonathan M. Wainwright Memorial VA Medical Center (Walla Walla VAMC), located at 77 Wainwright Drive in Walla Walla, Washington. As part of the decision-making process, VA will prepare an Environmental Assessment (EA) to comply with the National Environmental Policy Act (NEPA). VA seeks your input on issues to be addressed during the NEPA process, including environmental concerns.

VA initiated formal Section 106 consultation for the undertaking on June 6<sup>th</sup>, 2022 with the Confederated Tribes of the Umatilla Indian Reservation. The Section 106 consultation process and conclusions will provide the major contribution to the EA's analysis of potential effects to historic and cultural resources.

Please see the attached letter for additional project details and how to submit any initial comments on the scope of issues for analysis, or input on potential alternatives or information/analyses relevant to the proposed project. In particular, we invite you to provide preliminary information on any properties of historic, religious, or cultural significance that may be affected by our proposed undertaking.

Respectfully,

Glenn Elliott  
Director, Environmental Program Office  
Office of Construction and Facilities Management

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**From:** VACO Environment <VACOEnvironment@va.gov>  
**Sent:** Thursday, June 16, 2022 8:00 AM  
**To:** rbuck@gcpud.org  
**Cc:** Ferguson, Katherine A. (Walla Walla)  
**Subject:** Notice of Scoping and Stakeholder Involvement for the Proposed Seismic Upgrades at the Jonathan M. Wainwright Memorial VA Medical Center, 77 Wainwright Drive, Walla Walla, Washington  
**Attachments:** Walla Walla VAMC Sesimic NEPA Scoping Stakeholder Letter.pdf

Dear Chair Buck,

The U.S. Department of Veterans Affairs (VA) is proposing a project to perform seismic upgrades at the Jonathan M. Wainwright Memorial VA Medical Center (Walla Walla VAMC), located at 77 Wainwright Drive in Walla Walla, Washington. As part of the decision-making process, VA will prepare an Environmental Assessment (EA) to comply with the National Environmental Policy Act (NEPA). VA seeks your input on issues to be addressed during the NEPA process, including environmental concerns.

VA initiated formal Section 106 consultation for the undertaking on June 6<sup>th</sup>, 2022 with the Wanapum Tribe. The Section 106 consultation process and conclusions will provide the major contribution to the EA's analysis of potential effects to historic and cultural resources.

Please see the attached letter for additional project details and how to submit any initial comments on the scope of issues for analysis, or input on potential alternatives or information/analyses relevant to the proposed project. In particular, we invite you to provide preliminary information on any properties of historic, religious, or cultural significance that may be affected by our proposed undertaking.

Respectfully,

Glenn Elliott  
Director, Environmental Program Office  
Office of Construction and Facilities Management

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**From:** VACO Environment <VACOEnvironment@va.gov>  
**Sent:** Thursday, June 16, 2022 8:00 AM  
**To:** roberta.kirk@ctwsbnr.org  
**Cc:** Ferguson, Katherine A. (Walla Walla)  
**Subject:** Notice of Scoping and Stakeholder Involvement for the Proposed Seismic Upgrades at the Jonathan M. Wainwright Memorial VA Medical Center, 77 Wainwright Drive, Walla Walla, Washington  
**Attachments:** Walla Walla VAMC Sesimic NEPA Scoping Stakeholder Letter.pdf

Dear THPO Kirk,

The U.S. Department of Veterans Affairs (VA) is proposing a project to perform seismic upgrades at the Jonathan M. Wainwright Memorial VA Medical Center (Walla Walla VAMC), located at 77 Wainwright Drive in Walla Walla, Washington. As part of the decision-making process, VA will prepare an Environmental Assessment (EA) to comply with the National Environmental Policy Act (NEPA). VA seeks your input on issues to be addressed during the NEPA process, including environmental concerns.

VA initiated formal Section 106 consultation for the undertaking on June 6<sup>th</sup>, 2022 with the Confederated Tribes of the Warm Springs Reservation of Oregon. The Section 106 consultation process and conclusions will provide the major contribution to the EA's analysis of potential effects to historic and cultural resources.

Please see the attached letter for additional project details and how to submit any initial comments on the scope of issues for analysis, or input on potential alternatives or information/analyses relevant to the proposed project. In particular, we invite you to provide preliminary information on any properties of historic, religious, or cultural significance that may be affected by our proposed undertaking.

Respectfully,

Glenn Elliott  
Director, Environmental Program Office  
Office of Construction and Facilities Management

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**From:** VACO Environment <VACOEnvironment@va.gov>  
**Sent:** Thursday, June 16, 2022 8:01 AM  
**To:** kate@yakama.com  
**Cc:** Ferguson, Katherine A. (Walla Walla)  
**Subject:** Notice of Scoping and Stakeholder Involvement for the Proposed Seismic Upgrades at the Jonathan M. Wainwright Memorial VA Medical Center, 77 Wainwright Drive, Walla Walla, Washington  
**Attachments:** Walla Walla VAMC Sesimic NEPA Scoping Stakeholder Letter.pdf

Dear THPO Valdez,

The U.S. Department of Veterans Affairs (VA) is proposing a project to perform seismic upgrades at the Jonathan M. Wainwright Memorial VA Medical Center (Walla Walla VAMC), located at 77 Wainwright Drive in Walla Walla, Washington. As part of the decision-making process, VA will prepare an Environmental Assessment (EA) to comply with the National Environmental Policy Act (NEPA). VA seeks your input on issues to be addressed during the NEPA process, including environmental concerns.

VA initiated formal Section 106 consultation for the undertaking on June 6<sup>th</sup>, 2022 with the Confederated Tribes and Bands of the Yakama Indian Nation. The Section 106 consultation process and conclusions will provide the major contribution to the EA's analysis of potential effects to historic and cultural resources.

Please see the attached letter for additional project details and how to submit any initial comments on the scope of issues for analysis, or input on potential alternatives or information/analyses relevant to the proposed project. In particular, we invite you to provide preliminary information on any properties of historic, religious, or cultural significance that may be affected by our proposed undertaking.

Respectfully,

Glenn Elliott  
Director, Environmental Program Office  
Office of Construction and Facilities Management

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**From:** VACO Environment <[VACOEnvironment@va.gov](mailto:VACOEnvironment@va.gov)>

**Sent:** Thursday, June 30, 2022 12:15 PM

**To:** Rob Clark <[rclark@tlassoc.com](mailto:rclark@tlassoc.com)>

**Subject:** FW: [EXTERNAL] RE: Notice of Scoping and Stakeholder Involvement for the Proposed Seismic Upgrades at the Jonathan M. Wainwright Memorial VA Medical Center, 77 Wainwright Drive, Walla Walla, Washington

Rob,

FYI

Patrick Read  
Department of Veterans Affairs  
Environmental Officer/Engineer, CFM Eastern Region  
425 I Street 6th Floor RM-6W.502B  
NW Washington, DC 20001  
Cell: 202-891-9713

“The environment is where we all meet; where we all have a mutual interest; it is the one thing all of us share. It is not only a mirror of ourselves, but a focusing lens on what we can become.” – Lady Bird Johnson

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**From:** Leno, Lonna (DVA) <[LonnaL@DVA.WA.GOV](mailto:LonnaL@DVA.WA.GOV)>

**Sent:** Friday, June 24, 2022 9:32 PM

**To:** VACO Environment <[VACOEnvironment@va.gov](mailto:VACOEnvironment@va.gov)>

**Subject:** [EXTERNAL] RE: Notice of Scoping and Stakeholder Involvement for the Proposed Seismic Upgrades at the Jonathan M. Wainwright Memorial VA Medical Center, 77 Wainwright Drive, Walla Walla, Washington

Hello. I would welcome being part of this. Thank you for reaching out.

