FINAL
PROGRAMMATIC ENVIRONMENTAL ASSESSMENT

FOR THE PROPOSED

SEISMIC AND FUNCTIONAL IMPROVEMENT PROJECTS

ROSEBURG VA MEDICAL CENTER
913 NW GARDEN VALLEY BOULEVARD
ROSEBURG, OREGON

U.S. DEPARTMENT OF VETERANS AFFAIRS

OFFICE OF CONSTRUCTION AND FACILITIES MANAGEMENT
425 I STREET, NW
WASHINGTON, DC 20001

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EXECUTIVE SUMMARY

This Programmatic Environmental Assessment (EA) has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed seismic and functional improvement projects at the Roseburg VA Medical Center (Roseburg VAMC) located at 913 NW Garden Valley Boulevard in Roseburg, Douglas County, Oregon. This PEA has been prepared as required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 et seq.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26), and VA's *NEPA Interim Guidance for Projects*.

The Roseburg VAMC campus has functional and size deficiencies that do not meet VA's modern standards for the delivery of health care services to our nation's Veterans. Additionally, the campus is located within a seismically active area, classified as having a "high" distribution of damaging seismic activity and a seismic study of the campus found that several campus buildings, including the main hospital building (Building 1) and the mental health building (Building 2), do not meet current seismic building code standards and are at risk of significant damage or failure from a major seismic event. To correct these seismic and functional deficiencies, VA is proposing a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the campus, including construction of a new building (Building 100) to replace the function of Building 1. In addition, VA plans to transfer approximately 14 acres of the campus to the State of Oregon for the future development of a State Veterans Home (domiciliary or nursing home for Veterans). VA is currently in the preliminary, pre-design phase for the proposed seismic and functional improvement projects.

This PEA evaluates the potential environmental impacts of several proposed seismic and functional improvement projects being considered for the Roseburg VAMC campus to complete a comprehensive cumulative effects analysis. VA will review this PEA prior to implementing each proposed project, once additional details for that project are available. Where the impacts of the proposed project are identified and analyzed within this PEA, no further NEPA analysis will be needed or undertaken. If the impacts of the proposed project have not been evaluated within this PEA, VA will perform supplemental, tiered NEPA analyses, if necessary, to complete the evaluation of the potential effects of the proposed project. It is anticipated that supplemental NEPA analysis will be required for the future disposal of Building 1 once vacated, as the plans for this building are unknown at this time. In addition, supplemental NEPA analysis may be necessary for the Oregon Department of Veterans' Affairs (ODVA) future development of the State Veterans Home.

PROPOSED ACTION

VA's Proposed Action includes a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the campus. The Proposed Action includes the construction of a new approximately 165,000 building gross square feet (BGSF) building (Building 100) with associated parking to replace the functions currently within Building 1 (approximately 126,500 BGSF); seismic retrofitting/renovating Buildings 2, 11, 13, and 16; renovating/additions to three buildings; demolishing five buildings totaling approximately 21,000 BGSF; existing parking lot modifications; and associated roadway, infrastructure, and utility upgrades. In addition, the Proposed Action includes the transfer of approximately 14 acres of the campus to the State of Oregon for the future development of a State Veterans Home.

The Proposed Action construction activities would be conducted in phases over a period of approximately 10 years to minimize campus disruption, support continued campus operations, and minimize the need for temporary swing space during construction. VA is currently in the preliminary, pre-design phase for the

Proposed Action projects, and project design details are not yet available. VA anticipates that Proposed Action construction could begin in 2024 and could be completed as early as 2033. VA anticipates that the seismic retrofitting and renovation of Buildings 11, 13 and 16 could begin as early as 2026 and could be completed in 2027; Building 100 construction could begin in 2027 and could be completed in 2029; and the seismic retrofitting and renovation of Building 2 could begin in 2029 and could be completed in 2030. Some swing space would be provided by the existing campus buildings, but VA assumes that temporary trailers or modular buildings would also be installed on the Roseburg VAMC campus during construction to accommodate campus operations. VA estimates Building 1 could be vacated and available for transfer, reuse, or disposal after 2030. VA anticipates transferring the 14-acre area to the State of Oregon by 2026. Design and construction of the State Veterans Home would be conducted by ODVA, subject to the availability of funding. VA projects the State Veterans Home could be constructed between 2030 and 2033.

PURPOSE AND NEED

The purpose of the Proposed Action is to correct seismic, functional, and building size deficiencies at the Roseburg VAMC campus to meet the current and anticipated operational needs of the medical center and to enhance Veteran health care services. The Proposed Action would also provide land adjacent to the Roseburg VAMC to the State of Oregon for the future development of a State Veterans Home.

Executive Order (EO) 12941 of 1994 requires all federal agencies to develop an inventory of their owned and leased buildings in order to identify and mitigate unacceptable seismic risks to those buildings. EO 13717 of 2016 was issued to establish a Federal Earthquake Risk Management Standard and requires federal agencies to adhere to seismic design requirements of current national building codes and standards. EO 13717 encourages agencies to exceed the minimum required codes and standards to ensure that buildings are fully earthquake resilient.

In compliance with EO 13717, 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 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.

The Roseburg VAMC is identified on the Federal Emergency Management Agency (FEMA) Earthquake Hazard Map for the Western U.S. as being located within an area near several active seismic faults, with a high potential for ground shaking. Buildings in this earthquake hazard area are subject to the IBC Seismic Design Class D (may experience strong shaking) requirements. VA's Office of Facilities Planning also characterizes the Roseburg VAMC as being located within an area of high seismic activity.

The Proposed Action is needed to ensure the Roseburg VAMC campus facilities can provide protection to Veterans, employees, and other building occupants and can maintain health care and administrative operations in Critical and Essential facilities in the event of a major earthquake (VA Directive 7512).

VA's seismic inventory and evaluation efforts as required by EOs 12941 and 13717, VA Directive 7512 and VA Handbook 18-8, identified seven buildings at the Roseburg VAMC campus as seismically deficient (Buildings 1, 2, 3, 11, 13, 16, and 17). These buildings, all built in the 1930s, were constructed prior to modern seismic codes and do not meet current seismic building standards. As a result, they do not conform to current rules, standards, and design criteria for building seismic structural performance, and are at risk for significant damage or failure from a seismic event. VA proposes to seismically retrofit and renovate Building 3, built in 1933 as nurses' quarters and currently used as administrative space, as a separate project. The proposed retrofit and renovation of Building 3 was previously addressed through a separate NEPA analysis (categorical exclusion). The remaining six seismically deficient buildings (Buildings 1, 2, 11, 13, 16, and 17) are addressed as part of this Proposed Action.

The Proposed Action is also needed to correct functional and space deficiencies at the Roseburg VAMC. Specifically, facility condition assessments of the Roseburg VAMC campus identified several significant facility condition deficiencies. The two primary campus buildings, Buildings 1 and 2, were constructed in 1933 and do not meet VA's modern sizing, layout functionality and other related standards for Veteran health care. Additionally, some health care department spaces within the buildings are undersized. Notably Building 1 is not configured to support required critical department adjacencies and has insufficient space for private patient rooms. VA estimates Building 1 is approximately 40,000 BGSF too small to meet the space requirements of VA's modern health care model. In addition, the Roseburg VAMC does not have a sufficient number of Community Living Center (CLC) beds. The Roseburg VAMC currently maintains 55 CLC beds; VA estimates 56 additional CLC beds are needed at the campus.

The Proposed Action is further needed to establish a State Veterans Home in Roseburg. Oregon Revised Statute 408.385 requires ODVA to establish a State Veterans Home in Roseburg. VA and the ODVA have identified land at the Roseburg VAMC campus as the preferred location for the State Veterans Home. ODVA may seek VA funding for up to 65% of the construction costs for the State Veterans Home but must hold title to the land prior to receiving funding.

ALTERNATIVES

This PEA examines in depth two alternatives, the Proposed Action and the No Action Alternative:

Proposed Action

The Proposed Action includes a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the campus, including construction of a new main hospital building (Building 100) to replace the function of Building 1 and the transfer, repurpose or disposal of Building 1, once vacated, following the process in the *VA Real Property Disposal Guide*. In addition, VA proposes to transfer approximately 14 acres of the campus to the State of Oregon for the future development of a State Veterans Home. All of the projects are located entirely within the Roseburg VAMC campus on land currently owned by the federal government.

The primary components of the Proposed Action include the following:

New Construction

- Constructing a 3 to 4-story, approximately 165,000 BGSF building (Building 100) east of the Ellipse perimeter road. The building would be designed to improve patient care, meet modern health care delivery standards, consolidate clinical departments, and improve workplace conditions. Existing clinical functions within the seismically-deficient, undersized, approximately 126,500 BGSF Building 1 would be relocated to Building 100. Additionally, clinics within Building 1AC would be relocated to Building 100 to improve health care delivery.
- Constructing approximately 425 surface parking spaces north, east, and south of Building 100 to support the parking needs of the building.
- Vacating and disposing of Building 1 once Building 100 is operational. Building 1, the current main hospital building, is a 5-story, red brick building that was constructed in 1933 and is located west of the Ellipse. Disposition plans would be determined in the future, at the appropriate time. VA would carefully assess transfer, repurpose, and disposal options for Building 1 following the process in the VA *Real Property Disposal Guide*. VA would evaluate potential adaptive reuse, transfer to another agency or appropriate private entity, or, if no appropriate use is determined viable, demolition. The VA *Real Property Disposal Guide* prioritizes reuse, adaptation, and transfer before considering other options.

Seismic Retrofit and Renovation

- Seismically retrofitting/renovating Building 2, the approximately 74,500 BGSF mental health clinic building. Retrofitting would include the demolition of the interior of the building and the installation of the structural upgrades and new mechanical systems to the building interior. It is anticipated that little or no exterior modification would be required. Following the completion of the upgrades, the building interior would be redesigned and constructed to meet the current health care delivery requirements. The existing mental health clinic and administrative functions would remain in the retrofitted/renovated Building 2. In addition, administrative and support spaces from Buildings 1, 17, and 57 would be relocated to Building 2.
- Seismically retrofitting/renovating Buildings 11 (laundry), 13 (warehouse), and 16 (chapel/auditorium). The seismic retrofits are anticipated to include selective demolition of the interiors of the buildings, the installation of shear walls and other interior improvements, and interior renovation. Some exterior retrofits may be constructed on the sides and rear of Building 16 to minimize interior impact to the auditorium. The proposed renovation would retain the chapel and auditorium within Building 16. Following renovation, the buildings would be returned to their current uses.

Renovation/Additions

- Renovating the vacated clinical space of the ambulatory care/outpatient clinic building (Building 1AC) for an approximately 30-bed CLC facility. Approximately 25,000 BGSF of space within Building 1AC would be vacated and renovated. In addition, education facilities that are currently located in Building 2 would be relocated to Building 1AC.
- Remodeling the interior and adding a small wing to an existing CLC building (Building 81). The addition would result in approximately 14 additional CLC beds.
- Renovating the interior of Building 71 (patient food and nutrition, and campus canteen).

Demolition

- Demolishing five buildings in the northern portion of the campus, totaling approximately 21,000 BGSF, to allow for improved site access and parking. These buildings include Building 17 (VAMC offices), Building 57 (VA police station), Building 58 (environmental management and greenhouse), Building 63 (hazardous materials storage), and Building T15 (storage). Functions within Buildings 17 and 57 would be relocated to Building 2. Functions within Buildings 58, 63 and T15 would be relocated to Building 3.
- Depending on the disposition of Building 1, demolition of Building 60 (electrical utility building) and Building 84 (MRI building). These small buildings are located adjacent to and support Building 1.

Existing Parking Lot Modification

- Rebalancing existing surface parking lots at the campus. Once Building 1 operations are transferred to Building 100, less parking would be needed in the western portion of the campus. Other proposed projects would also affect existing parking in the northern and western portions of the campus. It is anticipated that approximately 97 new parking spaces would be constructed, approximately 165 parking spaces would be demolished, and approximately 189 parking spaces would no longer be used. However, the future disposition of Building 1 would determine the number of parking spaces needed in the western portion of the campus. In the near term, existing parking lots would likely be used for construction contractor parking and material storage and/or temporary swing space for the Proposed Action construction.

Infrastructure and Utilities

- Constructing/realigning campus roads as needed to provide access to proposed Building 100, the future State Veterans Home, and other campus buildings. Veterans Way may be extended (reconnected) from the northern campus entrance between Buildings 2 and 16 to the road circling the Ellipse, which would lead to new roads in the eastern portion of the campus that would serve Building 100 and the State Veterans Home. Other campus road modifications may also be constructed to improve traffic flow and pedestrian safety.
- Infrastructure upgrades to support the proposed development, including installing, relocating, and removing campus utilities, as necessary, based on the final design.

Campus Enhancements

- Installation of picnic tables, benches, pavilions, and/or exercise equipment on four concrete pads along the perimeter of the Ellipse.
- Renovating and enhancing of the existing flagpole area within the Ellipse in front of Building 1.

Land Transfer for State Veterans Home

- Transferring approximately 14 acres of land located in the eastern portion of the campus to the State of Oregon for ODVA's future construction of a State Veterans Home. Based on preliminary information provided by ODVA, it is anticipated that the State Veterans Home would include several connected, single-story buildings totaling approximately 130,000 BGSF and would include approximately 150 beds.

No Action Alternative

Under the No Action Alternative, the proposed seismic corrections and functional/operational improvement projects for the Roseburg VAMC campus would not be implemented. VA would continue to use the six seismically deficient buildings (Buildings 1, 2, 11, 13, 16, and 17) with no seismic upgrades or corrections. VA would not be compliant with the requirements of EO 13717 or VA Directive 7512 for the Roseburg VAMC campus. The buildings would remain structurally deficient and at risk of significant damage or failure from a major seismic event. This alternative would not improve patient, staff, and visitor safety in the event of a major earthquake and would not enable the facility to return to operation quickly in the aftermath of such a seismic event, and thus would not meet the requirements of VA's Seismic Program.

Additionally, functional and space deficiencies would persist at the Roseburg VAMC, which would significantly limit VA's ability to provide health care services to regional Veterans consistent with VA's modern standards of care. In addition, ODVA would not have designated land at or adjacent to the Roseburg campus to establish a State Veterans Home.

The No Action Alternative would not meet the purpose of or need for the Proposed Action. However, the No Action Alternative was evaluated in this PEA as required under the CEQ regulations; it also provides a benchmark for comparing potential impacts of the Proposed Action.

AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

The affected environment of the Roseburg VAMC campus and its immediate surroundings, or the region of influence of the Proposed Action, is discussed in Section 3 of this PEA.

The two considered alternatives are evaluated in this PEA to determine their potential direct or indirect impact(s) on the physical, environmental, cultural, and socioeconomic aspects of the Proposed Action's region of influence. Technical areas evaluated in this PEA are:

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

Potential Effects of the Proposed Action

The Proposed Action would result in impacts to the area as identified throughout Section 3 and summarized in the table below. These include short-term and/or long-term potential adverse impacts to aesthetics, air quality, cultural resources, soil and geology, hydrology and water quality, wildlife and habitat, noise, wetlands, community services, solid waste and hazardous materials, transportation, and parking (short-term only). All of these potential impacts are less than significant and would be further reduced through careful coordination and implementation of general best management practices (BMPs); management, minimization, avoidance, and mitigation measures; and compliance with regulatory requirements, as identified in Section 4.

Approximately 77 acres of the 114-acre Roseburg VAMC campus are located within the Roseburg Veterans Administration Hospital Historic District (RVAHHD; the Historic District), which was listed in the National Register of Historic Places (NRHP) in 2013. The Historic District includes most of the western portion of the campus. Several of the campus buildings that are proposed for modification or demolition (Buildings 1, 2, 13, 16, and 17), the Ellipse, the flagpole, and the campus roadway system are contributing resources to the Historic District. The Proposed Action has the potential to adversely affect these historic properties. In addition, the Proposed Action has the potential to interrupt existing viewsheds in the Historic District. However, the full levels of effect cannot be determined until the project designs are completed. Consequently, VA developed a Programmatic Agreement (PA) for the Proposed Action with the Oregon State Historic Preservation Office (OR SHPO), the Advisory Council on Historic Preservation (ACHP), City of Roseburg Historic Resources Review Commission (HRRC) as the Certified Local Government, and the ODVA. The PA includes project design review by OR SHPO and the consulting parties to avoid and/or minimize adverse effects to historic properties. If adverse effects to historic properties are identified, VA would notify the OR SHPO and the consulting parties and would consult to resolve the adverse effects. The PA provides a wide range of potential mitigation measures that would be considered to address adverse effects. The selection and implementation of the mitigation measures would be included within an agreement document, if required. As part of the PA, VA is required to conduct an archaeological survey of the 14 acres land being considered for the State Veterans Home prior to transfer to ODVA and to evaluate any identified archaeological deposits for NRHP eligibility. The PA also requires a cultural resource survey for archaeological resources prior to ground disturbance and/or archaeological monitoring during ground disturbing activities to ensure that any archaeological resources that may be encountered are properly handled. In addition, the PA provides

procedures for OR SHPO and consulting party involvement with regards to the future disposal of Building 1. The final PA (Appendix D) was fully executed by VA, OR SHPO, ODVA, and ACHP on June 3, 2024. With the implementation of the PA stipulations, cultural resources impacts would be less than significant.

The Proposed Action would have a significant long-term beneficial effect of mitigating existing seismic hazards at the campus. In addition, the Proposed Action would result in significant long-term beneficial socioeconomic impacts by providing improved and modernized health care facilities and services to regional Veterans.

Potential Effects of the No Action Alternative

Under the No Action Alternative, proposed seismic upgrades and space/functional improvements would not be implemented. No beneficial impacts attributable to the Proposed Action would occur. Buildings 1, 2, 11, 13, and 16 would remain structurally deficient and at risk of significant damage or failure from a major seismic event and no improvements to the current level of VA's regional health care services or capability would occur.

Summary of Impact Analysis

Resource Area	Proposed Action	No Action
Aesthetics	The Proposed Action would not result in an abrupt change to the visual resources of the area. New project buildings would be consistent with the size and general character of the existing campus buildings in the area. Demolition of Building 17 would not significantly alter the appearance or character of the campus. Minor, long-term adverse impact.	None
Air Quality	Dust, particulate matter, and construction equipment emissions during construction managed with BMPs. Additional vehicle and stationary equipment emissions during operation. Campus is located within a NAAQS full attainment area. In addition, emissions are anticipated to be below general conformity de minimis levels. Less-than-significant, short-term and long-term adverse impacts.	None
Cultural Resources	Several of the campus buildings that are proposed for modification or demolition (Buildings 1, 2, 13, 16, and 17), the Ellipse, the flagpole, and the campus roadway system are contributing resources to the NRHP-listed Historic District. The Proposed Action has the potential to adversely affect these historic properties. In addition, the Proposed Action has the potential to interrupt existing viewsheds in the Historic District. However, the full levels of effect cannot be determined until the project designs are completed. VA executed a Programmatic Agreement (PA) under Section 106 of the NHPA with the OR SHPO, ACHP, HRRC, and ODVA to avoid, minimize, and/or mitigate historic property impacts from the Proposed Action. No significant impact with the implementation of the PA stipulations.	None

Resource Area	Proposed Action	No Action
Geology and Soils	Soil erosion and sedimentation impacts during construction managed with BMPs. Proposed Action would mitigate existing seismic building hazards associated with six buildings at the campus. Less-than-significant, short-term adverse impact. Significant, long-term beneficial impact.	Six buildings at the campus would remain structurally deficient and at risk of significant damage from a major seismic event.
Hydrology and Water Quality	Stormwater runoff during construction managed through BMPs. The Proposed Action would include evaluation, design, and construction of improvements to the on-campus stormwater management system to ensure it complies with EISA Section 438 requirements for the Proposed Action development. These would include new on-campus stormwater management and retention structures and any required improvements to the existing campus stormwater management system to comply with EISA Section 438. Less-than-significant, short-term adverse impact.	None
Wildlife and Habitat	Campus does not contain habitat for federally-listed or state-listed species. Proposed Action construction areas contain habitat for migratory birds, Oregon sensitive bird species, and bats. Potential impacts to these species during construction would be minimized through seasonal vegetation clearing. Minor short-term adverse impact during construction.	None
Noise	Short-term noise impacts during construction managed through BMPs. Minor operational impacts associated with vehicle traffic, HVAC systems, and grounds maintenance, similar to existing noise levels. Less-than-significant, short-term and long-term adverse impact.	None
Land Use	Proposed Action is consistent with existing use of the Roseburg VAMC campus and current zoning, and is compatible with surrounding land use. No/negligible impact.	None

Resource Area	Proposed Action	No Action
Floodplains, Wetlands, and Coastal Zone Management	No federally jurisdictional wetlands or waters of the US are present in the Proposed Action construction areas. An excavated drainage ditch considered potential waters of the State is located in the proposed Building 100 and Building 100 parking area. VA would design Building 100 and its parking lots with a buffer of undeveloped land along the drainage ditch to avoid encroaching on waters of the State. An 0.62-acre wetland considered waters of the State is located on the eastern portion of the campus within the 14-acre proposed State Veterans Home parcel. It is anticipated that ODVA would design the State Veterans Home with a buffer to avoid encroachment on the identified wetlands to the extent possible. If wetland impacts cannot be avoided, ODVA would proceed with wetland mitigation in coordination with ODSL. Less-than-significant long-term adverse wetland impacts. The Roseburg VAMC campus is not located within a 100-year floodplain or designated coastal zone. No floodplain or coastal zone impact.	None
Socioeconomics	Short-term local beneficial impact to employment during construction. Significant long-term beneficial socioeconomic impacts by addressing seismic hazards associated with existing campus buildings and providing improved and modernized health care facilities and services to regional Veterans.	Seismically deficient buildings would continue to pose life-safety and VAMC operational risks
Community Services	Proposed Action would not put a significant additional load on local community services. Additional construction and operational traffic associated with the Proposed Action has the potential to emergency vehicles exiting the adjacent fire station. However, fire station operations are not anticipated to be significantly impacted. Less-than-significant short-term and long-term adverse impacts.	None
Solid Waste and Hazardous Materials	Existing project buildings contain asbestos and may contain lead-based paint. Asbestos would be removed prior to building renovation/demolition. BMPs to control dust would control potential lead-based paint emissions. Potential impacts from petroleum and hazardous substance handling during construction and operation would be managed through BMPs and regulatory compliance. Less-than-significant, short-term and long-term adverse impacts.	None

Resource Area	Proposed Action	No Action
Transportation and Parking	Less-than-significant, short-term adverse impact from construction traffic and temporary loss of parking. A Traffic Impact Analysis (TIA) found that new traffic generated by the Proposed Action, using conservative trip generation assumptions, would not have a significant impact on area intersections. Overall intersection levels of service would remain adequate (LOS D or better) and would generally be consistent with background levels without the Proposed Action. The TIA found that the left turn movement from NW Garden Valley Boulevard on to Estelle Street (traffic entering the medical center) would operate at LOS E during the a.m. peak hour with the Proposed Action, if Building 1 were to be reused by others for offices (conservative assumption). The queueing analysis found that this traffic would exceed the striped storage currently demarcated in the turn lane; however, would not interfere with storage needed within the turn lane for the next intersection. Less-than-significant, long-term adverse traffic impact. Additional parking spaces created by the Proposed Action would exceed the anticipated future parking demand and would free up space for construction contractor parking and staging, a long-term beneficial impact.	None
Utilities	Proposed Action would result in an increase in the consumption of utilities. Capacities of local utilities appear to be adequate to support the Proposed Action. Negligible impact.	None
Environmental Justice	Located in an area with a lower minority population and a higher low-income population than the State of Oregon. Proposed Action would have little impact on area residents. Low-income and minority Veterans would benefit from the implementation of the Proposed Action at the Roseburg VAMC. Negligible impact.	None

Cumulative Impacts

This PEA also examines the potential cumulative effects of implementing each of the considered alternatives. This analysis finds that the Proposed Action, with the implementation of the BMPs; management, minimization, avoidance, and mitigation measures; and regulatory compliance measures specified in this PEA, would not result in significant adverse cumulative impacts to the human environment.

AGENCY AND PUBLIC INVOLVEMENT

Agencies and organizations consulted for this PEA include:

- U.S. Fish and Wildlife Service
- U.S. Environmental Protection Agency
- U.S. Army Corps of Engineers

- USDA Natural Resource Conservation Service
- Bureau of Land Management – Roseburg District Office
- Oregon Department of Environmental Quality, various programs
- Oregon Health Authority – Drinking Water Services
- Oregon Department of Fish and Wildlife – Wildlife Division
- Oregon Department of Transportation
- Oregon Department of State Lands
- Oregon Department of Veterans' Affairs
- Oregon State Historic Preservation Office
- Douglas Soil and Water Conservation District
- Douglas County, various departments
- City of Roseburg City Manager
- City of Roseburg, various departments
- Confederated Tribes of Siletz Indians Tribal Veterans Services Office
- Confederated Tribes of the Grand Ronde Tribal Veterans Services Office
- Confederated Tribes of the Warm Springs Reservation Tribal Veterans Services Office
- Confederated Tribes of the Umatilla Indian Reservation Tribal Veterans Services Office
- Cow Creek Band of Umpqua Tribe of Indians Tribal Veterans Services Office
- Klamath Tribes Tribal Veteran Services Office

VA initiated the NEPA scoping process with these agencies and organizations on June 13, 2023, which included emailing the agencies/organizations scoping letters with a request for information and comment based on the available information regarding the campus area and the Proposed Action. The scoping letters also informed the agencies/organizations of two public meetings held at the campus on June 28 and 29, 2023 to receive public input on the scope of the environmental assessment. Responses were received from the U.S. Environmental Protection Agency (U.S. EPA), Douglas County Planning Department (DCPD), City of Roseburg Community Development Department (RCDD), members of the community, and VAMC staff. Input provided by government agencies is summarized in Section 6. Copies of relevant correspondence can be found in Appendix B. Information and comments obtained from the public is summarized in Section 5. Written input from the public is provided in Appendix H. Agency and public information and comments have been incorporated into this PEA, as and where appropriate.

On June 6, 2023, VA initiated NHPA Section 106 consultation for the Proposed Action with the OR SHPO, ACHP, Douglas County Historic Resource Review Commission, Douglas County Historical Society, Restore Oregon, City of Roseburg Historic Resources Review Commission (HRRC) as the Certified Local Government, Patrick W. Kelley Post 2468 & Auxiliary of the Veterans of Foreign Wars, and Earl B. Stewart Post 16 of the American Legion, and the nine federally-recognized Indian tribes identified as having possible ancestral ties to the Roseburg VAMC area, including the Burns Paiute Tribe; Confederated Tribes of the Warm Springs Reservation of Oregon; Confederated Tribes of Siletz Indians of Oregon; Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians; Confederated Tribes of the Grand Ronde Community of Oregon; Confederated Tribes of the Umatilla Indian Reservation; Coquille Indian Tribe; Cow Creek Band of Umpqua Tribe of Indians; and Klamath Tribes. Responses were received from the Oregon SHPO, ACHP, ODVA, HRRC, and the Klamath Tribes. Section 106 agency and tribal information and comments have been incorporated in this PEA (Section 3.4) and are summarized in Section 6. Section 106 correspondence is provided in Appendix C. The fully executed PA is provided in Appendix D.

VA published and distributed the Draft PEA for a 30-day public comment period, as announced by a Notice of Availability published in The News-Review on May 3 and 5, 2024. The Draft PEA was posted for public review on the VA Office of Construction and Facilities Management Environmental Program Office website: (https://www.cfm.va.gov/environmental/index.asp). In addition, a hard copy of the Draft

PEA was made available for public review at the Roseburg Public Library, located at 1409 NE Diamond Lake Boulevard, Roseburg, OR. VA emailed notification of the release of the Draft PEA to the stakeholders previously contacted during the NEPA scoping. The notice contained a link to the Draft PEA on VA's website and invited stakeholders to provide comments on the document. U.S. EPA provided comments on the Draft PEA. These comments were considered in preparing the Final PEA, as appropriate, and are summarized in Section 5.

VA held public meetings at the Roseburg VAMC on May 21, 2024 at 10 am and 7 pm to present a summary of the Draft PEA and to receive public input and comment on the Draft PEA. Three members of the public and five representatives of ODVA attended the 10 am meeting. No members of the public attended the 7 pm meeting. Comments on the Draft PEA received during the public meeting are also summarized and addressed in Section 5.

CONCLUSIONS

This PEA concludes there would be no significant adverse impact, either individually or cumulatively, to the human environment associated with the Proposed Action, provided the management, minimization, mitigation, and regulatory compliance measures described in this PEA are implemented.

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APPENDICES

ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
AADT	annual average daily traffic
ACM	asbestos-containing materials
amsl	above mean sea level
AST	above ground storage tank
bgs	below ground surface
BMP	best management practice
CAA	Clean Air Act
CEQ	President's Council on Environmental Quality
CFR	Code of Federal Regulations
CZMA	Coastal Zone Management Act
dBA	decibels, A-weighted scale
DCPD	Douglas County Planning Department
DoD	Department of Defense
EA	environmental assessment
ESA	Endangered Species Act
EUL	enhanced use lease
IPaC	USFWS Information for Planning and Conservation
JD	jurisdictional determination
LBP	lead-based paint
LOS	level of service
MBTA	Migratory Bird Treaty Act
MOA	memorandum of agreement
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
ODEQ	Oregon Department of Environmental Quality
ODFW	Oregon Department of Fish and Wildlife
ODOT	Oregon Department of Transportation
ODSL	Oregon Department of State Lands
PEA	programmatic environmental assessment
Phase I ESA	Phase I Environmental Site Assessment
RCDD	Roseburg Community Development Department
REC	recognized environmental condition
ROMC	Roseburg, Oregon Municipal Code
ROW	right-of-way
RVAHHD	Roseburg Veterans Administration Hospital Historic District
SHPO	State Historic Preservation Office
SWPPP	stormwater pollution prevention plan
TIA	transportation impact analysis
U.S.	United States of America
USACE	U.S. Army Corps of Engineers
USC	U.S. Code
USDA	U.S. Department of Agriculture

USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
VA	U.S. Department of Veterans Affairs
VAMC	VA Medical Center
WOTUS	Waters of the U.S.

1.0 INTRODUCTION, INCLUDING PURPOSE OF AND NEED FOR THE ACTION

1.1 Introduction

This Programmatic Environmental Assessment (PEA) has been prepared as required in accordance with the National Environmental Policy Act of 1969 ([NEPA]; 42 United States Code [USC] 4321 et seq.), the President's Council on Environmental Quality (CEQ) Regulations Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations [CFR] 1500-1508), *Environmental Effects of the Department of Veterans Affairs Actions* (38 CFR Part 26), and VA's *NEPA Interim Guidance for Projects* (U.S. Department of Veterans Affairs 2010). Federal agencies are required to consider the environmental effects of their proposed actions. This PEA is required to determine if VA's Proposed Action would have significant environmental impacts.

This PEA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed seismic and functional improvement projects at the Roseburg VA Medical Center (Roseburg VAMC) located at 913 NW Garden Valley Boulevard in Roseburg, Douglas County, Oregon.

