Draft Environmental Assessment

Building 101 Mental Health Services & Correct Seismic Deficiencies in Building 100 Nursing Tower and Community Living Center
Veterans Affairs Puget Sound
Health Care System
Seattle, Washington

Prepared For:
U.S. Department of Veterans Affairs

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EXECUTIVE SUMMARY

The Department of Veterans Affairs (VA), in projects 663-405 and 663-406, is proposing to construct a new seven-story Mental Health and Research building (MH&R), construct a new seven-level 1,000 car parking structure, and seismically upgrade an existing eight-floor Nursing Tower (NT) (Building 100) and two-floor Community Living Center (CLC) for the VA Puget Sound Health Care System ((VAPSHCS). The projects are located at the VA Puget Sound Medical Center Facility (VAPS) at 1660 S Columbian Way in the City of Seattle, King County, Washington. Additionally, the existing Mental Health Services Building (Building 24) and Buildings 18, 20, and 22 would be demolished for seismic deficiencies. In accordance with the National Environmental Policy Act (NEPA), the VA prepared this Environmental Assessment (EA) to analyze the potential environmental effects of the proposed action.

The VA's national list of medical centers with the most Exceptionally High Risk (EHR) Buildings lists the VAPSHCS as one of the most at risk facilities on the list. By implementing the proposed action, critical patient safety issues would be reduced by providing safe hazard free medical facilities. Currently, the VAPS campus is the VA tertiary referral center for veterans living in Alaska, Idaho, and Washington. The new MH&R building would accommodate the Mental Health Services currently housed in the existing Mental Health Building, and would add new areas for Research and administrative support. The NT would continue to provide a wide spectrum of clinical and administrative functions and the CLC would continue to provide inpatient care to special needs patients including frail, at-risk elderly patients suffering from traumatic brain injury, spinal cord injury, and multiple sclerosis as well as injured military service members returning from foreign wars.

The VA prepared this EA in accordance with NEPA to analyze the potential environmental effects of the Proposed Action on a range of physical, biological, and human resources. The EA identifies the purpose and need, alternatives considered, and agency consultations that have occurred for the Proposed Action. The EA also evaluates the No Action Alternative, under which the Proposed Action would not be implemented.

The analysis performed in this EA concludes that there would be no significant adverse impact, either individually or cumulatively, to the human environment, provided mitigation measures consisting of best management practices and regulatory compliance measures described in this EA are implemented. Therefore, this EA concludes that a Finding of No Significant Impact is appropriate, and that an Environmental Impact Statement is not required.

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BUILDING 101 MENTAL HEALTH SERVICES & CORRECT SEISMIC DEFICIENCIES IN BUILDING 100 NURSING TOWER AND COMMUNITY LIVING CENTER
VETERANS AFFAIRS PUGET SOUND
HEALTH CARE SYSTEM
SEATTLE, WASHINGTON
July 2012

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1.0 INTRODUCTION

1.1 PROJECT BACKGROUND

The Department of Veterans Affairs (VA) Medical Center, Puget Sound (VAPS) is located at 1660 S Columbian Way in the City of Seattle, King County, Washington (see Figure 1). The VA is proposing to combine two separate project numbers (663-405 and 663-406) to construct a new seven-story 223,000 gross square feet (GSF) Mental Health and Research (MH&R) building, construct a new seven-level 1,000 car parking structure, demolish roughly 63,000 GSF of existing buildings (Buildings 18, 20, 22, and 24), and seismically upgrade Building 100 (which houses the eight-floor Nursing Tower (NT) and the two-floor Community Living Center (CLC)) for the VA Puget Sound Health Care System (VAPSHCS).

This Environmental Assessment (EA) was prepared in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 United States Code 4321 et seq.), the Council on Environmental Quality (CEQ) Regulations for Implementing NEPA (40 Code of Federal Regulations [CFR] 1500-1508), and 38 CFR Part 26 (Environmental Effects of the Department of Veterans Affairs Actions). This EA has also been prepared in accordance with the VA NEPA Interim Guidance for Projects dated September 30, 2010.

1.2 PURPOSE AND NEED

The VA's national list of medical centers with the most Exceptionally High Risk (EHR) Buildings lists the VAPSHCS as one of the most at risk facilities on the list. The project (as described below) is designed to address critical patient safety issues by providing safe hazard free medical facilities. Currently, the VAPS campus is the VA tertiary referral center for veterans living in Alaska, Idaho, and Washington. The new MH&R building would accommodate the Mental Health Services currently housed in the existing Mental Health Building, and would add new areas for Research and administrative support. The NT would continue to provide a wide spectrum of clinical and administrative functions and the CLC would continue to provide inpatient care to special needs patients including frail, at-risk elderly patients suffering from traumatic brain injury, spinal cord injury, and multiple sclerosis as well as injured military service members returning from foreign wars.

<u>Purpose:</u> The purpose of the construction of the new MH&R Building and seismic upgrades of Building 100 is for VAPSHCS to continue delivering world-class health care to veterans in a seismically safe environment. This is the second seismic project for Building 100 to improve patient safety (previous project is Building 100 Diagnostic & Treatment Building).

The purpose of the new parking structure is to accommodate the displaced parking spaces from construction of the MH&R Building and to accommodate current and future demand for on-campus parking.

Need: The projects are needed to improve patient safety by removing seismic deficiencies and hazardous building materials from existing buildings, to meet current and future on-campus parking demands, and to continue to deliver world class health care by promoting research and patient health.

1.3 AGENCY CONSULTATION

The following agencies were consulted as part of this EA.

- Puget Sound Clean Air Agency (PSCAA) – The PSCAA was consulted as part of air quality conformity analysis
- State of Washington Department of Archaeology & Historic Preservation (DAHP) – The DAHP was consulted as a part of Section 106 National Historic Preservation Act (NHPA) consultation.
- State of Washington Department of Ecology (WDE) – The WDE was consulted with respect to air quality and water quality.
- United States Department of Agriculture (USDA) – The USDA was consulted with respect to the soil survey.
- United States Environmental Protection Agency (EPA) – The USEPA was consulted with respect to environmental regulations such as air quality conformity and water quality.
- United States Fish and Wildlife Service (USFWS) – The USFWS was consulted as part of biological resource investigations.
- Federal Aviation Administration (FAA) – The FAA was consulted for guidance and requirements regarding the distance from the airport and the type, size, and angles for placement of photovoltaic arrays.

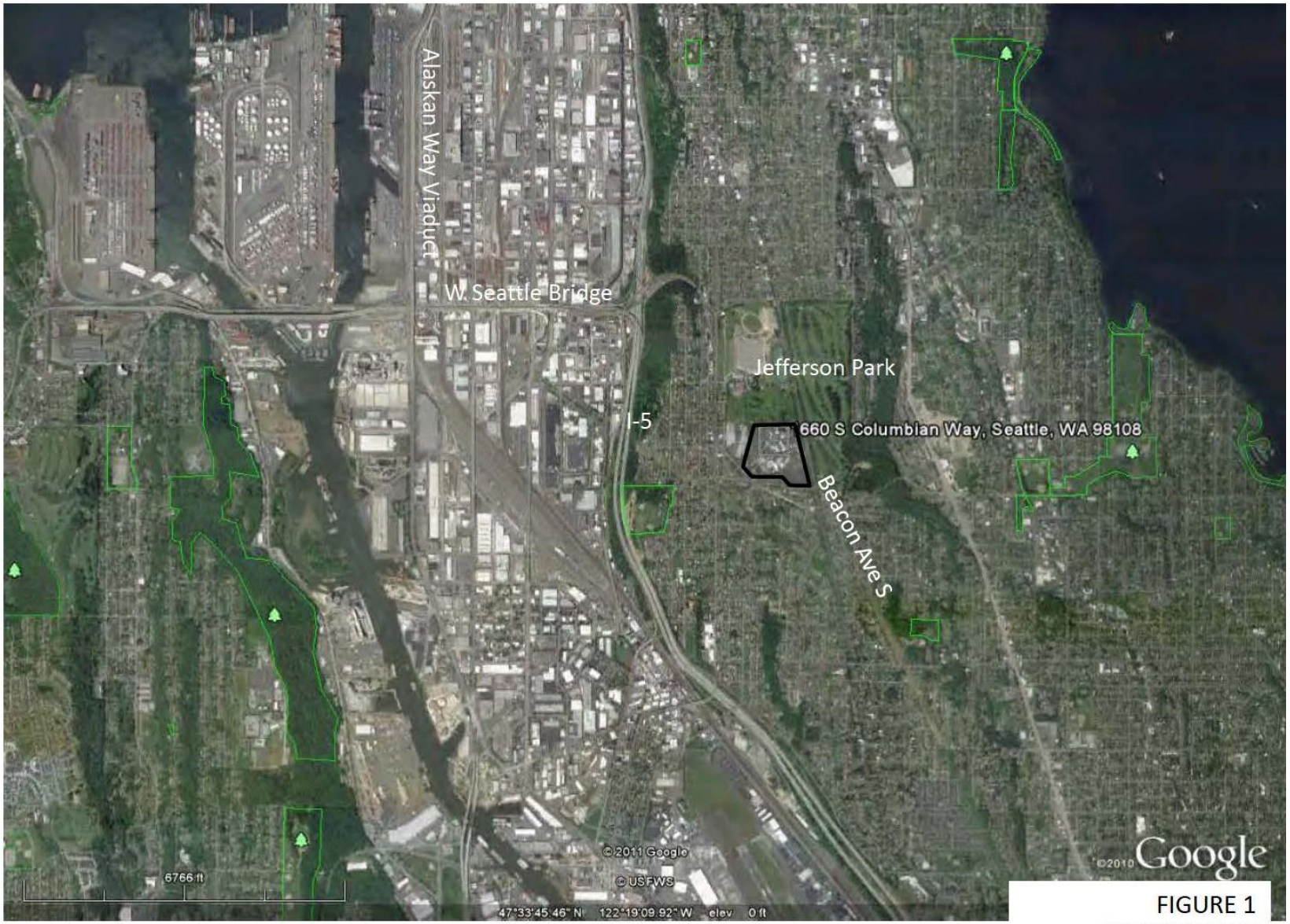

FIGURE 1
VICINITY MAP

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2.0 ALTERNATIVES

2.1 DEVELOPMENT OF ALTERNATIVES

The VA considered the following alternatives when evaluating the best approach to continue delivering world-class health care to veterans in a seismically safe environment:

Mental Health Building Alternatives

(1) construct new MH&R facility,
(2) contract out services,
(3) renovate existing buildings, and
(4) no action;

Parking Alternatives

(1) construct a new 1,000 car parking structure,
(2) relocate parking off-site, and
(3) no action;

Building 100 Alternatives

(1) retrofit deficiencies,
(2) replace Building 100,
(3) contract out services, and
(4) no action.