Lonna Leno, Administrator  
Walla Walla Veterans Home  
92 Wainwright Drive  
Walla Walla, WA 99362  
509-540-0312 (mobile)  
[lonnal@dva.wa.gov](mailto:lonnal@dva.wa.gov)



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**From:** VACO Environment <[VACOEnvironment@va.gov](mailto:VACOEnvironment@va.gov)>

**Sent:** Thursday, June 16, 2022 5:01 AM

**Subject:** Notice of Scoping and Stakeholder Involvement for the Proposed Seismic Upgrades at the Jonathan M. Wainwright Memorial VA Medical Center, 77 Wainwright Drive, Walla Walla, Washington

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External Email

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Dear Valued Stakeholder,

The U.S. Department of Veterans Affairs (VA) is proposing a project to perform seismic upgrades at the Jonathan M. Wainwright Memorial VA Medical Center (Walla Walla VAMC), located at 77 Wainwright Drive in Walla Walla, Washington. As part of the decision-making process, VA will prepare an Environmental Assessment (EA) to comply with the National Environmental Policy Act (NEPA). VA seeks your input on issues to be addressed during the NEPA process, including environmental concerns.

Please see the attached letter for additional project details and how to submit scoping comments.

Respectfully,

Glenn Elliott  
Director, Environmental Program Office  
Office of Construction and Facilities Management

WDVA pledges to provide the best in Customer Service to veterans, families and community partners. Your feedback helps! Click on the link to complete a short customer satisfaction survey or copy and paste this link into your web browser: <https://www.surveymonkey.com/r/WDVAemail2021> Thank you!

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STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Eastern Region Office

4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

July 14, 2022

Glenn Elliott  
Director, Environmental Program Office  
Office of Construction and Facilities Management  
US Department of Veterans Affairs  
810 Vermont Avenue, NW  
Washington, DC 20420

Re: Walla Walla VAMC-Seismic Updates

Dear Glenn Elliott:

Thank you for the opportunity to comment on the Notice of Application and anticipated Determination of Nonsignificance regarding the Walla Walla VAMC-Seismic Updates project (Proponent: US Department of Veterans Affairs). After reviewing the documents, the Department of Ecology (Ecology) submits the following comments:

**Solid Waste Management-Martyn Quinn (509) 329-3435**

Remodeling or retrofitting may require some level of demolition work. Improper disposal of solid waste, including demolition waste, can result in environmental health hazards. We encourage the applicant to salvage, reuse, and recycle as much of the waste as possible. Recycling demolition debris is typically less expensive than disposal. Otherwise, the demolition waste must be disposed of at a permitted solid waste facility.

**Water Quality Program-Shannon Adams (509) 329-3610**

If the renovations disturb over one acre of soil, Ecology may require a Construction Stormwater General Permit. The permitting authority is likely the Environmental Protection Agency as this is federal work on federal lands.

For more information in obtaining a Construction Stormwater General Permit, or for other technical assistance, please contact Shannon Adams at (509) 329-3610 or via email at [Shannon.Adams@ecy.wa.gov](mailto:Shannon.Adams@ecy.wa.gov).

**State Environmental Policy Act (SEPA)-Cindy Anderson (509) 329-3442**

Ecology bases comments upon information submitted for review. As such, comments made do not constitute an exhaustive list of the various authorizations you may need to obtain, nor legal requirements you may need to fulfill in order to carry out the proposed action. Applicants should remain in touch with their Local Responsible Officials or Planners for additional guidance.

For information on the SEPA Process, please contact Cindy Anderson at (509) 655-1541 or via email at [Cindy.Anderson@ecy.wa.gov](mailto:Cindy.Anderson@ecy.wa.gov).

For more guidance on, or to respond to the comments made by Ecology, please contact the appropriate staff listed above at the phone number or email provided.

Department of Ecology  
Eastern Regional Office  
(Ecology File: 202203067)

ecc: Patrick Read, VA Environmental Engineer, US Department of Veterans Affairs

## **APPENDIX C - NHPA SECTION 106 AND NATIVE AMERICAN TRIBE CORRESPONDENCE**

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**From:** Read, Patrick R. (CFM) <Patrick.Read@va.gov>  
**Sent:** Thursday, June 16, 2022 12:06 PM  
**To:** Rob Clark  
**Subject:** FW: Re: Notice of Undertaking and Draft PA for VA Walla Walla Seismic Projects  
**Attachments:** NOU .docx; VA Walla Walla\_DRAFT v7\_WA DAHP.docx

Patrick Read  
Department of Veterans Affairs  
Environmental Officer/Engineer, CFM Eastern Region  
425 I Street 6th Floor RM-6W.502B  
NW Washington, DC 20001  
Cell: 202-891-9713

“The environment is where we all meet; where we all have a mutual interest; it is the one thing all of us share. It is not only a mirror of ourselves, but a focusing lens on what we can become.” – Lady Bird Johnson

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**From:** Ferguson, Katherine A. (Walla Walla) <Katherine.Ferguson3@va.gov>  
**Sent:** Wednesday, June 15, 2022 4:31 PM  
**To:** Read, Patrick R. (CFM) <Patrick.Read@va.gov>  
**Subject:** FW: Re: Notice of Undertaking and Draft PA for VA Walla Walla Seismic Projects

For your records

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**From:** Ferguson, Katherine A. (Walla Walla)  
**Sent:** Monday, June 6, 2022 11:01 AM  
**To:** [cmoore@preservewa.org](mailto:cmoore@preservewa.org); [LonnaL@dva.wa.gov](mailto:LonnaL@dva.wa.gov); [lwasson@wallawallawa.gov](mailto:lwasson@wallawallawa.gov); [james@fwwm.org](mailto:james@fwwm.org); [e106@achp.gov](mailto:e106@achp.gov); [aclark@achp.gov](mailto:aclark@achp.gov); Vann, Nicholas (DAHP) <[nicholas.vann@dahp.wa.gov](mailto:nicholas.vann@dahp.wa.gov)>; Borth, Holly (DAHP) <[holly.borth@dahp.wa.gov](mailto:holly.borth@dahp.wa.gov)>; Houser, Michael (DAHP) <[Michael.Houser@DAHP.WA.GOV](mailto:Michael.Houser@DAHP.WA.GOV)>; [rbuck@gcpud.org](mailto:rbuck@gcpud.org); [keithb@nezperce.org](mailto:keithb@nezperce.org); [kate@yakama.com](mailto:kate@yakama.com); [roberta.kirk@ctwsbnr.org](mailto:roberta.kirk@ctwsbnr.org); [CareyMiller@ctuir.org](mailto:CareyMiller@ctuir.org)  
**Cc:** Ashley Morton <[AshleyMorton@ctuir.org](mailto:AshleyMorton@ctuir.org)>; 'Guy Moura (HSY)' <[Guy.Moura@colvilletribes.com](mailto:Guy.Moura@colvilletribes.com)>; Bailey, Aaron (Walla Walla) <[Aaron.Bailey2@va.gov](mailto:Aaron.Bailey2@va.gov)>; Naficy, Anne-Marie (V20) <[Anne-Marie.Naficy@va.gov](mailto:Anne-Marie.Naficy@va.gov)>; Kelter, Scott D (Walla Walla) <[Scott.Kelter@va.gov](mailto:Scott.Kelter@va.gov)>; [e106@achp.gov](mailto:e106@achp.gov); [aclark@achp.gov](mailto:aclark@achp.gov); [vhanvey@achp.gov](mailto:vhanvey@achp.gov)  
**Subject:** Re: Notice of Undertaking and Draft PA for VA Walla Walla Seismic Projects

All,

Please find attached a Notice of Undertaking for the Walla Walla VA Seismic Program which includes a set of projects that will impact the built environment on the Walla Walla VA campus which is also a Historic District. Also find attached a rough draft of our proposed Programmatic Agreement for these projects. Exact signatory information is not included yet as those details will be ironed out during the consultation process.