The Roseburg VAMC campus has functional and size deficiencies that do not meet VA's modern standards for the delivery of health care services to our nation's Veterans. Additionally, the campus is located within a seismically active area, classified as having a "high" distribution of damaging seismic activity and a seismic study of the campus found that several campus buildings, including the main hospital building (Building 1) and the mental health building (Building 2), do not meet current seismic building code standards and are at risk of significant damage or failure from a major seismic event. To correct these seismic and functional deficiencies, VA is proposing a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the campus, including construction of a new building (Building 100) to replace the function of Building 1. In addition, VA plans to transfer approximately 14 acres of the campus to the State of Oregon for the future development of a State Veterans Home (domiciliary or nursing home for Veterans). VA is currently in the preliminary, pre-design phase for the proposed seismic and functional improvement projects.

This PEA evaluates the potential environmental impacts of several proposed seismic and functional improvement projects being considered for the Roseburg VAMC campus (described in Section 2) to complete a comprehensive cumulative effects analysis. VA will review this PEA prior to implementing each proposed project, once additional details for that project are available. Where the impacts of the proposed project are identified and analyzed within this PEA, no further NEPA analysis will be needed or undertaken. If the impacts of the proposed project have not been evaluated within this PEA, VA will perform supplemental, tiered NEPA analyses, if necessary, to complete the evaluation of the potential effects of the proposed project. It is anticipated that supplemental NEPA analysis will be required for the future disposal of Building 1 once vacated, as the plans for this building are unknown at this time. In addition, supplemental NEPA analysis may be necessary for the Oregon Department of Veterans' Affairs (ODVA) future development of the State Veterans Home.

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

1.2 Background

The Roseburg VA Health Care System (VAHCS) includes the Roseburg VAMC and four VA clinics in central and southern Oregon. The Roseburg VAMC currently offers primary and specialty health care services to approximately 49,865 Veterans living in central and southern Oregon and northern California. Approximately 28,242 Veterans are currently served by the Roseburg VAMC.

The approximately 114-acre Roseburg VAMC campus is located within the central portion of the City of Roseburg, west of Interstate 5 and north of the South Umpqua River. The campus is located within an institutional and recreational land use area with considerable greenspace that is surrounded by fully developed mixed residential, commercial, and industrial areas. Figures 1-1 and 1-2 depict the location of the Roseburg VAMC campus. Figure 1-3 is an aerial photograph depicting the current development at the Roseburg VAMC campus and the surrounding area.

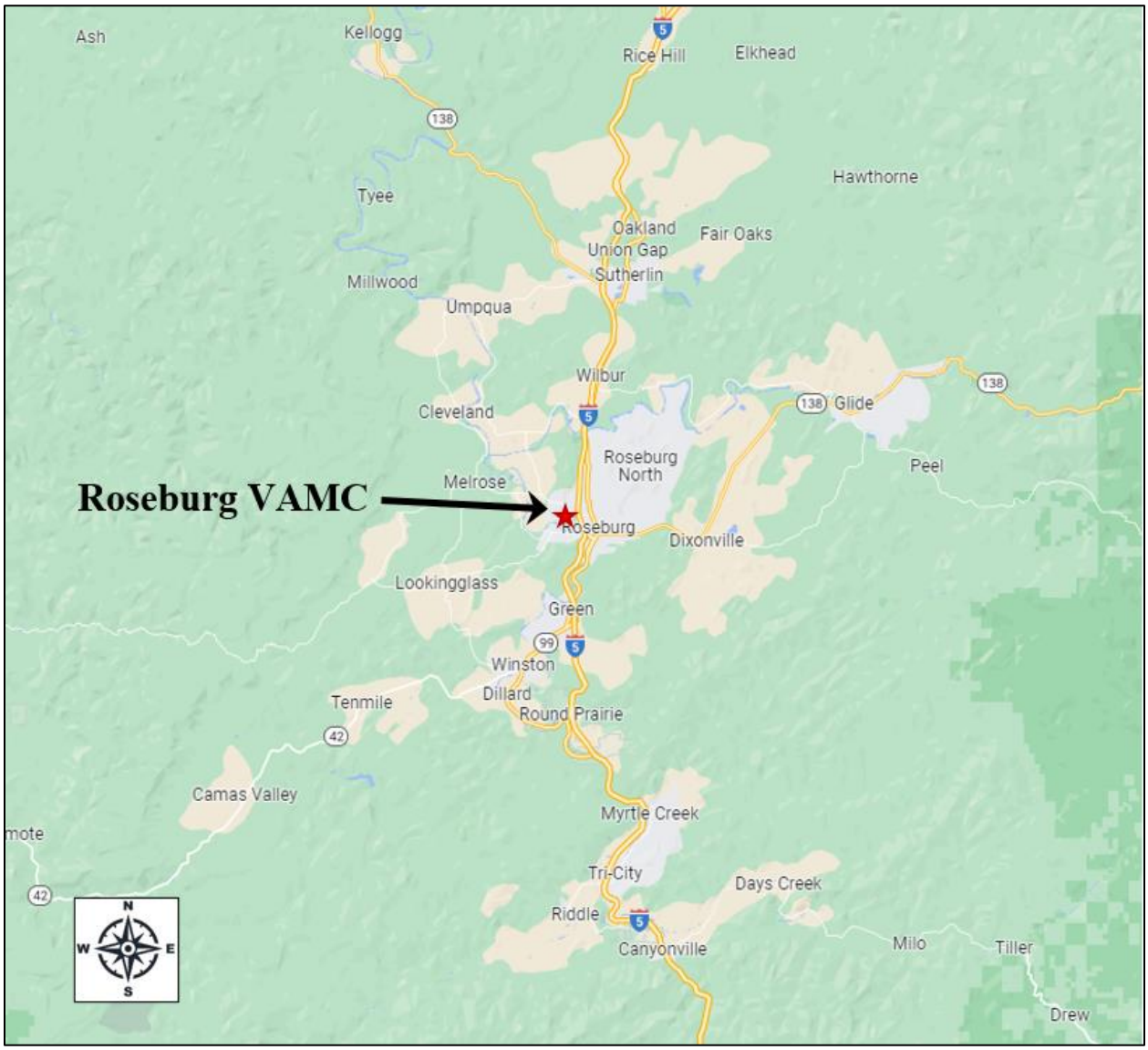

Figure 1-1 Regional Location Map

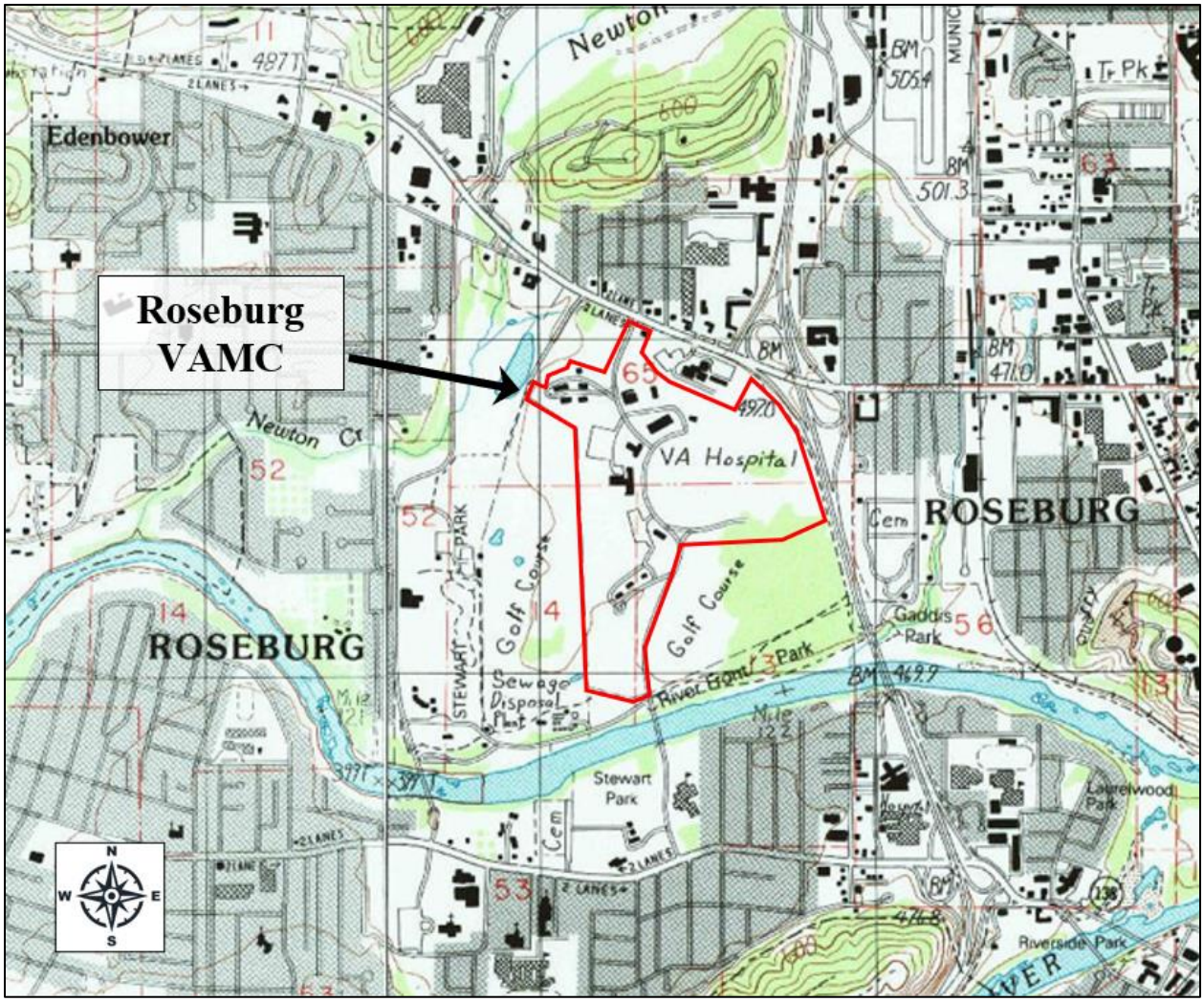

Figure 1-2 Topographic Location Map (Roseburg East and Roseburg West, OR 1987)

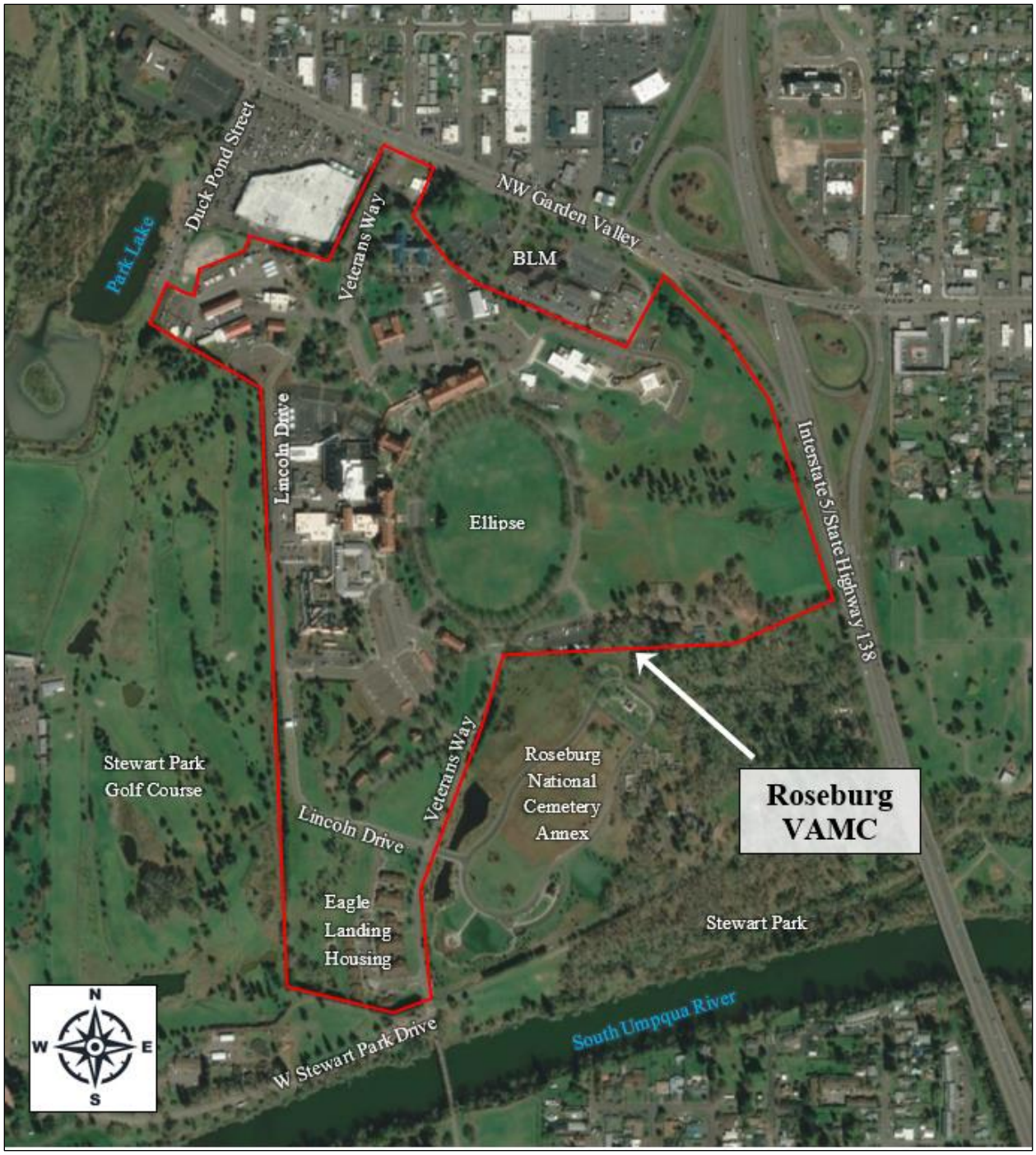

Figure 1-3 Aerial Photograph of Roseburg VAMC Campus

In 1932, the City of Roseburg and the State of Oregon transferred the Roseburg VAMC property to the U.S. Government to establish a federally operated Veterans hospital. The Roseburg VA Hospital opened in 1933 and was initially a domiciliary and general medical hospital. VA classified the facility as a neuropsychiatric hospital in 1937. Roseburg VAMC was reclassified from a psychiatric facility to a general medical and surgical hospital in 1975. The initial hospital included 13 buildings. The main hospital and administrative buildings were constructed along a road (Veterans Way) on the north and west

sides of a large, central grassy greenspace, generally known as the Ellipse. The residential quarters were located southwest of the Ellipse and the utility/maintenance buildings were constructed north/northwest of the Ellipse. Since the 1930s, the Roseburg VAMC campus has been transformed to meet the changing health care needs of area Veterans, including the construction of new buildings and parking lots. Many of the new buildings have been constructed since the 1980s. In 2011, approximately 44 acres of the campus were transferred to the VA National Cemetery Administration (NCA) for the development of the Roseburg National Cemetery Annex (southeast of the campus).

Approximately 77 acres of the 114-acre Roseburg VAMC campus are located within the Roseburg Veterans Administration Hospital Historic District (RVAHHD; the Historic District), which was listed in the National Register of Historic Places (NRHP) in 2013. The Historic District includes most of the western portion of the campus, including the Ellipse. The Historic District includes 23 contributing resources; several of the campus buildings that are proposed for modification or demolition (Buildings 1, 2, 13, 16, and 17), the Ellipse, the flagpole, and the campus roadway system are contributing resources to the Historic District.

1.3 Purpose and Need

The purpose of the Proposed Action is to correct seismic, functional, and building size deficiencies at the Roseburg VAMC campus to meet the current and anticipated operational needs of the medical center and to enhance Veteran health care services. The Proposed Action would also provide land adjacent to the Roseburg VAMC to the State of Oregon for the future development of a State Veterans Home.

Executive Order (EO) 12941 of 1994 requires all federal agencies to develop an inventory of their owned and leased buildings in order to identify and mitigate unacceptable seismic risks to those buildings. EO 13717 of 2016 was issued to establish a Federal Earthquake Risk Management Standard and requires federal agencies to adhere to seismic design requirements of current national building codes and standards. EO 13717 encourages agencies to exceed the minimum required codes and standards to ensure that buildings are fully earthquake resilient.

In compliance with EO 13717, 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 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.

The Roseburg VAMC is identified on the Federal Emergency Management Agency (FEMA) Earthquake Hazard Map for the Western U.S. as being located within an area near several active seismic faults, with a high potential for ground shaking. Buildings in this earthquake hazard area are subject to the IBC Seismic Design Class D (may experience strong shaking) requirements. VA's Office of Facilities Planning also characterizes the Roseburg VAMC as being located within an area of high seismic activity. Figure 1-4 depicts the location of Roseburg VAMC on the VA Seismic Zone Map.

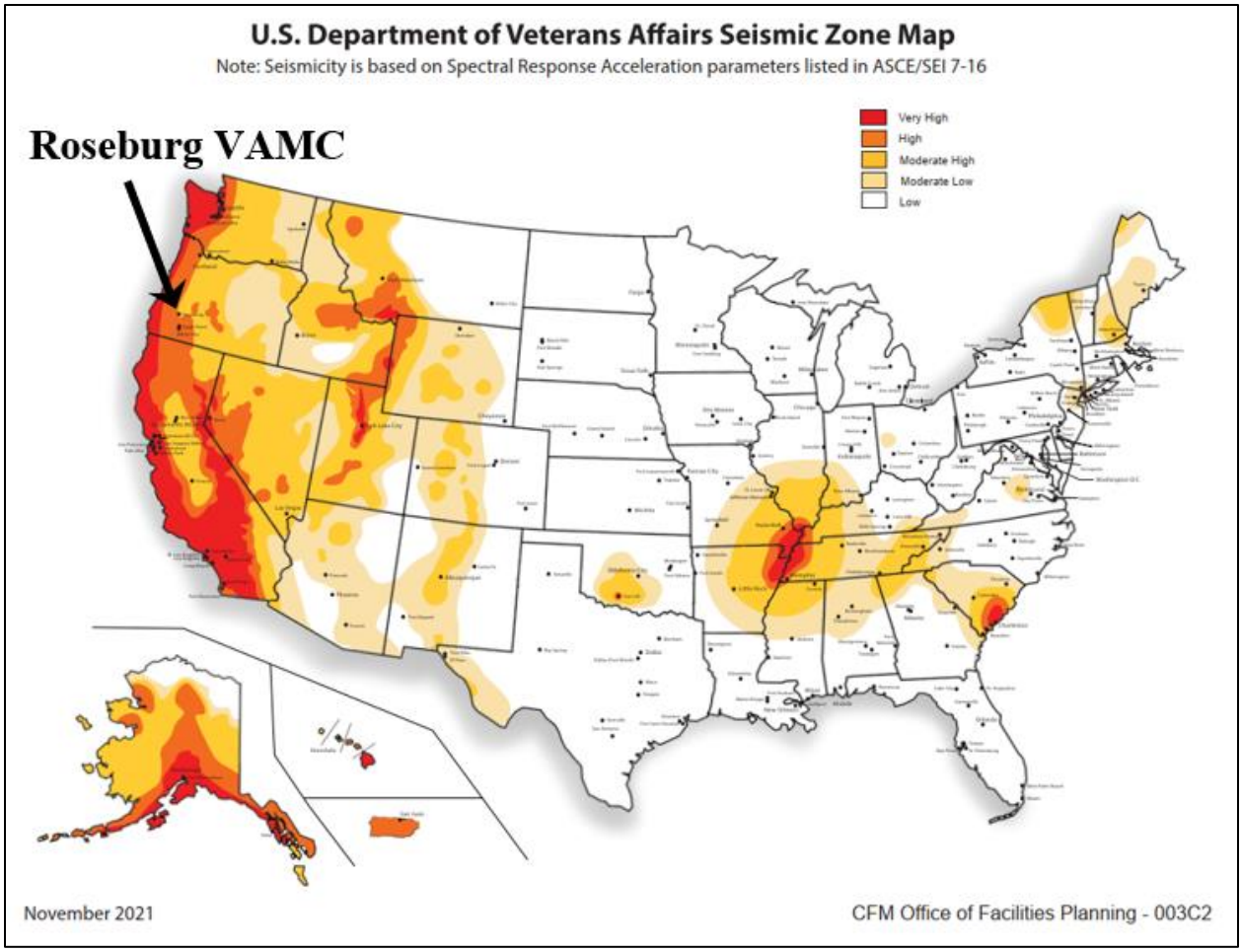

Figure 1-4 VA Seismic Zone Map

The Proposed Action is needed to ensure the Roseburg VAMC campus facilities can provide protection to Veterans, employees, and other building occupants and can maintain health care and administrative operations in Critical and Essential facilities in the event of a major earthquake (VA Directive 7512).

VA's seismic inventory and evaluation efforts as required by EOs 12941 and 13717, VA Directive 7512 and VA Handbook 18-8, identified seven buildings at the Roseburg VAMC campus as seismically deficient (Buildings 1, 2, 3, 11, 13, 16, and 17). These buildings, all built in the 1930s, were constructed prior to modern seismic codes and do not meet current seismic building standards. As a result, they do not conform to current rules, standards, and design criteria for building seismic structural performance, and are at risk for significant damage or failure from a seismic event. VA proposes to seismically retrofit and renovate Building 3, built in 1933 as nurses' quarters and currently used as administrative space, as a separate project. The proposed retrofit and renovation of Building 3 was previously addressed through a separate NEPA analysis (categorical exclusion). The remaining six seismically deficient buildings (Buildings 1, 2, 11, 13, 16, and 17) are addressed as part of this Proposed Action.

The Proposed Action is also needed to correct functional and space deficiencies at the Roseburg VAMC. Specifically, facility condition assessments of the Roseburg VAMC campus identified several significant facility condition deficiencies. The two primary campus buildings, Buildings 1 and 2, were constructed in 1933 and do not meet VA's modern sizing, layout functionality, and other related standards for Veteran health care. Additionally, some health care department spaces within the buildings are undersized. Notably Building 1 is not configured to support required critical department adjacencies and has

insufficient space for private patient rooms. VA estimates Building 1 is approximately 40,000 building gross square feet (BGSF) too small to meet the space requirements of VA's modern health care model. In addition, the Roseburg VAMC does not have a sufficient number of Community Living Center (CLC) beds. The Roseburg VAMC currently maintains 55 CLC beds; VA estimates 56 additional CLC beds are needed at the campus.

The Proposed Action is further needed to establish a State Veterans Home in Roseburg. Oregon Revised Statute 408.385 requires ODVA to establish a State Veterans Home in Roseburg. VA and the ODVA have identified land at the Roseburg VAMC campus as the preferred location for the State Veterans Home. Oregon DVA may seek VA funding for up to 65% of the construction costs for the State Veterans Home but must hold title to the land prior to receiving funding.

1.4 Decision-Making

This PEA has been prepared to identify, analyze, and document the potential physical, environmental, cultural, and socioeconomic impacts associated with VA's proposed seismic and functional improvement projects at the Roseburg VAMC campus.

Under NEPA, VA is required to incorporate environmental considerations into their decision-making process for major federal actions they propose to undertake. This is done in accordance with the regulations identified in Section 1.1.

The analysis presented in this PEA regarding potential environmental, cultural, and socioeconomic effects is part of the VA decision making process for consideration of implementation of the Proposed Action, and, as appropriate, implementation of management, minimization, and mitigation measures to reduce potential effects on the environment.

2.0 DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1 Introduction

This Section provides information regarding the Proposed Action and its alternatives, including those that VA initially considered, but eliminated, and the reasons for eliminating them. The processes developed and applied by VA provide an understanding of VA's rationale for analyzing the Proposed Action in this PEA.

2.2 Proposed Action

VA's Proposed Action includes a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the campus. The Proposed Action includes the construction of a new approximately 165,000 BGSF building (Building 100) with associated parking to replace the functions currently within Building 1 (approximately 126,500 BGSF); seismic retrofitting/renovating Buildings 2, 11, 13, and 16; renovating/additions to three buildings; demolishing five buildings totaling approximately 21,000 BGSF; existing parking lot modifications; and associated roadway, infrastructure, and utility upgrades. In addition, the Proposed Action includes the transfer of approximately 14 acres of the campus to the State of Oregon for the future development of a State Veterans Home.

The Proposed Action construction activities would be conducted in phases over a period of approximately 10 years to minimize campus disruption, support continued campus operations, and minimize the need for temporary swing space during construction. VA is currently in the preliminary, pre-design phase for the Proposed Action projects, and project design details are not yet available. VA anticipates that Proposed Action construction could begin in 2024 and could be completed as early as 2033. VA anticipates that the seismic retrofitting and renovation of Buildings 11, 13 and 16 could begin as early as 2026 and could be completed in 2027; Building 100 construction could begin in 2027 and could be completed in 2029; and the seismic retrofitting and renovation of Building 2 could begin in 2029 and could be completed in 2030. Some swing space would be provided by the existing campus buildings, but VA assumes that temporary trailers or modular buildings would also be installed on the Roseburg VAMC campus during construction to accommodate campus operations. VA estimates Building 1 could be vacated and available for transfer, reuse, or disposal after 2030. VA anticipates transferring the 14-acre area to the State of Oregon by 2026. Design and construction of the State Veterans Home would be conducted by ODVA, subject to the availability of funding. VA projects the State Veterans Home could be constructed between 2030 and 2033.

2.3 Alternatives Development

After identifying the seismic structural, functional, and size deficiencies of Buildings 1 and 2, VA examined other potential buildings and spaces within the Roseburg VAMC campus for relocating the functions of these buildings. No existing suitable space for these services is available at the campus. VA also considered leasing new facilities, acquiring existing off-campus facilities, or contracting out health care services, but found that none of these options were viable (see Section 2.5). Consequently, VA determined that construction a new, larger building (Building 100) to replace Building 1 and seismically retrofitting and renovating Building 2 was the only viable and reasonable alternative to meet the purpose and need for the Proposed Action. The new, larger main hospital building (Building 100) is required to maintain existing health care services at the campus during Proposed Action construction and is needed to address the existing Building 1 space deficiency. Once the existing functions within Building 1 are

relocated to Building 100, the vacated Building 1 may be used to provide temporary swing space for Building 2 functions while Building 2 is seismically retrofitted and renovated.

Once it was determined that construction of a new main hospital building at the Roseburg VAMC campus was the only viable alternative, VA examined various locations at the campus for construction of the building. VA initially identified the Rose Garden north of Building 1AC as the preferred location for the new main hospital building. However, further evaluation of this alternative found that the Rose Garden did not provide adequate space for a new hospital building and associated required parking. Consequently, VA re-evaluated the campus and selected the unimproved, grassy area east of the Ellipse as the new preferred location for the new main hospital building and parking lots. This area accommodates a larger building and expanded parking necessary to meet the requirements of the Proposed Action. In addition, this location would maintain the balance of structures along the Ellipse and would help retain the character of the Roseburg VAMC campus.

2.4 Alternatives Evaluated in this PEA

This PEA examines in depth two alternatives, the Proposed Action, and the No Action Alternative.

2.4.1 Proposed Action

The Proposed Action includes a series of construction, seismic retrofitting, renovation, and demolition projects at locations across the campus, including construction of a new main hospital building (Building 100) to replace the function of Building 1 and the transfer, repurpose, or disposal of Building 1, once vacated, following the process in the *VA Real Property Disposal Guide*. In addition, VA proposes to transfer approximately 14 acres of the campus to the State of Oregon for the future development of a State Veterans Home. All of the projects are located entirely within the Roseburg VAMC campus on land currently owned by the federal government.

The primary components of the Proposed Action include the following:

<u>New Construction</u>

- Constructing a 3 to 4-story, approximately 165,000 BGSF building (Building 100) east of the Ellipse perimeter road. The exterior of the building would incorporate some of the characteristics of the Roseburg VAMC campus aesthetics but would not mimic or seek to duplicate the historic features of the Historic District. The building would be designed to improve patient care, meet modern health care delivery standards, consolidate clinical departments, and improve workplace conditions. Existing clinical functions within the seismically-deficient, undersized, approximately 126,500 BGSF Building 1 would be relocated to Building 100. Additionally, clinics within Building 1AC would be relocated to Building 100 to improve health care delivery.
- Constructing approximately 425 surface parking spaces north, east, and south of Building 100 to support the parking needs of the building.
- Vacating and disposing of Building 1 once Building 100 is operational. Building 1, the current main hospital building, is a 5-story, red brick building that was constructed in 1933 and is located west of the Ellipse. Disposition plans would be determined in the future, at the appropriate time. VA would carefully assess transfer, repurpose and disposal options for Building 1 following the process in the VA *Real Property Disposal Guide*. VA would evaluate potential adaptive reuse, transfer to another agency or appropriate private entity, or, if no appropriate use is determined viable, demolition. The VA *Real Property Disposal Guide* prioritizes reuse, adaptation, and transfer before considering other options.

Seismic Retrofit and Renovation

- Seismically retrofitting/renovating Building 2, the approximately 74,500 BGSF mental health clinic building. Building 2 is a 3-story red brick building that was constructed in 1933 and is located north of the Ellipse. Retrofitting would include the demolition of the interior of the building and the installation of the structural upgrades and new mechanical systems to the building interior. It is anticipated that little or no exterior modification would be required. Following the completion of the upgrades, the building interior would be redesigned and constructed to meet the current health care delivery requirements. The existing mental health clinic and administrative functions would remain in the retrofitted/renovated Building 2. In addition, administrative and support spaces from Buildings 1, 17, and 57 would be relocated to Building 2.
- Seismically retrofitting/renovating Buildings 11 (laundry), 13 (warehouse), and 16 (chapel/auditorium). Building 11 is a one-story, approximately 13,000 BGSF red brick building that was built in 1933 with an addition constructed between 1985 and 2000. Building 13 is a one-story, approximately 8,000 BGSF red brick building that was constructed in 1933. Building 16 is a two-story, approximately 11,300 BGSF building that was constructed in 1936. Building 16 is located northwest of the Ellipse. Buildings 11 and 13 are located in the northwestern, engineering/maintenance portion of the campus. The seismic retrofits are anticipated to include selective demolition of the interiors of the buildings, the installation of shear walls and other interior improvements, and interior renovation. Some exterior retrofits may be constructed on the sides and rear of Building 16 to minimize interior impact to the auditorium. The proposed renovation would retain the chapel and auditorium within Building 16. Following renovation, the buildings would be returned to their current uses.

Renovation/Additions

- Renovating the vacated clinical space of the ambulatory care/outpatient clinic building (Building 1AC) for an approximately 30-bed CLC facility. Building 1AC is a one-story, approximately 47,000 BGSF brick and concrete addition to Building 1 that was constructed in 1994. Approximately 25,000 BGSF of space within Building 1AC would be vacated and renovated. In addition, education facilities that are currently located in Building 2 would be relocated to Building 1AC.
- Remodeling the interior and adding a small wing to an existing CLC building (Building 81). The addition would result in approximately 14 additional CLC beds. Building 81 is a one-story, approximately 24,000 BGSF brick and cement-fiber board building that was constructed in the western portion of the campus in 1999.
- Renovating the interior of Building 71 (patient food and nutrition, and campus canteen). Building 71 is a one-story, approximately 17,000 BGSF red brick building that was constructed in the western portion of the campus in 1994.