All alternatives were considered but only the preferred alternative and the no action alternative were carried forward. All other alternatives were not carried forward for feasibility and costs reasons discussed below. Constructing a new MH&R facility, a new parking garage, and retrofitting Building 100 deficiencies were selected as the preferred alternatives and will be analyzed in-depth in this EA as the Proposed Action.

2.1.1 Mental Health Services Building

Mental Health Services are currently housed in Building 24 of the VAPS Seattle campus. Services are proposed to remain on this campus and be expanded through this project. Buildings 18, 20, 22, and 24 are seismically deficient, asbestos and lead based paint containing structures.

Alternative 1 - Construct a New MH&R Facility (Preferred):

Construct a new mental health research facility. The proposed project meets current and planned mental health services program, maintains service at current campus location, and provides a seismically safe and asbestos/lead paint-free building to house the services.

Alternative 2 - Contract Out:

New construction equivalent workload would be contracted out to the local community. It is unlikely there are adequate service providers in the region for mental health programs. For lab and canteen space a leasing scenario plus the costs of appropriate staffing were used to estimate the contract out cost.

Alternative 3 - Renovate Existing Buildings:

Seismically upgrade Buildings 18, 20, 22, and 24 for continued use. Mental Health Services are planned to expand at this campus, and currently additional space is not available in this building. This would require constructing a new facility to house expanded program.

No Action Alternative:

Continue use of Buildings 18, 20, 22, and 24 without a seismic upgrade. This alternative puts users of Buildings 18, 20, 22, and 24 in danger of harm during a seismic event. It also does not address required expansion of services.

2.1.2 Parking

Campus parking capacity is currently deficient. By 9:00 in the morning most days, the parking lot is completely filled, and the VA is required to use valet parking.

Alternative 1 - Construct a New Parking Structure (Preferred):

Construct a new 1,000 car parking structure to help meet current and future demand for on-campus parking.

Alternative 2 - Relocate Parking Offsite:
Move parking off-site. This alternative would require securing (through purchase or lease) a large parcel of land adjacent to the medical facility. Ongoing cost of shuttle transport and/or valet would be incurred.

No Action Alternative:

Parking demand would continue to increase with no increase in available spaces, thus not meeting the purpose of the project.

2.1.3 Building 100 Nursing Tower and Community Living Center

Building 100 NT and CLC have been identified as seismically deficient for Immediate Occupancy, in both their structural and non-structural elements (Degenkolb Engineers, VA Seismic Inventory – Phase 6, May 9, 2005).

Alternative 1 - Retrofit Deficiencies (Preferred):

Replace existing lateral load-bearing members with new members and install bracing at non-structural elements to meet Immediate Occupancy objectives. This is the most cost-effective solution.

Alternative 2 - Replace Building 100:

Replace the NT and the CLC. The buildings, constructed in the early 1980's, have not reached the end of their useful lifespan. Key weaknesses to this alternative include: the Seattle campus is land-locked with no available space for staging such a project and the extremely high cost of construction for both the volume of services provided and the activation of such a project.

Alternative 3 - Contract Out:

This alternative would contract out all of the core hospital services provided in Building 100 NT and NHCU. In addition to being the most costly alternative, this alternative is fraught with other disadvantages including: non-availability within the local community for beds or volume of patient care demands, lack of seamless service to the Veterans with mental health illnesses, providing essential training and research for the community, and interrupting continuity of care to the nearly 16,000 Veterans enrolled to Primary Care providers at the Seattle Campus.

No Action Alternative:

Continue use of Building 100 NT & CLC without a seismic upgrade. This alternative puts users of Building 100 in danger of harm during a seismic event.

2.2 ALTERNATIVES RETAINED FOR DETAILED ANALYSIS

2.2.1 Proposed Action Alternative

Figure 2 shows the existing location of the buildings on the VAPS campus. Figure 3 shows the proposed location of the new MH&R building, parking structure, and the removal of the existing buildings. Figure 4 shows preliminary rendering of the proposed MH&R building and Parking Structure.

Mental Health Services Building

Alternative 1 - Construct a New MH&R Facility and Parking Structure

The first project (project number 663-405) is to construct a new multi-story MH&R building containing approximately 223,000 GSF in the northwest corner of the site. The existing Mental Health Building, Building 24, along with Buildings 18, 20, and 22 in the southern portion of the site are proposed to be demolished, as they are seismically deficient and contain asbestos and lead based paint.

The proposed new seven-story MH&R building would incorporate approximately 54,000 GSF of new space for Mental Health Services with roughly another 96,000 GSF dedicated to research, around 9,000 GSF for administrative and educational support space, an approximately 3,000 GSF lobby, and approximately 61,000 GSF for miscellaneous building functions and structures. Despite the increase in building space, the project will not introduce any new services or staffing demands (Buildings 18, 20, 22, and 24 will be demolished as part of the project). The MH&R would be located adjacent to a new seven-story, 1,000 car parking structure; vehicular entry, circulation improvements, and visitor/patient drop-off area. The project includes stormwater and underground utility improvements and demolition of roughly 63,000 GSF of existing space. The project will incorporate Leadership in Energy and Environmental Design (LEED) techniques including photovoltaic panels on the roof of the parking structure, low or ultra-low flow fixtures, and if feasible a rainwater harvesting system.

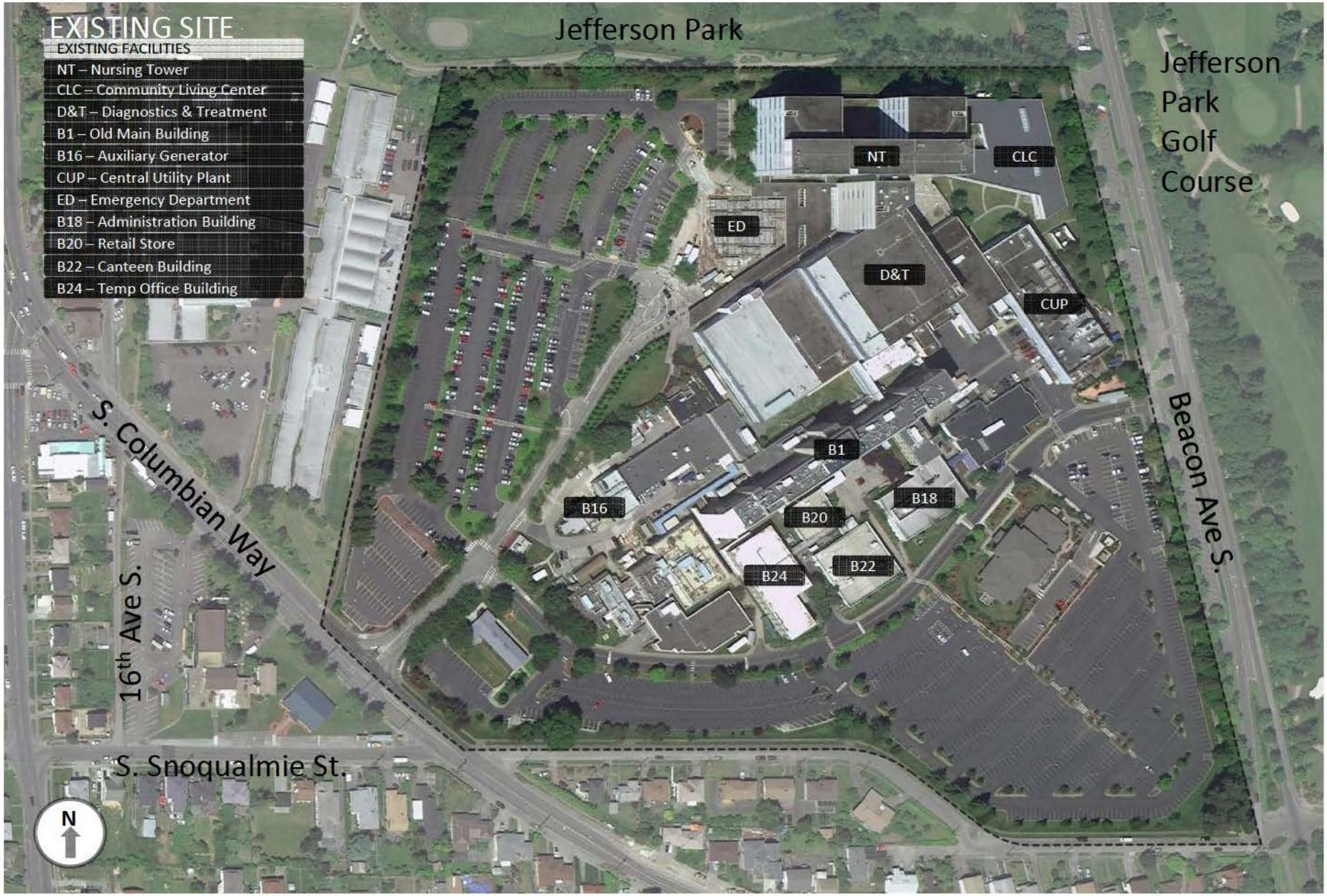

FIGURE 2
SITE MAP SHOWING EXISTING FACILITIES

FIGURE 3
SITE MAP SHOWING PROPOSED DEMOLISHED AND NEW FACILITIES

FIGURE 4
PERSPECTIVE VIEW OF PROPOSED SITE

Correct Seismic Deficiencies in Building 100 Nursing Tower and Community Living Center:

Alternative 1 - Retrofit Deficiencies

The second project (project number 663-406) is to correct the seismic deficiencies in Building 100, NT and CLC and replace all braced frame members in the buildings with a buckling restrained brace seismic system. At eight stories tall, Building 100 NT along with the one story CLC was built in 1985 and serves as the inpatient ward building in the main hospital at the VAPSHCS. The NT includes 194 ward beds and a wide spectrum of clinical and administrative functions. With 60 beds, the CLC provides inpatient care to special needs patients including frail, at-risk elderly patients suffering from traumatic brain injury, spinal cord injury, and multiple sclerosis as well as injured military service members returning from foreign wars. Over 90 percent of all patient activity at this facility goes through Building 100 in any given day so this project would resolve a critical patient safety issue. Four sections of Building 100 have been identified by the VA for seismic renovation. As a major tertiary inpatient facility, Building 100 NT ranks 10th and Building 100 CLC ranks 19th on the list of EHR Buildings in the VA Seismic Inventory report. The requirement provides for seismically strengthening approximately 218,754 GSF of vertical wall surfaces in Building 100. Building 100 NT comprises 180,528 GSF and Building 100 CLC comprises 38,226 GSF of an eight story (with basement) steel bracing and moment frame main hospital.

2.2.2 No Action Alternative

Under this alternative, the Proposed Action would not be implemented. The No Action alternative will be analyzed in this EA to provide a baseline from which to compare the Proposed Action alternative. The impacts of the Proposed Action will be contrasted with the current condition and future condition in the absence of the project.