I would like to have a meeting that includes all interested and consulting parties this week if possible. Mornings for Tuesday through Thursday work best as Friday I am tied up the majority of the day in other obligations. Please reply to let me know your availability for a meeting so that we may provide you more perspective on the project and have an open discussion about impacts.

V/R,

Kat

*Katherine A. Ferguson, MS, RPA*

Senior Resident Engineer (CFM), Cultural Resources Program Manager Walla Walla VA

(O) 509-525-5200 xt 26422

(Cell) 509-520-1820

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

June 2, 2022

Re: Initiation of Consultation for Seismic Compliance and Associated Improvements at the Jonathan M. Wainwright Memorial VA Medical Center, Walla Walla, Walla Walla County, Washington

Dear Interested or Consulting Party,

In 2016, President Obama signed Executive Order (EO) 13717 to establish a Federal Earthquake Risk Management Standard. This EO requires Federal agencies to adhere to seismic design requirements of current national building codes and standards and encourages agencies to exceed the minimum required codes and standards to ensure that buildings are fully earthquake resilient. EO 13717 allows agencies to set their own higher seismic performance standards.

In compliance with EO 13717, the U.S. Department of Veterans Affairs (VA) issued Directive 7512 to establish a policy for the seismic safety of VA buildings. Under VA Directive 7512, seismic compliance for existing buildings requires adoption of the latest version of the *Standards of Seismic Safety for Existing Federally Owned and Leased Buildings*. For new and leased buildings, VA Directive 7512 requires adoption of the 2015 edition of the International Building Code (IBC). On November 1, 2019, VA released VA Handbook 18-8: *Seismic Design Requirements* to help inform facility planning with regard to seismic standards. This guidance was revised May 1, 2020. VA released its *Physical Security and Design Manual* on October 1, 2020, and revised the guidance April 1, 2021. This manual contains the baseline physical security and resiliency requirements for improving the protection of VA facilities, including during and following seismic events.

As part of the required seismic risk reviews, VA determined the Jonathan M. Wainwright Memorial VA Medical Center at Walla Walla (Walla Walla VAMC) was at "Moderate High" risk for seismicity. This determination was based on the American Society of Civil Engineer's determinations in manual 7-10: *Minimum Design Loads for Buildings and Other Structures*. Three active fault systems have been identified near the campus: the Hite Fault System to the east, the Wallula Fault System to the southwest, and the Horse Haven Fault System to the west. Seismic evaluations of the Walla Walla VAMC identified eight buildings to be at risk of failure or significant damage during a seismic event: Buildings 1, 68, 69, 74, 75, 77, 78, and 80 (At-Risk Buildings), listed in Table 1.

#### Definition of the Undertaking

Walla Walla VAMC proposes to rectify seismic deficiencies of the At-Risk Buildings (see Figure 1) in accordance with the Seismic Requirements and Design Standards with one or more of the following construction alternatives with associated infrastructure improvements: (1A) retrofit to include rehabilitation to the *Standards* established by the Secretary of the Interior ("rehabilitation") or (1B) renovation not in accordance with the *Standards* ("retrofit"), (2) demolition and replacement with a building of similar massing in the existing location ("replacement"), or (3) demolition of multiple buildings and consolidation of their building functions in a new singular building of larger massing ("consolidation"). Rectifying the seismic deficiencies of these At-Risk Buildings may require upgrades to or demolition of Buildings T-1 and T-2 and the connecting corridor between the buildings. In some cases, infrastructure upgrades, such as water, sewer, stormwater, telecom, or electrical, or "swing space" accommodations may be necessary to accomplish the Undertaking.

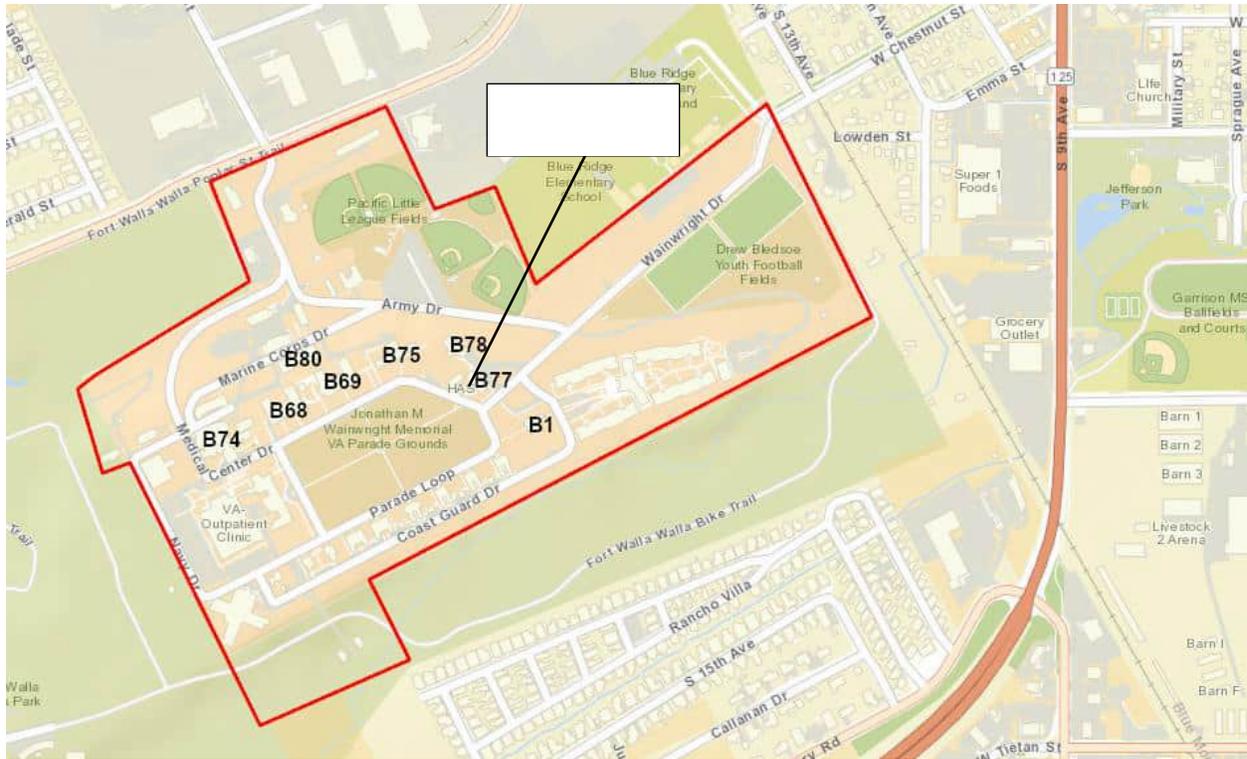


Figure 1 - Fort Walla Walla NRHD with At-Risk Buildings

Walla Walla VAMC is considering various combinations of construction alternatives based on funding, timing, and campus operational needs. It is likely that more than one construction alternative will be selected for the At-Risk Buildings. Walla Walla VAMC plans to phase the selection of the construction alternatives, project design, and construction activities over the course of approximately 10 years.