Demolition

- Demolishing five buildings in the northern portion of the campus, totaling approximately 21,000 BGSF, to allow for improved site access and parking. These buildings include Building 17 (VAMC offices), Building 57 (VA police station), Building 58 (environmental management and greenhouse), Building 63 (hazardous materials storage), and Building T15 (storage). Building 17 is a one-story, approximately 9,900 BGSF red brick building that was constructed in 1938. Building 57 is a one-story, approximately 2,400 BGSF building that was constructed in 1967. Building 58 is a one-story, approximately 3,800 BGSF building that was constructed in 1970 (greenhouse) and 1990s (building). Building 63 is an approximately 400 BGSF storage building constructed in 1980. T15 is a one-story, approximately 4,500 BGSF building that was constructed

in 1995. Functions within Buildings 17 and 57 would be relocated to Building 2. Functions within Buildings 58, 63 and T15 would be relocated to Building 3.

- Depending on the disposition of Building 1, demolition of Building 60 (400 BGSF electrical utility building) and Building 84 (1,100 BGSF MRI building). These buildings are located adjacent to and support Building 1.

Existing Parking Lot Modification

- Rebalancing existing surface parking lots at the campus. Once Building 1 operations are transferred to Building 100, less parking would be needed in the western portion of the campus. Other proposed projects would also affect existing parking in the northern and western portions of the campus. It is anticipated that approximately 97 new parking spaces would be constructed, approximately 165 parking spaces would be demolished, and approximately 189 parking spaces would no longer be used. However, the future disposition of Building 1 would determine the number of parking spaces needed in the western portion of the campus. In the near term, existing parking lots would likely be use for construction contractor parking and material storage and/or temporary swing space for the Proposed Action construction.

Infrastructure and Utilities

- Constructing/realigning campus roads as needed to provide access to proposed Building 100, the future State Veterans Home, and other campus buildings. Veterans Way may be extended (reconnected) from the northern campus entrance between Buildings 2 and 16 to the road circling the Ellipse, which would lead to new roads in the eastern portion of the campus that would serve Building 100 and the State Veterans Home. Other campus road modifications may also be constructed to improve traffic flow and pedestrian safety.
- Infrastructure upgrades to support the proposed development, including installing, relocating, and removing campus utilities, as necessary, based on the final design.

Campus Enhancements

- Installation of picnic tables, benches, pavilions, and/or exercise equipment on four concrete pads along the perimeter of the Ellipse.
- Renovating and enhancing of the existing flagpole area within the Ellipse in front of Building 1. The project would include renovating the base of the existing American flagpole, removal of the landscape trees and shrubs behind the flagpole, and installation of additional flagpoles, a walkway, and new landscaping behind the American flagpole.

Land Transfer for State Veterans Home

- Transferring approximately 14 acres of land located in the eastern portion of the campus to the State of Oregon for ODVA's future construction of a State Veterans Home. Based on preliminary information provided by ODVA, it is anticipated that the State Veterans Home would include several connected, single-story buildings totaling approximately 130,000 BGSF and would include approximately 150 beds.

Figure 2-1 identifies the locations of the current Roseburg VAMC campus buildings. Figure 2-2 depicts the general locations of the Proposed Action projects.

Prior to construction, VA would obtain all applicable, required federal, state, and local permits for the Proposed Action projects from the appropriate government authorities. As a federal agency conducting projects on land owned by the federal government, VA is not subject to State of Oregon, Douglas County, or City of Roseburg regulations and permitting requirements that are not based on federal statutes. However, VA intends to implement the Proposed Action in a manner generally consistent with applicable

state and local regulations, where such regulations are compatible with VA's mission and are not in conflict with federal law and VA policy. Proposed Action construction projects that may be conducted by other parties, such as the future development of the State Veterans Home by ODVA and the renovation/reuse of Building 1 by another non-federal agency or private entity, would be subject to state and/or local regulations and permitting.

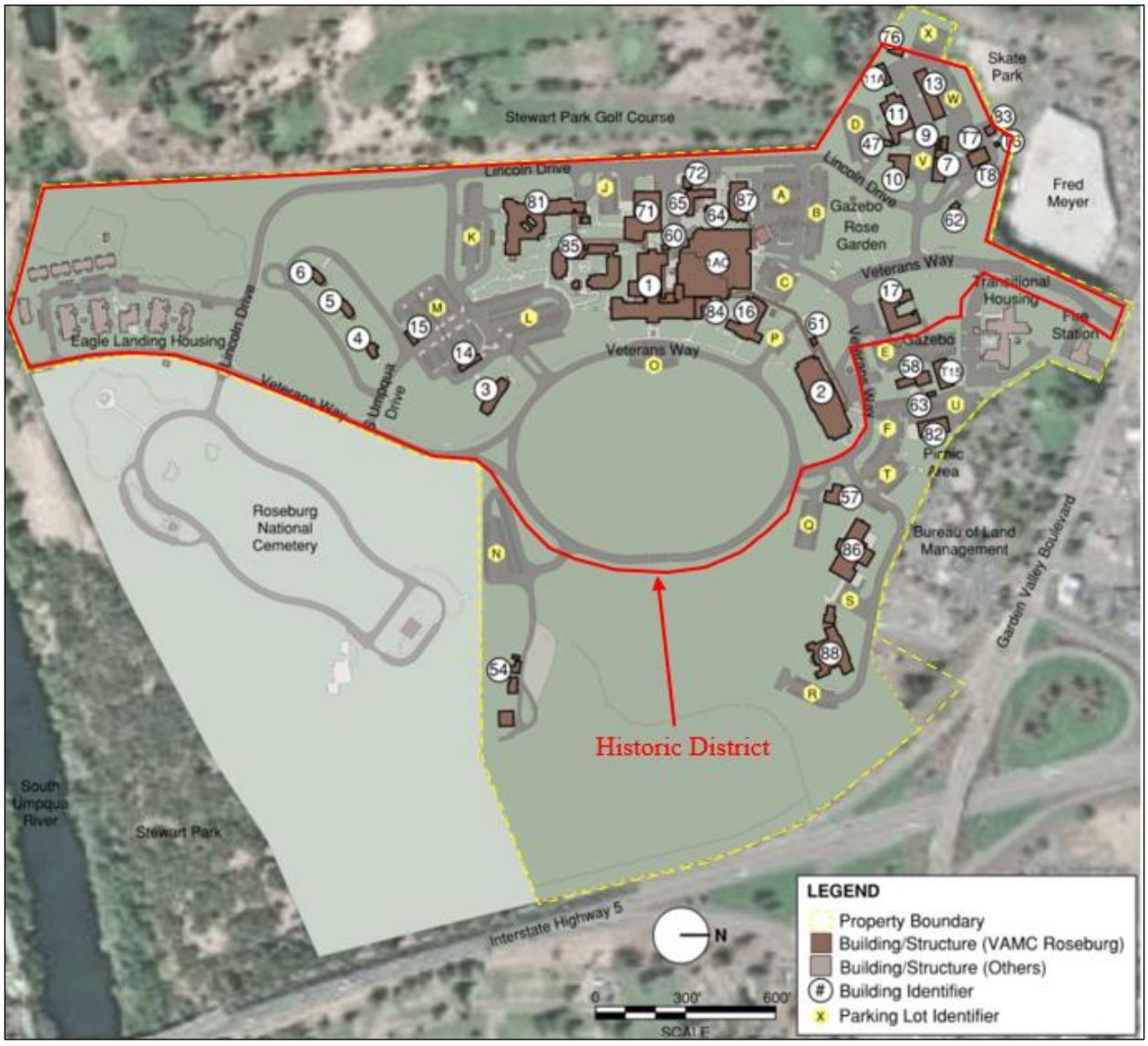

Figure 2-1 Existing Roseburg VAMC Campus Configuration

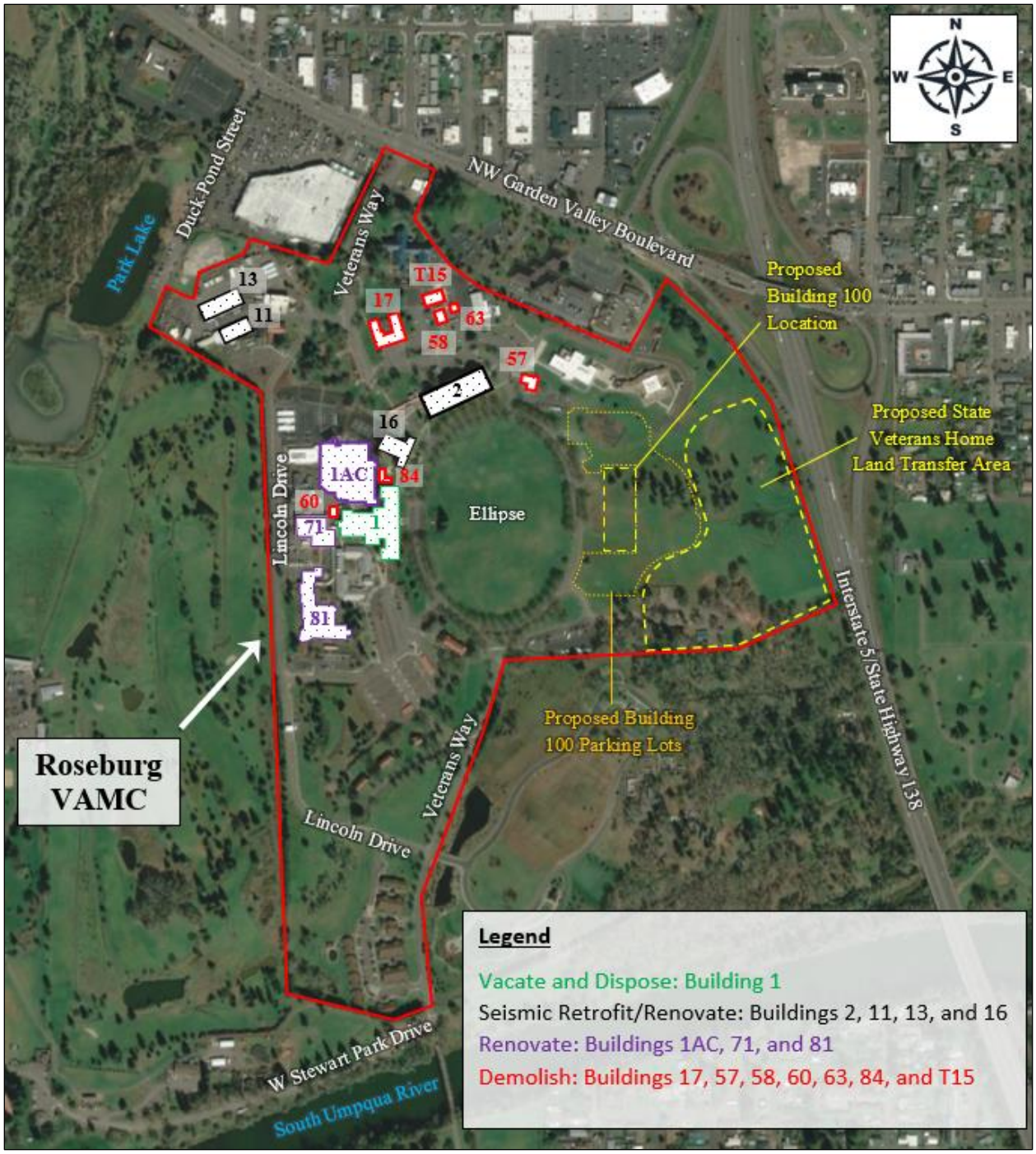

Figure 2-2 Approximate Locations of the Proposed Action Projects

2.4.2 No Action Alternative

Under the No Action Alternative, the proposed seismic corrections and functional/operational improvement projects for the Roseburg VAMC campus would not be implemented. VA would continue to use the six seismically deficient buildings (Buildings 1, 2, 11, 13, 16, and 17) with no seismic upgrades or corrections. VA would not be compliant with the requirements of EO 13717 or VA Directive 7512 for the Roseburg VAMC campus. The buildings would remain structurally deficient and at risk of significant

damage or failure from a major seismic event. This alternative would not improve patient, staff, and visitor safety in the event of a major earthquake and would not enable the facility to return to operation quickly in the aftermath of such a seismic event, and thus would not meet the requirements of VA's Seismic Program.

Additionally, functional and space deficiencies would persist at the Roseburg VAMC, which would significantly limit VA's ability to provide health care services to regional Veterans consistent with VA's modern standards of care. In addition, ODVA would not have designated land at or adjacent to the Roseburg campus to establish a State Veterans Home.

The No Action Alternative would not meet the purpose of or need for the Proposed Action. However, the No Action Alternative was evaluated in this PEA as required under the CEQ regulations; it also provides a benchmark for comparing potential impacts of the Proposed Action.

2.5 Alternatives Eliminated from Further Consideration

As described in Section 2.3, VA eliminated other initially considered alternatives for addressing the seismic structural, functional, and size deficiencies of Buildings 1 and 2, the primary project buildings. Options considered and the reasons for their elimination are summarized below.

- **Relocation to Existing Roseburg VAMC Facilities:** Relocation of some or all of the services provided by Buildings 1 and 2 to other the existing Roseburg VAMC buildings was not considered a feasible option due to the space limitations, age, and functionality of the existing campus buildings. The Roseburg VAMC does not have sufficient vacant building space for this option.
- **Lease a Newly Constructed Facility:** The lease option assumes that a lessor would build new facilities off-campus to accommodate some or all of the services provided by Buildings 1 and 2. Leasing off-campus space is an expensive option that would break the continuity of care provided at the Roseburg VAMC campus. This option would also be operationally inefficient due to its remoteness from the main Roseburg VAMC clinical and ancillary support and would require Veterans and staff to travel from the leased space to the Roseburg VAMC campus.
- **Contract Out Veteran Services on a Fee Basis Arrangement:** VA considered contracting out health care services to private health care providers in the Roseburg area. However, this alternative is not cost-effective and would not guarantee clear access and consistent standard and continuity of care. In addition, it is unlikely that existing private health care providers in the region have sufficient capacity to meet the health care needs of area Veterans.
- **Acquire an Existing Facility:** VA considered the acquisition and renovation of an existing facility in the Roseburg area for some or all of the services provided by Buildings 1 and 2. However, there are no suitable facilities available in the Roseburg area. In addition, like the lease of a newly constructed facility option, this option would break the continuity of care provided by the Roseburg VAMC and would be operationally inefficient.
- **VA/DoD Joint Project:** A VA/DoD joint venture project is not a feasible alternative as there are no DoD facilities in proximity of the Roseburg VAMC that would be suitable for this function.

For the reasons stated above, these other alternatives were eliminated from further consideration.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

3.1 Introduction

This Section describes the baseline (existing) environmental, cultural, and socioeconomic conditions at the Roseburg VAMC campus (see Figures 1-1 through 1-3 and 2-1) and its general vicinity (the Proposed Action's region of influence), with emphasis on those resources potentially impacted by the Proposed Action. Appendix E contains photographs of the campus and the surrounding area. Under each resource area (Sections 3.2 through 3.16), the potential direct and indirect effects of implementing the Proposed Action and the No Action Alternative are identified. Potential cumulative impacts are discussed in Section 3.17.

In this PEA, impacts are identified as either significant, less than significant (that is, impacts that would not be of the context or intensity to be considered significant under the CEQ regulations), or no/negligible impact. As used in this PEA, the terms "effects" and "impacts" are synonymous. Where appropriate and clearly discernible, each impact is identified as either adverse or beneficial.

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

Context refers to the significance of an effect to society as a whole (human and national), to an affected region, to affected interests, or to just the locality. Significance varies with the setting of the Proposed Action.

Intensity refers to the magnitude or severity of the effect and whether it is beneficial or adverse.

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

Resource areas considered in this PEA are as follows:

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

3.2 Aesthetics

The approximately 114-acre Roseburg VAMC campus is located within the central portion of the City of Roseburg, west of Interstate 5 and north of the South Umpqua River. The campus is located within an institutional and recreational land use area with considerable greenspace that is surrounded by fully developed mixed residential, commercial, and industrial areas. The campus is bordered to the north by a Bureau of Land Management (BLM) office, a Fred Meyer grocery store, and NW Garden Valley Boulevard, beyond which are commercial properties. The campus is bordered to the east by Interstate 5,

beyond which are residential and commercial properties and a cemetery. The campus is bordered to the south by the Roseburg National Cemetery Annex, wooded land associated with the cemetery, W. Stewart Park Drive, and a City of Roseburg Parks Maintenance Facility, beyond which is the South Umpqua River. The campus is bordered to the west by Stewart Park Golf Course (Roseburg municipal golf course), Roseburg Skate Park, and Stewart Park Natural Area. Figure 1-3 is an aerial photograph depicting the Roseburg VAMC campus and surrounding area.

The Roseburg VAMC campus currently consists of 44 VA owned and operated buildings of various ages, sizes and architectural styles that have been constructed at the campus since the early 1930s. Campus buildings range in height from one to five stories. The mostly grassy Ellipse is located in the central portion of the campus and is encircled by a tree-lined perimeter road, creating a park-like setting. The two primary campus buildings (Buildings 1 and 2) are constructed on the western and northern sides of the perimeter road, facing the Ellipse. Building 1, the main hospital building located on the western side of the Ellipse, is a five-story red brick building with a Classical Revival style exterior, constructed in 1933. Building 2, the mental health services building located on the northern side of the Ellipse, is a three-story red brick building with a Classical Revival style exterior, constructed in 1933. Additional VAMC buildings and associated parking lots are located in the northern, western, northwestern, and southwestern portions of the campus. Many of the original campus buildings are constructed of red brick with Classical Revival elements. The northern portion of the campus includes the Orchard Knoll Apartments (transitional housing facility), and the southern portion of the campus includes the Eagle Landing Apartments (low-income housing). The eastern portion of the campus is mostly undeveloped grassy land with some scattered trees.

The buildings proposed for seismic retrofit/renovation, renovation, and demolition are concentrated in the mostly developed northern, western, and northwestern portions of the campus. Building 100 and the State Veterans Home are proposed to be located in the undeveloped eastern portion of the campus.

The City of Roseburg enforces and controls aesthetics in various Chapters of the Roseburg, Oregon Municipal Code (ROMC). As a federal agency, VA is not subject to the City of Roseburg development standards or permitting requirements not based on federal statues; however, it is anticipated that the proposed seismic and functional improvement projects would be generally consistent with these requirements.

3.2.1 Effects of the Proposed Action

The Proposed Action would result in minor, long-term adverse aesthetic impacts. The Proposed Action projects would change the appearance of the Roseburg VAMC campus and would be visible from the surrounding properties, but would not result in an abrupt change to the visual resources of the area and would maintain the park-like campus setting. Building 100 would be constructed on the eastern portion of the Ellipse, facing the Ellipse and Building 1. The building would be 3 to 4 stories tall and would incorporate the characteristics of the campus, creating balance and symmetry around the Ellipse. The State Veterans Home would be a one-story structure located behind Building 100, between Building 100 and Interstate 5, and would be similar to other campus buildings constructed away from the Ellipse. The Proposed Action would include the demolition of Building 17, a red-brick historic building. However, the demolition of this smaller building (one-story, approximately 9,900 BGSF), located behind Building 2 from the Ellipse, would not significantly alter the appearance or character of the campus. In addition, no visually sensitive off-campus properties are located within the vicinity of the Proposed Action demolition and construction areas.

Aesthetics impacts associated with the Proposed Action construction activities would be minor and temporary.

3.2.2 Effects of the No Action Alternative

Under the No Action Alternative, no aesthetic impacts would occur as the Roseburg VAMC would continue its current operations with no new construction or demolition.

3.3 Air Quality

3.3.1 Ambient Air Quality

The ambient air quality in an area can be characterized in terms of whether it complies with the primary and secondary National Ambient Air Quality Standards (NAAQS). The Clean Air Act (CAA) requires the U.S. Environmental Protection Agency (U.S. EPA) to set NAAQS for pollutants considered harmful to public health and the environment. NAAQS are provided for the following principal pollutants, called "criteria pollutants" (as listed under Section 108 of the Clean Air Act):

- Carbon monoxide
- Lead
- Nitrogen oxides
- Ozone
- Particulate matter, divided into two size classes:
  - Aerodynamic size less than or equal to 10 micrometers
  - Aerodynamic size less than or equal to 2.5 micrometers
- Sulfur dioxide

Areas are designated by the U.S. EPA as "attainment", "non-attainment", "maintenance", or "unclassified" with respect to the NAAQS. Regions in compliance with the standards are designated as attainment areas. In areas where the applicable NAAQS are not being met, a non-attainment status is designated. Areas that have been classified as non-attainment, but are now in compliance, can be re-designated as maintenance status if the state completes an air quality planning process for the area. Areas for which no monitoring data are available are designated as unclassified and are by default considered to be in attainment of the NAAQS.

Information from the Oregon Department of Environmental Quality (ODEQ) and U.S. EPA Green Book internet websites (January 2024) indicates that the Roseburg VAMC is located in an area (Douglas County) that is in full attainment for the NAAQS pollutants.

The general conformity provision of the CAA prohibits the federal government from conducting, supporting, or approving any actions that do not conform to a U.S. EPA-approved State Implementation Plan (SIP), the state's plan for achieving and maintaining compliance with the goals of the CAA. Federal actions with emissions below de minimis levels specified in 40 CFR 93.153(b) are exempt from the general conformity regulations. The general conformity provision does not apply to criteria pollutants that are in attainment of the NAAQS. As the Roseburg VAMC is located in an area of full attainment for the NAAQS pollutants, the conformity regulations are not applicable to the Proposed Action.

3.3.2 State and Local Regulations

Federal Clean Air Act Sections 111 and 112 allow U.S. EPA to transfer primary implementation and enforcement authority for most of the federal air quality standards to state regulatory agencies through a process called delegation. Clean Air Act permitting in Oregon is the shared responsibility of U.S. EPA Region 10 and other agencies depending on geographic location within the state. The ODEQ Air Quality Division (AQD) oversees air permitting throughout the majority of Oregon (including Roseburg) to control present and future sources of emissions of air contaminants through Chapter 468 - Environmental

Quality Generally of the Oregon Revised Statutes (ORS) and Chapter 340 - Department of Environmental Quality, Division 200 through 268 (Air Quality Standards) of the Oregon Administrative Rules (OAR).

ODEQ develops and implements a wide range of pollution controls, including regulating air pollution from the industry and transportation sectors. Basic and General Air Contaminant Discharge Permits (ACDP) are established for some of the most common industry types in Oregon. General ACDPs are issued by order for a period of up to ten years and then individual sources are assigned to the General ACDP if they meet the qualifications. The Roseburg VAMC currently operates its boiler plant (Building 7) under ACDP General Permit Source No. 10-0034-11-01 and gasoline dispensing facility under ACDP General Permit Source No. 10-0034-22-01. Installation of additional equipment or modification to existing equipment at the Roseburg VAMC as part of the Proposed Action (such as new boilers) would require a new or revised ACDP General Permit from ODEQ AQD.

OAR Rule 340-208-0210 (requirements for fugitive emissions) indicates no person may cause or permit any materials handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. These requirements include using water or chemicals to control dust during demolition, construction, grading and clearing of land on unpaved roads, stockpiles, and other surfaces that can create dust.

Douglas County and the City of Roseburg do not maintain air quality regulations or ordinances.

3.3.3 Greenhouse Gases and Climate Change

In January 2023, CEQ released revised interim guidance for federal agencies on consideration of greenhouse gas (GHG) emissions and the effects of climate change in NEPA reviews, which describes how federal agencies should consider the effects of GHG emissions and climate change in their NEPA decision-making documents. The guidance indicates that federal agencies should consider both the potential effect of a proposed action on climate change, as indicated by its estimated GHG emissions, and the implications of climate change for the environmental effects of a proposed action. The guidance indicates that the agency analysis should be commensurate with the projected GHG emissions and climate impacts of the proposed action. The 2023 interim guidance does not include a threshold or screening level for GHG emission evaluations. However, CEQ's December 2014 guidance recommended that agencies consider 25,000 metric tons of carbon dioxide equivalent emissions on an annual basis as a threshold for GHG emissions, below which quantitative analysis of GHG is not recommended.

3.3.4 Sensitive Receptors

Sensitive receptors are land uses for which there is a sensitivity to air quality, such as residences, schools, hospitals, nursing homes, playgrounds, and parks. Sensitive air quality receptors in the vicinity of the Roseburg VAMC campus include:

- Roseburg VAMC users.
- Orchard Knoll Apartments, a transitional housing facility owned by the Housing Authority of Douglas County (HADCO) and located on the northern portion of the Roseburg VAMC campus.
- Eagle Landing Apartments, a low-income housing facility owned by Neighborworks Umpqua and located in the southern portion of the Roseburg VAMC campus.
- Roseburg National Cemetery Annex located adjacent to the southeast of the campus.
- Stewart Park Golf Course located adjacent to the west of the campus.
- Stewart Park Natural Area located adjacent to the west of the northwestern portion of the campus.

- Roseburg Masonic Cemetery located approximately 300 feet east of the campus, across I-5.
- Residential neighborhood located approximately 350 feet north of the campus, across NW Garden Valley Boulevard.
- Residential neighborhood located approximately 450 feet east of the campus, across I-5.
- Riverfront Park located approximately 800 feet southeast of the campus.
- Stewart Park located approximately 1,000 feet west of the campus.
- Gaddis Park located approximately 1,400 feet southeast of the campus, across I-5.

Sensitive air quality receptors in the Roseburg VAMC campus vicinity are depicted on Figure 3-1.

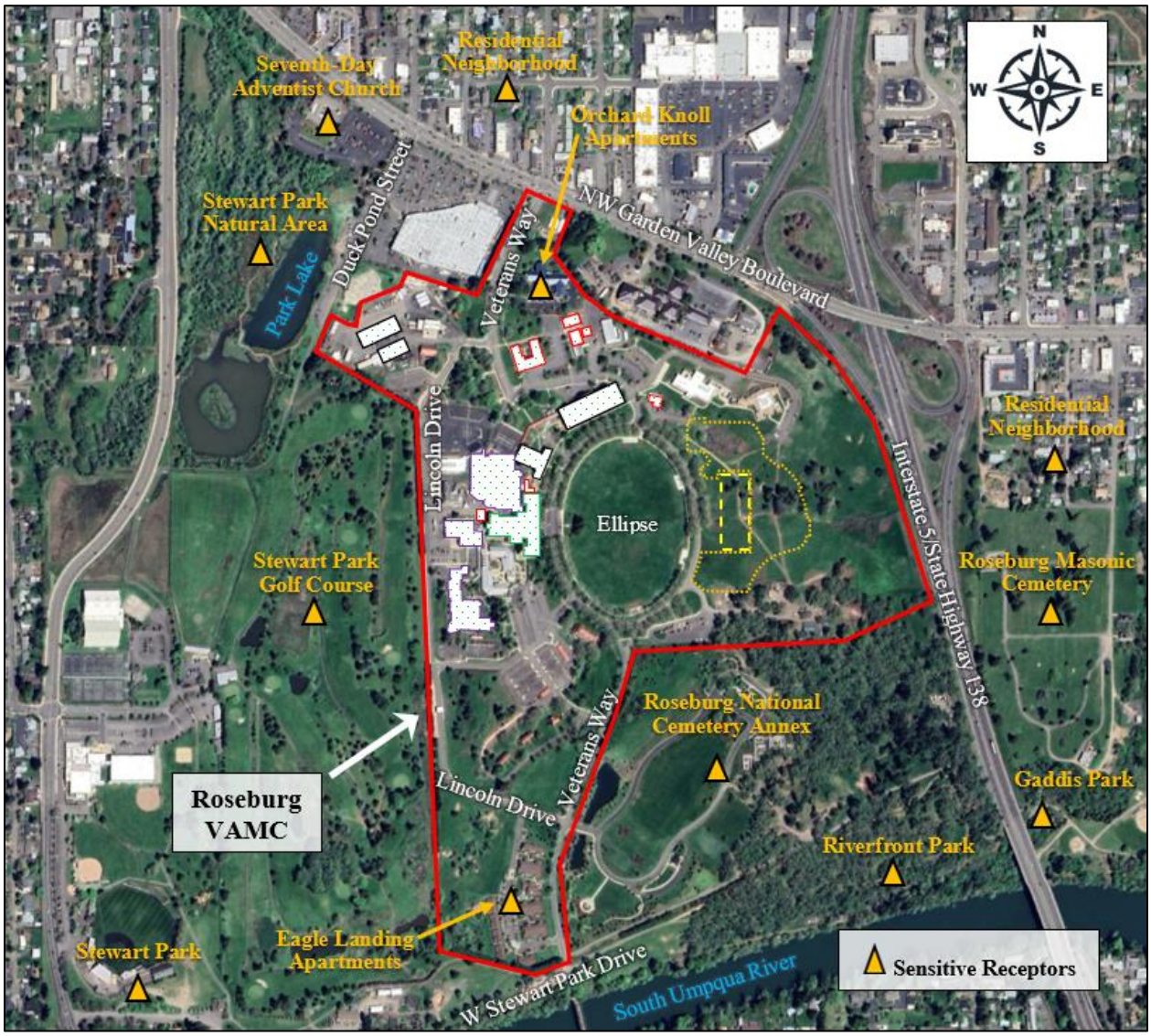

Figure 3-1 Sensitive Receptors

3.3.5 Effects of the Proposed Action

Air emissions generated from the Proposed Action would have less-than-significant direct and indirect, short-term and long-term adverse impacts to the existing air quality environment around the Roseburg VAMC campus. Impacts would include short-term air emissions as a result of proposed demolition and construction activities and long-term increased air emissions associated with the operation of the new, expanded Roseburg VAMC campus facilities.

Construction activities would be performed in accordance with federal and state air quality requirements. Construction-related emissions are generally short-term, but may still have adverse impacts on air quality, primarily due to the production of dust. Dust can result from a variety of activities, including building demolition, excavation, grading, and vehicle travel on paved and unpaved surfaces. Dust from demolition and construction can lead to adverse health effects and nuisance concerns, such as reduced visibility on nearby roadways. The amount of dust is dependent on the intensity of the activity, soil type and conditions, wind speed, and dust suppression activities used. Implementing dust control measures (BMPs) substantially reduces dust emissions from demolition and construction. Construction-related emissions also include the exhaust from the operation of construction equipment, including diesel particulate matter (DPM). The use of newer construction equipment with emissions controls and minimizing the time that the equipment is idling (BMPs) reduces construction equipment exhaust emissions. Implementation of BMPs, discussed in Section 4, would minimize these anticipated less-than-significant adverse, short-term construction-related, air quality impacts.

The structures that are planned to be renovated and/or demolished at the Roseburg VAMC campus are known or assumed to contain asbestos-containing building materials (ACM) and lead-based paint (LBP). Identified ACMs would be removed by licensed asbestos abatement contractors in accordance with the federal Clean Air Act National Emission Standards for Hazardous Air Pollutants (NESHAP) and State of Oregon requirements prior to building renovation or demolition. Asbestos abatement procedures require the removal of ACM with various controls and monitoring to prevent asbestos emissions. The renovation and demolition of buildings containing LBP can result in the generation of LBP-containing dust. Standard construction BMPs to control dust would reduce LBP dust emissions during renovation and demolition to less-than-significant levels.