2.3 PROJECT CONSTRUCTION SCHEDULE

Project construction is expected to occur from approximately August 2012 to July 2016. Construction of the seismic upgrades is anticipated from (approximately) August 2012 to June 2015 and the MH&R building and parking structure are projected to be constructed from (approximately) April 2013 to July 2016. Construction phasing site plans can be found in Appendix A.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES OF THE ALTERNATIVES

A detailed assessment of the effect of the Proposed Action for each environmental attribute is provided below. For each attribute of the proposed action, the existing condition, the anticipated construction condition and the final normal operation condition are discussed when applicable. In addition, the no action alternative is discussed as part of the existing condition and under future conditions.

3.1 AESTHETICS

Impacts to aesthetics are significant when the context and intensity of the impact resulting from the project would have an adverse impact on the visual quality and character of the project area.

3.1.1 Existing

The VAPS is located on a developed lot in an urban residential area in the City of Seattle, adjacent to Jefferson Park. The existing Mental Health Building (Building 24) and Buildings 18, 20, and 22 are located on the southern portion of the constructed buildings on the project site as shown in Figure 2 (above) and are visible from the residences along S. Snoqualmie Street. Building 24 is a two-story, 26,500 GSF, steel frame structure built in 1980. Building 100 NT and CLC are located in the north east corner of the project site and are visible from Jefferson Park and Jefferson Park Golf Course. Building 100 NT is eight stories tall and the CLC Building is two stories tall. Both buildings were built in 1985. The VAPS campus currently provides 1,987 on-site surface parking spaces. Surface parking lots are located on the western and southeastern portions of the project site.

3.1.2 Proposed

The project proposes to construct a new building (Building 101, MH&R) and parking structure, in the existing surface parking lots in the northwest corner of the project site.

<u>Construction – Short Term Impacts</u>

Construction activities would have a temporary adverse effect on visual quality including ground disturbance and landscape alteration. Mitigation actions described below include placement of construction fencing to block views of the work zone, as well as restoration/re-landscaping of all areas disturbed during construction, including areas used for staging. The proposed action would not include nighttime construction and nighttime related lighting would not be more than existing light poles. Therefore, the project is not anticipated to have a significant effect.

Operation – Long Term Impacts

The new MH&R building would be a seven story steel frame building. The south facade would include a curtain wall system and the other three facades would include an exterior cladding system of metal panel with punched windows. The exterior cladding materials have been selected for beauty, ease of maintenance, and value. The intent of the exterior design is to create a building of contemporary appearance that is not dated to a specific style or era. The building would be approximately 118 feet tall with surface dimensions of 260 feet by 130 feet. By comparison, the main hospital is 154 feet tall.

After constructing Building 101, the existing Mental Health Services Building (Building 24) would be demolished. Buildings 18, 20, and 22 would also be demolished, for a total of 63,000 GSF demolished.

The project proposes a 1,000 car, seven level parking structure, with a portion below grade. The new parking structure would be approximately 46 feet tall with surface dimensions of approximately 400 feet by 200 feet and would provide a net increase of 375 parking spaces to the campus. Figure 4 (above) shows a perspective view with the new Mental Health Services Building 101 and parking structure.

A goal of the VAPS facilities is to provide exceptional healthcare that improves Veteran's health and well-being. The landscaping of this project would be an extension of this goal, expanding a sense of welcome pride and recovery beyond the doors of the hospital to the outdoor spaces. The landscaping would transition from the campus to the neighboring properties and provide year-round interest in the landscape with form, color, and textures.

Once constructed, the new MH&R building and new parking structure would have a minimal effect on the aesthetics at the campus. The buildings would not be out of character with the campus as a whole, which is intensively developed with multi-story buildings, parking lots, and paved streets. It would be similar in height (slightly shorter) to the existing Main Hospital Building. The exterior surfaces, as noted above, would be colored to blend in with the surrounding buildings and landscaping is proposed to soften views and screen the structure. Federal Aviation Administration guidance and requirements indicate that based on the distance from the airport and the type, size, and angles of the PV arrays, no impact is anticipated. Although the new MH&R building and parking structure additions would include installation of new exterior lighting, mitigation measures described below would require exterior lighting to be directed on-site and downward using cutoff shields and non-glare fixture design to minimize direct light impacts in neighboring areas. Therefore, the project is not expected to have a significant effect.

The seismic upgrades to Building 100 NT and CLC would not result in aesthetic changes.

3.1.3 No Action Alternative

As no action would occur under this alternative a significant effect to aesthetics would not be anticipated. However, No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above.

3.1.4 Mitigation Measures – Aesthetics

All areas disturbed during construction, including temporary staging and disturbance areas, where feasible, shall be restored or re-vegetated to their pre-existing condition or better. The construction contractor shall place temporary fencing with green fabric screen around all staging areas to limit the prominence of views of construction equipment and associated construction materials/activities. Permanent exterior lighting shall incorporate cutoff shields and non-glare fixture design and shall be directed on-site and downward. New lighting shall be oriented to minimize direct light sources from adjacent residential areas. Highly reflective building materials and/or finishes shall not be used.

3.2 LAND USE

Impacts to land use are considered significant when the project would have an adverse effect on the zoned uses of the project site or the zoning requirements.

3.2.1 Existing

The medical center is located on assessor's parcel number 1624049193. Although the VAPS is not subject to the jurisdiction of Seattle's Planning Code or Zoning regulations, the Seattle General Plan and zoning is provided here for reference. The Seattle General Plan land use and zoning designation for the VAPS campus is Major Institution (City of Seattle, 2011). The site is located in an urban area with Jefferson Park to the north, Jefferson Park Golf Course to the east, Mercer Middle School to the west, and residential areas to the south and west. Although the VAPS campus has larger buildings with greater density than the residences and open space adjacent to the campus, it is consistent with the land use and type of building structure typically found within a medical center campus.

3.2.2 Proposed

<u>Construction – Short Term Impacts</u>

Project construction is expected to occur from approximately August 2012 to July 2016. Construction of the seismic upgrades is anticipated from approximately August 2012 to June

2015. While the MH&R and Parking Structure are projected to be constructed from approximately April 2013 to July 2016.

During the construction of the MH&R and parking structure, construction activities would temporarily encroach on existing surface parking and result in a temporary loss of parking. Please refer to the Transportation and Parking section of this EA for an evaluation of this impact. The construction land use conditions for the adjoining areas are not anticipated to be affected by the proposed action as the proposed use is consistent with the zoned use (Major Institution). Therefore, a significant effect is not anticipated.

Operation – Long Term Impacts

The proposed action would provide additional on-site parking, a new MH&R building, seismic retrofits for existing buildings and would be consistent with the zoning designation of Major Institution. The current uses at the VA Medical Center include a hospital, nursing home, medical clinics, research, administration buildings, and parking lots. The proposed project would be constructed within the footprint of the existing parking lots on the northwest corner of the site, which would represent a continuation of the existing land use in that area of the campus. Following construction, the proposed project would not encroach on existing land uses or cause a change in land use patterns. Therefore, the proposed action is not anticipated to have an adverse effect on the land use in the vicinity of the project.

3.2.3 No Action Alternative

As no action would occur under this alternative a significant effect to land use would not be anticipated as the current use is consistent with the zoned use of the property. However, No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above.

3.3 AIR QUALITY

The project would have a significant impact on the environment if the National Ambient Air Quality Standards (NAAQS) (as discussed below) thresholds are exceeded. Thresholds for the pollutants of concern include: carbon monoxide 9 parts per million (ppm) over 8-hours, particulate matter (PM_{10}) of 150 micrograms per cubic meter ($\mu g/m^3$) over 24-hours, ozone of 0.075 ppm over 8-hours, and sulfur dioxide of 0.014 ppm over 24-hours.

3.3.1 Existing

Federal projects are required to comply with the Clean Air Act (CAA) through preparation of a CAA General Conformity Analysis (GCA), which applies to projects located in areas that have been identified by the EPA as not meeting the NAAQS or are subject to a maintenance plan.

The GCA includes analysis of each criteria pollutant for which the area is considered a non-attainment or maintenance plan area. Literature and regulations reviewed for the preparation of this analysis includes:

- EPA General Conformity De Minimis Levels
- EPA Green Book Nonattainment Areas for Criteria Pollutants
- State of Washington, Department of Ecology, Air Quality
- Puget Sound Clean Air Agency
- URBEMIS, Environmental Management Software
- Stantec Consulting analysis and file information

Federal actions, such as the proposed action, that are located within a non-attainment or maintenance area are subject to a General Conformity evaluation. This determination can take one of three forms: (1) if the action meets certain criteria, it may be specifically exempted, regardless of whether the action would emit pollutants of concern; (2) if the action is determined to emit pollutants below specified “de minimis” thresholds or the potential emission levels conform with the State Implementation Plan (SIP); and (3) for actions that do not fall under either of these two categories, a complete conformity determination must be made.

The area designations for NAAQS that pertain to the proposed project were obtained from the EPA Green Book Nonattainment Areas for Criteria Pollutants and confirmed with Claudia Vaupel, Air Quality Planner with the EPA. EPA regulated pollutants include particulate matter (PM_{10} and $PM_{2.5}$), ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), Lead (Pb), and sulfur dioxide (SO_2). These designations, reflected in Table 3-1 below, became effective on August 30, 2011.

Table 3-1: Proposed Project Area NAAQS Designations

Criteria Pollutants	National Designation
8-Hour Ozone	Attainment
Carbon Monoxide	Maintenance Plan Area
Nitrogen Dioxide	Attainment
Sulfur Dioxide	Attainment
PM_{10}	Attainment
$PM_{2.5}$	Attainment
Lead	Attainment

(EPA, 2012)

The proposed project is located in an area designated as a maintenance plan area for CO and designated as in attainment for all other NAAQS pollutants. Because the project is located in an area that is designated as a maintenance plan area for CO, a GCA is required.

If CO emissions caused by the proposed action do not exceed the EPA General Conformity “de minimis” threshold for CO, the action is considered to meet EPA General Conformity requirements and no further evaluation is necessary. The EPA General Conformity “de minimis” threshold for CO is 100 tons/year.

3.3.2 Proposed

To quantify the predicted air emissions from the proposed action, an environmental specialist at Stantec Consulting Services Inc. conducted an evaluation using a URBEMIS air quality model. URBEMIS calculates total CO emissions based on the size and land use of the project, the types of construction equipment being used, and any combustion-related source emissions generated by the project. Based on the results of the model, the proposed project would not result in air degradation above the EPA General Conformity CO “de minimis” threshold (See Appendix B). Table 3-2 represents the project-related CO emissions, as predicted by URBEMIS and indicates that the expected CO construction emissions, area source CO emissions, and operational CO emissions are well below the EPA General Conformity CO “de minimis” threshold.