Delineation of the Area of Potential Effect

The Area of Potential Effect (APE) for the proposed Undertaking includes the entirety of the Walla Walla VAMC campus and the campus of the State Veterans Home (Figure 2). This APE takes into account direct effects related to building construction and utility upgrades as well as potential effects to viewshed, use, and traffic.



Figure 2 - APE indicated in red.

### Identification of Historic Properties

Historic properties within the APE include the Fort Walla Walla National Register Historic District (NRHD)<sup>1</sup>, archaeological sites listed in the National Register of Historic Places, and archaeological sites determined eligible for listing. The historic status of At-Risk Buildings and these archaeological sites are included in Tables 1 and 2, respectively. There also exists a potential for as-yet unidentified subsurface deposits.

**Fort Walla Walla NRHD:** The Walla Walla VAMC is located within the boundaries of the Fort Walla Walla NRHD, a property listed in the National Register of Historic Places in 1974. This historic district includes fifteen buildings plus the parade ground, the post cemetery, and one archaeological site. The 1974 nomination did not include information about non-contributing resources. Of the eight buildings proposed for seismic compliance activities, Buildings 1, 68, and 69 are listed as contributing resources to the Fort Walla Walla NRHD.

On May 5, 2022, Walla Walla VAMC submitted a revised nomination for the Fort Walla Walla NRHD to your office. The revision takes into account the history of the campus as a U.S. Army fort, a U.S. Public Health Service hospital, and its current function as a VA medical center. The revised historic district includes 59 contributing resources, including Buildings 1, 68, 69, 75, 77, 78, and 80. Buildings 74, T-1, and T-2 and the connecting corridors are considered non-contributing due to lack of integrity.

<sup>1</sup> Link to past nomination - <https://catalog.archives.gov/id/75613543>

Table 1

WALLA WALLA VAMC AT-RISK BUILDING SUMMARY				
Seismic Risk Category of Area	Building Number	Historic Status <sup>2</sup>	Seismic Design Categories <sup>3</sup>	Physical Security Design Classification <sup>4</sup>
Moderate	1	Contributing	Ancillary	Life-Safety Protected
	68	Contributing	Ancillary	Life-Safety Protected
	69	Contributing	Ancillary	Life-Safety Protected
	74	Non-Contributing	Ancillary	Life-Safety Protected
	75	Contributing	Critical	Mission Critical
	77	Contributing	Ancillary	Life-Safety Protected
	78	Contributing	Essential	Life-Safety Protected Plus Mission Critical Redundancies
	80	Contributing	Ancillary	Life-Safety Protected

**Archaeological Sites and Deposits:** Past archaeological investigations of the Walla Walla VAMC Campus have identified materials related to Native American lifeways, Fort Walla Walla, and twentieth century use of the campus as a hospital. Not all of the boundaries of identified sites are completely delineated and some have been damaged in past campus construction activities (Figure 3). There is potential for additional deposits within the APE.

<sup>2</sup> Based on the amendment to the National Register nomination submitted to WA DAHP on May 5, 2022.

<sup>3</sup> VA divides buildings and structures into three categories of function: Critical, Essential, and Ancillary. VA uses these Facility Occupancy Categories (FOCs) and the risk of seismic activities to assign categories of necessary Physical Safety Design. Generally, *Critical* facilities include acute care; hospitals; in-patient mental health; safety and law enforcement; and hazardous materials storage, among other functions. *Essential* facilities include domiciliaries, community living centers (CLCs), and dietetics. *Ancillary* facilities include libraries, office space, residential quarters, recreation spaces, and education rooms, among others.

<sup>4</sup> Generally, *Mission Critical* facilities are those intended to remain fully functional during and following a natural or manmade extreme event or a national emergency. *Life-Safety Protected* facilities are those intended to protect the life safety of the VA patients, staff, and visitors in case of an emergency. Although indispensable to the mission of VA, *Life-Safety Protected* facilities are not required to remain operational during and following a natural or manmade extreme event or a national emergency. *Life-Safety Protected facilities with Mission Critical* utilities/systems redundancies are those intended to remain functional with minor repairs, in addition to protecting the life safety of occupants. The physical condition of the buildings must meet these standards.

**Redacted**

Figure 3 - Map of Identified Archaeological Sites, courtesy of WISAARD

Table 2

<b>IDENTIFIED ARCHAEOLOGICAL SITES WITHIN THE APE</b>		
<b>Site Number</b>	<b>Site Type/Name</b>	<b>National Register Eligibility</b>
45WW33	Historic Fort / Dump Site	Listed
45WW105	Prehistoric Fishing Assemblage	Not eligible
45WW262	Fort Cemetery	Listed
45WW304	Historic Scatter – Blacksmith Shop	Eligible
45WW305	Historic Scatter – Quartermasters Area	Eligible
45WW306	Prehistoric Isolate	Not eligible
45WW329	Historic Scatter – Building 23	Eligible
45WW330	Multi-component – Building 24	Eligible
45WW331	Multi-component – Building 71	Eligible
45WW332	Historic Privy – Parking Lot 6	Eligible
45WW333	Officers Quarters BURR/EUL parcel	Eligible
45WW341	Multi-component Nursing Home parcel	Eligible
45WW342	Historic Scatter – Building 7	Eligible
45WW343	Historic Scatter – Building 58 Coal Shed	Eligible
45WW344	Historic Scatter- Building 8 Hospital	Eligible
45WW345	Historic Scatter – Building 66 Wagon Shed	Eligible
45WW346	Fort Magazine / Building 40	Eligible
45WW347	Fort sewer and manholes	Eligible
45WW348	VA Pharmacy / Building T6	Eligible
45WW349	Historic Scatter – Building 47 Gatehouse	Not eligible

Walla Walla VAMC requests your concurrence with the APE and the identification of historic properties.

#### Assessment of Adverse Effects

The Undertaking has the potential to renovate and/or demolish contributing resources to the Fort Walla Walla NRHD and construct new buildings within the district. The number of At-Risk Buildings that can be successfully rehabilitated and meet current seismic standards is not yet known. Renovation may adversely affect the resource, but the specific plans will determine the level of effect. Demolition of a historic building is adverse; replacement of the building may lead to additional effects. The Undertaking may result in changes to the viewsheds within the historic district, notably from the historic parade ground. Additionally, construction activities, especially demolition and replacement, have the potential to adversely affect identified and unidentified subsurface deposits. More specific information about the level of adverse effect cannot be known until design plans have been developed and funding has been secured.

Seismic correction has the potential to necessitate utility upgrades. This disturbance has the potential to affect subsurface resources.

Each of the At-Risk Buildings holds multiple VAMC functions. To accommodate construction, departments and offices may temporarily relocate to another location in the building or on campus. These "swing space" shifts are unlikely to require changes to the campus physical plant. At this time, adverse effects to historic properties related to the use of swing space are not anticipated.

Walla Walla VAMC has determined the Undertaking has the potential to adversely affect historic properties but that the range of effects cannot be fully analyzed prior to approval of the Undertaking given the variety of actions proposed and their respective effects. Walla Walla VAMC, therefore, plans to pursue a programmatic agreement (PA) in accordance with 36 CFR §800.14(b). Walla Walla VAMC proposes to provide opportunities in the PA for consultation to seek methods to avoid and/or minimize adverse effects as designs are developed.