The Proposed Action would also result in short-term air emissions from the operation of off-road construction equipment at the campus and on-road construction-related vehicles. Construction criteria pollutant and GHG emissions were preliminarily modeled using U.S. EPA's Motor Vehicle Emissions Simulator (MOVES3) for each Proposed Action construction project for calendar years between 2025 and 2033 based on assumed project construction phasing and schedules, assumed construction equipment use, and estimated associated construction vehicle traffic. The modeling found that annual construction emissions for all of the proposed demolition and construction projects are well below the general conformity de minimis levels (100 tons per year) for criteria pollutants in maintenance areas, although these criteria are not applicable to the Proposed Action as the Roseburg VAMC is located within a full attainment area. Estimated annual construction GHG emissions are also well below the 25,000 metric tons carbon dioxide equivalent threshold below which CEQ did not recommend quantitative analysis. Additional information regarding the preliminary air modeling is provided in Appendix F.

The Proposed Action would result in long-term (operational) air quality impacts associated with stationary source emissions from the operation of the new buildings (boilers, generators, etc.) and transportation-related emissions associated with patients, staff, and visitors using the expanded Roseburg VAMC campus facilities. The estimated increased boiler and generator emissions associated with the Proposed Action (primarily from Building 100 and the State Veterans Home) are well below the general conformity de minimis levels for criteria pollutants in maintenance areas and the 25,000 metric tons carbon dioxide equivalent CEQ threshold. VA estimates that approximately 2,108 additional daily one-way vehicle trips (1,054 round trips) to the Roseburg VAMC campus would result from the Proposed

Action, conservatively assuming the re-use of Building 1 for non-VAMC offices once vacated (see Section 3.14). Preliminary modeling was conducted to estimate criteria pollutant and GHG emissions from the additional vehicle traffic associated with the completed projects in 2033. The modeling found that annual additional long-term vehicle emissions associated with the Proposed Action would be below the general conformity de minimis level for criteria pollutants in maintenance areas and the GHG emissions would be below the 25,000 metric tons carbon dioxide equivalent threshold.

3.3.6 Effects of the No Action Alternative

Under the No Action Alternative, no air quality effects from the Proposed Action would occur. Air emissions from operational activities at the Roseburg VAMC campus would remain near current levels.

3.4 Cultural and Historic Resources

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires federal agencies to consider the effects on historic properties of projects they carry out, assist, fund, permit, license, or approve throughout the country. The process begins when a federal or federally-assisted project has the potential to affect historic properties, if any are present.

The Roseburg VAMC property was deeded to the U.S. Government in 1932 for the establishment of a federal soldier's home. The initial phase of construction included 13 buildings and was completed in 1933. The main hospital buildings and administrative buildings were constructed along the western and northern sides of a large, central grassy greenspace (the Ellipse). Residential quarters were constructed southwest of the Ellipse and the campus utility and maintenance buildings were constructed north/northwest of the Ellipse. The area east of the Ellipse was mostly grassy with some trees. Since the 1930s, the Roseburg VAMC campus has been transformed to meet the changing health care needs of area Veterans, including the construction of new buildings and parking lots.

In May 2023, Row 10 Historic Preservation Solutions, LLC (Row 10) completed a Cultural Resources Study (CRS) of the Roseburg VAMC campus. The CRS included records and literature search of the Oregon State Historic Preservation Office (OR SHPO) and NRHP data, and a pedestrian survey of the campus by an architectural historian. The CRS indicated that approximately 77 acres of the 114-acre Roseburg VAMC campus are located within the Roseburg Veterans Administration Hospital Historic District (RVAHHD; the Historic District), which was listed in the NRHP in 2013. The RVAHHD was listed for the intensive and successful political campaign for the selection of Roseburg as the northwest branch of the federal soldier's home (Criterion A: Politics/Government) and the role the Roseburg VA Hospital played in the mission of the federal government to provide quality health care to the nation's Veterans, with a period of significance from 1932 to 1950 (Criterion A: Health/Medicine). The Historic District was also listed for its architecture (Criterion C). The CRS also identified the adjacent Roseburg National Cemetery Annex as eligible for inclusion in the NRHP. All National Cemeteries, regardless of age, are eligible for inclusion in the NRHP.

The Historic District includes most of the western portion of the campus, including the Ellipse. Figure 2.1 depicts the boundaries of the Historic District at the campus. The Historic District contains 23 contributing resources, including several campus buildings proposed for modification or demolition (Buildings 1, 2, 13, 16, and 17), the Ellipse to include the flagpole with associated elements, and the campus roadway system. The exteriors of these buildings retain historic integrity. However, the interiors of the buildings have been modified over the years as the VAMC operational needs have evolved. VA determined that only the lobby of Building 1 and the lobby and auditorium areas of Building 16 retain interior historic integrity. Project Buildings 1AC, 11, 60, 71, 81, and 84 are not contributing resources to the Historic District, and Project Buildings 57, 58, 63, and T15 are located outside of the Historic District.

The CRS indicated that a pedestrian archaeological survey was conducted at the Roseburg VAMC campus by Sore Foot Archaeology (Sore Foot) in 2010. Subsurface testing was conducted in two relatively small areas of the campus, not in the Proposed Action construction areas. The pedestrian archaeological survey did not identify any cultural resources within the Proposed Action construction areas. The primary Proposed Action construction area (east of the Ellipse) was not identified as an area as have a high archaeological potential. However, Sore Foot recommended archaeological monitoring during ground disturbance.

3.4.1 Effects of the Proposed Action

The Proposed Action has the potential to adversely affect historic properties. Buildings 1, 2, 13, 16, and 17, the campus roadway system, the Ellipse, and the flagpole are contributing resources to the Historic District and are proposed for modification or demolition as part of the Proposed Action. The Proposed Action also has the potential to interrupt existing viewsheds in the Historic District. The following potential adverse effects have been identified:

- Building 1 – the disposal of Building 1, once Building 100 is in operation and Building 1 is vacated. The effects could be adverse, depending upon disposition plan selected for the building. Disposition plans would be determined in the future, at the appropriate time.
- Buildings 2 and 13 – interior demolition, seismic retrofitting, and renovation. It is anticipated design plans would meet the Secretary of the Interior's *Standards for Rehabilitation*, which would result in no adverse effect; however, design plans have not been completed.
- Building 16 – interior demolition, seismic retrofitting, and renovation, with possible exterior retrofits on exterior sides and rear of building to minimize impact to the auditorium. It is anticipated design plans would minimize alteration to the interior of the lobby and auditorium, which retain historic integrity, and would meet the Secretary of the Interior's *Standards for Rehabilitation*, which would result in no adverse effect; however, designed plans have not been completed.
- Building 17 – demolition. The demolition of this building, a contributing resource to the Historic District, would be an adverse effect.
- Campus Roadway System – constructing/realigning campus roads. Veterans Way once extended from the Ellipse to the northern campus entrance, but this path was interrupted circa 1964. The proposed reconnection of the road encircling the Ellipse with the campus entrance, similar to the original campus design, may not have adverse historic property effects; however, design plans for the campus roadway system modifications have not been completed.
- Flagpole – renovating/enhancing the flagpole area within the Ellipse in front of Building 1. The renovation of the flagpole area, including the surrounding landscaping, could result in an adverse effect; however, design plans have not been completed.
- Viewsheds – The construction of Building 100, located outside of the Historic District, could adversely affect views from/of the Historic District. It is anticipated that exterior of Building 100, in particular, the west elevation of the building that would face the Ellipse and Building 1, would be designed to incorporate the characteristics of the Historic District such as red brick, without mimicking the historic features of the Historic District. These design considerations would reduce viewshed effects.

In addition, Proposed Action construction, particularly excavation activities, has the potential to adversely affect unidentified archaeological deposits.

On June 6, 2023, VA initiated NHPA Section 106 consultation for the Proposed Action with the OR SHPO, the Advisory Council on Historic Preservation (ACHP), Douglas County Historic Resource Review Commission, Douglas County Historical Society, Restore Oregon, City of Roseburg Historic Resources Review Commission (HRRC) as the Certified Local Government (CLG), the Patrick W. Kelley Post 2468 & Auxiliary of the Veterans Foreign Wars, the Earl B. Stewart Post 16 of the American Legion, and the nine federally-recognized Indian tribes identified as having possible ancestral ties to the Roseburg VAMC area, including the Burns Paiute Tribe; Confederated Tribes of the Warm Springs Reservation of Oregon; Confederated Tribes of Siletz Indians of Oregon; Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians; Confederated Tribes of the Grand Ronde Community of Oregon; Confederated Tribes of the Umatilla Indian Reservation; Coquille Indian Tribe; Cow Creek Band of Umpqua Tribe of Indians; and Klamath Tribes. As part of this effort, VA submitted information regarding the undertaking (Proposed Action), the delineation of the area of potential effects (APE) of the undertaking (the entire Roseburg VAMC campus and adjacent Roseburg National Cemetery Annex, totaling approximately 158 acres), the identification of historic properties (the findings of the CRS), and VA's determination of potential adverse effects to historic properties. VA determined that several of the proposed seismic and functional improvements could adversely affect historic properties; however, the effects cannot be fully determined until the design plans are completed. Consequently, VA proposed to develop a Programmatic Agreement (PA) to evaluate and address potential historic properties effects as the various proposed seismic and functional improvements are designed. OR SHPO, ACHP, and the HRRC responded with an interest in participating in the consultation.

On June 28, 2023, VA hosted a consultation meeting with the consulting parties. Representatives of the OR SHPO, ACHP, and ODVA attended the meeting. VA provided information and answered questions regarding the definition of the undertaking, the delineation of the APE, the identification of historic properties within the APE, the preliminary assessment of adverse effect, and the proposed development of the PA. On July 3, 2023, OR SHPO concurred with VA's assessment that the undertaking would likely have adverse effects on historic properties and agreed that negotiating a PA was appropriate.

On September 6, 2023, VA submitted the draft PA to the consulting parties for review and comment. On October 12, 2023, VA hosted a consultation meeting with the consulting parties to discuss the draft PA. Representatives of OR SHPO, ACHP, ODVA, and the Klamath Tribes attended the meeting. Consulting parties provided input on the draft PA. HRRC did not attend the meeting, but provided written comments on the draft PA.

On November 28, 2023, VA submitted the revised draft PA to the Section 106 consultation parties for further review and comment. OR SHPO, ACHP, HRRC, and ODVA provided comments. The comments were generally minor and clear. VA accepted the comments and recommendations.

On February 27, 2024, VA submitted the final draft PA to the OR SHPO, ACHP, HRRC and ODVA for final review and comment prior to signature. OR SHPO, ACHP, and ODVA provided comments.

The final PA was fully executed by VA, OR SHPO, ODVA, and ACHP on June 3, 2024. The PA includes project design review by OR SHPO and the consulting parties to avoid and/or minimize adverse effects to historic properties. If adverse effects to historic properties are identified, VA would notify the OR SHPO and the consulting parties and would consult to resolve the adverse effects. The PA provides a wide range of potential mitigation measures that would be considered to address adverse effects. The selection and implementation of the mitigation measures would be included within an agreement document, if required. As part of the PA, VA is required to conduct an archaeological survey of the 14 acres land being considered for the State Veterans Home prior to transfer to ODVA and to evaluate any identified archaeological deposits for NRHP eligibility. The PA also requires a cultural resource survey for archaeological resources prior to ground disturbance and/or archaeological monitoring during ground disturbing activities to ensure that any archaeological resources that may be encountered are properly handled. In addition, the PA provides procedures for OR SHPO and consulting party involvement with

regards to the future disposal of Building 1. With the implementation of the PA stipulations, cultural resources impacts would be less than significant.

Additional details of the Section 106 consultation are provided in Sections 6.2 and 6.3. The executed PA is included in Appendix D.

3.4.2 Effects of the No Action Alternative

Under the No Action Alternative, the Proposed Action demolition and construction activities would not occur and there would be no cultural resources impacts.

3.5 Geology and Soils

United States Geological Survey's (USGS's) Ecoregions of Oregon indicates the City of Roseburg is located within the Klamath Mountains – Umpqua Interior Foothills ecoregion, which covers approximately 920 square miles in the Umpqua Valley. The Umpqua Interior Foothills ecoregion is a complex of foothills and narrow valleys containing fluvial terraces and floodplains. Elevations in the ecoregion vary from 400 to 2,800 feet above mean sea level (amsl). The City of Roseburg and the Roseburg VAMC campus are located within a valley associated with the South Umpqua River with elevations generally ranging from 420 to 600 feet amsl, surrounded by hills/small mountains that range up to 2,000 feet amsl.

The Roseburg East, Oregon USGS Topographic Quadrangle (dated 1987) and campus topographic maps indicate the Roseburg VAMC campus largely consists of graded areas that have been leveled by past development activities. Elevations at the campus range from approximately 480 feet amsl near the northern and eastern campus boundaries to approximately 445 feet amsl near the southern campus boundary. The northwestern portion of the campus slopes to the west toward Park Lake (aka Duck Pond), located approximately 100 feet west of the campus. Overall, the campus generally slopes to the south towards the South Umpqua River (elevation 415 feet amsl), located approximately 250 feet south of the campus. Figure 1-2 depicts the topography of the Roseburg VAMC campus and surrounding area.

The USGS *A Tapestry of Time and Terrain* (USGS 2000) indicates that Douglas County is located in the Oregon Coast Range of the Pacific Border physiographic province of the Pacific Mountain System physiographic region in Oregon. The USGS *Groundwater Atlas of the United States* (USGS 1994) indicates the geology of the Roseburg VAMC area consists of undifferentiated volcanic rocks. In some places, unconsolidated deposits contain thick beds of volcanic ash or thin (a few feet to a few tens of feet) flows of basaltic or silicic volcanic rocks.

The USGS Quaternary Faults Map internet application indicates the closest mapped active faults to the Roseburg VAMC campus are unnamed faults near Sutherlin, located approximately 12 miles north of the campus. The next closest faults include a series of faults located south of Coos Bay, approximately 43 miles west of the campus, and a series of faults located in the Crater Lake region of Oregon, approximately 56 miles east of the campus.

The City of Roseburg is identified on the FEMA Earthquake Hazard Map for the Western U.S. as being located within an area near several active seismic faults, with a high potential for ground shaking. Buildings in this earthquake hazard area are subject to the IBC Seismic Design Category D (may experience very strong shaking) requirements. VA's Office of Facilities Planning also characterizes the Roseburg VAMC as being located within an area of high seismic activity (Figure 1-4).

The U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey indicates that the soils at the Roseburg VAMC campus consist of Curtin clay (3 to 12 percent slopes) in the northernmost portion, Philomath-Dixonville complex (3 to 30 percent slopes) in the northwestern and west-central portions, Bashaw clay (0 to 1 percent slopes) in the western, eastern, and

southern portions, Climax clay (12 to 30 percent slopes) in the northwest and west-central portions, Pengra silt loam (2 to 20 percent slopes) in the central and southern portions, and Speaker loam (2 to 20 percent slopes) in the southeastern portion.

The Curtain soil series consists of somewhat poorly drained clay from clayey alluvium. The Philomath-Dixonville complex soil series consists of well drained silty clay, clay, and silty clay loam from colluvium and residuum derived from basalt. The Bashaw soil series consists of poorly drained clay from alluvium derived from mixed sources. The Climax soil series consists of moderately well drained clay from colluvium derived from basalt. The Pengra soil series consists of somewhat poorly drained silt loam, silty clay loam, and clay from alluvium, colluvium, and residuum derived from sandstone and siltstone. The Speaker soils series consists of well drained loam from colluvium and residuum derived from sandstone, siltstone, and metamorphic rock. The Roseburg VAMC campus soils are shown on Figure 3-2.

PBS Engineering + Environmental (PBS) conducted a geotechnical investigation of the northeastern portion of the campus in 2011, prior to the construction of Buildings 86 and 88. According to the geotechnical investigation report, the campus is located within the Tyee basin of Oregon. The campus area geology is mapped as fluvial deposits, described as unconsolidated to poorly consolidated river deposits of boulders, gravel, sand, and silt, underlain by basalt bedrock of the Roseburg member of the Siletz River Volcanics formation. The stratigraphy encountered in the geotechnical borings generally consisted of a surface layer of sandy clay that was approximately 1.5 to 5 feet thick, underlain by dense clayey sand and gravelly sand fluvial deposits to a depth of approximately 12 to 26 feet below ground surface (bgs). The clayey sand/gravelly sand was underlain by basalt bedrock, which was encountered between 460 and 454 feet amsl.

3.5.1 Prime and Unique Agricultural Land Soils

Prime and unique farmland soils are protected under the Farmland Protection Policy Act (FPPA). The intent of the FPPA is to minimize the extent to which federal programs contribute to the unnecessary or irreversible conversion of farmland soils to non-agricultural uses. The FPPA also ensures that federal programs are administered in a manner that, to the extent practicable, will be compatible with private, state, and local government programs and policies to protect farmland. The USDA NRCS is responsible for overseeing compliance with the FPPA and has developed the rules and regulations for implementing the Act.

According to the USDA NRCS Web Soil Survey, all of the campus soils are classified as farmland of statewide importance except for the Philomath-Dixonville complex soils (approximately 10 acres in the northwestern and west-central portions of the campus). However, the Roseburg VAMC campus is located within an area identified by the U.S. Census Bureau as an “urbanized area” and is, therefore, exempt from the FPPA.

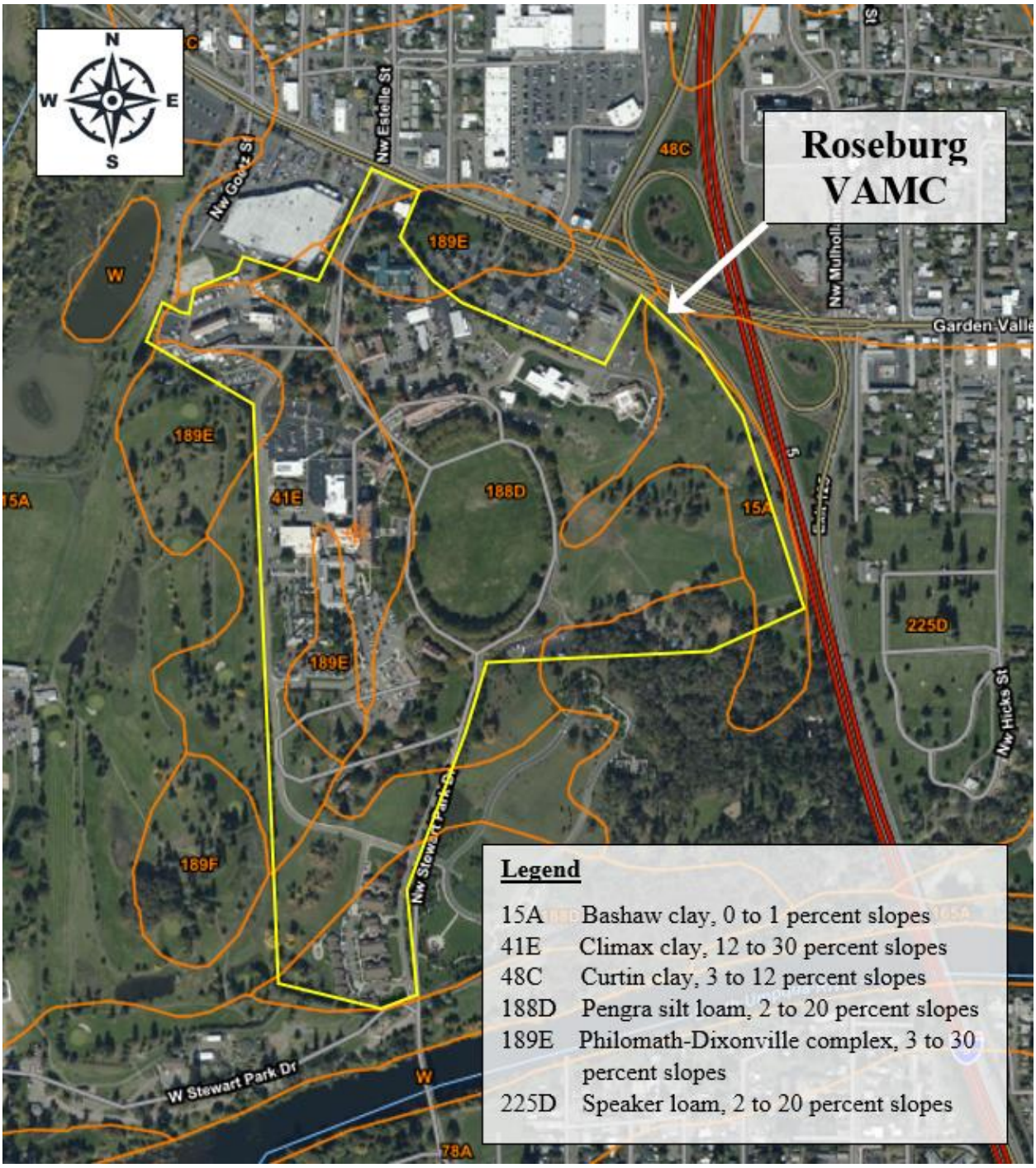

Figure 3-2 Soils Map

3.5.2 Effects of the Proposed Action

The Roseburg VAMC campus is located within an area near several active seismic faults with a high potential for ground shaking. The Proposed Action would rectify or would otherwise address hazards posed by seismic deficiencies for six buildings (Buildings 1, 2, 11, 13, 16, and 17) at the Roseburg VAMC campus that do not meet current seismic building standards and are at risk for significant damage

or failure from a seismic event. The Proposed Action would have a significant long-term beneficial effect of mitigating existing seismic hazards at the campus.

Less-than-significant impacts to soils are anticipated. No major changes to topography or drainage would occur on the Roseburg VAMC campus due to the Proposed Action. The Proposed Action construction projects would be designed in concert with the current campus topography. It is anticipated that minor cutting and filling would be required to establish relatively level areas for the construction of buildings and maintaining campus drainage patterns; however, no significant cutting or filling would be required.

During construction, less-than-significant, direct and indirect, short-term soil erosion and sedimentation impacts would be possible as the proposed buildings and other project components are constructed. Construction would expose and disturb the soil surface and compact the soil. The soil would then be susceptible to erosion by wind and surface runoff. Exposure of the soils during construction has the potential to result in increased sedimentation to stormwater management systems and offsite discharges of sediment-laden runoff. However, such potential adverse erosion and sedimentation effects would be prevented through utilization of appropriate BMPs (Section 4) and adherence to the terms of an approved ODEQ National Pollution Discharge Elimination System (NPDES) stormwater permit, including the development and implementation of a site-specific Storm Water Pollution Prevention Plan (SWPPP).

Once construction is complete, no long-term erosion and sedimentation impacts would be anticipated. Areas where soils are exposed during construction would be mostly covered with pavement or buildings. Stormwater would be managed through the campus stormwater management system. Additional information regarding stormwater management is provided in Section 3.6.

3.5.3 Effects of the No Action Alternative

Under the No Action Alternative, no construction would occur and there would be no impacts to soil, topography, or geology. However, Buildings 1, 2, 11, 13, 16, and 17 would remain structurally deficient and at risk of significant damage or failure from a major seismic event.

3.6 Hydrology and Water Quality

This section describes the affected environment, regulatory setting, and potential Proposed Action impacts for hydrology and water quality (surface water and groundwater). Wetlands, floodplains, and coastal zones are discussed in Section 3.10.

The Federal Water Pollution Control Act, commonly referred to as the Clean Water Act (CWA), governs the control of water pollution in the U.S. The CWA authorizes the U.S. EPA to regulate point sources that discharge pollutants into waters of the U.S. (WOTUS). U.S. EPA has authorized the ODEQ Water Quality Permitting Program (WQPP) to implement the NPDES stormwater permitting program in Oregon.

Under section 303(d) of the CWA, states are required to develop and update, every two years, a list of waters that are impaired by one or more pollutants. Impaired waters are those that do not meet Water Quality Standards (WQSs) for their designated use. After identification as impaired, the state creates and prioritizes Total Maximum Daily Loads (TMDLs) to target and implement pollution reduction strategies and watershed plans to improve water quality. ODEQ oversees the water quality assessment program for the 303(d) listed waterbodies in Oregon.

The National Wild and Scenic Rivers Act was created in 1968 to preserve certain rivers with outstanding natural, cultural, and recreational values. The Oregon Scenic Waterway Act protects special Oregon rivers.

Section 438 of the Energy Independence and Security Act of 2007 (EISA) requires federal agencies to reduce stormwater runoff from federal development projects to protect water resources. Section 438 requires any development or redevelopment of a federal facility with a footprint exceeding 5,000 square feet to maintain or restore, to the extent technically feasible, the predevelopment hydrology of a property with regard to the temperature, rate, volume, and duration of flow.

3.6.1 Surface Waters

No permanent surface waters are located at the Roseburg VAMC campus. The nearest surface water bodies to the campus include Park Lake (aka Duck Pond), located approximately 100 feet west of the campus and approximately 300 feet from the Proposed Action construction areas; and the South Umpqua River, located approximately 250 feet south of the campus and approximately 1,500 feet from the Proposed Action construction areas.

The section of the South Umpqua River located near the campus is listed on the 303(d) list for various parameters, including chlorine, iron, phosphorus, pH, temperature, flow modification, and habitat modification. The South Umpqua River is not listed as a protected National Wild Scenic River or Oregon Scenic River.

Stormwater in undeveloped and lightly developed portions of the campus generally infiltrates into the soil in unpaved areas or runs off via sheet flow to catch basins. Stormwater in the developed portions of the campus is collected in the campus stormwater management system, which includes a northern and a southern network. The smaller northern network serves the area and buildings north of Parking Lot A and Buildings 2 and 82. Stormwater in this network flows west and discharges off-campus into Park Lake. The larger southern network is located on the central and southern portions of the campus and has multiple branches that follow Centennial Drive, Veterans Way, and Lincoln Drive. Stormwater in this network flows south and discharges off-campus to the South Umpqua River. Stormwater in the grassy eastern portion of the campus flows to an inlet east of the Ellipse, which connects to the southern stormwater network. An analysis of the existing campus stormwater system completed by GDM of Oregon in October 2023 found that the majority of the system has sufficient capacity to accommodate a 10-year, 24-hour storm event (City of Roseburg design standard) with the current development. Specifically, the major trunk lines all have sufficient capacity; however, a few lateral lines near Building 1 and the lateral line that drains the proposed main development area east of the Ellipse (Lateral D6), do not meet the current City of Roseburg design standard for a 10-year, 24-hour storm event.

3.6.2 Groundwater

According to the *Groundwater Atlas of the United States*, the Roseburg VAMC area is underlain by both unconsolidated-deposit aquifers and aquifers in pre-Miocene rocks. Unconsolidated-deposit aquifers consist primarily of alluvial sand and gravel that fill large to small basins. Aquifers in pre-Miocene rocks are extremely variable and include several types of igneous and metamorphic rocks, consolidated sedimentary rocks of marine and nonmarine origin, and volcanic rocks.

During the 2011 geotechnical investigation of the campus, conducted during the rainy season (March), perched groundwater was encountered within the shallow sandy clay soil. PBS stated that the underlying, dense clayey sand/gravelly sand layer acted as a confining layer. PBS inferred the depth to groundwater to correlate with the top of bedrock, located approximately 12 to 26 feet bgs in the soil boring locations.

Site-specific information pertaining to the groundwater flow direction was not identified during this assessment. Based on topographic maps for the campus and surrounding area, surficial topography in the site vicinity generally slopes towards the South Umpqua River. The groundwater table often mimics the surficial topography, suggesting that shallow groundwater in the Roseburg VAMC campus area may

generally flow to the south, although there may be some localized flow to the west (towards Park Lake) in the northwestern portion of the campus.

The Roseburg VAMC campus is not located within an U.S. EPA-designated sole source aquifer area, per the U.S. EPA Sole Source Aquifers internet application.

3.6.3 Effects of the Proposed Action

It is not anticipated that groundwater would be used or impacted by the Proposed Action. The proposed expanded Roseburg VAMC facilities would be serviced by the City of Roseburg municipal water system. Perched or shallow groundwater may be encountered during excavation and other subsurface construction activities. If perched or shallow groundwater is encountered, appropriate engineering controls would be utilized to ensure there are no adverse impacts to groundwater.

The Proposed Action is not anticipated to significantly impact surface water. VA would implement BMPs as described in Section 4 to control construction-related impacts of soil erosion and sedimentation. Additional information regarding the soil and erosion control measures, including the required ODEQ NPDES permit and SWPPP, is provided in Section 3.5.2. VA would provide on-campus stormwater management consistent with EISA Section 438 requirements to ensure site hydrology following the completion of construction would replicate predevelopment hydrology. In addition, VA would evaluate all of the existing campus stormwater system affected by the Proposed Action, most notably the lateral that drains the main development area east of the Ellipse (Lateral D6), and upgrade the system, as necessary, to meet VA design criteria and applicable standards.

3.6.4 Effects of the No Action Alternative

Under the No Action Alternative, no construction would occur and there would be no impacts to hydrology and water quality.

3.7 Wildlife and Habitat

The City of Roseburg is located within the Umpqua River Valley in southwest Oregon, approximately 50 miles east of the Pacific Ocean. Roseburg has a Mediterranean climate, with very warm, dry summers and cool, rainy winters. The rainy season extends from October through April, and precipitation averages approximately 32 inches annually.

The northern and western portions of the Roseburg VAMC campus are mostly developed with VAMC buildings and structures, asphalt-paved parking areas, and roads, with some surrounding grassy and landscaped areas. Several coniferous and deciduous trees have been planted within the landscaped areas. The northwestern portion of the campus also includes the approximately 1.5-acre Rose Garden (Figure 2-1), which is a grassy, park-like area with a gazebo and a variety of ornamental bushes and trees. Within the Rose Garden is the “Moon Tree”, a Douglas fir planted in 1976 from a seed that traveled to the moon as part of the Apollo 14 mission.

The southwestern portion of the campus contains the original VAMC residential quarters buildings, a large asphalt-paved parking lot, and grassy areas with several trees. The southern portion of the campus includes Eagle Landing Apartments, constructed in the early 2010s, and a mostly grassy area with several trees. The central portion of the campus contains the Ellipse, a large oval, maintained grassy area surrounded by a perimeter road. Each side of the road is lined by London planetrees.

The eastern portion of the campus is mostly undeveloped grassy land with some deciduous and coniferous trees in the center of this area. A small (less than one acre) seasonally flooded wetland and associated ditch are also located in the eastern portion of the campus. The wetland, located within the 14-acre

proposed State Veterans Home area, appears to be mostly formed from stormwater captured from the adjacent Interstate 5 that discharges to the campus from a pipe at its eastern boundary. The wetland is discussed further in Section 3.10. The southeastern portion of the campus formerly contained a golf shack, storage building, a stone gazebo, and baseball backstops that were recently demolished. Scattered trees and landscape material storage remain in this area. A fence separates this area from the southern adjacent undeveloped wooded area that is associated with the Roseburg National Cemetery Annex.