Table 3-2: URBEMIS Summary Report for Annual Emissions (Tons/Year) for the VAPS Project

Construction CO Emission Estimates	
2012 TOTALS (tons/year unmitigated)	1.78
2013 TOTALS (tons/year unmitigated)	7.57
2014 TOTALS (tons/year unmitigated)	6.75
2015 TOTALS (tons/year unmitigated)	5.16
2016 TOTALS (tons/year unmitigated)	3.88

Area Source CO Emission Estimates	
TOTALS (tons/year, unmitigated)	0.14

Operation (Vehicle) CO Emission Estimates	
TOTALS (tons/year, unmitigated)	0.01
EPA General Conformity "de minimis" Threshold (tons/year)	**100**

2/1/2012 12:19:07 PM, Urbemis 2007 Version 9.2.4
Project Location: Seattle, Washington
On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006, *Off-Road Vehicle Emissions Based on*: OFFROAD2007

As shown in Table 3-2, the emissions of CO generated by the project do not violate the EPA General Conformity "de minimis" threshold. Therefore, the proposed project has been found to meet EPA General Conformity requirements and no further evaluation is necessary.

Construction – Short Term Impacts

Project construction is expected to occur from approximately August 2012 to July 2016. Construction of the seismic upgrades is anticipated from approximately August 2012 to June 2015. While the MH&R and Parking Structure are projected to be constructed from approximately April 2013 to July 2016. Project construction would create dust, smoke, and engine emissions. During demolition and construction, asbestos may be released into the atmosphere. Implementing the mitigation measures detailed below would reduce the possibility of such an occurrence. Based on the above, a significant effect to air quality during construction is not anticipated.

Operation – Long Term Impacts

The proposed project would not induce population growth or development either directly or indirectly and would therefore not generate emissions beyond General Conformity "de minimis" thresholds. The present deficiency in parking spaces at the VAPS results in vehicles circling the facility and surrounding neighborhoods in search of parking, thus generating additional vehicle emissions. The additional parking spaces proved by the proposed parking structure would reduce this practice and therefore would have a slight beneficial effect on local air quality. Use of the parking structure would not conflict with any of the policies for reduction of greenhouse gases adopted or contemplated by the City of Seattle or the State. An Exhaust Re-Entrainment Assessment was conducted in February 2012 by Rowan Williams Davies & Irwin Inc. for the VAPSHCS to assess the MH&R building and parking structure for selected exhausts. Mechanical ventilation will be used in subgrade sections of the parking structure to reduce carbon monoxide levels to safe levels for motorists and pedestrians. The study found that with appropriate ventilation and fan speeds carbon monoxide levels would remain below the threshold of safety for pedestrians and motorists. The proposed project would not result in a stationary source that would cause direct emissions of carbon dioxide greenhouse gas emissions. Long-term air quality impacts are considered minimal.

3.3.3 No Action Alternative

As no action would occur under this alternative a significant effect to air quality would not be anticipated. However, No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above.

3.3.4 Mitigation Measures – Air Quality

Construction contractors shall take measures to minimize fugitive dust and dirt emissions resulting from construction. At a minimum, construction contractors shall undertake the following measures to reduce temporary air impacts:

(1) VA Standard Specifications
(2) EPA regulations on national standards for hazardous air pollutants (40 CFR 61, Subpart M)
(3) Occupational Safety and Health Administration (OSHA) regulations on removal of asbestos (29 CFR 1910.1001 and 1926.58)

3.4 CULTURAL RESOURCES

Impacts to cultural resources are significant if they have an adverse effect as defined in Section 106 of the National Historic Preservation Act of 1996 that cannot be mitigated through consultation.

3.4.1 Existing

The proposed project is located on the VAPS campus. The DAHP reviewed the proposed construction and renovation projects that involve interior or exterior renovations that do not require ground disturbing actions on behalf of the State Historic Preservation Officer (SHPO) under provisions of Section 106 of the NHPA of 1966 (as amended) and 36 CFR Part 800. The threshold for significance for the cultural resources attribute is a significant effect as defined in Section 106 of the NHPA that cannot be mitigated through consultation. The DAHP indicates that the campus is not currently listed in the Washington Heritage Register National Register of Historic Places. The DAHP further indicates that the campus is not eligible for the National Register of Historic Places under criterion C (See Appendix C). As a result, further consultation with DAHP is not necessary.

3.4.2 Proposed

<u>Construction – Short Term Impacts</u>

Based on SHPO consultation with the DAHP pursuant to 36 CFR 800.4(d) and due to the fact that the site is totally developed and consists of modern development with no structures over 50 years old, no cultural resource impacts are anticipated from implementation of the proposed project. In the case that any archaeological resources are uncovered during construction, work shall be halted in the area of discovery and the appropriate Native American Tribes and DAHP shall be consulted as described in the mitigation measures below. Therefore, a significant effect during construction is not anticipated.

<u>Operation – Long Term Impacts</u>

No Archaeological resources and no sites or features of Native American cultural importance have been identified at the project site. After construction of the proposed project, there is no likelihood of impacts to cultural resources as there would be no further ground disturbing work. Therefore, a significant effect during normal operation is not anticipated.

3.4.3 No Action Alternative

As no action would occur under this alternative a significant effect to cultural resources would not be anticipated. However, No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above.

3.4.4 Mitigation Measures – Cultural

If any archaeological resources are uncovered during construction, the contractor shall halt work in the area of discovery immediately and contact the project proponent who shall contact the appropriate Native American Tribes and DAHP shall be consulted.

3.5 GEOLOGY AND SOILS

Impacts to geology and soils are considered significant if the project result in an increased geologic hazard or a change in the availability of a geologic resource. Examples of geologic and soil hazards include seismic vibration, land subsidence, and slope instability.

3.5.1 Existing

Soils in the project area consist of fill material comprised of loose to medium dense silty sand with gravel near the ground surface. Underlying soils are mapped as Vashon Till (Qvt) and Recessional Outwash (Qvr). Vashon Till deposits are typically a dense to very dense mix of silts, sands, and gravels. Recessional Outwash deposits typically consist of loose to medium dense sand and gravel. Groundwater conditions vary seasonally and locally throughout the site. Where groundwater is encountered, it is associated with a perched groundwater. Geotechnical Engineering Design Report (GeoEngineers 2009) provides recommendations for seismic, structural, and drainage design.

According to the United States Geological Survey (USGS) Earthquake Hazards program, the VAPS is within the Seattle Fault Zone and surrounded by several quaternary faults less than 15,000 years in age. The Seattle Fault Zone is a four to seven kilometer-wide east-trending fault zone that extends from the Cascade Range foothills on the east across the Puget Lowland to Hood Canal, crossing Lake Sammamish, Lake Washington, Puget Sound, Bainbridge Island, and the Kitsap peninsula. Parts of the fault zone lie largely concealed underneath Seattle and surrounding population areas. The fault zone forms the boundary between uplifted Tertiary rocks of the Seattle uplift on the south and thick Tertiary to Quaternary strata of the Seattle basin on the north. Gravity and seismic studies indicate that Eocene volcanic rocks exposed at the surface in the Seattle uplift are buried by as much as nine to ten kilometers of younger sediments in the Seattle basin. USGS data indicates there are three or more south-dipping thrust faults that form the structural boundary between the Seattle uplift on the south and the

Seattle basin on the north. These structures have been named frontal fault, the Blakely Harbor fault, and the Orchard Point fault. The "frontal fault" has been termed the "Seattle fault." The Seattle fault zone also includes north-dipping reverse or thrust faults, such as the Toe Jam Hill, which forms a complex scarp in densely forested terrain on Bainbridge Island. Slip on both south- and north-dipping faults within the zone probably is associated with offset on a south-dipping master fault at depth. Surface-deforming earthquakes have occurred on the Seattle fault in the latest Holocene, most recently about 1050-1020 A.D. (USGS 2012).

Seismic design is governed by the Seattle edition of the 2006 International Building Code (IBC). The site is classified as a Site Class C (IBC Table 1613.5.2).

3.5.2 Proposed

Construction – Short Term Impacts

The new Building 101 and the seismic retrofits to Building 100 would be constructed according to current seismic code requirements as stated in IBC, referenced above.

Operation – Long Term Impacts

The proposed action includes seismic retrofit of existing Building 100 and the demolition of Buildings 18, 20, 22, 24 to ensure geologic and soil safety. The new MH&R and parking structure would be built to current seismic codes and has a low likelihood of being impacted by geologic deficiencies.

The VAPS campus, utilizes Best Management Practices (BMPs) to reduce the potential for subsurface soil discharge of hazardous waste. Routine maintenance activities such as landscaping, irrigation system maintenance and pavement maintenance utilize BMPs to reduce sediment, oil-grease and other pollutants from being discharged to site soils. Therefore, a significant effect during normal operations is not anticipated.

3.5.3 No Action Alternative

As no action would occur under this alternative a significant effect to geology and soils would not be anticipated. However, No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above and would maintain the unsafe EHR listing and the buildings would still be subject to damage from seismic activity.

3.5.4 Mitigation Measures – Geology and Soils

The contractor shall construct the project according to current seismic code requirements as stated in IBC, referenced above.

3.6 HYDROLOGY AND WATER QUALITY

Impacts to hydrology and water quality would be considered significant if the proposed action causes substantial flooding, erosion, or siltation; adversely affects any significant water body or groundwater resource; or results in substantial alteration of surface water drainage.

3.6.1 Existing

The Federal Clean Water Act (CWA, 1972, and later modifications, 1977, 1981, 1987) established water quality goals for the navigable (surface) waters of the United States. One of the mechanisms for achieving the goals of the CWA is the National Pollutant Discharge Elimination System permit program (NPDES permits), which is administered by the EPA. The EPA has responsibility to administer the NPDES permit program for federal facilities within the State of Washington (EPA 2011). On February 16, 2012, the EPA signed and issued a new NPDES permit for stormwater discharges related to construction activities (2012 Construction General Permit [CGP]). The 2012 CGP requires that any project disturbing one acre or more of land obtain coverage by filing an electronic Notice of Intent (eNOI) with the EPA at least 14 days prior to commencing earth-disturbing activities. The permittee must comply with all conditions of the 2012 CGP, including preparing and implementing a Stormwater Pollution Prevention Plan. The 2012 CGP includes Erosion and Sediment Control requirements, Stabilization requirements, and Pollution Prevention requirements. The permit applies to clearing, grading, excavation, and other land disturbing activities that result in the disturbance of one or more acres.

The Washington Department of Ecology formally submitted a 2010 Water Quality Assessment to the EPA in December 2011; however, it has not yet been approved. The Washington State 2008 Water Quality Assessment 303(d) list (approved by the EPA on January 29, 2009) remains the current document. The site is in the Lake Washington watershed. Lake Washington, located 1.3 miles to the east, is listed on the 303(d) list as impaired for fecal coliform; however, a Total Maximum Daily Load (TMDL) has not been established.

3.6.2 Proposed

Construction – Short Term Impacts

During construction, including during demolition and landscaping activities, stormwater runoff could result in sediment and other construction related pollutants entering the storm drainage system. Demolition and grading operations would be designed to minimize the extent of bare soil. A detailed erosion and sediment control plan and specifications would include preventive measures to protect watersheds, watercourses, and surface water drainage form sedimentation, siltation, and pollution. Revegetation and stabilization would be quickly established to further ensure against erosion.