#### Invited Consulting Parties

Walla Walla VAMC has invited the following agencies and organizations to participate in this consultation effort: Advisory Council on Historic Preservation (ACHP), Washington Department of Archives & History, Washington Trust for Historic Preservation, Confederated Tribes of the Umatilla Indian Reservation, Confederated Tribes of the Warm Springs Reservation of Oregon, Confederated Tribes and Bands of the Yakama Indian Nation, Fort Walla Walla Museum, Nez Perce Tribe, Walla Walla Certified Local Government, Walla Walla State Veterans Home, and the Wanapum Tribe.

#### Plans for Public Involvement

Walla Walla VAMC intends to seek public comment through notices on its social media accounts and emails to its stakeholders.

Walla Walla VAMC is evaluating impacts of the Undertaking on the human environment in accordance with the National Environmental Policy Act (NEPA). As part of the NEPA process, members of the public will be provided the opportunity to comment on impacts to cultural resources, including historic properties, and the draft PA. Notices for public comment will be published in the local newspaper, *The Union-Bulletin*, and posted to social media.

#### Next Steps

A draft of the PA is included in this transmission. Walla Walla VAMC requests your review and comment within the 30 days of receipt as established in 36 CFR Part 800. Walla Walla VAMC will host a meeting to describe the Undertaking and the purpose of the draft PA for members of your office, the ACHP, Tribes, and other Consulting Parties toward the beginning of June, 2022. Walla Walla VAMC will host the meeting

as a Microsoft Teams webinar with the ability to share screens. Contact information for participants is needed in advance of the meeting. RSVP to [Katherine.Ferguson3@va.gov](mailto:Katherine.Ferguson3@va.gov) by June 6, 2022.

Walla Walla VAMC looks forward to consulting with your office on this important Undertaking. Please contact me at [Katherine.Ferguson3@va.gov](mailto:Katherine.Ferguson3@va.gov) or 509-525-5200 ext. 26422 if you have any questions or require additional information.

Sincerely,

Katherine A. Ferguson, MS, RPA

**VA**



**U.S. Department  
of Veterans Affairs**

Jonathan M. Wainwright Memorial VA Medical Center  
Walla Walla, Washington

Seismic Compliance

Consultation

July 20, 2022  
11:00 AM PT

**1**



## Introductions

2

**Kat –**

- (Thank everyone for joining today.)
- Introductions –
  - VA
  - ACHP
  - Native American Tribes
  - WA DAHP
  - Others

## Purpose of Today's Session

- Walla Walla VAMC is hosting this session to answer questions about the Undertaking and assist review of the draft programmatic agreement.
- Recent changes to the National Register Historic District
- Fluidity of decision-making process for seismic compliance
- Use of a programmatic agreement



3

### Kat –

- The proposed Undertaking has a lot of moving parts and the decisions that will be made will take into account a number of factors including campus needs, costs, schedules, projected patient volumes, projected Veteran populations, as well as cultural resources.
- VA is working to finalize amendment of the campus National Register of Historic Places nomination.
- This is the first use of a programmatic agreement for Walla Walla VAMC.



## **Seismic Compliance Undertaking**

4

Dave –

- The proposed Undertaking relates to seismic compliance of at-risk buildings at the Walla Walla VAMC campus.



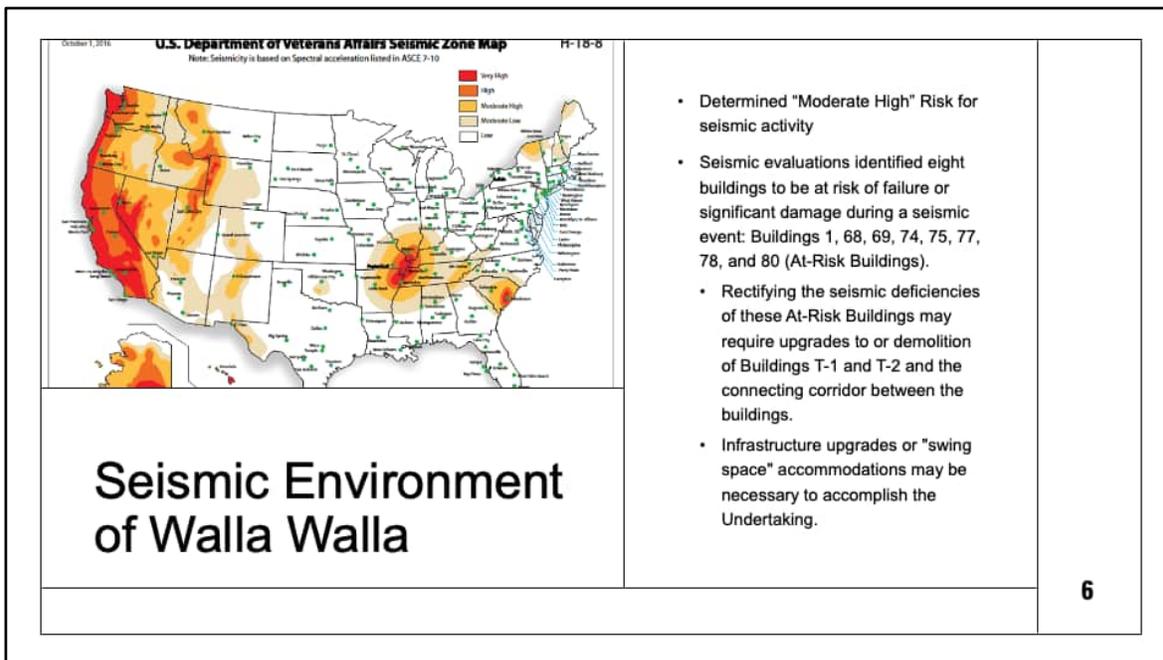
## Seismic Requirements

- VA created the Secretary's Advisory Committee on Structural Safety of VA Facilities after the San Fernando Earthquake of 1971. This Committee meets annually and advises VA structural policy.
- The Committee created a document that is now labeled H-18-8, "Seismic Design Requirements", which includes definitions of and requirements for VA buildings and structures.
- VA Directive 7512, "Seismic Safety of VA Buildings", and Executive Order 13717, "Establishing a Federal Earthquake Risk Management Standard", define VA policy regarding Seismic buildings.
- VA released its revised "Physical Security and Design Manual" on April 1, 2021.

5

### Dave –

- The letters sent in June and this slide provide a little background on VA's commitment to seismic compliance.
- In a nutshell, VA is committed to seismic safety and has gone above and beyond federal requirements to create a program that maintains the safety of Veterans, staff, and visitors.
- VA's requirements and physical design policies are available online if anyone is interested in learning more about the agency's commitment to seismic safety.



**Dave –**

- Due to the presence of three active fault systems, this area has been determined "Moderate High Risk" for seismic activity.
- VA evaluated the campus and determined eight buildings to be at risk of failure or significant damage during a seismic event.
- These buildings are 1, 68, 69, 74, 75, 77, 78, and 80.
- Correcting these deficiencies has the potential to affect Buildings T-1 and T-2 as well as the connecting corridors.
- These corrections will require improvements to the existing utilities and may require the use of swing space in other areas of the campus.

## At-Risk Buildings

- Building 1
- Building 68
- Building 69
- Building 74
- Building 75
- Building 77
- Building 78
- Building 80
- Not At-Risk but potentially affected –
  - Connecting corridors, T-1, and T-2



7

**Dave –**

Quick reference map of the locations of the At-Risk Buildings.