The campus is bordered to the north by a BLM office, a Fred Meyer grocery store, and NW Garden Valley Boulevard, beyond which are commercial properties. The campus is bordered to the east by Interstate 5, beyond which are residential and commercial properties and a cemetery. The campus is bordered to the south by the Roseburg National Cemetery Annex, wooded land associated with the cemetery, W. Stewart Park Drive, and a City of Roseburg Parks Maintenance Facility, beyond which is the South Umpqua River. The campus is bordered to the west by Stewart Park Golf Course (Roseburg municipal golf course), Roseburg Skate Park, and Stewart Park Natural Area. The campus and surrounding area support wildlife species associated with a mostly developed, small urban area within the Klamath Mountains – Umpqua Interior Foothills ecoregion of Oregon.

3.7.1 Threatened and Endangered Species

The United States Fish and Wildlife Service (USFWS), Oregon Department of Fish and Wildlife (ODFW), and Oregon Department of Agriculture (ODA) were contacted to identify the potential presence of threatened and endangered species in the vicinity of the Roseburg VAMC campus.

A federal Endangered Species Act (ESA) protected species list for the Roseburg VAMC campus was obtained through the USFWS Information for Planning and Conservation (IPaC) internet application. The IPaC report indicated the campus is within the range of two federally-listed threatened bird species (marbled murrelet and northern spotted owl), one federally-listed endangered insect species (Franklin's bumble bee), one federally-listed candidate insect species (monarch butterfly), and one federally-listed threatened plant species (Kincaid's lupine). The IPaC report did not identify any critical habitat of protected species on or near the campus.

Table 3-1 provides a summary of the federally-protected species listed in the IPaC report, their habitat requirements obtained from the NatureServe Explorer and ODFW internet applications, and the potential presence of their required habitat at the campus.

Table 3-1 Federally Listed Species in the Vicinity of the Roseburg VAMC Campus (Site)

Species	Federal ESA Status	Habitat	Potential Habitat Present at the Site
Birds			
Marbled Murrelet *(Brachyramphus marmoratus)*	Threatened	Majority of time spent in near-shore marine areas within 3 miles of shore. Nests in old growth forests within 50 miles of the coast.	No
Northern Spotted Owl (*Strix occidentalis caurina*)	Threatened	Old-growth forests. Nests in trees, cliff ledges, or caves.	No

Insects			
Franklin's Bumble Bee (*Bombus franklini*)	Endangered	Open grassy coastal prairies and coast range mountain meadows. Require nectar producing plants in bloom for food and abandoned rodent burrows or clumps of grass for nesting.	No
Monarch Butterfly *(Danaus plexippus)*	Candidate	Breeding areas are mid-successional grasslands containing a significant milkweed component (larvae feed exclusively on milkweed). Adult butterflies need nectar producing plants in bloom for food.	No
Plants			
Kincaid's Lupine (*Lupinus sulphureus ssp. Kincaidii*)	Threatened	Upland prairie remnants and ecotones between grassland and forest. Usually occurs in heavy, well-drained soils at elevations below 2,750 feet.	No

The Roseburg VAMC campus does not contain the habitat required by the federally listed species identified for the campus vicinity. None of these species are likely to be present at the campus.

The IPaC report also identified 10 Birds of Conservation Concern (BCC) protected under the Migratory Bird Treaty Act (MBTA) and/or the Bald and Golden Eagle Protection Act (Eagle Act) for the campus area. Based on their general habitat requirements, four of the identified MBTA BCC and Eagle Act species (bald eagle, evening grosbeak, olive-sided flycatcher, and wrentit) have the potential to be present in the general campus area during their breeding seasons. Based on their nesting habitat requirements, evening grosbeak and wrentit may nest in trees and/or shrubs at the campus. The Roseburg VAMC campus contains trees and some shrubs within the Rose Garden, in landscaped areas around and between campus buildings and roads, and scattered trees within undeveloped, mostly grassy areas of the campus. The primary Proposed Action construction areas, located east of the Ellipse, are mostly grassy with scattered trees with little or no shrubs. Other Proposed Action construction areas are mostly developed with buildings and pavements and limited landscaping.

The Oregon Endangered Species Act (Oregon ESA) provides protection for threatened and endangered species on non-federal public lands. State-listed protected species include federally-listed species occurring within Oregon as well as additional state-identified species. The Oregon Fish and Wildlife Commission, through the ODFW, manages and protects state-listed wildlife (animal) species. The ODA Native Plant Conservation Program oversees the conservation and management of state-listed plant species.

The Oregon Conservation Strategy (OCS) is the State of Oregon's overarching state strategy for conserving fish and wildlife. The OCS identifies 294 strategy species (17 amphibians, 58 birds, 29 mammals, 5 reptiles, 60 fish, 62 invertebrates, and 63 plants and algae) and 11 strategy habitats. OCS strategy species include state-threatened and endangered species and state-sensitive (SS) and state sensitive-critical (SC) species. State-sensitive species have small or declining populations, are at-risk, and/or are of management concern. State sensitive-critical species are a sub-designation of sensitive species and have current or legacy threats that are significantly impacting their abundance, distribution,

diversity, and/or habitat. The state-sensitive species list is designed to help prevent species from declining to the point of qualifying as threatened or endangered, but is primarily a non-regulatory tool.

ODFW's Centralized Oregon Mapping Products and Analysis Support System (Compass) internet application was used to generate an Oregon Conservation Strategy (OCS) Report for the campus. The Compass application uses observed and modeled strategy species and habitat information within one-square mile hexagons to generate the OCS Report. The OCS Report for the campus included three adjacent hexagons (three square miles).

The OCS Report for the campus identified 4 documented strategy fish species and 22 observed and/or modeled strategy wildlife species as potentially present within the campus area. No strategy plant species were identified in the OCS Report. Four of the 26 identified strategy species (coho salmon, marbled murrelet, northern spotted owl, and Franklin's bumble bee) are federally-listed and state-listed protected species. The remaining 22 species are listed state-sensitive species. The Roseburg VAMC campus does not provide suitable habitat for the four federally-listed and state-listed protected species.

The Roseburg VAMC campus provides potential habitat for 5 of the 22 state-sensitive species listed in the OCS Report for the campus area. These species include three birds (acorn woodpecker, grasshopper sparrow, and purple martin), one bat (California myotis), and one amphibian (western toad).

Suitable habitat for the acorn woodpecker (semi-open habitats with scattered trees near oak woodlands), grasshopper sparrow (open grasslands/fields), and purple martin (open and partly open areas near water, such as wetlands) is present in the eastern and southern portions of the campus. These birds nest in trees (acorn woodpecker and purple martin) or on the ground (grasshopper sparrow).

The eastern and southern portions of the campus (open areas with scattered trees) also provide suitable roosting and foraging habitat for California myotis. California myotis prefer forested areas; however, will use a wide variety of habitats. Other bat species may also forage in open areas of the campus but are less likely to roost at the campus.

Western toads may be found around Park Lake near the western campus boundary and possibly near the ponds at the Rosenburg National Cemetery Annex and along the South Umpqua River to the south. This species can be found up to a few kilometers into upland habitats around ponds, lakes, and slow-moving rivers and is found in loose soil, small mammal holes, and under logs or rocks. Undeveloped portions of the campus provide marginal upland habitat for western toads.

3.7.2 Effects of the Proposed Action

Based on information obtained through the USFWS IPaC report, the habitat requirements for protected species identified in the campus area, and campus observations, no federally-listed species are likely to be present at the campus or affected by the Proposed Action. No further actions under Section 7(a)(2) of the ESA are required.

In addition, based on the OSC Report obtained through the ODFW and campus area observations, no state-listed species protected under the Oregon ESA, or the habitat for such species, were identified at the Proposed Action construction areas.

Two MBTA BCC species identified in the IPaC report (evening grosbeak and wrentit) and three Oregon SS/SC species identified in the OCS Report (acorn woodpecker, grasshopper sparrow, and purple martin) may nest in trees, shrubs, or on the ground at the campus. In addition, California myotis (Oregon SS species) may roost and forage at the campus.

The primary Proposed Action construction areas are located within the eastern portion of the campus, which consists of undeveloped, mostly grassy land with scattered trees and a seasonal wetland. Vegetation clearing, including some tree removal, is anticipated as part of the Proposed Action. It is

anticipated that vegetation clearing and tree removal would occur outside of the nesting seasons for the identified MBTA and Oregon SS/SC species (March 15 through August 31). If vegetation clearing and tree removal during the nesting season is necessary, a qualified biologist would survey the area for active nests no more than five days prior to tree/shrub removal. If active nests are discovered, a buffer around the nests should be maintained until the young birds have fledged.

With the implementation of these management and avoidance measures, wildlife and habitat impacts associated with the Proposed Action would be less than significant.

3.7.3 Effects of the No Action Alternative

Under the No Action Alternative, no impacts to biological resources would occur.

3.8 Noise

The existing noise environment at the Roseburg VAMC campus is dominated by vehicle traffic/parking, delivery/service trucks, mechanical equipment, and routine landscaping and maintenance at the campus. Off-site noise sources in the campus vicinity include vehicle traffic on the adjacent Interstate 5 and NW Garden Valley Boulevard. The predominant off-campus noise source is vehicle traffic on Interstate 5. Additionally, a north-south runway for the Roseburg Regional Airport is located approximately 0.5-mile northeast of the Roseburg VAMC campus. Roseburg Regional Airport is a general aviation airport owned and managed by the City of Roseburg. According to available flight data, the airport averaged 87 aircraft operations per day between November 2018 to November 2019. No other notable noise-generating sources are present in the immediate vicinity of the campus. Noise levels in the general vicinity of the campus are typical of those in a fully developed, small urban area. Noise levels at the campus and the adjacent recreational properties are somewhat lower due the general park-like setting and uses of the properties.

Day time noise levels in this type of setting typically range from approximately 50 A-weighted decibels (dBA) to 65 dBA or more, based on proximity to noise-generating sources, such as roads and mechanical equipment. Higher daytime noise levels occur as a result of landscaping and other maintenance operations. However, these noise sources are intermittent and of short duration. Nighttime noise levels are typically approximately 10 dBA lower than daytime noise levels.

3.8.1 Sensitive Receptors

Sensitive receptors are land uses for which there is a sensitivity to noise, such as residences, schools, hospitals, libraries, churches, nursing homes, auditoriums, playgrounds, and parks. Sensitive noise receptors in the vicinity of the Roseburg VAMC campus are identified in Section 3.3.4 and depicted on Figure 3-1.

3.8.2 Effects of the Proposed Action

The proposed seismic and functional improvement projects would have temporary (short-term) impacts to the existing noise environment due to construction activities. Noise generating sources during construction would be associated primarily with standard construction equipment and equipment/material transportation. These increased noise levels could directly affect the identified sensitive receptors and neighboring areas.

Construction activities generate noise by their very nature and are highly variable, depending on the type, number, and operating schedules of equipment. Construction projects are usually executed in stages, each having its own combination of equipment and noise characteristics and magnitudes.

Construction activities are expected to generally be typical of other similar construction projects and would include mobilization, site preparation, building demolition, excavation, placing foundations, utility development, heavy equipment movement, and paving. The most prevalent noise source at typical construction sites is the internal combustion engine. General construction equipment using engines includes, but is not limited to: heavy, medium, and light equipment such as excavators; roller compactors; front-end loaders; bulldozers; graders; backhoes; dump trucks; water trucks; concrete trucks; pump trucks; utility trucks; cranes; and lube, oil, and fuel trucks.

Based on preliminary geotechnical information, basalt bedrock is present in the Building 100 area at estimated depths of 12 to 25 feet below grade. Preliminary, pre-design information indicates Building 100 would be slab-on-grade or would have a shallow utility basement and would be supported by a conventional, shallow spread footing foundation. Bedrock removal, if necessary, would likely be limited and conducted with excavators equipped with rock teeth. Rock blasting, which would produce additional noise and vibration, is not anticipated to be required.

Peak noise levels vary at a given location based on line of sight, topography, vegetation, and atmospheric conditions. Peak noise levels would be variable and intermittent because each piece of equipment would only be operated when needed. However, peak construction noise levels would be considerably higher than existing noise levels. Relatively high peak noise levels in the range of 93 to 108 dBA would occur on the active construction site, decreasing with distance from the construction areas. Generally speaking, peak noise levels within 50 feet of active demolition and construction areas and material transportation routes would most likely be considered “striking” or “very loud”, comparable to peak crowd noise at an indoor sports arena. At approximately 200 feet, peak noise levels would be loud - approximately comparable to a garbage disposal or vacuum cleaner at 10 feet. At 0.25-mile, construction noise levels would generally be quiet enough so as to be considered insignificant, although transient noise levels may be noticeable at times. Table 3-2 presents peak noise levels that could be expected from a range of equipment during proposed construction activities.

Table 3-2 Peak Noise Levels Expected from Typical Construction Equipment

Source	Peak Noise Level (dBA, attenuated)							
	Distance from Source (feet)							
	0	50	100	200	400	1,000	1,700	2,500
Heavy Truck	95	84-89	78-93	72-77	66-71	58-63	54-59	50-55
Dump Truck	108	88	82	76	70	62	58	54
Concrete Mixer	108	85	79	73	67	59	55	51
Jack-hammer	108	88	82	76	70	62	58	54
Scraper	93	80-89	74-82	68-77	60-71	54-63	50-59	46-55
Bulldozer	107	87-102	81-96	75-90	69-84	61-76	57-72	53-68
Generator	96	76	70	64	58	50	46	42
Crane	104	75-88	69-82	63-76	55-70	49-62	45-48	41-54
Loader	104	73-86	67-80	61-74	55-68	47-60	43-56	39-52
Grader	108	88-91	82-85	76-79	70-73	62-65	58-61	54-57
Pile driver	105	95	89	83	77	69	65	61
Forklift	100	95	89	83	77	69	65	61
Worst-Case Combined Peak Noise Level (Bulldozer, Jackhammer, Scraper)								
Combined Peak Noise Level	**Distance from Source (feet)**							
	50	**100**	**200**	**¼ Mile**	**½ Mile**			
	103	97	91	74	68			

Source: Tipler 1976

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

Although noise levels would be quite loud in the immediate area, the intermittent nature of peak construction noise levels would not create the steady noise level conditions for an extended duration that could lead to hearing damage. Construction workers would follow standard federal OSHA requirements to prevent hearing damage.

Much of the Roseburg VAMC campus would be directly or indirectly affected by the Proposed Action construction projects as a result of building demolition, building renovation, building construction, parking lot and road construction, utility installation/replacement, and material/equipment transportation and storage. However, the areas where existing buildings would be renovated or demolished and areas where new buildings and parking lots would be constructed are anticipated to have the highest and most pervasive construction noise levels. A composite of these areas was used as the noise generating source area to estimate worst-case peak noise levels from the VA Proposed Action construction activities (Figure 3-3). A separate noise generating source area (Figure 3-4) was established for the proposed State Veteran Home, which would be constructed in the future by ODVA. Noise contours depicted on Figures 3-3 and 3-4 illustrate the estimated peak construction noise levels at varying distances from the primary construction areas.

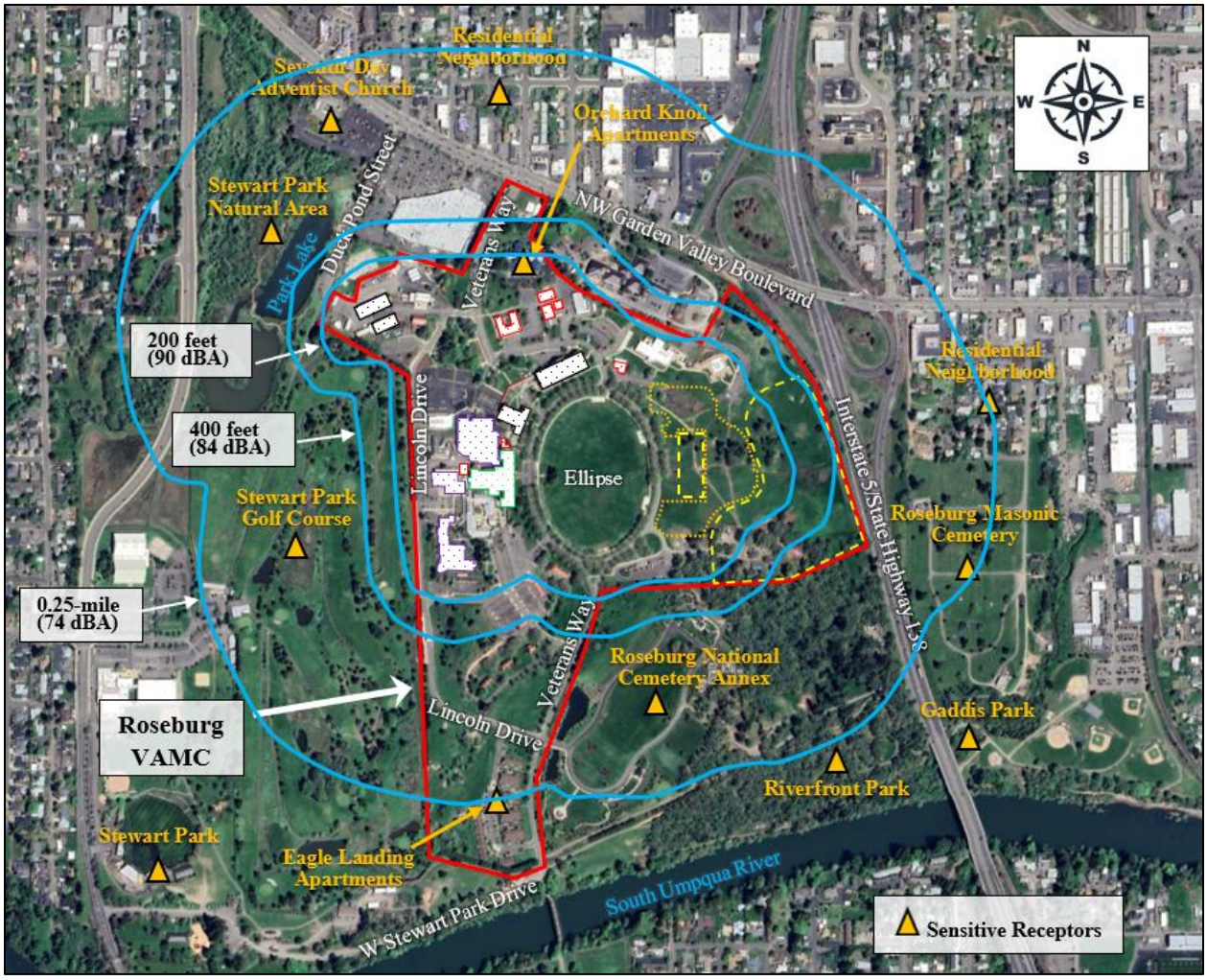

Figure 3-3 Anticipated VA Proposed Action Construction Peak Noise Contours Map

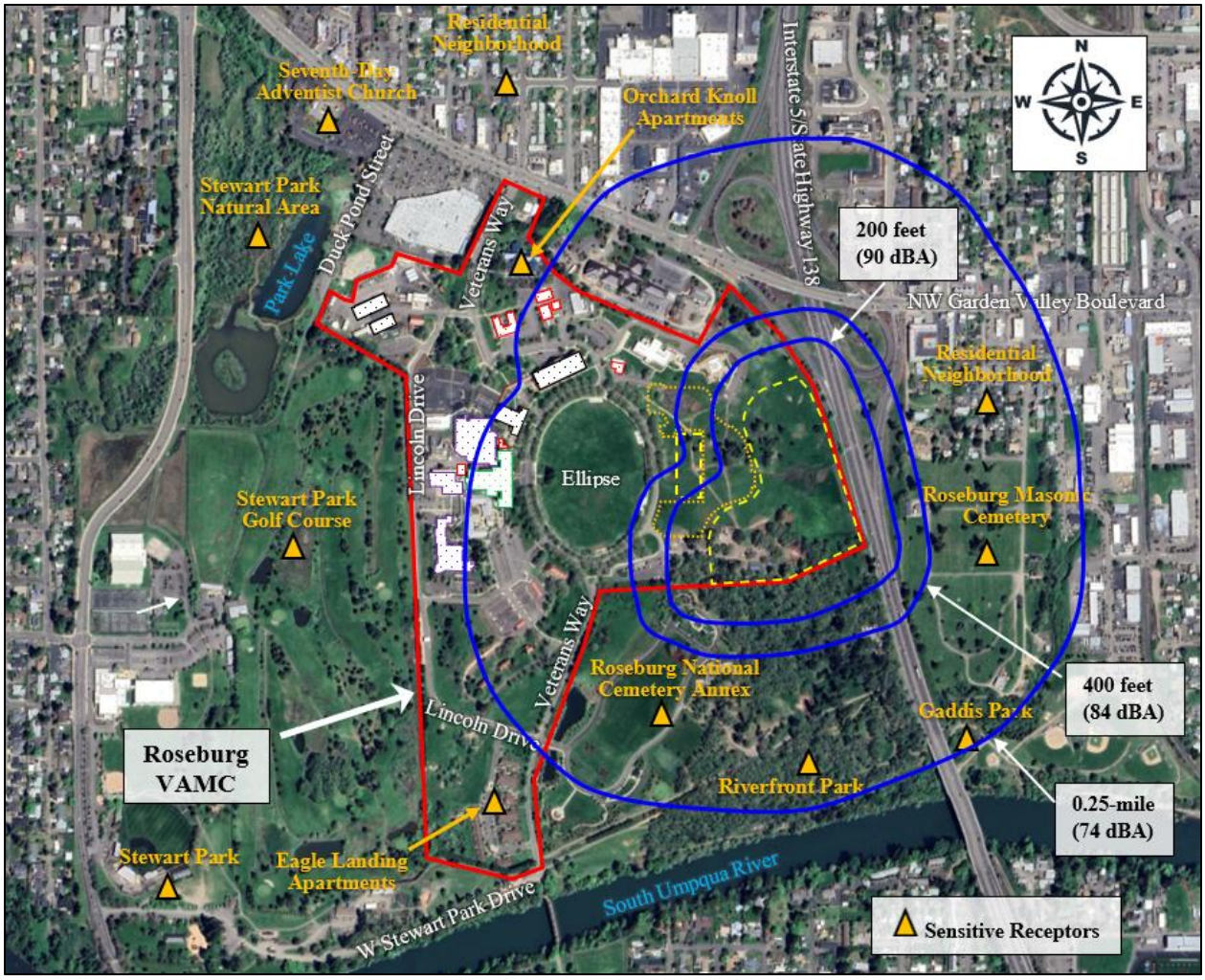

Figure 3-4 Anticipated State Veterans Home Construction Peak Noise Contours Map

Areas that could be most affected by noise from VA's proposed construction activities are those closest to the construction and demolition footprints, including the remainder of the Roseburg VAMC campus (including Orchard Knoll Apartments and Eagle Landing Apartments), Roseburg National Cemetery Annex, Stewart Park Golf Course, Stewart Park Natural Area, Roseburg Masonic Cemetery, Roseburg Seventh-Day Adventist Church, and nearby residential areas located across Interstate 5 and NW Garden Valley Boulevard (see Figure 3-3). Areas that could be most affected by noise from future proposed ODVA State Veterans Home construction activities include the eastern and central areas of the Roseburg VAMC campus, Roseburg National Cemetery Annex, Riverfront Park, Gaddis Park, Roseburg Masonic Cemetery, and nearby residential areas located across Interstate 5 (see Figure 3-4). Indoor noise levels would be expected to be 15-25 decibels lower than outdoor levels. Under the City of Roseburg Noise Ordinance, noise from construction activities is permissible, as long as the construction occurs between the hours of 7:00 a.m. and 7:00 p.m. on Monday through Friday and between the hours of 8:00 a.m. and 6:00 p.m. on Saturdays. It is anticipated construction activities would be conducted during these hours. In addition, BMPs described in Section 4, would reduce temporary construction noise impacts.

Indirect impacts include noise from workers commuting and material transport. Area traffic volumes and noise levels would increase as construction employees commute to and from work at the project area, and delivery and service vehicles (including trucks of various sizes) transit to and from the site. Persons in the project area would experience temporary increases in traffic noise during day-time hours. These effects

are not considered significant because they would be temporary, intermittent, and generally similar to existing traffic noise levels in the area.

No notable additional long-term operational noise impacts would be associated with the Proposed Action. The Roseburg VAMC campus would continue to be used for medical and administrative support functions with dedicated parking areas, similar to its existing uses. No significant new noise-generating activities or operations would be conducted at the Roseburg VAMC campus. A minor increase in vehicle traffic is expected with the expanded Roseburg VAMC campus operations; however, noise levels associated with vehicle traffic are anticipated to be similar to current conditions at the campus. Likewise, no notable additional long-term operational noise impacts would be associated with the future State Veterans Home. The State Veterans Home would be a quiet residential facility that is consistent and compatible with the existing Roseburg VAMC campus.

3.8.3 Effects of the No Action Alternative

Under the No Action Alternative, the noise environment surrounding the Roseburg VAMC campus would not change. The Roseburg VAMC campus would continue its current operations.

3.9 Land Use

The Roseburg VAMC campus currently includes 44 VA-owned and operated buildings of various ages, sizes, and architectural styles. The mostly grassy Ellipse is located on the central portion of the campus. The main hospital and administrative buildings are located on the northern and western portions of the campus. The utility/maintenance buildings are located on the northwestern portion of the campus. The primary Proposed Action construction area, east of the Ellipse, is mostly undeveloped grassy land with some scattered trees. The northern portion of the campus includes the Orchard Knoll Apartments (transitional housing facility EUL), and the southern portion of the campus includes the Eagle Landing Apartments (low-income housing EUL).

The campus is located within an institutional and recreational land use area with considerable greenspace that is surrounded by fully developed mixed residential, commercial, and industrial areas. The campus is bordered to the north by a BLM office, a Fred Meyer grocery store, and NW Garden Valley Boulevard, beyond which are commercial properties. The campus is bordered to the east by Interstate 5, beyond which are residential and commercial properties and a cemetery. The campus is bordered to the south by the Roseburg National Cemetery Annex, wooded land associated with the cemetery, W. Stewart Park Drive, and a City of Roseburg Parks Maintenance Facility, beyond which is the South Umpqua River. The campus is bordered to the west by Stewart Park Golf Course (Roseburg municipal golf course), Roseburg Skate Park, and Stewart Park Natural Area.

Zoning in the City of Roseburg is regulated through Roseburg Municipal Code Title 12 Land Use and Development Regulations (Chapter 12.04 Zoning Regulations) and managed by Roseburg Community Development Department (RCDD). Zoning information obtained from RCDD indicates the Roseburg VAMC campus is located within a Public Reserve (PR) Zoning District. Most of the properties surrounding the campus to the east, south, and west, and the BLM property to the north, are also zoned PR. Areas north of the campus along NW Garden Valley Boulevard are zoned General Commercial (C3) and Professional Office (PO). Areas farther north, northeast, and south across the South Umpqua River are zoned Residential (R) and Multi-family Residential (MR). Zoning designations for the Roseburg VAMC campus and surrounding properties are shown on Figure 3-5.

PR zoning applies primarily to publicly-owned lands and allows for a variety of public service activities. Hospitals and nursing homes are specified permitted uses within PR Zoning Districts.

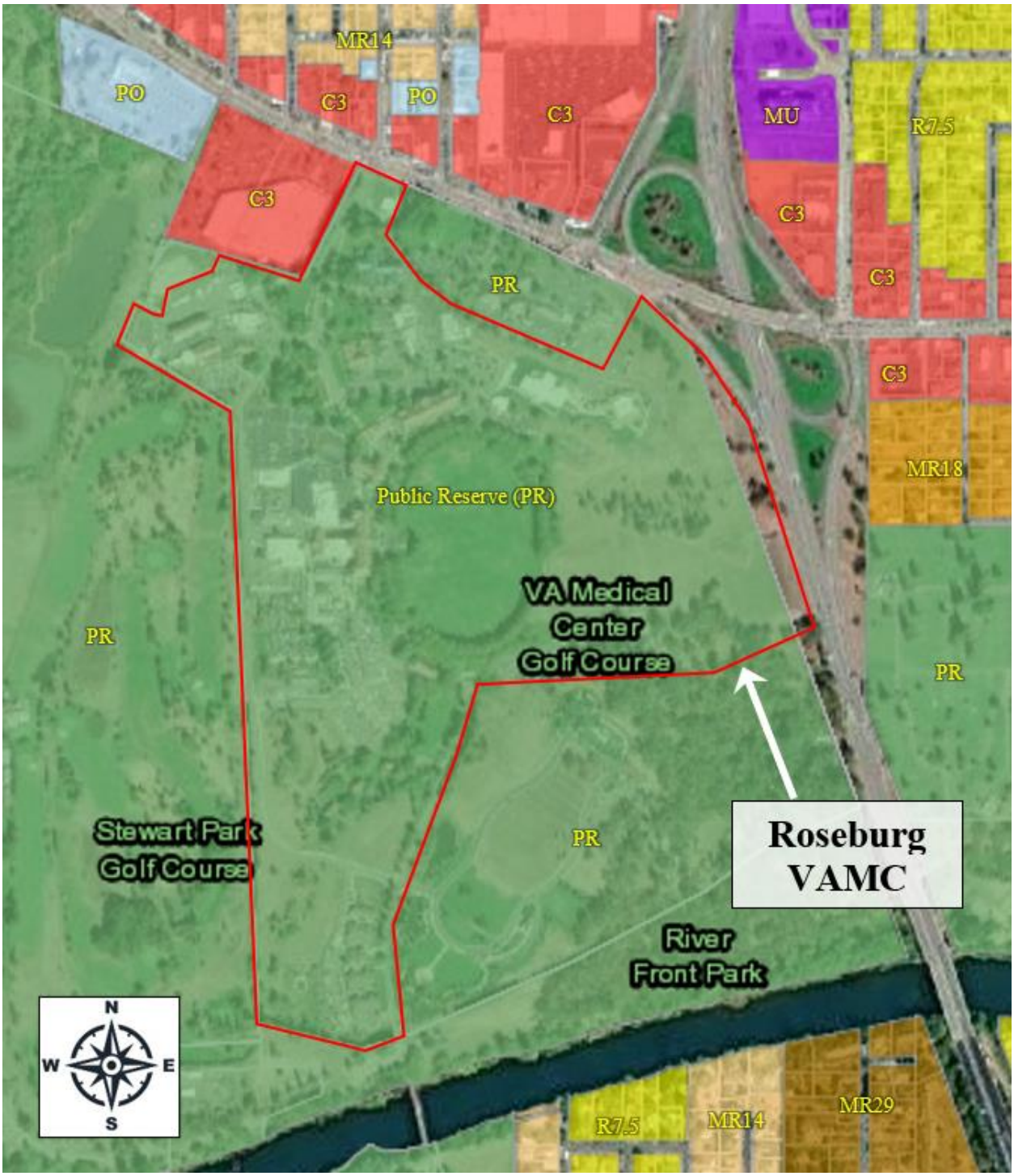

Figure 3-5 Area Zoning Map

3.9.1 Effects of the Proposed Action

The Proposed Action would result in negligible land use effects. The Roseburg VAMC has been in operation since 1933; the proposed seismic and functional improvement projects would enhance and expand Veteran health care services at the campus, the overall use of the campus would not change. In addition, the Proposed Action would be consistent with local zoning and compatible with surrounding land use.

Federal actions on federal government-owned property are exempt from local zoning regulations. Although, as a federal agency, VA is not subject to local zoning regulations or restrictions, the Proposed Action projects would be designed and implemented in consonance with City of Roseburg development standards, to the extent practicable, to ensure they are consistent with other Roseburg VAMC campus and surrounding area developments. No adverse on-site building function or architecture impacts are anticipated.