BMPs described in the SWPPP such as (but not limited to) sediment basins, drain inlet protection, good housekeeping, fiber rolls, and silt fence barriers would minimize the pollutants entering the storm drain system to the maximum extent practicable. In addition, the proposed storm drain pipes will be stubbed and capped during construction so that construction related stormwater runoff will not be connected to the existing storm drainage system.

Dewatering is not anticipated to be necessary for this project. If the potable water system needs to be disinfected, it will be discharged to the sanitary sewer system, not to the storm drainage system. The 2012 CGP identifies allowable non-stormwater discharges including water used for dust control; landscaping irrigation; fire hydrant flushing; uncontaminated water line flushing; uncontaminated, non-turbid discharges of groundwater; uncontaminated foundation or footing drains; and construction dewatering water that has been treated by an appropriate control. Other non-stormwater discharges are not permitted.

Operation – Long Term Impacts

There is no increase in stormwater runoff volume because the site is currently developed as impervious surface. Runoff from all impervious surfaces will be routed to a water quality facility such as a rain garden or underground storm filter vault. The proposed storm drain system would be designed in accordance with the Technical Guidance on Implementing the Stormwater Runoff Requirements for Federal Projects under Section 438 of the Energy Independence and Security Act published by the EPA. The permanent storm drainage system would follow Low Impact Design (LID) techniques. Storm drainage runoff would utilize the site's natural topography and would be routed through biofiltration swales and rain gardens. Porous paving would also be utilized in portions of the site. Due to implementation of these water quality control measures, it is anticipated that there will be an improvement to water quality as a result of the project. Implementation of the project will not impact Lake Washington due to the onsite water treatment measures.

Runoff from the new Building 101 would be routed into cisterns and the water would be stored and used for landscape irrigation during drier months.

The project is not subject to either an Industrial NPDES stormwater permit or a Municipal NPDES stormwater permit.

3.6.3 No Action Alternative

As no action would occur under this alternative a significant effect to hydrology and water quality would not be anticipated. However, with implementation of the project, an improvement to long-term water quality is anticipated due to the implementation of low impact design measures.

3.6.4 Mitigation Measures – Hydrology and Water Quality

Construction of the proposed project shall be in accordance with the requirements of the 2012 CGP to eliminate or reduce pollution related to stormwater runoff.

Mitigation measures for operations have been incorporated into the design of the project via LID measures such as biofiltration swales, rain gardens, and porous pavement.

3.7 WILDLIFE AND HABITAT

The threshold of significance for the Wildlife and Habitat attribute is the Endangered Species Act (ESA) or Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species.

The ESA prohibits projects that impact species of fish or wildlife that are in danger of extinction, or that endanger the designated critical habitat of these species. The Migratory Bird Treaty Act makes it illegal to “take” migratory birds or their eggs, feathers or nests. The Bald Eagle Protection Act of 1940 prohibits the taking, possession, or commerce of both bald and golden eagles. Bald eagles were delisted under the Endangered Species Act in 2007 but are still protected under the federal Bald Eagle Protection Act, the Migratory Bird Treaty Act, and the Washington State Bald Eagle Protection Act (RCW 77.12.655). The state of WDFW identifies Priority Habitats and Species that warrant additional protection or special management.

3.7.1 Existing

The site has been developed as a medical facility for over 30 years with primarily buildings and parking areas. There are small landscaped areas outside the buildings and the parking lot. Native birds, squirrels, and other backyard animals are the only wildlife present. No endangered or threatened species, migratory birds or raptors, or wetlands were identified on the campus during the August 4, 2011 survey by a Stantec Consulting Services Inc. biologist. Pursuant to 50

CFR 402.12(c) a letter was sent on January 30, 2012 to the USFWS Lacey Washington office requesting concurrence with the VA's "no effect" determination and at of the date of publication of this draft EA no response has been received (See Appendix D). Since a "no effect" determination does not require Section 7 Consultation the USFWS generally does not provide concurrence with these determinations. Additionally, the WDFW Priority Habitat and Species (PHS) online mapping tool does not indicate any species within the vicinity of the project (WDFW, 2012).

The VAPS campus is within the Pacific flyway for migratory birds. Migratory birds may pass through the campus while traveling between breeding areas to the north and wintering areas to the south or they may winter or breed at the VAPS.

3.7.2 Proposed

Construction – Short Term Impacts

New building construction would require removal of trees and other landscaping. Every attempt would be made to preserve the largest, healthiest trees. The proposed action includes new landscape areas around the new Building 101 and parking structure.

Removal of mature trees could impact species that use these trees for roosting, nesting, feeding, or cover. Eagles may use some of the larger trees for perch or roost trees. Migratory birds are likely to nest or roost in the trees. To minimize impacts to migratory birds, trees to be removed will be cut down outside of the active nesting season. Currently, eagle nests are not located in the project area. If tree removal outside of the non-nesting season is not feasible pre-construction nesting surveys shall be required as described below in section 3.7.4.

As threatened or endangered species or state priority listed species are not anticipated to be impacted, a significant effect to wildlife and habitat during construction is not anticipated.

Operation – Long Term Impacts

Proposed landscaping would, where feasible, be restored to existing or improved conditions. As threatened or endangered species or state priority listed species are not anticipated to be impacted, a significant effect to wildlife and habitat during operation is not anticipated.

3.7.3 No Action Alternative

As no action would occur under this alternative a significant effect to Wildlife and Habitat would not be anticipated. However, No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above.

3.7.4 Mitigation Measures – Wildlife and Habitat

Where feasible, tree removal shall occur outside of the raptor/migratory bird breeding season of March 1 to August 31.

If construction is proposed during the breeding season (March-August), a pre-construction raptor and migratory bird nest survey shall be conducted within 30 days prior to the beginning of construction activities by a qualified biologist to identify active nests within the vicinity of the project. If no active nests are identified, further mitigation is not required. If active nests are found, a quarter-mile (1320 foot) temporary nest disturbance buffer shall be established and results shall be submitted to WDFW.

If construction activities are required within the disturbance buffer during the nesting season (March 1 to September 1), then an on-site biologist/monitor experienced with raptor/migratory bird behavior shall be retained by the project proponent to monitor the nest(s) and WDFW shall be consulted with to determine the best course of action necessary to avoid nest abandonment or take of individuals.

Work may be allowed to proceed within the temporary nest disturbance buffer if raptors/migratory birds are not exhibiting agitated behavior such as defensive flights at intruders, getting up from a brooding position, or flying off the nest. The on-site biologist shall be on-site daily while construction activities are taking place and shall have the authority to stop work if raptors are exhibiting agitated behavior.

3.8 NOISE

Impacts from noise would be considered significant if the project generates new sources of substantial noise, increases the intensity or duration of noise levels to sensitive receptors, or results in exposure at unacceptable levels.

3.8.1 Existing

The VAPS campus is located in an urban residential area of the City of Seattle. The proposed planning area is considered a relatively quiet environment with no significant noise emitters. Project area noise is generated mainly from cars on surrounding streets. The general noise setting of the project area is typical of an urban residential area. Columbian Way is a busy arterial road that generates a low to moderate amount of noise and the City of Seattle buses climbing the hill near the entry of the VAPS generate contribute to a louder urban setting.

3.8.2 Proposed

Construction – Short Term Impacts

The completion of the proposed action is not anticipated to have a significant adverse noise impact. The construction phase of the project is subject to noise limitations specified by project specifications.

During construction, the sound of equipment would cause background noise. These impacts would be mitigated by the requirements in the VA specification "Environmental Protection" controlling noise levels and adherence to appropriate OSHA standards would protect the workforce from excessive noise (29 CFR 1926.52). These impacts would be temporary for the duration of the construction period and limited to daytime hours. During the brace replacement work at Building 100, special conditions would be enforced to limit excessive noise that may disturb recovering patients on adjacent floors (construction is phased floor-by-floor, from the top down).

Since construction related noise impacts are temporary in nature and would not expose people residing or working in the area to severe noise levels, it is anticipated that the impacts to residences, patients and employees would not exceed the OSHA noise limit. In addition, no work at night or blasting is anticipated at this time. If other projects on the VAPS campus are constructed at the same time, the contractor and the VA must coordinate with other contractors with respect to construction timing and staging (see section 3.16, Cumulative Impacts, for more details). Based upon the above, a significant effect due to noise is not anticipated.

Operation – Long Term Impacts

There would be no change in the noise environment after construction is completed. As additional traffic during the normal operation is not anticipated, increased traffic noise in not anticipated. Therefore, a significant impact from normal operations is not anticipated.

3.8.3 No Action Alternative

As no action would occur under this alternative a significant effect to noise would not be anticipated. However, No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above.

3.8.4 Mitigation Measures – Noise

The contractor shall adhere to VA specification “Environmental Protection” for controlling noise levels and OSHA noise limits pursuant to 29 CFR 1926.52.

If other projects on the VAPS campus are constructed at the same time, the contractor and the VA must coordinate with other contractors with respect to construction timing and staging.

3.9 FLOODPLAINS, WETLANDS, AND COASTAL ZONE MANAGEMENT

Impacts to floodplains, wetlands, and coastal zone management would be considered significant if the project would subject people or property to flooding, adversely affect wetlands, or adversely affect coastal resources.

3.9.1 Existing

The Coastal Zone Management Act (CZMA) requires all federal activities to be consistent with approved state coastal zone management programs to maximum degree possible. King County is one of fifteen coastal counties included in the Washington State Coastal Zone Management Program and subject to the CZMA. However, all proposed construction work would occur outside the 200-foot shoreline management area associated with Lake Washington.

Federal Emergency Management Agency Flood Insurance Rate Map Panel No. 53033C0645F shows the project is not in a floodplain. A Stantec Consulting Services Inc. biologist surveyed the VAPS Site on August 4, 2011 to verify aerial photograph background research that no wetlands are present on the project site. No wetlands or waters of the U.S. occur on or near the site.

3.9.2 Proposed

<u>Construction – Short Term Impacts</u>

There are no floodplains or wetlands within the project area and the project is more than 200-feet away from a coastal zone water; therefore there would be no impact.

<u>Operation – Long Term Impacts</u>

There are no floodplains or wetlands within the project area and the project is more than 200-feet away from a coastal zone water; therefore there would be no impact.

3.9.3 No Action Alternative

As no action would occur under this alternative a significant effect to Floodplains, Wetlands, and Coastal Zones would not be anticipated. However, No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above.

3.10 SOCIOECONOMICS

Impacts to socioeconomics are considered significant if the project adversely affects the local economy or results in a substantial increase in the resident population.

3.10.1 Existing

The City of Seattle is the County Seat and the largest City within King County with a year 2010 census population of 608,660 and about 3.4 million inhabitants in the surrounding metropolitan area. The census reported that within the City the racial composition was 69.5 percent White, 13.8 percent Asian, and 7.9 percent Black or African American. The City of Seattle is a major seaport situated on a narrow isthmus between Puget Sound and Lake Washington. The City covers 142.5 square miles of land and the metropolitan area covers 8,186 square miles. The 1999 median city household income was $42,736 and median income for a family was $62,195. The per capita income for the city was $30,306.