	<ul style="list-style-type: none"><li>• (1A) Retrofit to include rehabilitation to the <i>Standards</i> established by the Secretary of the Interior ("rehabilitation")</li><li>• (1B) Renovation not in accordance with the <i>Standards</i> ("retrofit")</li><li>• (2) Demolition and replacement with a building of similar massing in the existing location ("replacement")</li><li>• (3) Demolition of multiple buildings and consolidation of their building functions in a new singular building of larger massing ("consolidation")</li></ul>	<p>8</p>
<h2>Alternatives for Seismic Compliance</h2>		

Kat –

- In order to comply with the seismic requirements, VA has developed three alternatives – retrofit either to the Secretary’s *Standards for Rehabilitation* or not; demolition and replacement of a single building; and/or demolition of several buildings and replacement with one building.
- The first alternative is broken into two options. These options potentially have different Section 106 outcomes – the first will not adversely affect historic properties and the second may or may not, depending on design.

	<ul style="list-style-type: none"> <li>• Walla Walla VAMC does not yet know which alternative will be selected for any of the At-Risk Buildings.</li> <li>• Factors in Decision Making – <ul style="list-style-type: none"> <li>• Safety</li> <li>• Cost</li> <li>• Space Planning</li> <li>• Functionality</li> <li>• Operational Needs</li> <li>• Historic Significance</li> </ul> </li> <li>• Walla Walla VAMC intends to phase selection of alternatives to account for operational and financial changes.</li> <li>• Walla Walla VAMC cannot assess adverse effects of the Undertaking at this time.</li> <li>• Walla Walla VAMC has proposed development of a programmatic agreement to establish a process for assessment of adverse effects and avoidance, minimization, and/or mitigation of those effects.</li> </ul>	<b>9</b>
<h2 style="text-align: center;">Plans for Each At-Risk Building</h2>		

**Dave –**

- Cards on the table, VA does not yet know which alternative will be selected for each of the At-Risk Buildings.
- It is highly unlikely that one alternative will be selected for all eight, instead VA anticipates a mix-and-match approach based on individual analysis.
- The decision-making process will consider safety, costs, operational needs, and functionality. For example, VA could consolidate functions but constructing one huge support building wouldn't necessarily meet operational needs. Or VA could add shear walls to a building, but if those walls have to be 6-feet thick to withstand a seismic event, VA would lose 70% of its operational space in the building, rendering the building pretty much obsolete. And since each of these buildings is unique, VA will tailor its decision-making process to each building.
- Additionally, since the project will be implemented in phases, this analysis will be continuous, not a one-off meeting.

**Kat –**

- For these reasons, VA cannot adequately assess adverse effects at this time and is

recommending development of a programmatic agreement to establish a process for consultation moving forward.

## Historic Properties within the APE

- Fort Walla Walla National Register Historic District
  - Building 1
  - Building 68
  - Building 69
  - Building 75
  - Building 77
  - Building 78
  - Building 80
  - Archaeological Sites
- Identified archaeological sites
- Potential archaeological sites



10

### Kat –

- VA has recommended an Area of Potential Effects (APE) that includes the whole of the campus and the State Veterans Home property.
- This APE accounts for seismic construction and necessary infrastructure improvements.
- Historic properties within the APE include the National Register Historic District and archaeological sites.
- Nearly all of the At-Risk Buildings contribute to the Historic District.

## Use of a Programmatic Agreement



- The draft PA requires updating of the Monitoring Plan so Walla Walla VAMC can take “lessons learned” into account in planning.
- The draft PA establishes a process for Design Review to minimize adverse effects, if feasible.
- The draft PA establishes mitigation measures so Walla Walla VAMC can take the costs into consideration in budgeting.
- The draft PA establishes multiple opportunities to discuss cumulative effects to the NRHD and identify opportunities to avoid and/or minimize adverse effects.
- The draft PA establishes a streamlined process for ongoing consultation.

11

Kat –

- PAs are different than the MOAs we have typically worked under at Walla Walla VAMC.
- The PA will set a process for ongoing consultation instead of making decisions and then VA going off to implement those decisions.
- The draft PA sent for review establishes mitigation for specific actions AND for potential cumulative effects to historic properties.

## Review of Draft PA

- Treatment Measures to Resolve Adverse Effects to Built Resources
  - As written, WWVAMC will document any building subject to the Undertaking.
  - WWVAMC will make a decision which action best meets the goals of the Undertaking. WWVAMC is aware that some of these actions will adversely affect historic properties.
  - WWVAMC will follow the described steps to avoid, minimize, and/or mitigate adverse effects to historic properties.
  - Periodically, WWVAMC will assess cumulative effects to built resources.
- Treatment Measures to Resolve Adverse Effects to Archaeological Resources
  - WWVAMC will update the *Monitoring & Discovery Protocol*.
  - WWVAMC shall follow the *Protocol*.
- Treatment of Human Remains and Items of Religious and Cultural Importance
- Post-Review Discoveries

12

Kat –

- I will not review the Whereas and Administrative clauses at the beginning and end of the draft, but I encourage each of you to review these sections.
- You will see highlighting in the draft. Those pieces will be filled in throughout this consultation.
- Built Resources –
  - The process described in the PA requires ongoing consultation between Walla Walla VAMC and the consulting parties.
  - VA makes a decision about a building or buildings and then consults with parties to avoid, minimize, and/or mitigate adverse effects.
  - The PA provides enough information for VA to make informed decisions about the relative costs of mitigation and factor those costs into its overall decision-making process.
  - The PA requires VA to assess cumulative effects to the Fort Walla Walla National Register Historic District on a regular basis to look at the longer-term impacts.
- Archaeological Resources -
  - WWVAMC will update the Monitoring & Discovery Protocol that was

developed in consultation with many of the parties here today and in use on the campus since 2017.

- WWVAMC will follow the revised Protocol regardless of the action selected. WWVAMC also will follow the Protocol for related infrastructure improvements.

## Next Steps



Walla Walla VAMC requests additional comments by July 27, 2022.



Walla Walla VAMC will review the comments and revise the draft PA in August 2022.



Walla Walla VAMC looks to finalize the PA in fall 2022.



Concurrent with this process, Walla Walla VAMC is conducting NEPA analysis. All parties are encouraged to participate.

**13**

### Kat –

- VA is looking for comments on the Undertaking and the draft PA by July 27, 2022. Please use “Track Changes” or some other method of clearly marking comments on the draft PA.
- After that, VA will review the comments received release a revised version of the PA in August.
- VA would like to have a final PA prepared and circulating for signature in the fall of this year.
- VA also is conducting a NEPA analysis of this Undertaking. All parties are encouraged to participate to learn more about the potential impacts of this Undertaking on other resources.



Questions?

14

**Kat –**

- Lot of information provided today. Any questions on VA's requirements for seismic compliance, the definition of the Undertaking, the affected resources, the various alternatives, or the purpose of a programmatic agreement?



Thank you for your participation.

15

**Kat –**

- Thank everyone for their participation in today's information session and in this Undertaking.

## **APPENDIX D - SITE PHOTOGRAPHS**

## SITE PHOTOGRAPHS



Photo #1: Looking southeast at Building 1



Photo #2: Looking northeast at Buildings 68 and 69



Photo #3: Looking northeast at Building 69



Photo #4: Looking northeast at Building 74

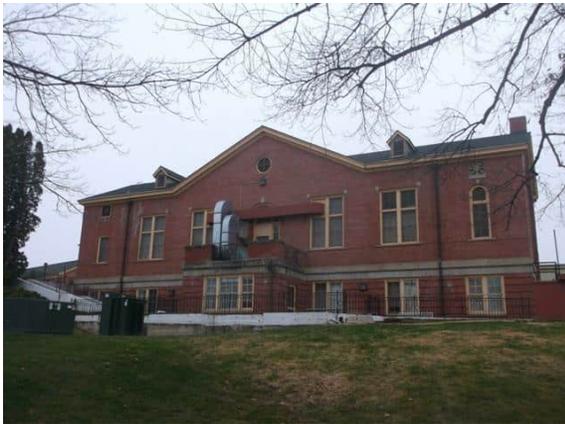


Photo #11: Looking southwest at Building 78



Photo #12: Looking south at Buildings 80 (right) and 69 (left and center)

## SITE PHOTOGRAPHS



Photo #21: Looking south at the emergency generator and diesel UST location north of Building 78



Photo #22: Looking north at the north adjoining Building 75



Photo #29: Looking northeast at the north adjoining Building 76



Photo #30: Looking northeast at the north adjoining Building 82 with AST



Photo #31: Looking east at the north adjoining Building 66.