Future design and construction of the State Veterans Home would be conducted by ODVA in accordance with local zoning requirements.

3.9.2 Effects of the No Action Alternative

Under the No Action Alternative, no land use impacts would occur.

3.10 Wetlands, Floodplains, and Coastal Zone Management

3.10.1 Wetlands

Jurisdictional waters of the United States (WOTUS), including streams and wetlands, are defined by 33 CFR Part 328.3 and are protected by Section 404 of the Clean Water Act (CWA), which is administered and enforced by the U.S. Army Corps of Engineers (USACE). In August 2023, USACE and U.S. EPA issued a final rule to amend the definition of WOTUS. The new rule defines jurisdictional waters are traditional navigable waters (TNW) or tributaries to TNW. Under the new rule, wetlands need to have a continuous surface connection to WOTUS to be considered federally jurisdictional WOTUS.

The State of Oregon regulates waters of the State, which include the Pacific Ocean (within three miles of shore); tidal bays and estuaries; rivers, streams, creeks, and lakes, including some intermittent streams and ditches; and natural and some artificially created wetlands and ponds. The Oregon Department of State Lands (ODSL) administers Oregon's removal-fill law, which is designed to minimize or avoid adverse impacts to waters of the State, including wetlands.

The USFWS National Wetland Inventory (NWI) Mapper and the ODSL State Wetlands Inventory (SWI) map did not identify any mapped wetlands at or immediately adjacent to the Roseburg VAMC campus. The SWI map identified the presence of hydric soils at the campus. However, all three wetland indicators (hydric soil, wetland hydrology, and wetland vegetation) must be present for an area to be considered a wetland.

PBS conducted a wetland determination and delineation of the Proposed Action areas of the Roseburg VAMC campus in October 2023. Precipitation occurred during the field study and the two weeks prior to the field study and the visit occurred within the growing season, so wetland hydrology and vegetation, if present, were expected to be observed. PBS identified an approximately 0.62-acre seasonally flooded, isolated wetland on the eastern portion of the campus near the center of the approximately 14-acre proposed State Veterans Home area (Figure 3-6). The wetland is located within a shallow depression that slopes to the west. The wetland originates from the east at an off-site pipe in the Interstate 5 right-of-way.

The pipe appears to convey stormwater collected from Interstate 5 to the wetland. The wetland then continues to the west and transitions from a wetland to a drainage ditch.

PBS indicated the intermittent, excavated drainage ditch that originates at the west end of the wetland leads to a stormwater inlet located along the eastern side of the Ellipse loop road. The ditch passes under two walking trails. Under each walking trail, a 4-inch PVC pipe is used to carry flow in the ditch past the trail. The average width of the ditch is approximately 5 feet, but it widens to approximately 10 feet before the second or westernmost trail. Water from the ditch flows to a shallow depression and then enters the stormwater inlet. Once stormwater enters the inlet, it flows through a series of pipes, combines with additional stormwater from the campus, and eventually discharges to the South Umpqua River. The water from the ditch flows more than 0.5-mile through the campus stormwater pipe system before discharging to the river.

PBS concluded that the 0.62-acre wetland and the associated intermittent drainage ditch are isolated and have no surface connection to TNW or tributaries to TNW, and therefore, are not federally jurisdictional WOTUS. PBS noted that the isolated wetland and the section of the drainage ditch between the wetland and the second walking trail (approximately 0.04-acre) would likely be considered waters of the State by ODSL.

3.10.2 Floodplains

The Federal Emergency Management Agency (FEMA) National Flood Hazard Flood Layer FIRMette internet mapping application was used to determine if the Roseburg VAMC campus or surrounding properties are located in designated floodplains. The FEMA Flood Insurance Rate Map (FIRM) indicates the majority of the Roseburg VAMC campus, including the Proposed Action construction areas, is not located within or immediately adjacent to 100-year or 500-year floodplains. The southernmost corner of the campus (approximately 1.3 acres) is located within the 500-year floodplain. The floodway of the South Umpqua River (100-year floodplain) is located just south of the campus. The FEMA floodplain map for the campus area is provided as Figure 3-7.

3.10.3 Coastal Zone

The Coastal Zone Management Act (CZMA) was promulgated to control nonpoint pollution sources that affect coastal water quality. The CZMA encourages states to preserve, protect, develop, and where possible, restore or enhance valuable natural coastal resources such as wetlands, floodplains, estuaries, beaches, dunes, barrier islands, and coral reefs, as well as the fish and wildlife using those habitats. The CZMA requires that federal actions within and outside the coastal zone that could have reasonably foreseeable impacts on land, water, and natural resources of the coastal zone be consistent with the state's federally-approved Coastal Management Program. The Oregon Department of Land Conservation and Development (ORDLCD) manages Oregon’s Coastal Management Program. According to ORDLCD Coastal Management Program mapping, the Roseburg VAMC campus is not located within or near a designated coastal zone. The eastern limit of the coastal zone is located approximately 10 miles west of the campus.

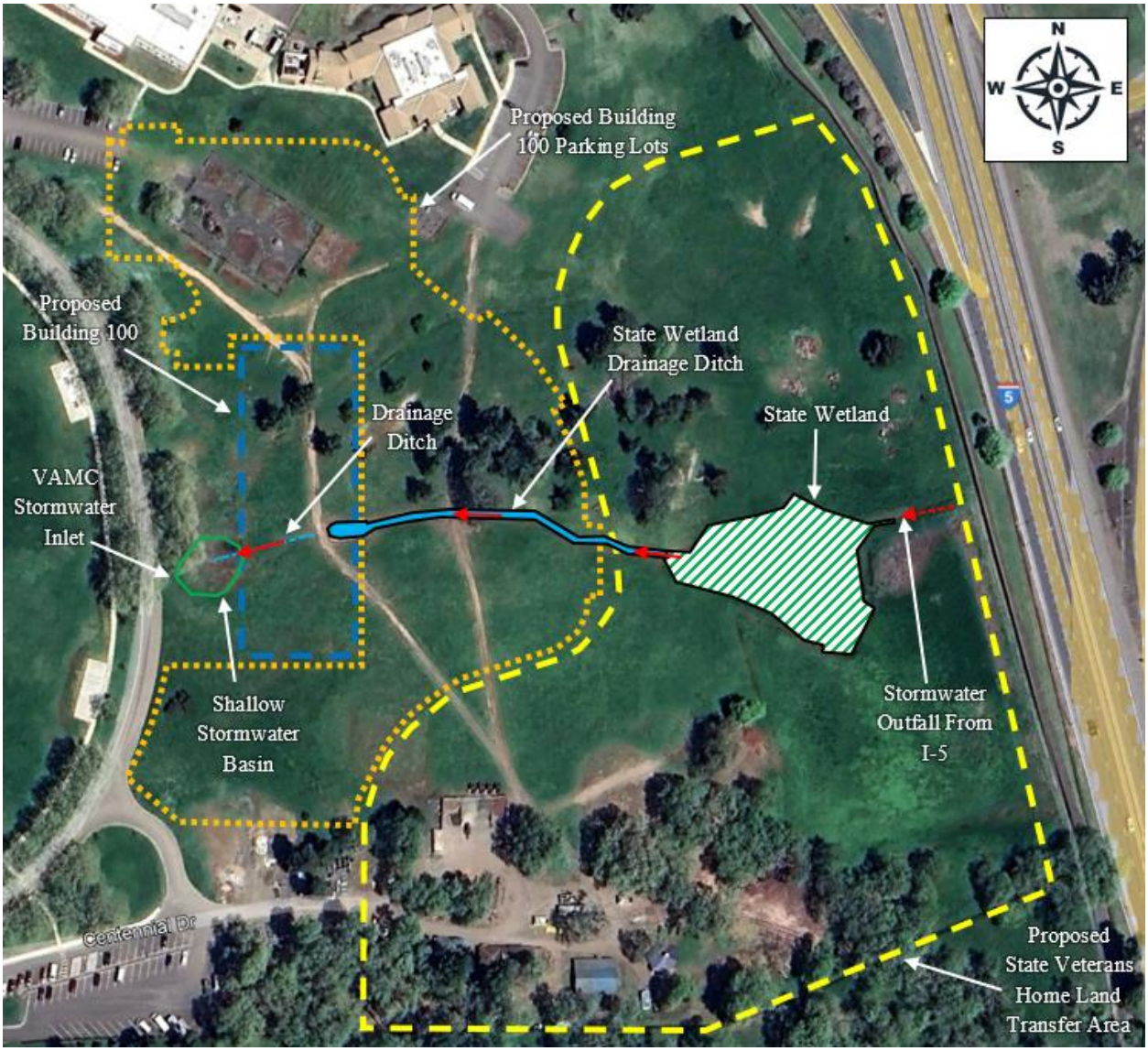

Figure 3-6 Wetlands in Roseburg VAMC Proposed Action Areas

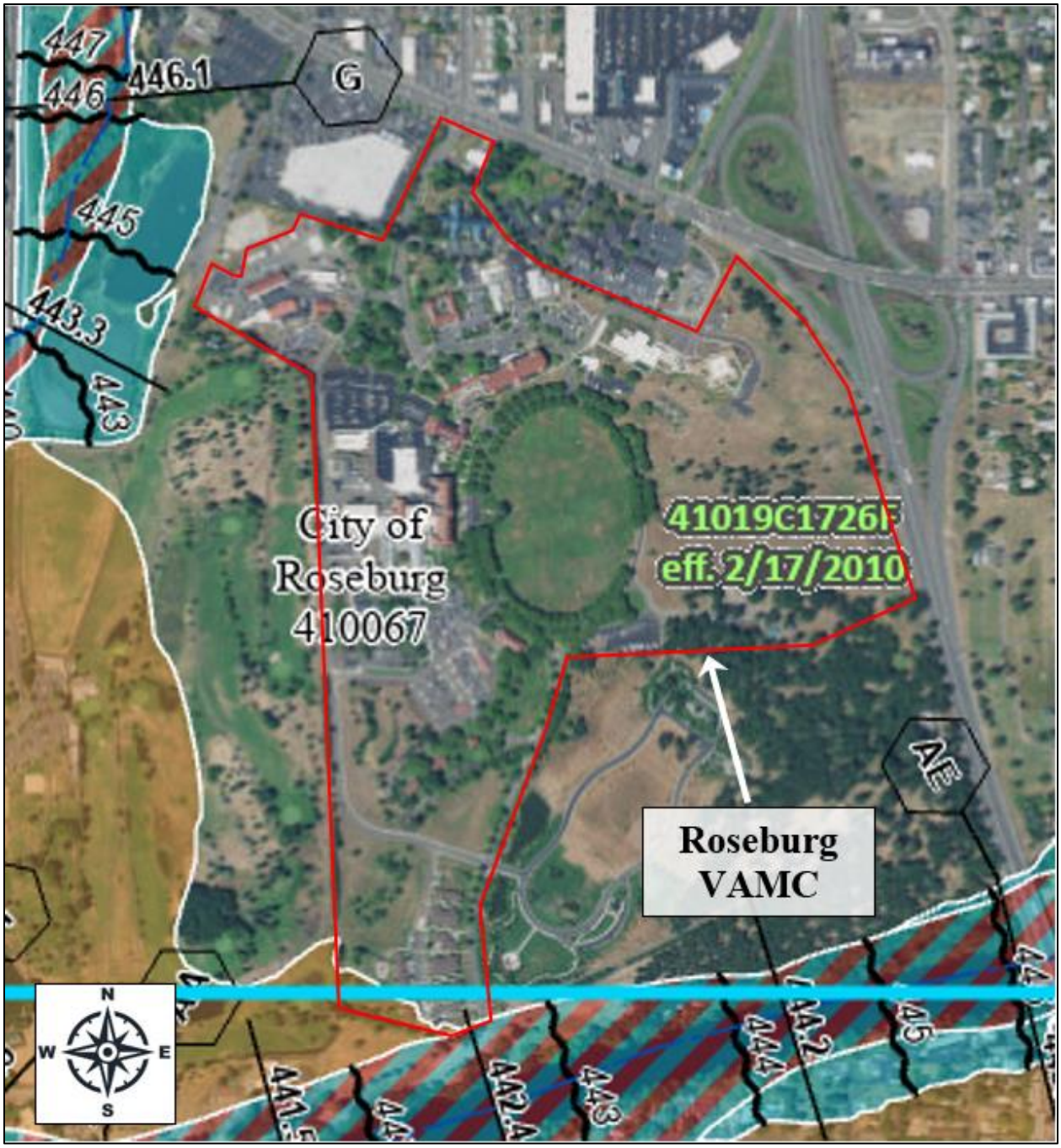

Figure 3-7 FEMA Floodplains Map

3.10.4 Effects of the Proposed Action

Wetlands identified within the Proposed Action areas of the campus were determined to be isolated, potential waters of the State and not federally jurisdictional WOTUS. Federal actions on federal government-owned property are exempt from state wetland regulations. Although, as a federal agency, VA is not subject to state wetland regulations or restrictions, the Proposed Action projects would be designed to avoid the identified wetlands.

A portion of the drainage ditch considered potential waters of the State is located in the proposed Building 100 and Building 100 parking lot area. Unless subsequently determined that this drainage is *not* waters of the State, VA intends to design and construct Building 100 and its parking lots with a buffer of undeveloped land along the drainage ditch to avoid any encroaching on waters of the State. Water that flows from the potential state-regulated portion of the drainage ditch would likely be diverted from its current manmade path to facilitate construction and future maintenance, but would continue to be managed through the VAMC stormwater management system.

The 0.62-acre seasonal wetland considered waters of the State and a portion of the associated drainage ditch are located within the central portion of the 14-acre proposed State Veterans Home parcel. As a state agency, ODVA is subject to state wetland regulations. As part of the design and permitting process, ODVA would coordinate with ODSL, in accordance with state regulations, regarding the state-jurisdictional wetlands. It is anticipated that ODVA would design the State Veterans Home with a buffer to avoid encroachment on the identified wetlands to the extent possible. If wetland impacts cannot be avoided, ODVA would proceed with wetland mitigation in coordination with ODSL.

With these design avoidance measures and mitigation measures, if necessary, wetland impacts would be less than significant.

The southernmost corner of the campus is located within the 500-year floodplain. The Proposed Action is not located in this portion of the campus and, therefore, is not anticipated to impact floodplains.

The campus is not located within or near a designated coastal zone. The Proposed Action would not affect a designated coastal zone, and therefore, a federal consistency determination would not be required.

3.10.5 Effects of the No Action Alternative

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

3.11 Socioeconomics

The following subsections identify and describe the socioeconomic environment of the City of Roseburg , Douglas County, and the State of Oregon. Presented data provide an understanding of the socioeconomic factors that have developed the area. Socioeconomic areas of discussion include the local demographics of the area, regional and local economy, and local housing. Data used in preparing this section were obtained from the U.S. Census Bureau through a QuickFacts report utilizing 2020 U.S. Census information and subsequent U.S. Census Bureau data, and the U.S. Department of Commerce Bureau of Economic Analysis.

Demographics

The City of Roseburg has a lower minority population than the State of Oregon and a higher minority population than Douglas County. Minority populations specific to the Roseburg VAMC campus area are discussed in Section 3.16 (Environmental Justice). Age distributions and high school graduation rates are generally similar between the City of Roseburg, Douglas County, and the State of Oregon, although Douglas County has a higher population of residents over 65 years of age (Table 3-3).

Table 3-3 Demographic Data for Roseburg, Douglas County, and Oregon

Area	All Individuals (2022 Estimate)	Population Under 18 Years of Age (2022 Estimate)	Population Over 65 Years of Age (2022 Estimate)	Minority (2022 Estimate)	High School Graduates (2022 Estimate)	Veterans (2022 Estimate)
Oregon	4,239,379	19.7%	19.2%	14.1%	91.6%	261,322
Douglas County	112,297	19.2%	26.6%	7.9%	91.3%	12,474
City of Roseburg	23,853	21.0%	20.4%	11.0%	93.0%	2,997
Source: US Census Bureau, QuickFacts (U.S. Census Bureau 2022).						

Employment and Income

The City of Roseburg and Douglas County have lower median household incomes than the State of Oregon as a whole (Table 3-4). The City of Roseburg has a higher population below the poverty line than Douglas County and the State of Oregon. Household incomes specific to the Roseburg VAMC campus area are discussed in Section 3.16.

Table 3-4 Regional Income for the Roseburg, Douglas County, and Oregon

Area	Number of Households	Median Household Income	Population Below Poverty Level	Unemployment Rate (December 2023)
Oregon	1,680,800	$76,632	12.1%	3.7%
Douglas County	46,242	$56,440	16.9%	Not available
City of Roseburg	9,954	$50,297	20.0%	Not available
Source: US Census Bureau, QuickFacts (U.S. Census Bureau 2022) and U.S. Bureau of Labor Statistics, Unemployment Rate in States and Local Areas (U.S. Bureau of Labor Statistics 2022).				

Commuting Patterns

Residents of the City of Roseburg area are largely dependent on personal automobiles for transportation to and from work. Public transportation is available in the greater Roseburg area through the Umpqua Public Transportation District (UPTD). The average commuting time in the City of Roseburg was approximately 13 minutes in 2021.

Protection of Children

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

Children are not regularly present within the medical center areas of the Roseburg VAMC campus. However, children may be present at the Orchard Knoll Apartments, located in the northern portion of the

campus, and Eagle Landing Apartments, located in the southern portion of the campus. The nearest off-campus residences are located approximately 350 feet north and 450 feet east of the campus.

The closest school to the campus, Fir Grove Elementary School, is located approximately 950 feet south of the campus, across the South Umpqua River. No other schools are located within 0.25-mile of the campus and no childcare centers or preschools are located within 0.25-mile of the campus.

Riverfront Park is located along the northern side of the South Umpqua River, south of Roseburg National Cemetery Annex and Stewart Park is located west of the campus. The Stewart Park playground is located approximately 1,150 feet west of the southern portion of the campus.

3.11.1 Effects of the Proposed Action

The Proposed Action would provide additional temporary construction jobs in the private sector, providing short-term socioeconomic benefit to the area through increased employment and increased spending at local businesses. The Proposed Action would also provide additional long-term employment for the area through the addition of full-time service and professional jobs at the Roseburg VAMC campus. Most importantly, the Proposed Action would result in significant long-term beneficial socioeconomic impacts by addressing seismic hazards associated with existing campus buildings and providing improved and modernized health care facilities and services to regional Veterans.

No significant adverse health or safety risks to children are anticipated to result from the Proposed Action. Children may be present at the Orchard Knoll and Eagle Landing Apartments and other off-campus areas. However, children would only be present within the medical center areas of the campus as visitors. Construction areas would be secured to prevent unauthorized access by children from the on-campus and nearby off-campus residential areas. The construction contractors would limit and control dust and noise, as discussed in Section 4, thereby minimizing adverse effects to children in the area.

3.11.2 Effects of the No Action Alternative

The No Action Alternative would result in no construction and no increased short-term or long-term economic benefit due to VA's action.

Most importantly, the No Action Alternative would limit VA's ability to address seismic deficiencies in campus buildings and provide life-safety protection to Veterans, employees, and other building occupants, a significant adverse, long-term, direct impact to Veterans in the region.

3.12 Community Services

The Roseburg VAMC campus is located in the Roseburg School District. The school district includes 13 schools – a high school, an alternative high school, two middle schools, eight elementary schools, and a virtual school. Fir Grove Elementary School is located approximately 950 feet south of the campus. No other schools are located within 0.5-mile of the campus.

Mercy Medical Center is located approximately 0.9-mile north of the Roseburg VAMC campus. No other major medical facilities are located with the vicinity of the campus.

The City of Roseburg Police and Fire Departments provide police and fire protection and emergency medical services to the campus and its vicinity. The fire department includes three fire stations strategically located in the City. Roseburg Fire Department Station #3 (801 NW Garden Valley Boulevard) is located on the extreme northern portion of the campus, at the southeast corner of intersection of Estelle Street and NW Garden Valley Boulevard.

The City of Roseburg Public Works Department and the Oregon Department of Transportation (ODOT) provide maintenance to primary roads and bridges in the vicinity of the campus.

The southeasterly adjoining Riverfront Park is a 45-acre park with a disc golf course and bike path/walking trails. The westerly adjoining Stewart Park Natural Area is a 236-acre park with ball fields, bike path/walking trails, a pond, playground, and other amenities. The westerly adjoining area also includes Stewart Park Golf Course (owned by the City of Roseburg). Additional parks within 0.5-mile of the campus include Fir Grove Park (approximately 750 feet south), Gaddis Park (approximately 1,300 feet southeast), and Charles S. Gardiner Park (approximately 2,300 feet north). Several other parks are also located in the Roseburg area.

Public transportation is provided to the vicinity of the Roseburg VAMC by UPTD with bus service every approximately 60 minutes (Roseburg Redline and Roseburg Greenline) with two bus stop shelters located approximately 550 feet east and 550 feet west of the northern campus entrance along NW Garden Valley Boulevard. UPTD does not provide bus service directly to the Roseburg VAMC campus.

3.12.1 Effects of the Proposed Action

No significant additional load is expected to be placed on the fire or police departments as the result of implementing the Proposed Action. Use of other public or community services would be minor and consistent with the existing Roseburg VAMC.

Proposed Action construction activities and the operation of the expanded Roseburg VAMC facilities would increase short-term and long-term traffic volumes on roads near the campus. The additional traffic has the potential to impede the operation of Roseburg Fire Department Station #3. The main exit for emergency vehicles leaving the fire station is located approximately 100 feet east of the north (main) entrance to the VAMC. Traffic in this area is controlled at the intersection of Estelle Street and NW Garden Valley Boulevard, which is fully signalized. The signalization of the intersection and the use of lights and sirens on emergency vehicles leaving the fire station are anticipated to prevent traffic associated with the Proposed Action from significantly impeding the fire station operations. Additional information regarding the potential transportation impacts associated with the Proposed Action is provide in Section 3.14.

The Proposed Action is expected to have a less-than-significant impact on local public services.

3.12.2 Effects of the No Action Alternative

Under the No Action Alternative, there would be no impacts to community services.

3.13 Solid Waste and Hazardous Materials

Hazardous and toxic materials or substances are generally defined as materials or substances that pose a risk (through either physical or chemical reactions) to human health or the environment.

TTL Associates, Inc. (TTL) completed a Phase I Environmental Site Assessment (Phase I ESA) for the approximately 114-acre Roseburg VAMC campus in February 2024. The Phase I ESA included a site visit, interviews with persons knowledgeable about the campus, a review of historic information, and review of local, state, and federal regulatory information for the campus and surrounding area. The Phase I ESA identified the following recognized environmental conditions (RECs) associated with the VA-operated portions of the campus:

- Seven petroleum underground storage tanks (USTs) are currently in use in the western and northwestern portions of the campus. Two 15,000-gallon diesel/heating oil USTs (installed in 1994) are located approximately 100 feet north of the eastern portion of Building 7 and store

back-up fuel for the Building 7 boiler plant. One 1,000-gallon gasoline UST and one 2,500-gallon diesel UST (installed in 1993) are also located in this area and are used to fuel campus vehicles (although the 2,500-gallon diesel UST is no longer actively used). One 30,000-gallon diesel UST (installed in 2003) is located north of Building 65 and fuels the Building 65 emergency generator. One 4,000-gallon diesel UST (installed in 1993) is located west of Building 64 and fuels the Building 64 emergency generator. One 1,000-gallon diesel UST (installed in 1993) is located north of Building 61 and fuels the Building 61 emergency generator. No spills or releases have been reported for any of the USTs that are currently in use at the campus; however, the long operation of these USTs (approximately 20 to 30 years) may have resulted in petroleum releases; therefore, these USTs were considered to be RECs in connection with the campus.

- One 20,000-gallon heating oil/diesel UST (installed in approximately 1974) was formerly located approximately 100 feet north of the east side of Building 7 and provided backup fuel for the Building 7 boilers prior to being replaced by the two current 15,000-gallon heating oil/diesel USTs in 1994. A release was reported during the closure/removal of the 20,000-gallon UST in 1994. Soil and groundwater were reported to have been impacted. No laboratory reports or documentation regarding additional investigation, cleanup activities, or ODEQ closure were identified. Consequently, the reported release from the 20,000-gallon heating oil/diesel UST that was removed in 1994 was considered to be a REC in connection with the campus.
- One 15,000-gallon heating oil/diesel UST (installed in approximately 1974) located approximately 45 feet north of Building 7 was abandoned in place in 1993. No additional information regarding this UST was identified; therefore, the abandoned in place UST was considered to be a REC.

No RECs were identified for the primary Proposed Action construction areas in the eastern portion of the campus.

Figure 3-8 depicts the locations of the current and former USTs in the VA-operated portions of the campus that were considered to be RECs.

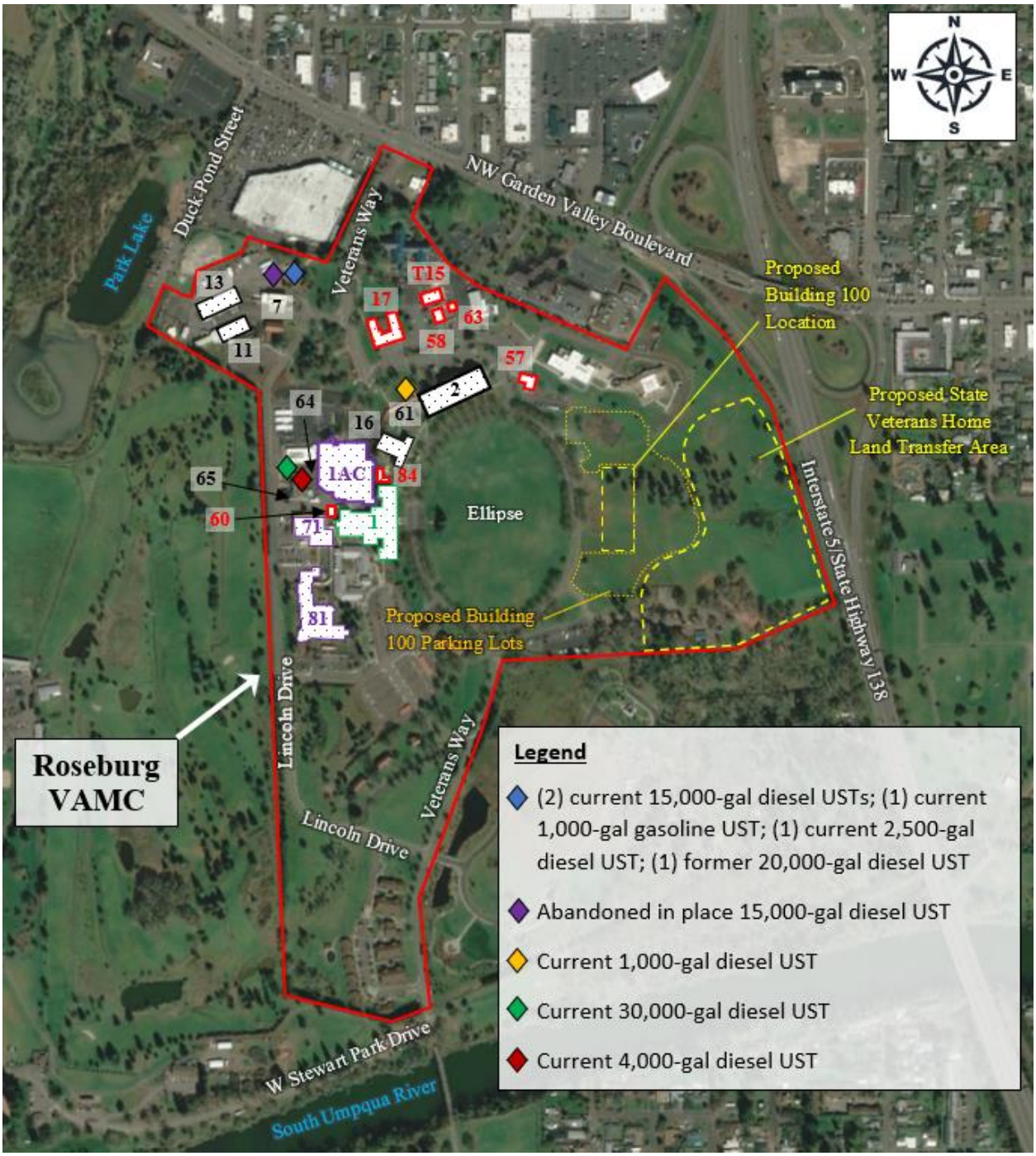

Figure 3-8 Recognized Environmental Condition (REC) Locations

3.13.1 Effects of the Proposed Action

The Proposed Action would result in short-term, less-than-significant adverse impacts due to the increased presence and use of petroleum and hazardous substances during construction. An increase in construction vehicle traffic would increase the likelihood for release of vehicle operating fluids (such as oil, diesel, gasoline, and antifreeze) and maintenance materials. As such, a less-than-significant, direct,

short-term adverse impact is possible. Implementation of standard construction BMPs would serve to ensure this impact is further minimized.

None of the proposed seismic and functional improvement projects are anticipated to include subsurface construction in the immediate vicinity of the seven USTs that are currently in use at the Roseburg VAMC campus or the former USTs at the campus. VA is planning separate projects to remove the seven in-use USTs and replace them with aboveground storage tanks (ASTs).

The structures that are planned to be renovated and/or demolished at the Roseburg VAMC campus are known or assumed to contain ACM and LBP. Identified ACMs would be removed by licensed asbestos abatement contractors in accordance with NESHAP and State of Oregon requirements prior to building renovation or demolition. Asbestos abatement procedures require the removal of ACM with various controls and monitoring to prevent asbestos emissions. The renovation and demolition of buildings containing LBP can result in the generation of LBP-containing dust. Standard construction BMPs to control dust (Section 4) would reduce LBP dust emissions during renovation and demolition to less-than-significant levels.

No significant adverse long-term impacts during operation of the proposed expanded Roseburg VAMC facilities are anticipated. Long-term operational solid wastes, hazardous materials, and medical wastes would be managed in accordance with applicable federal and state laws. Wastes would be collected and properly disposed of by licensed, contracted transportation and disposal companies.

New emergency power generators may be installed as part of the Proposed Action. The generators would likely be fueled by diesel stored in new USTs or ASTs located near the generators. In addition, Building 100 may use heating oil/diesel stored in one or more USTs or ASTs as a backup fuel source for the building heating system, if it is not connected to the VAMC's central boiler plant. Petroleum storage and handling would be conducted in accordance with the Roseburg VAMC's Spill Prevention, Control and Countermeasures (SPCC) Plan and, if applicable, ODEQ requirements. With these BMPs, potential impacts associated with petroleum storage for emergency power generators and potential Building 100 boilers would be less than significant.

3.13.2 Effects of the No Action Alternative

Under the No Action Alternative, the proposed seismic and functional improvement projects would not be implemented and no potential petroleum and hazardous substances impacts associated with the Proposed Action would occur.

3.14 Traffic, Transportation, and Parking

3.14.1 Traffic and Transportation

Traffic in the vicinity of the Roseburg VAMC campus is regulated by the City of Roseburg Public Works Department and ODOT.