3.10.2 Proposed

<u>Construction – Short Term Impacts</u>

Temporary impacts would occur during construction and activation through the purchase of materials, supplies, and construction workers. Construction of the proposed action is not anticipated to have a significant adverse effect on socioeconomics.

<u>Operation – Long Term Impacts</u>

No new permanent jobs would be created as a result of this project. Therefore, a long-term significant effect resulting from the project is not anticipated.

3.10.3 No Action Alternative

As no action would occur under this alternative a significant effect to socioeconomics would not be anticipated. However, No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above.

3.11 COMMUNITY SERVICES

Impacts to community services are considered significant if the project would increase levels of demand for services to more than capacity provides, requiring expansion or upgrade.

3.11.1 Existing

The existing King County bus system has drop off locations on-campus, serving the main entry of the hospital. Currently the busses circulate through the surface parking lot, competing with automobiles. This project proposes to provide mode separation, giving busses a dedicated drop-off and turn-around, allowing them to circulate through the site with much less automobile interaction. Fire department and wastewater treatment/sanitary sewer connection are currently provided by the City of Seattle. The VAPS currently maintains a police force for security and law enforcement, however, the City of Seattle Police Department would provide mutual aid if requested.

3.11.2 Proposed

Construction – Short Term Impacts

Additional impacts during construction to community services are not anticipated because security would be provided by the VA police, potable water from onsite water sources and temporary sanitary services (such as portable toilets) would be provided. Impacts to community services such as schools associated with construction worker dependents is not anticipated as it is likely construction workers would be retained from the local labor force within the vicinity of Seattle.

During construction, entry/exits from Building 100 would be maintained. The path of travel for the emergency exit may be through a contractor staging area, but a clear path of travel would be maintained. Further, it is proposed that the project construction be phased to maintain vehicular access to the hospital main entrance at all times.

Based on the information above, a significant effect to community services during construction is not anticipated.

Operation – Long Term Impacts

As the number of employed people during the normal operations is anticipated to be similar to existing conditions and not change as a result of the project, an additional impact to community services is not anticipated. Improvements would be made for pedestrian drop off by providing a new vehicular drop off/turn around adjacent to the main entry, the aforementioned bus stop improvements, and disabled/spinal cord injury (SCI) underground parking adjacent to the main entry. The pedestrian path of travel from the public way to the main entry would essentially remain the same.

Based upon the above information, a significant effect to the community service attribute from long-term normal operations is not anticipated.

3.11.3 No Action Alternative

As no action would occur under this alternative a significant effect to community services would not be anticipated. However, No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above.

3.12 SOLID AND HAZARDOUS MATERIALS

Impacts to solid and hazardous materials are considered significant if project would result in a substantial increase in the generation of hazardous waste, increase the exposure of persons to hazardous or toxic substances, or increase the presence of hazardous or toxic materials in the environment.

3.12.1 Existing

Buildings 18, 20, 22, and 24 are being demolished as the services are relocated in new MH&R building. The buildings on the VA campus (including the Building 100 NT and CLC) contain ACM containing materials (floor tiles and mastic, roofing adhesives, etc.), LBP, and seismic deficiencies. The construction contractor is required to manage nonhazardous building construction and demolition waste in accordance with VA Specifications Section 017419 and other relevant VA specifications, which requires efficient waste management, removal and legal disposal of materials. During demolition and construction, hazardous waste would be required to be disposed of in a manner consistent with federal, state, and local regulations.

3.12.2 Proposed

<u>Construction – Short Term Impacts</u>

The ACM have been identified in buildings within the VAPS complex. ACM and LBP surveys of building areas anticipated to be disturbed to assess the potential presence of ACM were completed. Areas of ACM including friable and non-friable and LBP outlined in the previous survey reports that would be disturbed during construction must be abated. Friable ACM must be abated in accordance with NESHAP and non-friable ACM in accordance with OSHA and Washington Department of Environmental Occupational Health (DEOP). LBP abatement and disposal must be completed in accordance with OSHA requirements, as well as, local, state, and federal guidelines. The remaining areas that contain hazardous building materials that are

not disturbed by the construction should be included and addressed in an Operation and Maintenance (O&M) plan.

Hazardous waste is not anticipated to be generated during construction with the exception of ACM and LBP identified above and routine construction debris. The seismic demolition specification and the MH&R demolition sheets call for the deconstruction, sorting, and recycling of all demolition building materials. There should be a minimal amount of material going straight into landfills. When it is necessary to dispose of materials at a landfill, materials shall be disposed at either an offsite municipal landfill approved for the waste stream or construction debris landfill. Transformers are anticipated to be encountered during demolition of Buildings 18, 20, 22, and 24. Transformers and other potential PCB containing materials must be disposed in accordance with the TSCA.

Any buried medical waste encountered during construction would be disposed in accordance with applicable regulation and in accordance with the MWTA of 1988 at an approved landfill or incinerator.

During demolition and construction, hazardous waste including paint, solvents, residues in exhaust systems, asbestos containing material, bulk solid waste, tree stumps, excess building material, fill, etc., shall be disposed of in a manner consistent with federal, state, and local regulations and shall be removed from the medical center property.

A significant effect by solid and hazardous materials during construction is not anticipated as these impacts would be mitigated by implementation of EPA and OSHA regulations identified above.

Operation – Long Term Impacts

Emergency Planning and Community Right-to-Know Act (EPCRA) diesel fuel thresholds reporting may be required depending on the size/need of the diesel Aboveground Storage Tank (AST) associated with the emergency generator if the total volume of all diesel and gasoline stored within the VAPS complex is in ASTs exceeds 10,000 pounds (EPA 2011). Diesel weighs roughly 7.05 pounds per gallon and gasoline weighs approximately 6.19 pounds per gallon, so the threshold is roughly equivalent to 1,500 gallons.

The existing Spill Prevention Control and Countermeasure (SPCC) plans would need to be updated to address storage of additional petroleum product in the emergency generator if needed in association with the proposed action.

The VAPS is also implementing the Green Environmental Management System (GEMS) policy which guides and encourages VA employees, at all levels of the organization, to be good

stewards of the environment by complying with all applicable environmental requirements; preventing pollution; reducing waste; conserving energy, water, and other natural and cultural resources. Part of the GEMS process includes instituting new and improving current processes to eliminate, minimize, or mitigate adverse environmental impacts in order to minimize expenses associated with hazardous material management and expenses associated with trash management.

Hazardous waste generated during normal operation must be disposed in accordance with EPA RCRA regulations. Medical waste generated during normal operations must be disposed in accordance with MWTA. Human exposure to ACM and LBP is possible in Building 100 NT and CLC from the non-retrofitted sections of the building. Long-term monitoring by trained personnel shall be required to ensure there are no significant effects during normal operating. No additional long term significant impacts are anticipated as wastes generate would be disposed of in accordance with applicable local, state, and federal regulations, including the EPA.

3.12.3 No Action Alternative

As no action would occur under this alternative a significant effect to solid and hazardous materials would not be anticipated. However, if no action occurs hazardous building materials will remain on site and pose a potential significant effect to the users of the hazardous materials containing buildings. The No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above.

3.12.4 Mitigation Measures – Solid and Hazardous Materials

The VA shall follow all pertinent regulations including but not limited to EPA RCRA, EPA TSCA, and EPA MWTA for waste disposal and OSHA regulations for ACM and LBP abatement as well as project specifications related to construction activities.

For long term impacts, exposure to ACM and LBP is possible in Building 100 NT and CLC. The VA shall employ trained persons to appropriately monitor ACM and LBP levels and human exposure to hazardous materials and implement further remediation as needed. This will be accomplished through the GEMS program. If the amount of stored diesel fuel or other hazardous materials is greater than the EPA threshold of 10,000 pounds or roughly 1,500 gallons pursuant to EPRCA, the VA shall implement the necessary reporting pursuant to EPA regulations. If additional petroleum product in the emergency generator is needed in association with the proposed action the VA shall ensure the existing SPCC plans are updated to address storage of additional petroleum product.

3.13 TRANSPORTATION AND PARKING

Impacts are considered significant if the project would increase demand on transportation infrastructure in excess of infrastructure capacity.

3.13.1 Existing

The VAPS is accessible from Interstate-5 via either the Columbian Way exit or the Swift Avenue exit. Entry to the VAPS is via Columbian Way from the west or Beacon Avenue from the east.

The VAPS includes parking on the northwest side of the campus and on the southeast.

3.13.2 Proposed

Construction – Short Term Impacts

Access to Building 100 would not be changed on a long-term basis, but there may be alternative entry points during construction. Demolition of Buildings 18, 20, 22, and 24 and the construction of Building 101 would impact the access to these services at the medical center. However, the parking lot in the south would still be continuously available.

The new parking structure would provide a long-term benefit to the medical center by adding 479 parking spaces.

Construction of the new parking garage which would displace 424 existing surface stalls and the new Building 101 would displace 201 existing surface stalls, for a total of 625 parking stalls temporarily displaced. Phasing of construction work areas and contractor staging areas would be needed in order to minimize the impacts to on-site parking. However, parking capacity would be temporarily impacted and the VA would need to provide temporary additional parking. Options for accommodating temporary parking displacement include parking at an adjacent surface lot, providing shuttle busses from an off-site location, providing valet service, working with the City of Seattle to provide increased public bus service to the campus, or any combination of these or other methods of accommodating staff, patients, and visitors. The off-site parking location that is proposed is the existing Federal Center South parking lot, approximately 2.5 miles away (approximately an eight minute commute). There is excess capacity at this parking lot and the Federal Center is relocating in November 2011, which will result in additional capacity. The VA proposes to lease parking spaces at this location.

If other projects on the VAPS campus are constructed at the same time the contractors must coordinate with respect to construction timing and staging (see Section 3.16, Cumulative Impacts, for more details).

ADA compliance parking would permanently be retained and increased within the campus.

Operation – Long Term Impacts

As the entrance will maintain the same number of entry and exit lanes, the proposed project would not permanently impact entry to the medical center.

The parking garage would permanently add an additional 479 parking spaces which would help to meet the current parking demand. Based on the above information, a significant effect is not anticipated during normal operating conditions.

3.13.3 No Action Alternative

As no action would occur under this alternative a significant effect to transportation and parking would not be anticipated. However, No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above.

3.13.4 Mitigation Measures – Transportation and Parking

Phasing of construction work areas and contractor staging areas shall be incorporated in the project design to minimize temporary impacts to on-site parking. If on-site parking capacity is impacted for a significant amount of time by construction, the VA shall provide an alternative parking solution (by a measure such as additional parking at an adjacent surface lot with shuttle buses or valet services or increased public bus service, etc.). If other projects on the VAPS campus are constructed at the same time the contractors must coordinate with respect to construction timing and staging.