Photo #32: Looking northeast at the north adjoining Buildings 63 and 65 and Parking Lot #1

**SITE PHOTOGRAPHS**



Photo #33: Looking northeast across the south and west adjoining Parade Grounds



Photo #34: Looking east across the south and west adjoining Parade Grounds



Photo #35: Looking east at the east adjoining State Veterans Home



Photo #36: Looking southwest at the south adjoining Building 86



Photo #37: Looking southwest across the south and west adjoining Parade Grounds and west adjoining Catholic Charities residences



Photo #38: Area adjoining to the south of Building 1

**SITE PHOTOGRAPHS**



Photo #39:	Looking south at the south adjoining Fort Walla Walla Park, including Bryant Creek and residential area further to the south
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Photo #40:	Looking northwest at the campus chapel (Building T-7)
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Photo #41:	Looking southeast at the west adjoining OPC
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## **APPENDIX E – IPaC REPORT**



## United States Department of the Interior



FISH AND WILDLIFE SERVICE  
Washington Fish And Wildlife Office  
510 Desmond Drive Se, Suite 102  
Lacey, WA 98503-1263  
Phone: (360) 753-9440 Fax: (360) 753-9405  
<http://www.fws.gov/wafwo/>

In Reply Refer To:

March 10, 2022

Project Code: 2022-0018307

Project Name: Walla Walla VAMC, Walla Walla, WA Seismic Program

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2))

(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

**Migratory Birds:** In addition to responsibilities to protect threatened and endangered species under the Endangered Species Act (ESA), there are additional responsibilities under the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA) to protect native birds from project-related impacts. Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). For more information regarding these Acts see <https://www.fws.gov/birds/policies-and-regulations.php>.

The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. It is the responsibility of the project proponent to comply with these Acts by identifying potential impacts to migratory birds and eagles within applicable NEPA documents (when there is a federal nexus) or a Bird/Eagle Conservation Plan (when there is no federal nexus). Proponents should implement conservation measures to avoid or minimize the production of project-related stressors or minimize the exposure of birds and their resources to the project-related stressors. For more information on avian stressors and recommended conservation measures see <https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds.php>.

In addition to MBTA and BGEPA, Executive Order 13186: *Responsibilities of Federal Agencies to Protect Migratory Birds*, obligates all Federal agencies that engage in or authorize activities that might affect migratory birds, to minimize those effects and encourage conservation measures that will improve bird populations. Executive Order 13186 provides for the protection of both migratory birds and migratory bird habitat. For information regarding the implementation of Executive Order 13186, please visit <https://www.fws.gov/birds/policies-and-regulations/executive-orders/e0-13186.php>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Code in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

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Attachment(s):

- Official Species List

## **Official Species List**

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

**Washington Fish And Wildlife Office**

510 Desmond Drive Se, Suite 102

Lacey, WA 98503-1263

(360) 753-9440

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## Project Summary

Project Code: 2022-0018307  
Event Code: None  
Project Name: Walla Walla VAMC, Walla Walla, WA Seismic Program  
Project Type: Government / Municipal (Non-Military) Construction  
Project Description: Walla Walla VAMC, Walla Walla, WA Seismic Program  
Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@46.0526754,-118.35771257594368,14z>



Counties: Walla Walla County, Washington

## Endangered Species Act Species

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries<sup>1</sup>, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

### Birds

NAME	STATUS
Yellow-billed Cuckoo <i>Coccyzus americanus</i> Population: Western U.S. DPS There is <b>final</b> critical habitat for this species. The location of the critical habitat is not available. Species profile: <a href="https://ecos.fws.gov/ecp/species/3911">https://ecos.fws.gov/ecp/species/3911</a>	Threatened

### Fishes

NAME	STATUS
Bull Trout <i>Salvelinus confluentus</i> Population: U.S.A., conterminous, lower 48 states There is <b>final</b> critical habitat for this species. The location of the critical habitat is not available. Species profile: <a href="https://ecos.fws.gov/ecp/species/8212">https://ecos.fws.gov/ecp/species/8212</a>	Threatened

### Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: <a href="https://ecos.fws.gov/ecp/species/9743">https://ecos.fws.gov/ecp/species/9743</a>	Candidate

### Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

## **IPaC User Contact Information**

Agency: Department of Veterans Affairs  
Name: Paul Jackson  
Address: 44265 Plymouth Oaks Boulevard  
City: Plymouth  
State: MI  
Zip: 48170  
Email: [pjackson@ttlassoc.com](mailto:pjackson@ttlassoc.com)  
Phone: 7345824960

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# IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

## Project information

### NAME

Walla Walla VAMC, Walla Walla, WA Seismic Program

### LOCATION

Walla Walla County, Washington



### DESCRIPTION

Some(Walla Walla VAMC, Walla Walla, WA Seismic Program)

## Local office

Washington Fish And Wildlife Office

(360) 753-9440

(360) 753-9405

510 Desmond Drive Se, Suite 102  
Lacey, WA 98503-1263

<http://www.fws.gov/wafwo/>

NOT FOR CONSULTATION

# Endangered species

**This resource list is for informational purposes only and does not constitute an analysis of project level impacts.**

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Log in to IPaC.
2. Go to your My Projects list.
3. Click PROJECT HOME for this project.
4. Click REQUEST SPECIES LIST.

Listed species<sup>1</sup> and their critical habitats are managed by the [Ecological Services Program](#) of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries<sup>2</sup>).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact [NOAA Fisheries](#) for [species under their jurisdiction](#).

1. Species listed under the [Endangered Species Act](#) are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the [listing status page](#) for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

## Birds

NAME

STATUS

Yellow-billed Cuckoo *Coccyzus americanus*

Threatened

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<https://ecos.fws.gov/ecp/species/3911>

## Fishes

NAME

STATUS

Bull Trout *Salvelinus confluentus*

Threatened

There is **final** critical habitat for this species. The location of the critical habitat is not available.

<https://ecos.fws.gov/ecp/species/8212>

## Insects

NAME

STATUS

Monarch Butterfly *Danaus plexippus*

Candidate

Wherever found

No critical habitat has been designated for this species.

<https://ecos.fws.gov/ecp/species/9743>

## Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

## Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act<sup>1</sup> and the Bald and Golden Eagle Protection Act<sup>2</sup>.

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described [below](#).

1. The [Migratory Birds Treaty Act](#) of 1918.
2. The [Bald and Golden Eagle Protection Act](#) of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern <http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php>
- Measures for avoiding and minimizing impacts to birds <http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php>
- Nationwide conservation measures for birds <http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf>

The birds listed below are birds of particular concern either because they occur on the [USFWS Birds of Conservation Concern](#) (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the [FAQ below](#). This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the [E-bird data mapping tool](#) (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found [below](#).