Public transportation is provided to the vicinity of the Roseburg VAMC by UPTD with bus service every approximately 60 minutes (Roseburg Redline and Roseburg Greenline) with two bus stop shelters located approximately 550 feet east and 550 feet west of the northern campus entrance along NW Garden Valley Boulevard. UPTD does not provide bus service directly to the Roseburg VAMC campus.

Primary access to the Roseburg VAMC campus is from the northern campus boundary, where the campus entrance road (Estelle Street) intersects with NW Garden Valley Boulevard. Secondary access to the campus is provided at the southern campus boundary from Stewart Park Drive. Veterans Way and Lincoln Drive, internal VAMC campus roads, provide access to campus buildings and parking lots, and the Roseburg National Cemetery Annex.

NW Garden Valley Boulevard is an east-west oriented, four-lane, undivided highway with a center turn lane, on-road bicycle lanes, and sidewalks in the campus area. The posted speed limit is 35 miles per hour (mph). Stewart Park Drive is a north-south oriented, two-lane, undivided road. The road crosses the South Umpqua River via a narrow steel truss bridge. The posted speed limit is 25 mph.

Access to the general campus area is provided by Interstate 5, a north-south oriented, four-lane divided highway located along the eastern campus boundary. Interstate 5 has entrances/exits at NW Garden Valley Boulevard, near the northeastern corner of the campus, and at Harvard Avenue, located approximately one mile farther south. NW Garden Valley Boulevard, Harvard Avenue, and NW Stewart Parkway also provide routes to the campus area. Roads and intersections near the Roseburg VAMC campus are illustrated on Figure 3-9. Table 3-5 provides information regarding campus area roads, including annual average daily traffic (AADT) data from ODOT, where available.

Table 3-5 Roseburg VAMC Campus Area Roadways

Type	Route	Direction	Lanes	Average Daily Traffic (2002)
Major Arterial	NW Garden Valley Boulevard	east-west	4 + Center Turn	30,323
Interstate Highway	Interstate 5	north-south	4	46,894
Major Arterial	Stewart Parkway	north-south	2/4	14,213
Major Arterial	Harvard Avenue	east-west	4 + Center Turn	20,495
Minor Collector	Stewart Park Drive	north-south	2	Not Available
Local	Estelle Street	north-south	2	Not Available
Private (VA owned)	Veterans Way	north-south	2	Not Available
Private (VA owned)	Lincoln Drive	north-south	2	Not Available
AADT Source: Oregon Department of Transportation 2002 Additional Data Source: Traffic Impact Analysis, Wells + Associates, May 15, 2024				

Wells + Associates (Wells) completed a Traffic Impact Analysis (TIA) for the Roseburg VAMC campus in 2024 that identified current traffic conditions in the campus area and modeled projected transportation impacts associated with the proposed seismic and functional improvement projects. Wells and VA representatives met with the City of Roseburg and ODOT staff to discuss the Proposed Action and develop the scope of work for the TIA The TIA was conducted in accordance with the scope of work that was agreed upon by the City and ODOT. The TIA evaluated the following intersections:

- NW Garden Valley Boulevard/NW Estelle Street (# 1).
- NW Garden Valley Boulevard/Garden Valley Center/Bureau of Land Management (BLM) (# 2).
- NW Garden Valley Boulevard/Interstate 5 Southbound Ramp (# 3).
- NW Garden Valley Boulevard/Interstate 5 Northbound Ramp/NW Mulholland Drive (# 4).
- NW Stewart Parkway/W Stewart Park Drive (# 5).
- W Harvard Avenue/Stewart Park Drive (# 6).

Note: Numbers in parentheses denote the intersection numbers on Figure 3-9.

Study intersection locations and configurations are shown on Figure 3-9.

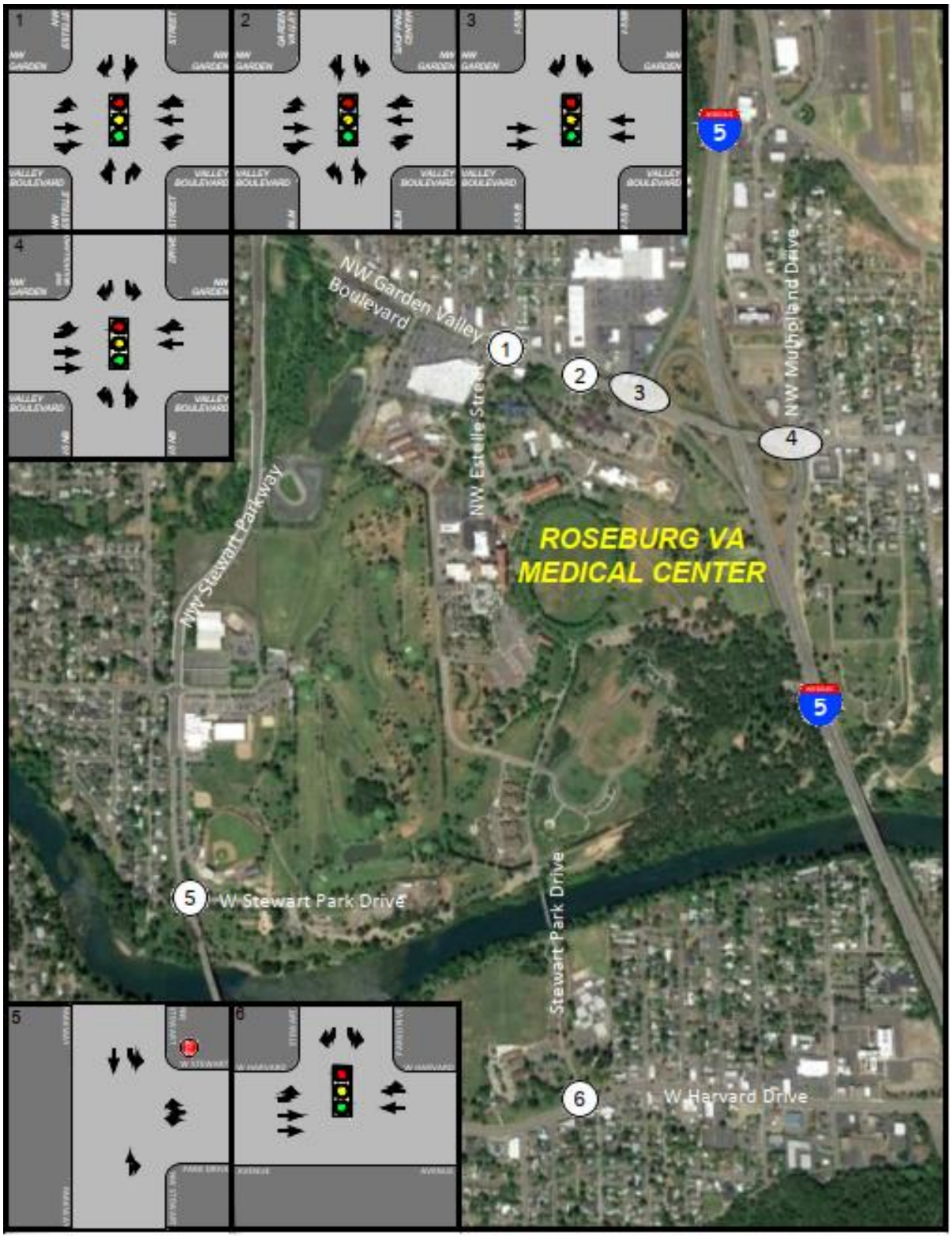

Figure 3-9 Roseburg VAMC Campus Traffic Study Intersections

The TIA evaluated each of the six study intersections for existing traffic conditions (2023) and predicted future traffic conditions in 2045 without (no build) and with (build) the proposed expanded Roseburg VAMC facilities. The Proposed Action is anticipated to be completed within 10 years (by the end of 2033); however, the TIA evaluated a build year of 2045, as requested by ODOT, to coincide with available ODOT forecast models for anticipated local and regional growth.

Two Proposed Action 2045 build scenarios were evaluated. One 2045 build scenario included the traffic generated by the proposed 165,000 BGSF Building 100, the proposed future 150-bed State Veterans Home, and the reuse of vacated clinical space within Building 1AC as a 30-bed CLC. The second 2045 build scenario also included the assumed reuse of 125,000 BGSF Building 1 for non-VAMC general office purposes. The future disposition of Building 1, once vacated, is unknown at this time. The reuse of this space for offices by others was selected as a conservative assumption for estimated trip generation under the second 2045 build scenario, however it should be noted that, if that option were pursued, any resultant traffic impacts would be the responsibility of the future Building 1 occupant.

The TIA used site-specific trip generation data and rates developed during a 2019 traffic study for the Roseburg VAMC campus to estimate the additional vehicle trips that would be generated by Building 100. The TIA used rates/equations from the Institute of Transportation Engineers (ITE) Trip Generation Manual to estimate trip generation from the proposed CLC within Building 1AC and the State Veterans Home (both considered nursing homes) and the office reuse of Building 1 (general offices).

The TIA projected approximately 2,108 additional one-way daily vehicle trips to/from the Roseburg VAMC campus would be generated by the Proposed Action, with approximately 244 additional one-way daily vehicle trips during the a.m. peak hour (approximately 7:00 to 8:00 am) and 241 additional one-way daily vehicle trips during the p.m. peak hour (approximately 4:00 to 5:00 pm). Most of these additional daily vehicle trips (1,409), a.m. peak hour trips (203), and p.m. peak hour trips (200) would be generated by the assumed reuse of Building 1 for offices. The TIA estimated that proposed Building 100, the future State Veterans Home, and the proposed CLC within Building 1AC would generate a total of 699 additional daily vehicle trips and only 41 additional a.m. peak hour trips and 41 additional p.m. peak hour trips.

The TIA assessed worst-case peak traffic conditions, during the a.m. and p.m. weekday rush hours, for each scenario. Level of Service (LOS) evaluations of each intersection were conducted in accordance with the Highway Capacity Manual. LOS is a qualitative measure of traffic flow and is represented by letter designations ranging from “A” to “F” with an LOS of A representing the best conditions and an LOS of F representing the worst conditions. The TIA noted that overall intersection operations of LOS D or better are considered acceptable. The peak hour LOS results for the six studied intersections are summarized in Table 3-6.

Existing Conditions (2023)

A shown in Table 3-6, all study intersections currently operate at overall acceptable levels of service (LOS D or better). However, some individual traffic lanes/movements at intersections #1 and #2 operate at LOS F.

Although the #1 Estelle Street/Garden Valley Boulevard intersection currently operates at overall LOS B or better, the Estelle Street northbound left-turn lane (traffic exiting the medical center) was reported to operate at LOS F during the p.m. peak hour. The Estelle Street southbound left-turn lane was also reported to operate at LOS F during the p.m. peak hour. However, queueing analyses conducted as part of the TIA found the associated queues (traffic backup) for these traffic lanes are not excessive.

Background (No-Build) Conditions (2045)

ODOT reported that an improvement is planned for the Interstate 5 northbound exit ramp at Garden Valley Boulevard (the addition of a new right turn lane) which should be incorporated in the 2045 scenarios. This improvement was included in the TIA modeling.

A shown in Table 3-6, all study intersections would continue to operate at overall acceptable levels of service (LOS D or better) under background (no-build) conditions in 2045. Some individual traffic lane/ movements at intersections #1 and #2 would continue to operate at LOS F.

The #1 Estelle Street/Garden Valley Boulevard intersection would operate at overall LOS C or better in 2045, however, similar to existing conditions, the Estelle Street northbound left-turn lane (traffic exiting the medical center) would operate at overall LOS F during the p.m. peak hour. The Estelle Street southbound left-turn lane would also operate at LOS F during the p.m. peak hour. However, queueing analyses conducted as part of the TIA found the associated queues under background 2045 conditions are also not excessive.

Proposed Action (Build) Conditions (2045)

As shown in Table 3-6, the additional trips generated by the Proposed Action would increase traffic on nearby roads and would increase delays in some lane movements. However, all study intersections would continue to operate at overall acceptable levels of service (LOS D or better) under both modeled Proposed Action build scenarios in 2045 (with and without the reuse of Building 1 for offices by others).

The #1 Estelle Street/Garden Valley Boulevard intersection would continue to operate at overall LOS C or better with the Proposed Action in 2045. Similar to existing and background 2045 conditions, the Estelle Street northbound left-turn lane (traffic exiting the medical center) would operate at overall LOS F during the p.m. peak hour under both modeled 2045 Proposed Action scenarios, with a longer delay assuming the office reuse of Building 1. The Estelle Street southbound left-turn lane would also operate at LOS F during the p.m. peak hour. However, queueing analyses conducted as part of the TIA found the associated queues are not excessive. The TIA found that the left turn movement from NW Garden Valley Boulevard on to Estelle Street (traffic entering the medical center) would operate at LOS B during the a.m. peak hour during the 2045 build scenario that does not include the office reuse of Building 1 and would operate at LOS E during the a.m. peak hour during the 2045 build scenario that includes the reuse of Building 1 for offices. The queueing analysis found that this traffic (with the office reuse of Building 1) would exceed the current striped storage in the turn lane; however, would not interfere with storage needed within the turn lane for intersection #2.

Table 3-6 Summary of Peak Hour LOS Results

Approach/ Lane Group	2023 Existing Conditions				2045 Background				2045 Total Future (Build) Without Reuse of Building 1				2045 Total Future (Build) With Office Reuse of Building 1			
	AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour		AM Peak Hour		PM Peak Hour	
	LOS	Delay(s)	LOS	Delay(s)	LOS	Delay(s)	LOS	Delay(s)	LOS	Delay(s)	LOS	Delay(s)	LOS	Delay(s)	LOS	Delay(s)
1. NW Garden Valley Blvd/NW Estelle Street -Signaled																
EBL	A	4.7	A	8.9	A	5.0	A	9.0	A	5.7	A	9.0	A	6.8	A	9.0
EBT	B	12.8	C	21.9	B	14.1	C	28.0	B	16.8	C	29.0	C	24.6	C	31.3
EBR	B	12.7	C	21.7	B	14.0	C	27.7	B	16.7	C	28.7	C	24.7	C	31.0
WBL	A	8.8	B	13.7	A	10.0	B	17.0	B	12.8	B	17.4	E	60.4	B	19.0
WBT	A	1.0	A	1.5	A	1.1	A	1.1	A	1.2	A	1.1	A	1.3	A	1.1
WBR	A	0.9	A	1.5	A	1.1	A	1.0	A	1.2	A	1.0	A	1.2	A	1.0
NBL	D	50.3	F	193.8	D	50.5	F	237.3	D	50.4	F	247.5	D	50.3	F	300.9
NBT	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0
NBR	D	35.6	C	28.8	C	34.7	C	29.1	C	33.1	C	29.8	C	31.0	D	38.8
SBL	D	40.9	F	123.0	D	42.7	F	167.7	D	41.5	F	167.7	D	39.7	F	167.7
SBT	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0
SBR	C	34.8	C	27.3	C	33.9	C	27.6	C	32.1	C	27.6	C	29.7	C	27.6
Overall	**A**	**8.7**	**B**	**19.8**	**A**	**9.4**	**C**	**23.9**	**B**	**11.0**	**C**	**24.8**	**C**	**21.9**	**C**	**28.6**
2. NW Garden Valley Blvd/Garden Valley Center/BLM -Signaled																
EBL	E	55.4	F	98.2	E	57.4	F	96.0	E	55.4	F	98.5	D	43.5	F	96.5
EBTR	A	2.6	B	13.6	A	3.2	B	13.4	A	3.2	B	12.9	A	5.0	B	16.3
WBL	E	67.4	E	73.3	E	64.7	E	71.8	E	64.2	E	72.6	E	60.3	E	72.3
WBTR	A	5.3	C	28.9	A	5.5	D	50.5	A	5.8	D	52.4	A	6.7	E	58.3
NBL	D	39.7	C	26.9	D	39.9	C	27.5	D	39.9	C	27.5	D	39.9	C	27.5
NBTR	D	39.3	C	26.9	D	39.6	C	27.3	D	39.6	C	27.3	D	39.6	C	27.3
SBL	D	53.2	F	94.0	D	52.9	F	102.2	D	52.9	F	102.2	D	52.9	F	102.2
SBTR	D	39.4	C	27.0	D	39.6	C	27.5	D	39.6	C	27.5	D	39.6	C	27.5
Overall	**A**	**9.6**	**C**	**32.8**	**A**	**8.9**	**D**	**41.4**	**A**	**9.0**	**D**	**41.9**	**A**	**9.7**	**D**	**44.8**
3. NW Garden Valley Blvd/Interstate 5 Southbound Ramp -Signaled																
EBT	A	2.3	A	4.0	A	2.5	A	6.1	A	2.5	A	6.3	A	5.6	A	8.5
WBT	A	3.5	A	4.3	A	3.5	A	3.8	A	3.5	A	3.9	A	4.2	A	4.4
SBL	D	46.0	D	45.7	D	46.6	D	46.4	D	46.6	D	46.1	D	43.4	D	43.9
SBR	D	37.2	D	44.3	D	36.4	D	45.1	D	37.0	D	46.1	D	46.8	D	47.4
Overall	**A**	**8.0**	**A**	**7.8**	**A**	**8.2**	**A**	**8.8**	**A**	**8.4**	**A**	**9.0**	**B**	**11.1**	**B**	**10.3**
4. NW Garden Valley Blvd/Interstate 5 Northbound Ramp/NW Mulholland Drive - Signaled																
EBL	B	12.4	C	20.0	B	15.0	C	28.5	B	14.0	C	28.2	B	14.3	C	26.8
EBT	B	13.7	B	15.0	B	16.8	C	22.0	B	16.2	C	21.8	B	13.2	C	21.1
WBTR	C	25.1	D	46.8	C	26.1	D	48.8	C	26.3	D	49.1	C	28.8	D	49.8
NBL	D	35.4	D	42.6	C	34.4	E	64.7	C	34.9	E	66.3	D	36.6	E	71.4
NBTR	E	67.7	D	35.9		NA		NA		NA		NA		NA		NA
NBT		NA		NA	C	21.8	C	24.4	C	21.6	C	24.4	C	20.1	C	24.4
NBR		NA		NA	C	22.0	C	27.6	C	21.8	C	27.6	C	20.4	C	27.7
SBL	C	23.4	C	25.3	B	18.0	C	23.0	B	17.8	C	23.0	B	16.6	C	23.0
SBR	B	19.0	C	22.5	B	18.2	C	26.1	B	18.0	C	26.1	B	16.8	C	26.1
Overall	**C**	**33.6**	**C**	**33.6**	**C**	**23.8**	**D**	**38.3**	**C**	**23.7**	**D**	**38.6**	**C**	**23.8**	**D**	**39.3**
5. NW Stewart Parkway/W Stewart Park Drive - Stop Sign																
WBLR	B	13.4	C	20.4	C	15.4	D	28.4	C	15.4	D	28.6	C	15.6	D	29.6
NBTR	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0
SBL	A	8.2	A	8.6	A	8.5	A	9.0	A	8.5	A	9.0	A	8.5	A	9.0
SBT	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0
6. W Harvard Ave/Stewart Park Drive - Signaled																
EBL	D	37.6	D	35.1	D	37.5	D	35.3	D	37.4	D	36.1	D	37.4	D	37.0
EBT	A	1.8	A	2.9	A	1.7	A	3.2	A	1.8	A	3.2	A	1.8	A	4.1
WBTR	A	4.2	A	8.8	A	3.9	A	9.3	A	4.0	A	9.7	A	4.1	B	11.4
SBL	D	39.1	D	35.7	D	39.1	D	35.9	D	39.1	D	36.9	D	39.6	C	34.3
SBR	D	35.9	C	31.2	D	36.0	C	31.3	D	35.9	C	31.3	D	35.8	C	30.1
Overall	**A**	**4.0**	**A**	**8.9**	**A**	**3.8**	**A**	**9.1**	**A**	**3.9**	**A**	**9.4**	**A**	**4.1**	**B**	**10.7**

3.14.2 Parking

Parking at the Roseburg VAMC campus is distributed across 24 surface-level parking lots, totaling approximately 948 parking spaces. The parking lots are primarily located near existing campus buildings in the western, northern, and northwestern portions of the campus, with the largest lots located north of Building 1AC, south of Building 1, and north of Building 2. Current Roseburg VAMC campus parking areas are depicted on Figure 3-10.

The 2019 traffic study evaluated campus parking conditions. The traffic study found that the total campus parking occupancy peaked at 90 percent (practical capacity) during the mid-morning hours. The traffic study estimated the peak parking demand to be approximately 775 spaces in 2019.

Proposed Building 100, based on its location on the eastern portion of the campus away from other campus parking, would have its own parking lots designed for the anticipated needs of the building. Surface parking lots totaling approximately 425 parking spaces are planned for areas north, east, and south of Building 100.

The future State Veterans Home that would be constructed by ODVA on roughly 14 acres of land located in the eastern portion of the campus would also have its own parking. Based on preliminary information provided by ODVA, it is anticipated that the State Veterans Home include approximately 290 parking spaces.

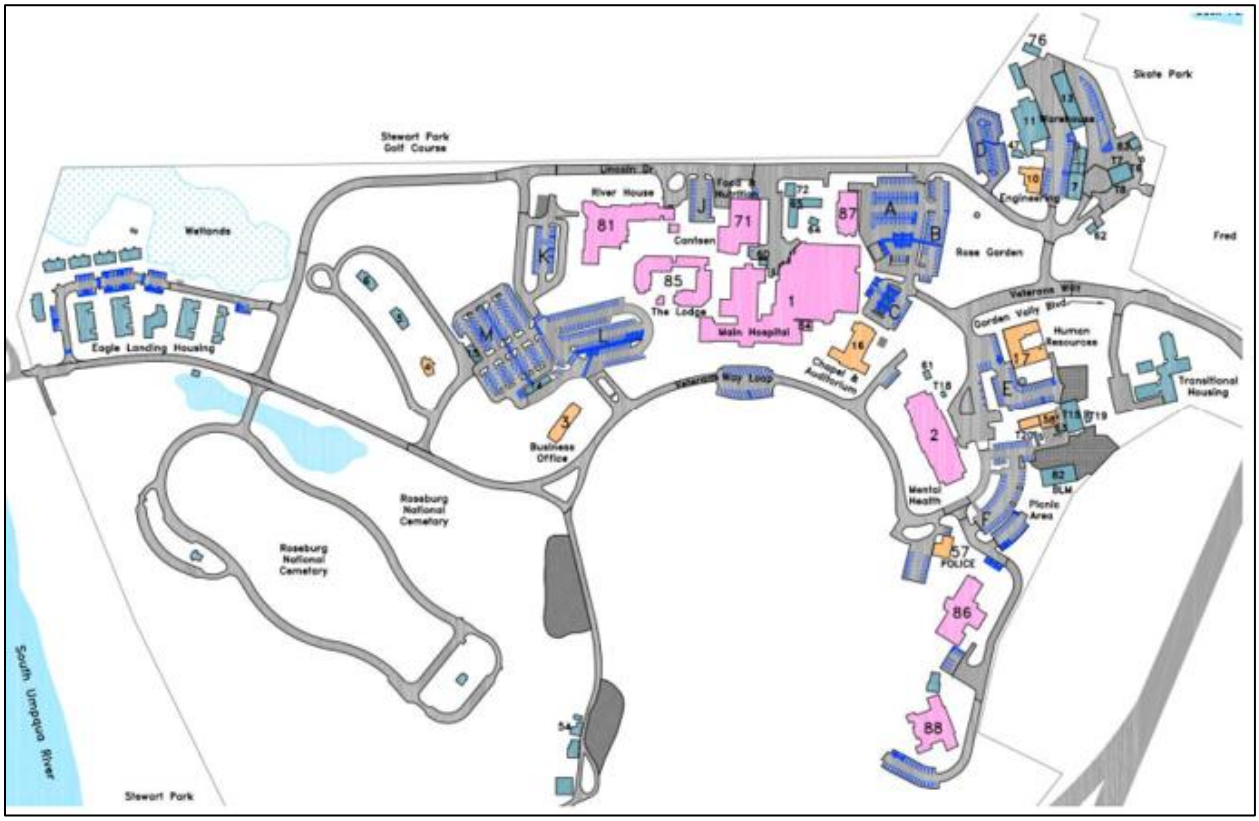

Figure 3-10 Existing Roseburg VAMC Parking Areas

3.14.3 Effects of the Proposed Action

The Proposed Action would have less-than-significant adverse, short-term (construction) transportation and parking impacts. The Proposed Action would also have less-than-significant adverse, long-term (operational) transportation impacts and beneficial long-term parking impacts.

Construction traffic, consisting of trucks, workers' personal vehicles, and construction equipment, would increase traffic volumes in the local area, and could cause delays if this occurred during morning and evening peak periods. However, roads and intersections in the campus area operate efficiently (LOS D or better) even during peak traffic hours; therefore, no significant delays area anticipated. Construction traffic would be minimized by utilizing available staging areas within the 114-acre campus and minimizing interruptions to campus roadways and parking lots during construction.

Following the completion of the Proposed Action construction, public roads in the vicinity of the campus would experience additional traffic. The TIA estimates that 2,108 additional one-way vehicle trips would be generated by the operation of the expanded Roseburg VAMC facilities (including Building 100, the future State Veterans Home, and the assumed reuse of Building 1 for non-VAMC offices). The TIA estimates that approximately 90% of the additional vehicles would enter/exit the campus from NW Garden Valley Boulevard. The increased traffic volume on NW Garden Valley Boulevard (1,897 daily one-way trips) would represent an approximately 6 percent increase over the existing daily traffic volume on this road. A potential significant traffic impact is defined by 38 CFR 26(26.62)(ii) as "an increase in average daily traffic volume of at least 20 percent on access roads to a site or the major roadway network." The increased traffic on the local roadways accessing the Roseburg VAMC campus would be less than the 20 percent threshold that indicates a potential significant traffic impact. In addition, the TIA found that new traffic generated by Proposed Action under the two 2045 build scenarios would not have a significant impact on area intersections. Overall intersection levels of service would remain adequate (LOS D or better) and would be generally consistent with 2045 background levels without the Proposed Action.

The TIA found that the left turn movement from NW Garden Valley Boulevard on to Estelle Street (traffic entering the medical center) would operate at LOS B during the a.m. peak hour during the 2045 build scenario that does not include the office reuse of Building 1 and would operate at LOS E during the a.m. peak hour during the 2045 build scenario that conservatively includes the ***assumed*** reuse of Building 1 for non-VAMC offices. The queueing analysis found that this traffic (with the office reuse of Building 1) would exceed the striped storage currently demarcated in the turn lane; however, would not interfere with storage needed within the turn lane for intersection #2.

The operation of Building 100 and the State Veterans Home, and the reuse of the clinical space with Building 1AC for a CLC, would have very minor traffic impacts. VA will re-evaluate potential traffic impacts associated with Building 1, if necessary, once the plans for its disposal are known.

The current campus parking supply is approximately equal to the parking demand, with no significant excess or shortage of parking spaces. Some existing parking lots at the campus would be temporarily closed during construction, a temporary adverse impact. In addition, approximately 165 existing parking spaces would be permanently eliminated as a result of the Proposed Action. However, Building 100 would include its own new parking (approximately new 425 spaces) and the future State Veterans Home would include its own parking (approximately new 290 spaces), both sized to fully meet the operational needs of these new buildings. Once Building 100 is operational, patients and staff that currently park in lots near Buildings 1 and 1AC would park in the new parking lots near Building 100, freeing up an estimated 200 or more parking spaces that could be used for contractor parking and staging areas during construction and future parking for Building 1. The Proposed Action would have long-term beneficial parking impacts.

3.14.4 Effects of the No Action Alternative

Under the No Action Alternative, no transportation or parking impacts associated with VA's Proposed Action would occur.

3.15 Utilities

The Roseburg VAMC campus is currently serviced by natural gas, electricity, potable water, sanitary sewerage, and telecommunication utilities. The proposed expanded Roseburg VAMC facilities would also be serviced by these utilities. Utility providers to the Roseburg VAMC include the following:

- **Roseburg Urban Sanitary Authority (RUSA)** provides sanitary sewer service to the campus.
- **City of Roseburg Public Works Department (RPWD)** supplies potable water service to the campus.
- **Avista Utilities** supplies natural gas to campus.
- **Pacific Power** supplies electricity to the campus.
- **Douglas Fast Net** provides telecommunication services to the campus.

The Roseburg VAMC has two sets of sanitary sewer lines. One set of sanitary lines services Building 82 and Orchard Knolls Apartments and flows west to a RUSA sanitary main located in the northwestern portion of the campus. The second set of sanitary sewer lines services the remainder of the campus and flows south and then southwest through an easement on the adjacent Stewart Park Golf Course property to a RUSA sanitary main located south of the campus.

The Roseburg VAMC domestic water system supplies potable water to all campus buildings and provides water for the campus fire hydrants and sprinkler systems. The on-campus looped water system is fed by municipal water from the City of Roseburg via two metered connection points. The City obtains its water from the North Umpqua River. The water is treated at a water treatment plant in Winchester prior to be being distributed to the municipal water customers.

Avista Utilities provides natural gas service to the Roseburg VAMC campus. The campus central boiler plant (Building 7) uses natural gas as the primary fuel source and heating oil/diesel as the secondary/backup fuel source. Heating oil/diesel provides a redundant fuel source at the campus, allowing campus operations to continue in the event of a natural gas service failure.

Pacific Power supplies electrical service to the campus via one metered service location on the northern portion of the campus. VA owns and operates all transformers downstream of the metering point. The campus maintains several backup/emergency power generators fueled by diesel in the event of a service interruption or power outage.

3.15.1 Effects of the Proposed Action

The Proposed Action would result in an increase in the consumption of utilities, including electricity, natural gas, potable water, and sanitary sewer discharges. Building 100 would be owned and operated by VA and would be connected to current Roseburg VAMC utility systems. The State Veterans Home would be owned and operated by ODVA and serviced through separate (new) utility service lines. Building 1, if reused by others, may also use separate utilities and/or separate metering. VA' modern design standards, including compliance with federal energy efficiency and sustainability requirements, would minimize the consumption of utilities associated with the Proposed Action.

A Utilities Identification and Capacity Report (Utilities Report) prepared by S&B Christ Consulting, LLC (SBCC) in December 2023 investigated the current campus utilities and provided a preliminary analysis of their capacities to meet the needs of the Proposed Action. The Utility Report evaluated the additional utility demands of Building 100, but did not include the State Veterans Home, because it would be serviced with separate utility lines. The Utilities Report found that the existing utilities that service the campus appear to have sufficient capacity to meet the increased demand of the Proposed Action. Potable water, natural gas, and telecommunications lines that service the campus were found to be sufficient to meet the needs of the proposed facilities without service upgrades, although some on-campus improvements may be required. Pacific Power stated that an engineering study would be required to confirm that the existing campus electrical service would be sufficient for the power demands of the Building 100 addition. RUSA confirmed that the existing RUSA sewer main has sufficient capacity to meet the increased sanitary sewer demands of the proposed facilities. However, the Utility Report recommended repairs and upgrades to the campus sanitary sewer system. VA has a separate project to repair and upgrade the sanitary sewer system at the campus.

No utility service upgrades are anticipated to be required for the Proposed Action. Each utility provider would require a review of detailed design drawings to determine the connection and service requirements. The Proposed Action is not anticipated to require alteration of the existing utility mains or affect off-site utility consumers. Proposed Action utility impacts would be negligible.