3.14 UTILITIES

Impacts to utilities are considered significant if the project generates a substantial number of new service connections or substantially increases the demand on existing utilities.

3.14.1 Existing

The existing utilities serving the site appear to have adequate capacity to serve the proposed project with the exception of chilled water, which is discussed below. Improvements associated with the proposed project are not anticipated to require utility relocation.

WATER SUPPLY. Water service for the campus is provided by Seattle Public Utilities (SPU). A 12” private water system loops around the buildings of the campus and provides service to the campus fire hydrants as well as domestic and fire service to several buildings. This 12” looped

system connects to the existing 66” SPU transmission main in Beacon Avenue South and is connected to the 12” SPU main in Columbian Way via an 8” piped system. The two points of connection to the SPU system provides a redundancy measure in the event one of the SPU mains becomes temporarily inactive.

STORM WATER DRAINAGE. Storm drainage from the site drains in to the City of Seattle 15” and 18” storm drain pipes, which ultimately discharge to Lake Washington. The Hydrology and Water Quality Section includes additional detail on storm water drainage.

SANITARY SEWER. The existing site is served by two City of Seattle 10” sanitary sewer mains that roughly form two sewer basins on the site, east and west.

ELECTRICAL. Electrical service to the site is provided from Seattle City Light and would enter the campus from Beacon Avenue at Building 16.

GAS. Currently, gas service lines exist outside of the construction area, on the south and east sides of the campus.

CHILLED WATER. A Central Utility Plant (CUP) located on the east side of the site provides several utilities to the campus. The CUP contains boilers to provide hot water for the campus and chillers to provide cooling. The CUP provides a two pipe chilled water system and two pipe hot water system, both consisting of a supply and return pipe to the other buildings on campus. The CUP is connected to Building 100 through a below grade utility tunnel.

TELECOMMUNICATIONS. The existing site is serviced by telecommunication service.

3.14.2 Proposed

Construction – Short Term Impacts

There are no impacts to water, storm, sewer, electric, gas, telecommunication, or chilled water due to construction of the parking structure or the seismic upgrades to Building 100. The utility impacts due to construction of Building 101 are described below.

Utilities services would be temporarily interrupted when the new services from the MH&R are connected into the system. This temporary disconnect would be scheduled over a weekend to minimize the temporary effects of the downtime. Due to the short time period and the minor impact, the temporary impact would not be significant.

Operation – Long Term Impacts

WATER SUPPLY. The existing campus water system is anticipated to have adequate capacity to serve the new Building 101 and parking garage. New domestic and fire services are provided for both buildings. A new 4" domestic and 6" fire services are proposed for Building 101 and a 2" domestic for the parking garage. A new 8" water loop is proposed around the new Building 101 and parking garage and would connect to the existing site water system to provide fire hydrant coverage as well as new fire and domestic services for both Building 101 and the parking garage. Low flow fixtures will be used where feasible and rainwater harvesting will be used to supply water where feasible. No adverse impact to the City water system is anticipated because there is adequate water supply in the area.

STORM WATER DRAINAGE. There is not a net increase in impervious surface area due to the project, so there would be no increase in storm runoff. Storm drainage from the site drains in to the City of Seattle 15" and 18" storm drain pipes.

SANITARY SEWER. A new sanitary sewer pipe would be constructed along the west side of the parking garage and Building 101 and would connect to the existing west basin sewer system. No adverse impact to the City sanitary sewer system is anticipated because there is extra capacity in the sewer system.

ELECTRICAL. A new power distribution loop would provide power to Building 101 and the parking garage. This new power loop would be fed from the existing transformers located on the east side of Building 16. The power distribution system would consist of a below grade concrete encased duct bank, below grade vaults, and above grade transformers. The project includes a new building and a parking garage where there wasn't a building or parking garage before, so new electrical demand to the utility company will be introduced. However, there are no modifications needed to the City of Seattle's electrical system or campus service since the system, as currently installed, anticipated this building and its associated demand. These service revisions were addressed in a prior project. No adverse impacts are anticipated to electrical systems because the project electrical demands were anticipated in a previous project.

GAS. The existing three-quarter inch natural gas line runs from the utility tunnel junction with the CUP down to the end of the tunnel under Building 100. The gas line appears to be isolated and unused at this time but shut off valve has been located near the CUP. The gas line seems to be set to run at 15 pound-force per square inch gauge (Psig). The gas line will be extended using one inch corrugated stainless steel tubing (CSST). The loads in MH&R are very low as the gas is only used in the lab spaces for lab burners; the building and domestic hot water will be heated by steam generated at the CUP. A gas pressure regulator and meter will be installed. The

expected full load should be less than 50,000 British Thermal Unit (BTHU). The existing boilers in the CUP have adequate capacity for the new MH&R building. The steam distribution system will be extended to connect to the new MH&R building.

The oxygen gas line will be run down the tunnel from a point near the CUP intersection with the tunnel. It is likely this line will need to be modified from two and a half inch to three inches. No adverse impacts are anticipated since there is no increase gas demand anticipated.

CHILLED WATER. The CUP is connected to Building 100 through a below grade utility tunnel. It is anticipated that this tunnel would likely be utilized to provide utility services to the new Building 101. The existing chillers are currently under capacity and cannot provide chilled water for the proposed project. Therefore, as part of the project, two new chillers would be constructed at the CUP.

TELECOMMUNICATIONS. If necessary, this service would be extended to the new construction. The project is relocating existing services to a new location; therefore, no adverse impacts are anticipated.

3.14.3 No Action Alternative

As no action would occur under this alternative a significant effect to utilities would not be anticipated. However, No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above.

3.15 ENVIRONMENTAL JUSTICE

Significant impacts would occur if the project disproportionately affects minority or low-income populations.

3.15.1 Existing

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, requires that federal agencies, whenever practicable and appropriate, maintain information on populations by race, national origin, or income and shall use this information to determine whether their programs, policies, and activities have disproportionately high and adverse human health or environmental effects.

The demographic characteristics of the City of Seattle from the 2010 Census indicate a predominately White (69.5 percent), Asian (13.8 percent), and Black (7.9 percent) population (U.S. Census Bureau 2010). Minority groups in the City of Seattle include Hispanic/Latino, American Indian/Alaska Native, Native Hawaiian/Pacific Islanders, and a small percentage of

other races. The VA provides equal access to minorities, encourages the hiring of disabled veterans, and disadvantaged business enterprises.

3.15.2 Proposed

Construction – Short Term Impacts

Construction of the proposed action is not anticipated to change minority or disenfranchised population affected environments including air, water, land use, or natural resources as the proposed project area currently is owned and operated by the VA. Therefore, a significant effect as defined in Executive Order 12898 is not anticipated.

Operation – Long Term Impacts

The proposed action is not anticipated to change minority or disenfranchised population affected environments including air, water, land use, or natural resources during normal operations as the proposed building area currently is owned and operated by the VA. Therefore, a significant effect as defined in Executive Order 12898 is not anticipated.

3.15.3 No Action Alternative

As no action would occur under this alternative a significant effect to environmental justice would not be anticipated. However, No Action Alternative would not satisfy the purpose and need for the Proposed Action as stated above.

3.16 CUMULATIVE IMPACTS

The CEQ defines cumulative impact in Section 1508.5 as "…the impact on the environment which 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."

As part of the cumulative impacts analysis, the approved VAPS projects and other local projects were considered. The City of Seattle, King County, and Washington State Department of Transportation were consulted to identify projects that could possibly have a cumulative impact with the proposed project. The following projects were identified as needing to be considered:

Regional Projects

- Washington State Department of Transportation (WSDOT) Interstate-90 Two Way Transit and High Occupancy Vehicle Operations. WSDOT is currently implementing the multiple phase I-90 project. Stage 3 of the project from Seattle to Mercer Island is currently in design with construction planned for 2015.

VAPSHCS PROJECTS

- VAPSHCS Expand Specialty Clinics at Seattle. Project will construct a new approximately 17,670 gross square foot (GSF) two story addition on the third and fourth floor levels of Building 100, Diagnostic & Treatment (D&T).

- VAPSHCS Relocate Seattle 10 Bed Surgical Intensive Care Unit/Post Care Unit Building 100 D&T 3rd Floor to New Building 100 D&T 3rd Floor. This project will add 19,000 GSF of new space to the Building 100 Bed Tower in the Diagnostic and Treatment wing. This constructs a new 18-bed Surgical Intensive Care Unit/Progressive Care Unit (a gain of two beds). This project is linked to the phasing of the proposed Project.

- VAPSHCS Purchase 2.64 Acres Adjacent to Seattle Division. Purchase 2.64 acres of land currently owned by the Seattle Presbytery and demolish 2,747 GSF of condemned building. This property is located directly across the street from VAPSHCS, Seattle Division, and has been of interest to the facility for years. Because of that long association for leased parking the church is offering the VA first right of refusal on this property. It has a 2,747 GSF condemned church building that needs to be demolished, but also has two other buildings of approximately 10,000 GSF and 3,500 GSF, respectively, and a parking lot which would accommodate approximately 200 vehicles.

- VAPSHCS Install Seattle Photovoltaic System. Install 3.8 MW photovoltaic system on approximately seven acres (roofs and over parking lots as a canopy).

- VAPSHCS planned Building 100 D&T renovation and improvement projects. Approximately 10 improvement and/or renovation projects are planned within the next three years for Building 100 D&T. Projects include but are not limited to expansion of laboratory and sterile processing services in the basement to renovations of the same day surgery area.

The proposed project will have no impacts (or require no mitigation) to Land Use; Floodplains, Wetlands, and Coastal Zone Management; Socioeconomics; Community Services; Utilities; and Environmental Justice. Therefore, these resource topics have been eliminated from the cumulative impact discussion because they will have no contribution to cumulative impacts. They following table addresses the proposed project's contribution to the resource areas with a potential for cumulative impacts.

Table 3-3: Cumulative Impacts

Resource	Cumulative Impact
Aesthetics	The construction of the proposed project combined with the other planned projects on the VAPS campus would result in additional light and glare in the project vicinity. Implementation of recommended mitigation measures would ensure that lighting plans are developed to reduce the cumulative impact of light spillage and glare from the proposed project. The proposed parking structure and MH&R Building would not substantially alter the views of the nearby elementary school, park, or residences through the incorporation of appropriate lighting and glare minimization measures and landscaping improvements. Therefore, development of the proposed project would not contribute considerably to any significant cumulative impacts related to aesthetic resources.
Air Quality	Generally, if a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. As the project's impacts to air quality are limited to temporary construction impacts, the project would not result in a cumulatively considerable air quality impact on the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is unnecessary.
Cultural Resources	The proposed project includes mitigation measures to address any potential impacts to cultural resources that arise during construction, and therefore will not result in considerable contribution to any significant cumulative impacts for cultural resources.
Geology and Soils	The proposed project structures will be constructed to the requirements of the International Building Code. Therefore, the proposed project will not contribute considerably to any significant cumulative impacts to geological resources.
Hydrology and Water Quality	With the implementation of BMPs and erosion control measures implementation of the proposed project will not have a substantial impact on hydrology and water quality. With the implementation of the mitigation measures addressed in the Hydrology and Water Quality section of the document, the proposed project's contribution to cumulative effects associated with water resources with other identified development projects is not considered significant.