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)
Cassin's Finch <i>Carpodacus cassinii</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. <a href="https://ecos.fws.gov/ecp/species/9462">https://ecos.fws.gov/ecp/species/9462</a>	Breeds May 15 to Jul 15
Evening Grosbeak <i>Coccothraustes vespertinus</i> This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 15 to Aug 10

Lewis's Woodpecker *Melanerpes lewis*

Breeds Apr 20 to Sep 30

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/9408>

Olive-sided Flycatcher *Contopus cooperi*

Breeds May 20 to Aug 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/3914>

Rufous Hummingbird *selasphorus rufus*

Breeds Apr 15 to Jul 15

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.

<https://ecos.fws.gov/ecp/species/8002>

## Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

### Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

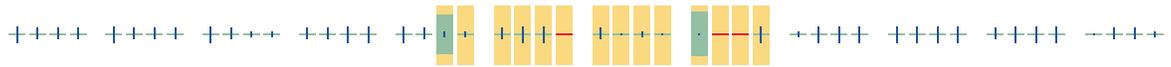
How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is  $0.25/0.25 = 1$ ; at week 20 it is  $0.05/0.25 = 0.2$ .
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

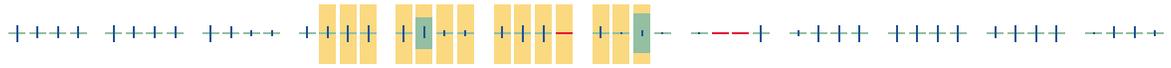
To see a bar's probability of presence score, simply hover your mouse cursor over the bar.



Olive-sided  
Flycatcher  
BCC Rangewide  
(CON) (This is a  
Bird of  
Conservation  
Concern (BCC)  
throughout its  
range in the  
continental USA  
and Alaska.)



Rufous  
Hummingbird  
BCC Rangewide  
(CON) (This is a  
Bird of  
Conservation  
Concern (BCC)  
throughout its  
range in the  
continental USA  
and Alaska.)



**Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.**

[Nationwide Conservation Measures](#) describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. [Additional measures](#) or [permits](#) may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

**What does IPaC use to generate the migratory birds potentially occurring in my specified location?**

The Migratory Bird Resource List is comprised of USFWS [Birds of Conservation Concern \(BCC\)](#) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the [Avian Knowledge Network \(AKN\)](#). The AKN data is based on a growing collection of [survey, banding, and citizen science datasets](#) and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a DCC species in that area, an eagle ([Eagle Act](#) requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the [AKN Phenology Tool](#).

**What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?**

The probability of presence graphs associated with your migratory bird list are based on data provided by the [Avian Knowledge Network \(AKN\)](#). This data is derived from a growing collection of [survey, banding, and citizen science datasets](#).

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

### How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: [The Cornell Lab of Ornithology All About Birds Bird Guide](#), or (if you are unsuccessful in locating the bird of interest there), the [Cornell Lab of Ornithology Neotropical Birds guide](#). If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

### What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are [Birds of Conservation Concern](#) (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the [Eagle Act](#) requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

### Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the [Northeast Ocean Data Portal](#). The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the [NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf](#) project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the [Diving Bird Study](#) and the [nanotag studies](#) or contact [Caleb Spiegel](#) or [Pam Loring](#).

### What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to [obtain a permit](#) to avoid violating the Eagle Act should such impacts occur.

### Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring

in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

## Facilities

### National Wildlife Refuge lands

Any activity proposed on lands managed by the [National Wildlife Refuge](#) system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

THERE ARE NO REFUGE LANDS AT THIS LOCATION.

### Fish hatcheries

THERE ARE NO FISH HATCHERIES AT THIS LOCATION.

### Wetlands in the National Wetlands Inventory

Impacts to [NWI wetlands](#) and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local [U.S. Army Corps of Engineers District](#).

THERE ARE NO KNOWN WETLANDS AT THIS LOCATION.

#### Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

### **Data exclusions**

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

### **Data precautions**

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

## **APPENDIX F – PUBLIC NOTICES AND COMMENTS**



**AFFIDAVIT OF PUBLICATION**

Rob Clark  
TTL Associates, Inc.  
44265 Plymouth Oaks Boulevard  
Plymouth MI 48170

**STATE OF WASHINGTON, COUNTIES OF WALLA WALLA**

The undersigned, on oath states that he/she is an authorized representative of Walla Walla Union-Bulletin, Inc., publisher of the Walla Walla Union-Bulletin, of general circulation published daily in Walla Walla County, State of Washington. The Walla Walla Union-Bulletin has been approved as a legal newspaper by orders of the Superior Court of Walla Walla County.

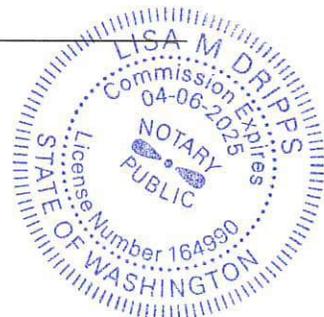
The notice, in the exact form annexed, was published in the regular and entire issue of said paper or papers and distributed to its subscribers during all of the said period.

06/16/2022, 06/19/2022

Agent JACKIE CHAPMAN Signature Jackie Chapman

Subscribed and sworn to before me on June 29, 2022  
Lisa M. Dupps  
(Notary Signature) Notary Public in and for the State of Washington, residing at Yakima

Publication Cost: \$272.62  
Order No: 32243  
Customer No: 28606  
PO #: Jonathan Wainwright



Publication Cost: \$272.62  
Order No: 32243  
Customer No: 28606  
PO #: Jonathan  
Wainwright

**PUBLIC NOTICE  
SCOPING FOR AN ENVIRONMENTAL ASSESSMENT  
U.S. DEPARTMENT OF VETERANS AFFAIRS  
PROPOSED SEISMIC UPGRADES AT  
JONATHAN M. WAINWRIGHT MEMORIAL  
VA MEDICAL CENTER  
WALLA WALLA, WASHINGTON**

The U.S. Department of Veterans Affairs (VA) requests scoping input for the preparation of an Environmental Assessment (EA) for proposed seismic upgrades for eight buildings (Buildings 1, 68, 69, 74, 75, 77, 78, and 80) at the Jonathan M. Wainwright Memorial VA Medical Center, located at 77 Wainwright Drive in Walla Walla, WA (Walla Walla VAMC). The purpose of the Proposed Action is to address existing seismic deficiencies at the Walla Walla VAMC. The Proposed Action is needed to improve safety for Veterans, staff, and visitors, and to ensure the continuity of health care services and administrative operations to Veterans in the event of a major earthquake. Additional project details are available in the scoping notice at <https://www.cfm.va.gov/environmental/>.

If you have any of the following: comments on the scope of issues for analysis, input on potential alternatives, information or existing analyses relevant to the Proposed Action, or information concerning historic properties at the Walla Walla VAMC, please submit your comments/input via email by July 18, 2022 to [vacoenvironment@va.gov](mailto:vacoenvironment@va.gov) with the subject line "Walla Walla VAMC Seismic Upgrade EA." For additional information or questions please contact Patrick Read, VA Environmental Engineer, at [patrick.read@va.gov](mailto:patrick.read@va.gov). Reference "Walla Walla VAMC Seismic Upgrade EA" in your correspondence.

VA anticipates publishing the Draft EA for a 30-day public review and comment period in the Summer of 2022. VA will publish a notice of availability of the Draft EA in the Walla Walla Union-Bulletin and solicit public comments at that time. The Draft PEA will be available for public review at the Walla Walla Public Library (located at 238 E. Alder Street, Walla Walla, WA) and via the VA CFM website: <https://www.cfm.va.gov/environmental/>.  
(Pub. June 16 & 19, 2022)