3.15.2 Effects of the No Action Alternative

Under the No Action Alternative, the proposed seismic and functional improvement projects would not be implemented. Utility use at the Roseburg VAMC campus would remain unchanged.

3.16 Environmental Justice

In 1994, EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, was issued to focus attention of federal agencies on human health and environmental conditions in minority and low-income communities and to ensure that disproportionately high and adverse human health or environmental effects on these communities are identified and addressed. The USEPA-developed EJSCREEN, an environmental justice mapping and screening internet application, was used to obtain information regarding minority and low-income populations within a one-mile radius of the Roseburg VAMC campus.

The EJSCREEN results indicate the Roseburg VAMC campus is located in an area with a lower minority population (17 percent) and higher low-income population (39 percent) than the State of Oregon as a whole (24 percent and 29 percent, respectively).

3.16.1 Effects of the Proposed Action

The Proposed Action would have negligible environmental justice effects. The Roseburg VAMC campus is located in an area with a smaller-than-average minority population. Although the campus is in an area with a higher-than-average low-income population, the Proposed Action would have only a minor impact on the residents in the area. During construction, effects on nearby residents, such as through noise and dust, would be limited and controlled through BMPs described in Section 4, thereby minimizing adverse effects to minority and low-income populations within the region of influence.

Proposed Action construction activities are anticipated to have a short-term beneficial socioeconomic (and environmental justice) effect on the local employment and personal income in the region of influence, as described in Section 3.11.

3.16.2 Effects of the No Action Alternative

Under the No Action Alternative, the proposed seismic and functional improvements would not be constructed and there would be no direct environmental justice effects. However, Veterans in the Roseburg area, including low-income and minority populations, would continue to be served by seismically-deficient buildings, limiting VA's ability to provide life-safety protection to Veterans, employees, and other building occupants.

3.17 Cumulative Impacts

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

The approximately 114-acre Roseburg VAMC campus is located within the central portion of the City of Roseburg, west of Interstate 5 and north of the South Umpqua River. The campus is located within an institutional and recreational land use area with considerable greenspace (parks, golf course, etc.) that is surrounded by fully developed mixed residential, commercial, and industrial areas. The land surrounding the VAMC campus generally consists of commercial properties to the north; Interstate 5 to the east, beyond which are residential and commercial properties and a cemetery; the Roseburg National Cemetery Annex and wooded land associated with the cemetery, recreational areas, and South Umpqua River to the south; and recreational areas (golf course, skate park, and natural area) to the west.

Several new buildings have been constructed at the Roseburg VAMC campus over the last 20 years. A storage building (Building 83) was constructed in the northwestern portion of the campus in 2008, an MRI addition (Building 84) to Building 1 was constructed in the western portion of the campus in 2008; The Lodge (Building 85) and the dental clinic (Building 87) were constructed in the western portion of the campus in the early 2010s, the Eagle Landing Apartment buildings were constructed in the southern portion of the campus in 2014; and the acute mental health/acute psychiatric unit building (Building 86) and CLC/hospice building (Building 88) were constructed in the northeastern portion of the campus in approximately 2015. In addition, the eastern portion of the Ellipse perimeter road was constructed in 2020/2021, and small buildings associated with the former campus golf course (Buildings 54 and 56) were demolished in 2023.

In addition to the various campus improvement projects that are included in the Proposed Action, VA is planning several other projects at the Roseburg VAMC campus, including:

- Seismic retrofit and interior renovation of Building 3
- Replacing campus generators in Building 65 and the associated diesel USTs with new generators near Building T-6 and a diesel AST
- Removing the other petroleum USTs at the campus and replacing them with ASTs
- Repair and replacement of the campus sanitary sewer and storm water system lines

These projects were generally initiated before the Proposed Action projects and are expected to be completed within the next five years, pending available funding. In addition, VA has planned several smaller, maintenance and repair projects for the campus.

The area southeast of the campus was developed with the Roseburg National Cemetery Annex in 2012. There has been no other large-scale development in the vicinity of the Roseburg VAMC campus in the last 20 years. Further potential development in the immediate campus area is limited due to the developed

nature of the area and the public park use of the undeveloped land. Most potential future development in the area would likely be a result of the replacement or transformation of older developments that have reached the end of their effective useful lives.

3.17.1 Effects of the Proposed Action

VA purposely completed this NEPA analysis as a PEA, with a large number of proposed seismic and functional improvement projects, to consider the potential cumulative effects of these projects. This analysis found that the Proposed Action would result in impacts to the Roseburg VAMC campus area as identified throughout Section 3. These include short-term and/or long-term potential adverse impacts to aesthetics, air quality, cultural resources, soil and geology, hydrology and water quality, wildlife and habitat, noise, wetlands, community services, solid waste and hazardous materials, transportation, and parking (short-term only). All of these potential impacts are less than significant and would be further reduced through careful coordination and implementation of general BMPs and management measures, and compliance with regulatory requirements, as identified in Section 4. Given the nature of the Proposed Action and the limited recent and potential future large, off-campus development in the Roseburg VAMC campus area, no significant cumulative adverse impacts to any of these resource areas are anticipated. Other potential off-campus development in the area of the Roseburg VAMC would be subject to zoning requirements and site plan approval by the City of Roseburg, which would serve to maintain and control regional, potentially cumulative impacts.

The Proposed Action could have cumulative impacts with respect to other recent and future Roseburg VAMC campus projects. Collectively, these projects provide significant beneficial cumulative impact to the health of Veterans in the Roseburg area. VA planned the sequencing of campus improvement projects to avoid potential adverse cumulative effects caused by conducting several construction projects the same time. VA would continue to carefully coordinate projects at the campus to minimize impacts to campus operations and the surrounding area. With this coordination, potential cumulative impacts would be minor.

No significant adverse cumulative impacts to the environment induced by the Proposed Action are anticipated within the region. Close coordination between federal and state agencies, the City of Roseburg, and community representatives would serve to manage and control cumulative effects within the region, including managing regional transportation increases with adequate infrastructure. Implementation of local land use and resource management plans would serve to control the extent of environmental impacts, and continued planning would ensure future socioeconomic conditions maintain the quality of life the area's residents currently enjoy. Implementation of effective resource management plans and programs should minimize or eliminate any potential cumulative degradation of the natural ecosystem, cultural, or human environment within the region of influence of the Proposed Action.

3.17.2 Effects of the No Action Alternative

Under the No Action Alternative, no adverse cumulative impacts due to the Proposed Action would occur.

3.18 Potential for Generating Substantial Public Controversy

As discussed in Sections 5 and 6, VA has solicited input from the public and various federal, state, and local government agencies regarding the Proposed Action. The public and government agencies have provided input, which has been considered and addressed in the completion of the Draft PEA. None of the input has identified opposition or controversy related to the Proposed Action. VA published and distributed the Draft PEA for a 30-day public comment period. No comments of opposition or controversy related to the Proposed Action were received.

4.0 MANAGEMENT, MINIMIZATION, AND MITIGATION MEASURES

This section summarizes the management, minimization and avoidance measures, and mitigation measures (if necessary), that are proposed to minimize and maintain potential adverse effects of the Proposed Action at acceptable, less-than-significant levels.

Per established protocols, procedures, and requirements, VA and its contractors would implement BMPs and would satisfy all applicable regulatory requirements in association with the Proposed Action. These "management measures" are described in this PEA and are included as components of the Proposed Action. "Management measures" are defined as routine BMPs and/or regulatory compliance measures that are regularly implemented as part of proposed activities, as appropriate, in southwestern Oregon. In general, implementation of such management measures would maintain impacts at acceptable levels for all resource areas analyzed. These are different from "mitigation measures," which are defined as project-specific requirements, not routinely implemented as part of development projects, necessary to reduce identified potentially significant adverse environmental impacts to less-than-significant levels.

The management, minimization, and mitigation measures summarized in Table 4-1 would be included by VA in the Proposed Action to minimize and maintain adverse effects at less-than-significant levels.

Table 4-1 Management, Minimization, and Mitigation Measures Incorporated into the Proposed Action

Technical Resource Area	Measure
Aesthetics	Comply with the development standards of the Roseburg, Oregon Municipal Code (ROMC), to the extent practicable.
	Design Building 100 to be compatible with the character of the historic campus buildings.
Air Quality	Remove asbestos containing materials in accordance with the federal and state requirements prior to building renovation or demolition.
	Implement dust control measures during building demolition and renovation to minimize fugitive dust and control possible lead-based paint emissions.
	Use appropriate dust suppression methods (such as the use of water, dust, palliative, covers, and suspension of earth moving in high wind conditions) during onsite construction activities.
	Stabilize disturbed area through re-vegetation or mulching if the area would be inactive for several weeks or longer.
	Implement measures to reduce diesel particulate matter emissions from construction equipment, such as reducing idling time and using newer equipment with emissions controls.
	Obtain a new or revised ODEQ Air Contaminant Discharge Permit for new campus boilers, generators, and equipment, if necessary.

Technical Resource Area	Measure
Cultural and Historic Resources	Comply with the stipulations of the executed Programmatic Agreement (PA) to avoid, minimize, and/or mitigate potential adverse effects to historic properties.
	Should potentially historic or culturally significant items be discovered during project construction, the construction contractor would immediately cease work in the area until VA, a qualified archaeologist, the Oregon SHPO, Tribes, and other consulting parties are contacted to properly identify and appropriately treat discovered items in accordance with applicable state and federal laws.
Geology and Soils	Control soil erosion and sedimentation impacts during construction by implementing erosion prevention measures and complying with the ORDEQ-issued National Pollutant Discharge Elimination System (NPDES) permit required under the federal Clean Water Act, including the development and implementation of a site-specific Stormwater Pollution Prevention Plan (SWPPP). The NPDES permit would require stormwater runoff and erosion management using BMPs, such as earth berms, vegetative buffers and filter strips, and spill prevention and management techniques. The construction contractor would implement the sedimentation and erosion control measures specified in the NPDES permit and the SWPPP to protect surface water quality.
Hydrology and Water Quality	Control soil erosion and sedimentation impacts during construction by complying with the ODEQ NPDES permit.
	Use low impact development practices, to the extent possible, during the Proposed Action design.
	Ensure Roseburg VAMC stormwater infrastructure affected by the Proposed Action, including the lateral that drains the main development area east of the Ellipse, is upgraded, as necessary, to meet VA design criteria and requirements.
	Design and construct stormwater system improvements as needed to comply with the requirements of Energy Independence and Security Act Section 438 with respect to stormwater runoff quantity and characteristics.
Wildlife and Habitat	Use native species to the extent practicable when re-vegetating land disturbed by construction to avoid the potential introduction of non-native or invasive species.
	Conduct vegetation clearing between September 1 and March 14 or conduct a survey for active bird nests prior to clearing. If active nests are discovered, maintain a buffer around the nests until the young birds have fledged.
	Should federally-listed or state-listed protected species be identified at the Proposed Action construction area, construction activities in that area should cease until appropriate protection measures are developed and implemented in consultation with USFWS and/or ODFW, as applicable.
	Use downward facing outdoor lighting.
Noise	Limit, to the extent possible, exterior construction and associated heavy truck traffic to occur between 7:00 a.m. and 7:00 p.m. on Monday through Friday, and between the hours of 8:00 a.m. and 6:00 p.m. on Saturdays.
	Locate stationary operating equipment as far away from sensitive receptors as possible.
	Shut down noise-generating heavy equipment when it is not needed.
	Maintain equipment per manufacturer's recommendations to minimize noise generation.
	Encourage construction personnel to operate equipment in the quietest manner practicable (such as speed restrictions, retarder brake restrictions, engine speed restrictions).

Technical Resource Area	Measure
Land Use	Comply with the applicable City of Roseburg zoning regulations and development standards, to the extent practicable.
Wetlands, Floodplains, and Coastal Zone Management	Design Building 100 and the associated parking lots to maintain a buffer of undeveloped land along the sections of the drainage ditch that are waters of the State.
	Ensure that ODVA complies with state wetland regulations and obtains necessary approvals from ODSL prior to the development of the State Veterans Home on the 14-acre land transfer area. It is anticipated ODVA would design the State Veterans Home to avoid impacts to state-regulated wetlands to the extent possible.
Socioeconomics	Secure construction areas to prevent unauthorized access by children from nearby residential areas.
Community Services	Ensure construction and operational traffic associated with the Roseburg VAMC campus does not interfere with the operation of Roseburg Fire Department Station #3.
Solid Waste and Hazardous Materials	Comply with applicable federal and state laws governing the use, generation, storage, transportation, and disposal of solid and hazardous materials and medical wastes.
	Remove asbestos containing materials in accordance with the federal and state requirements prior to building renovation or demolition.
	Implement dust control measures during building demolition and renovation to control possible lead-based paint emissions.
	Register, install, and operate new emergency generator and boiler USTs and ASTs in accordance with Roseburg VAMC's Spill Prevention, Control and Countermeasures (SPCC) Plan, and ODEQ requirements, as applicable and to the extent practicable.
Traffic, Transportation, and Parking	Ensure construction traffic does not adversely affect traffic flow on local roadways. Time construction traffic and select transportation routes to minimize transportation impacts, to the extent practicable. If disruptive construction traffic impacts cannot be avoided, notify the City of Roseburg Public Works Department (RPWD) and the public in advance.
	Ensure debris and/or soil is not deposited on local roadways during the construction activities.
	Re-evaluate potential traffic impacts associated with the operation of Building 1 once the plans for its disposal are known.
Utilities	Submit design plans to each utility provider to determine the specific connection/extension requirements and implement the necessary requirements.
Environmental Justice	None required.

5.0 PUBLIC PARTICIPATION

VA invites public participation in decision-making on new proposals through the NEPA process. Public participation with respect to decision-making on the Proposed Action is guided by 38 CFR Part 26, VA's regulations for implementing NEPA. Additional guidance is provided in VA's *NEPA Interim Guidance for Projects*. Consideration of the views and information of all interested persons promotes open communication and enables better decision-making. Members of the public with a potential interest in the Proposed Action are encouraged to participate. A record of the public involvement associated with this PEA is provided in Appendix H.

5.1 SCOPING

VA initiated the NEPA public scoping process for the Proposed Action in June 2023, which included public scoping meetings held at the Roseburg VAMC campus on June 28, 2023 at 7:00 pm and on June 29, 2023 at 10:00 am that were announced in The News-Review on June 18 and 20, 2023. Members of the public, including Roseburg VAMC staff, provided verbal input and comments during the scoping meetings and written comments via email. Written input from the public is provided in Appendix H. Public input and comments related to the Proposed Action are addressed in the appropriate sections of this PEA. Public scoping input included the following:

- Comment regarding the beauty of the campus and the concern that new buildings would not reflect the character of the historic buildings. Commentor would like to see red brick used in the design of the new buildings.
- Comments related to the historic significance of the campus buildings to the community and a request that VA consider creative options to preserve campus structures and, in particular, Building 1.
- Consider the reverence due to the National Cemetery. Preserve the surrounding landscape to maintain peace and solemnity of the cemetery.
- Concerned about air quality impacts from the renovation and demolition of buildings that may contain asbestos and lead paint and the disposal of demolition debris that may be contaminated.
- Need to consider noise from daily ceremonial rifle fire from adjacent National Cemetery when siting Building 100.
- Concerned about noise impacts from demolition and construction on the surrounding community, schools, and businesses.
- Need to consider construction impacts on daily VAMC operations.
- Concerns related to construction traffic impacts on campus access.
- Concerns related to traffic impacts on local roads.
- Recommended contact and coordination with the City of Roseburg regarding the Proposed Action.
- Concerned that the Proposed Action does not include the addition of emergency room services for the VAMC. Commentor noted the importance of the Roseburg VAMC in serving the local Veteran community and would like it restored to a Level 2 hospital.

5.2 PUBLIC REVIEW

VA published and distributed the Draft PEA for a 30-day public comment period, as announced by a Notice of Availability published in The News-Review on May 3 and 5, 2024. The Draft PEA was posted for public review on the VA Office of Construction and Facilities Management Environmental Program Office website: (https://www.cfm.va.gov/environmental/index.asp). In addition, a hard copy of the Draft PEA was made available for public review at the Roseburg Public Library, located at 1409 NE Diamond Lake Boulevard, Roseburg, OR. VA emailed notification of the release of the Draft PEA to the stakeholders previously contacted during the NEPA scoping. The notice contained a link to the Draft PEA on VA's website and invited stakeholders to provide comments on the document. U.S. EPA provided comments on the Draft PEA (Appendix H). U.S. EPA concluded that their review of the Draft PEA found "***no significant environmental concerns to address in the Final PEA"***. U.S. EPA provided recommendations for the Final PEA. These recommendations were considered, and incorporated as applicable, in preparing the Final PEA. No other agency stakeholders provided comment on the Draft PEA.

VA held public meetings at the Roseburg VAMC on May 21, 2024 at 10 am and 7 pm to present a summary of the Draft PEA and invite the public to provide input and comment on the Draft PEA. Three members of the public and five representatives of ODVA attended the 10 am meeting. No members of the public attended the 7 pm meeting. Two members of the public requested information regarding the number of Veteran enrollees, workload, and space planning for the Roseburg VAMC. Following the meeting, VA provided these meeting participants links to the VA Recommendations to the AIR Commission (www.va.gov/aircommisionreport/index.asp) and VA's Space and Facility Planning information (www.cfm.va.gov/TIL/planning.asp). ODVA representatives involved with the planning and design for the proposed State Veterans Home asked if the technical reports referenced in the Draft PEA would be made available and whether a jurisdictional determination request of USACE had been submitted for the wetland identified on the proposed 14-acre land transfer area. VA will provide technical reports applicable to the 14-acre land transfer area to ODVA. Based on the findings of the wetlands investigations conducted on behalf of VA, no request for jurisdictional determination from USACE was made. No public comments specific to the Draft PEA were received during the public meetings or through VA's designated email.

6.0 AGENCIES AND PERSONS CONSULTED

6.1 AGENCY COORDINATION

Agencies and organizations consulted for this PEA include:

- U.S. Fish and Wildlife Service
- U.S. Environmental Protection Agency
- U.S. Army Corps of Engineers
- USDA Natural Resource Conservation Service
- Bureau of Land Management – Roseburg District Office
- Oregon Department of Environmental Quality, various programs
- Oregon Health Authority – Drinking Water Services
- Oregon Department of Fish and Wildlife – Wildlife Division
- Oregon Department of Transportation
- Oregon Department of State Lands
- Oregon Department of Veterans' Affairs
- Oregon State Historic Preservation Office
- Douglas Soil and Water Conservation District
- Douglas County, various departments
- City of Roseburg City Manager
- City of Roseburg, various departments
- Confederated Tribes of Siletz Indians Tribal Veterans Services Office
- Confederated Tribes of the Grand Ronde Tribal Veterans Services Office
- Confederated Tribes of the Warm Springs Reservation Tribal Veterans Services Office
- Confederated Tribes of the Umatilla Indian Reservation Tribal Veterans Services Office
- Cow Creek Band of Umpqua Tribe of Indians Tribal Veterans Services Office
- Klamath Tribes Tribal Veteran Services Office

VA initiated the NEPA scoping process with these agencies and organizations on June 13, 2023, which included emailing the agencies/organizations scoping letters with a request for information and comment based on the available information regarding the campus area and the Proposed Action. The scoping letters also informed the agencies/organizations of two public meetings held at the campus on June 28 and 29, 2023 to receive public input on the scope of the environmental assessment.

Responses were received from the U.S. EPA, Douglas County Planning Department (DCPD), and City of Roseburg Community Development Department (RCDD). Input provided by these agencies is addressed in the appropriate resource sub-sections of Section 3. Written correspondence from the agencies is provided in Appendix B. The following summarizes that input, which VA used to focus this PEA's analysis:

- **U.S. EPA** commented that VA should consider the impacts of demolition debris on Veterans using the VAMC during proposed construction activities and requested information regarding construction equipment staging areas. U.S. EPA also recommended that VA use sustainable designs and building materials in building renovations or new construction.
- **DCPD** stated the Roseburg VAMC is located entirely within the City of Roseburg and the DCPD does not have jurisdiction over the project. Therefore, DCPD stated they will not participate in planning efforts for the Proposed Action.

- **RCDD** stated that they support the Proposed Action which would greatly enhance the function and appearance of the Roseburg VAMC campus. RCDD stated that the classical revival buildings within the Roseburg VA Hospital Historic District are a critical and under-utilized resource for the area and noted that the Ellipse is the single largest urban public space in Douglas County. RCDD commented that the proposed new building (Building 100) and the repurposing of Building 1 would be a potential game-changer for VAMC patients and family members, residents, and tourism. In addition, RCDD offered the following comments and suggestions:
    - RCDD requested that VA perform a traffic impact study to analyze impacts of the Proposed Action and present a plan to address those impacts in coordination with the City's planned Garden Valley Corridor Study.
    - The City has an upcoming construction project for the Stewart Park Drive/Centennial Drive Bridge, which would have temporary impacts during construction. The City would like to discuss and coordinate transportation issues with VAMC staff.
    - VA needs to consider the how the Proposed Action would impact the City's emergency services resources.
    - Given the historic designation of the campus, the City of Roseburg Historic Resource Review Commission should be consulted if there are going to be major changes or potential demolition of contributing structures.
    - RCDD noted that there may be challenges providing water service to the 14-acre proposed State Veterans Home property based on City water service access regulations. The City would need to work through access and service issues for any state-owned project or lands.
    - The City's Transportation System Plan identifies the need for better bike and pedestrian connections to and through the campus and City is currently working on planning projects with ODOT for both nearby I-5 interchanges (at Garden Valley Boulevard and Harvard Avenue). The City welcomed and encouraged VA's participation with the City and ODOT on finding solutions for better campus access.
    - The City requested the opportunity to comment as each project continues to develop to ensure that shared goals and concerns can be discussed.

6.2 NATIONAL HISTORIC PRESERVATION ACT SECTION 106 CONSULTATION

On June 6, 2023, VA initiated NHPA Section 106 consultation for the Proposed Action with OR SHPO, ACHP, Douglas County Historic Resource Review Committee, Douglas County Historical Society, Restore Oregon, City of Roseburg Historic Resources Review Commission (HRRC) as the Certified Local Government, the Patrick W. Kelley Post 2468 & Auxiliary of the Veterans of Foreign Wars, the Earl B. Stewart Post 16 of the American Legion, and federally-recognized Indian tribes identified as having possible ancestral ties to the Roseburg VAMC area. As part of this effort, VA submitted information regarding the undertaking (Proposed Action), the delineation of the APE of the undertaking (the entire Roseburg VAMC campus and adjacent Roseburg National Cemetery Annex, totaling approximately 158 acres), the identification of historic properties, and VA's determination of potential adverse effects to historic properties. VA determined that several of the proposed seismic and functional improvements could adversely affect historic properties; however, the effects cannot be fully determined until the design plans are completed. Consequently, VA proposed to develop a PA to evaluate and address potential historic properties effects as the various proposed seismic and functional improvements are

designed. OR SHPO, ACHP, and the HRRC responded with an interest in participating in the consultation.

On June 28, 2023, VA hosted a consultation meeting with the consulting parties. Representatives of the OR SHPO, ACHP, and ODVA attended the meeting. VA provided information and answered questions regarding the definition of the undertaking, the delineation of the APE, the identification of historic properties within the APE, the preliminary assessment of adverse effect, and the proposed development of the PA.

VA also provided members of the public information about the undertaking and its effects on historic properties, and sought public comment and input, through the NEPA scoping process, which included newspaper announcements on June 18 and 20, 2023 and public meetings at the Roseburg VAMC campus on June 28 and 29, 2023.

On July 3, 2023, OR SHPO concurred with VA's assessment that the undertaking would likely have adverse effects on historic properties and agreed that negotiating a PA was appropriate. In addition, OR SHPO recommended VA perform an archaeological inventory of the APE, a Traditional Cultural Property (TCP) or ethnographic study of the APE, and include additional consulting parties (such as the Oregon Military Museum, Oregon Black Pioneers, Oregon Chinese Benevolent Association, American Latino Veterans Association, and other non-placed based, non-profit heritage organizations that may have an interest in the Roseburg VAMC). As recommended by OR SHPO, on July 7, 2023, VA solicited information about historic properties and/or cultural resources potentially affected by the undertaking to the Women Veterans Alliance, Foundation for Women Warriors, Women Veterans Network, Modern Military Association of America, Oregon Department of Veterans Affairs LGBTQ+ Veterans, National Association of Minority Veterans of America, Minority Veterans, Black Veterans Project, National Association for Black Veterans Inc., American Latino Veterans Association, Disabled American Veterans, Disabled Veterans National Foundation, Oregon Military Museum, Oregon Black Pioneers, and Oregon Chinese Consolidated Benevolent Association. No responses were received from any of these organizations.

On September 6, 2023, VA responded to OR SHPO comments and submitted the draft PA to the consulting parties for review and comment. On October 12, 2023, VA hosted a consultation meeting with the consulting parties to discuss the draft PA. Representatives of OR SHPO, ACHP, ODVA, and the Klamath Tribes attended the meeting. Consulting parties provided input on the draft PA. HRRC did not attend the meeting, but provided written comments on the draft PA.

On November 28, 2023, VA submitted the revised draft PA to the Section 106 consultation parties for further review and comment. OR SHPO, ACHP, HRRC, and ODVA provided comments. The comments were generally minor and clear. VA has accepted the comments and recommendations.

On February 27, 2024, VA submitted the final draft PA to the OR SHPO, ACHP, HRRC and ODVA for final review and comment prior to signature. OR SHPO, ACHP, and ODVA provided comments.

The final PA was fully executed by VA, OR SHPO, ODVA, and ACHP on June 3, 2024. The final PA includes project design review by OR SHPO and the consulting parties to avoid and/or minimize adverse effects to historic properties. If adverse effects to historic properties are identified, VA would notify the OR SHPO and the consulting parties and would consult to resolve the adverse effects. The PA provides a wide range of potential mitigation measures that would be considered to address adverse effects. The selection and implementation of the mitigation measures would be included within an agreement document, if required. As part of the PA, VA is required to conduct an archaeological survey of the 14 acres land being considered for the State Veterans Home prior to transfer to ODVA and to evaluate any identified archaeological deposits for NRHP eligibility. The PA also requires a cultural resource survey for archaeological resources prior to ground disturbance and/or archaeological monitoring during ground disturbing activities to ensure that any archaeological resources that may be encountered are properly

handled. In addition, the PA provides procedures for OR SHPO and consulting party involvement with regards to the future disposal of Building 1. With the implementation of the PA stipulations, cultural resources impacts would be less than significant.

Section 106 correspondence is provided in Appendix C. The executed PA is provided in Appendix D.

6.3 NATIVE AMERICAN CONSULTATION

On June 6, 2023, VA initiated consultation with nine federally-recognized Indian Tribes (Burns Paiute Tribe; Confederated Tribes of the Warm Springs Reservation of Oregon; Confederated Tribes of Siletz Indians of Oregon; Confederated Tribes of the Coos, Lower Umpqua and Siuslaw Indians; Confederated Tribes of the Grand Ronde Community of Oregon; Confederated Tribes of the Umatilla Indian Reservation; Coquille Indian Tribe; Cow Creek Band of Umpqua Tribe of Indians; and Klamath Tribes) as part of this NEPA and NHPA Section 106 process, in accordance with 36 CFR 800.2 and EO 13175, *Consultation and Coordination with Indian Tribal Governments*, November 2000. These Tribes, identified as having possible ancestral ties to the area of the Roseburg VAMC campus, were invited by VA to participate in the NHPA Section 106 consultation process as Sovereign Nations per EO 13175.

The Klamath Tribes responded that Roseburg VAMC is outside of their aboriginal territories, but chose to participate in the Section 106 consultation meeting held on October 12, 2023. No other tribes have responded or elected to participate in the NHPA Section 106 consultation process.

Tribal correspondence is provided in Appendix C.

7.0 LIST OF PREPARERS

U.S. Department of Veterans Affairs Staff

Bruce Mack, PG, REA, CHMM
Environmental Engineer
Construction & Facilities Management
U.S. Department of Veterans Affairs

Héctor M. Abreu Cintrón, PA AIC
VA Federal Preservation Officer
Construction & Facilities Management, Historic Preservation Office
U.S. Department of Veterans Affairs

TTL Associates, Inc. (Consultants)

Lee Brewer
Role: Research and Data Gathering, Document Preparation, Affected Environment, Environmental Impact Analysis, and Scoping Coordination
Degree: B.A., Environmental Studies, 2002
Years of Experience: 18

Carrie Hess
Role: Site Reconnaissance, Research and Data Gathering, Document Preparation, Affected Environment, and Environmental Impact Analysis
Degree: B.S., Professional Geology, 2003
Years of Experience: 17

Rob Clark
Role: Project Manager, Technical QA/QC Review, Program Management/Project Coordination
Degree: B.S., Aquatic Environments/Environmental Science, 1985
Years of Experience: 38

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National Wetlands Inventory: https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

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Various mapping tools: https://www.google.com/maps, https://earth.google.com, etc.

9.0 GLOSSARY

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

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

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

Ambient Air Quality Standards - Those standards established under the Clean Air Act to protect health and welfare.

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

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

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

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

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

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

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

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

Criteria Pollutants - The Clean Air Act of 1970 required the USEPA to set air quality standards for common and widespread pollutants in order to protect human health and welfare. There are six "criteria pollutants": ozone (O_3), carbon monoxide (CO), sulfur dioxide (SO_2), lead (Pb), nitrogen dioxide (NO_2), and particulate matter.

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

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

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

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

Emission - A release of a pollutant.

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

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

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

Agricultural land - Cropland, pastures, meadows, and planted woodland.

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

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

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

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

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

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

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

- Any substance designated pursuant to section 311 (b)(2)(A) of the Clean Water Act.
- Any element, compound, mixture, solution, or substance designated pursuant to Section 102 of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).
- Any hazardous substance as defined under the Resource Conservation and Recovery Act (RCRA).
- Any toxic pollutant listed under TSCA.
- Any hazardous air pollutant listed under Section 112 of the Clean Air Act.
- Any imminently hazardous chemical substance or mixture with respect to which the EPA Administrator has taken action pursuant to Subsection 7 of TSCA.

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

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

Hazardous Waste Storage - As defined in 40 CFR 260.10, ". . . the holding of hazardous waste for a temporary period, at the end of which the hazardous waste is treated, disposed of, or stored elsewhere".

Hydric Soil - A soil that is saturated, flooded, or ponded long enough during the growing season to develop anaerobic (oxygen-lacking) conditions that favor the growth and regeneration of hydrophytic vegetation. A wetland indicator.

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

available habitat.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Potable Water - Water which is suitable for drinking.

Prime Agricultural land - A special category of highly productive cropland that is recognized and described by the U.S. Department of Agriculture’s Natural Resource Conservation Service and receives special protection under the Surface Mining Law.

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

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

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

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

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

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

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

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

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

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

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

Waters of the United States - Include the following: Territorial seas and traditional navigable waters; perennial and intermittent tributaries that contribute surface water flow to such waters; certain lakes, ponds, and impoundments of jurisdictional waters; and wetlands adjacent to other jurisdictional waters.

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

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

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