Resource	Cumulative Impact
Wildlife and Habitat	The proposed project will not have a significant biological impact due to the highly developed site. Removal of mature trees could impact migratory birds that may use the trees for roosting, nesting, feeding, or cover. The construction timing and nesting season mitigation measures discussed in the Wildlife and Habitat section above will ensure this impact is not substantial. Due to the disturbed nature of the proposed site and implementation of the proposed mitigation measures, the proposed project will not contribute considerably to any significant cumulative impact on wildlife and habitat and therefore, will not have a significant cumulative impact on wildlife and habitat resources.
Noise	Construction of the proposed project and other reasonably foreseeable projects on the VAPS campus may occur at the same time. The proposed project's mitigation measures ensure that OSHA noise limits will be adhered to pursuant to 29 CFR 1926.52. If the other projects on the VAPS campus are constructed at the same time the contractor and the VA must coordinate with other contractors with respect to construction timing and staging. With these mitigation measures, the proposed project's incremental contribution to any significant cumulative impact would not be cumulatively considerable. Operation of VAPSHCS is not expected to vary greatly from existing conditions. Cumulative impacts associated with noise from other identified development projects during operation are not considered significant.
Solid and Hazardous Materials	Accidental releases of hazardous materials could affect public health and the environment. With the implementation of hazard mitigation measures discussed in the Solid and Hazardous Materials section above, the proposed project's contribution to cumulative effects would not be cumulatively considerable and therefore not considered significant.
Transportation and Parking	If the VAPS project is under construction at the same time as the I-90 project, the VAPS contractor needs to be aware of any detours or traffic information that may impact material delivery. Construction of the proposed project and other reasonably foreseeable projects on the VAPS campus may occur at the same time. The proposed project's mitigation measures accounts for the potential need for alternative parking solutions. If the other projects on the VAPS campus are constructed at the same time the contractors must coordinate with respect to construction timing and staging. Operation of VAPSHCS is expected to improve parking conditions on the campus. Cumulative impacts associated with Transportation and parking from other identified development projects during operation are not considered significant.

In summary, through mitigation measures and compliance with environmental regulations, the proposed project's incremental contribution to any significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant.

3.17 POTENTIAL FOR GENERATING SUBSTANTIAL CONTROVERSY

3.17.1 Existing

Controversy over impacts from construction or disturbance to the project site, removal of existing mature trees within the campus and construction related congestion are all possible issues that could raise public controversy. Measures including consultation, avoidance, replanting trees, neutral design are incorporated to address this potential controversy.

To date there has been no public controversy.

3.17.2 Proposed

Construction

Construction traffic associated with the proposed project could generate short-term increases in traffic volumes on surrounding neighborhood roadways. Construction would also result in a temporary loss of parking on campus. Mitigation actions summarized in the Transportation section of this EA require construction staging to occur within the VAPS and, to the extent feasible, scheduling of haul trucks for off-peak hours to minimize impacts on peak hour traffic. Mitigation actions also include measures to compensate for parking spaces displaced during construction to ease overall parking demands.

Operation

Following construction, the proposed project is not anticipated to generate substantial controversy. The proposed project would have substantial beneficial effect on parking availability at the VAPS, and would result in less overflow parking in the surrounding neighborhood areas. The elementary school to the west of the project site and the golf course to the north would be subject to changes in scenery which would affect the amount of sunlight they receive on their properties; however, it is not expected to generate substantial controversy. The elementary school has buildings that abut to the VAPS campus that shelter the playground from impacts. The majority of the golf course is offset off the VAPS property to not experience impact from shadows of the buildings.

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4.0 PUBLIC INVOLVEMENT

Notice of Availability

The draft version of this EA will be made available for public review and comment for thirty days. VA will publish a Notice of Availability (NOA) in the local newspaper, the Seattle Times, for three consecutive days; the NOA will also be posted on the VAPS website www.pugetsound.va.gov/ and the VAPS complex Canteen (see Appendix E for more details). The VA will consider all comments received in the preparation of the final EA.

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5.0 MITIGATION

The below mitigation measures are to be implemented to reduce potential negative environmental impacts.

Summary of Mitigation Measures

Resource	Proposed Action Impacts	Proposed Action Mitigation Measures	No Action Alternative Impacts
Aesthetics	The removal of mature landscaping trees during construction, the construction of a new building, and the demolition of existing buildings would impact the visual aesthetics of the VAPS campus.	All areas disturbed during construction, including temporary staging and disturbance areas, where feasible, shall be restored or re-vegetated to their pre-existing condition or better. The construction contractor shall place temporary fencing with green fabric screen around all staging areas to limit the prominence of views of construction equipment and associated construction materials/activities. Permanent exterior lighting shall incorporate cutoff shields and non-glare fixture design and shall be directed on-site and downward. New lighting shall be oriented to ensure that no light source is directly visible from adjacent residential areas. Highly reflective building materials and/or finishes shall not be used.	No impacts would occur.
Air Quality	Some impact on air quality is anticipated during the construction phase of the project due to dust generated from earthwork, welding fumes, surface coating, demolition activities, and construction equipment emissions.	Construction contractors shall take measures to minimize fugitive dust and dirt emissions resulting from construction. At a minimum, construction contractors shall undertake the following measures to reduce temporary air impacts: (1) VA Standard Specifications (2) EPA regulations on national standards for hazardous air pollutants (40 CFR 61, Subpart M) (3) OSHA regulations on removal of asbestos (29 CFR 1910.1001 and 1926.58)	No impacts would occur.
Cultural	Archaeological and historical	If any archaeological resources are	No impacts would occur.

Resource	Proposed Action Impacts	Proposed Action Mitigation Measures	No Action Alternative Impacts
Resources	resources are not anticipated to be encountered during construction and operation.	uncovered during construction, the contractor shall halt work in the area of discovery immediately and contact the project proponent who shall contact the appropriate Native American Tribes and DAHP shall be consulted.	
Geology and Soils	The VAPS is located within a seismically active portion of the United States. Sediment may be generated during rain events within areas of soil intrusive activities associated with grading and excavations.	The contractor shall construct the project according to current seismic code requirements as stated in IBC, referenced in the Geology and Soils Section 3.5 of this report.	Patients would continue to be at risk from damage caused by seismic activity.
Hydrology and Water Quality	Due to implementation of water quality control measures, it is anticipated that there will be an improvement to water quality as a result of the project.	Construction of the proposed project shall be in accordance with the requirements of the 2012 CGP to eliminate or reduce pollution related to stormwater runoff. Mitigation measures for operations have been incorporated into the design of the project via LID measures such as biofiltration swales, rain gardens, and porous pavement.	No impacts would occur.
Wildlife and Habitat	Removal of mature trees could impact migratory birds that may use these trees for roosting, nesting, feeding, or cover.	Where feasible, tree removal shall occur outside of the raptor/migratory bird breeding season of March 1 to August 31. If construction is proposed during the breeding season (March-August), a pre-construction raptor and migratory bird nest survey shall be conducted within 30 days prior to the beginning of construction activities by a qualified biologist to identify active nests within the vicinity of the project. If no active nests are identified, further mitigation is not required. If active nests are found, a quarter-mile (1320 foot) temporary	No impacts would occur.

Resource	Proposed Action Impacts	Proposed Action Mitigation Measures	No Action Alternative Impacts
		nest disturbance buffer shall be established and results shall be submitted to WDFW. If construction activities are required within the disturbance buffer during the nesting season (March 1 to September 1), then an on-site biologist/monitor experienced with raptor/migratory bird behavior shall be retained by the project proponent to monitor the nest(s) and WDFW shall be consulted with to determine the best course of action necessary to avoid nest abandonment or take of individuals. Work may be allowed to proceed within the temporary nest disturbance buffer if raptors/migratory birds are not exhibiting agitated behavior such as defensive flights at intruders, getting up from a brooding position, or flying off the nest. The on-site biologist shall be on-site daily while construction activities are taking place and shall have the authority to stop work if raptors are exhibiting agitated behavior.	
Noise	Temporary construction noise would take place in a relatively quiet neighborhood. No permanent noise increases would occur.	The contractor shall adhere to VA specification “Environmental Protection” for controlling noise levels and OSHA noise limits pursuant to 29 CFR 1926.52.	No impacts would occur.

Resource	Proposed Action Impacts	Proposed Action Mitigation Measures	No Action Alternative Impacts
Solid and Hazardous Materials	Hazardous building materials such as asbestos and lead based paint are likely to be encountered during demolition activities. The facility would contain an emergency generator with an associated diesel aboveground storage tank (AST).	The contractor in coordination with the VA shall follow all pertinent regulations including but not limited to EPA RCRA, EPA TSCA, and EPA MWTA for waste disposal and OSHA regulations for ACM and LBP abatement as well as project specifications related to construction activities. For long term impacts, exposure to ACM and LBP is possible in Building 100 NT and CLC. The VA shall employ trained persons to appropriately monitor ACM and LBP levels and human exposure to hazardous materials and implement further remediation as needed. This will be accomplished through the GEMS program. If the amount of stored diesel fuel or other hazardous materials is greater than the EPA threshold of 10,000 pounds or roughly 1,500 gallons pursuant to EPRCA, the VA shall implement the necessary reporting pursuant to EPA regulations. If additional petroleum product in the emergency generator is needed in association with the proposed action the VA shall ensure the existing SPCC plans are updated to address storage of additional petroleum product.	Buildings 18, 20, 22, and 24 would continue to contain asbestos and lead based paint.
Transportation and Parking	Temporary impacts to parking will occur during construction of the new MH&R building and parking structure.	Phasing of construction work areas and contractor staging areas shall be incorporated to minimize temporary impacts to on-site parking. If on-site parking capacity is impacted by construction significant amount of time, the VA shall provide an alternative parking solution (by a measure such as additional parking at an adjacent surface lot with shuttle buses or valet services or increased public bus service,	Parking would continue to be deficient.

Resource	Proposed Action Impacts	Proposed Action Mitigation Measures	No Action Alternative Impacts
		etc.).	
Cumulative	Temporary impacts to site access due to several construction projects occurring simultaneously.	The Building 100 D&T construction projects and the various Building 100 renovation projects must be coordinated with respect to construction timing and staging with regards to transportation and noise impacts.	No impacts would occur.

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6.0 CONCLUSION

The analysis performed in this EA concludes that there would be no significant adverse impact, either individually or cumulatively, to the human environment, provided mitigation measures consisting of best management practices and regulatory compliance measures described in this EA are fully implemented. Therefore, this EA concludes that a Finding of No Significant Impact is appropriate and that an Environmental Impact Statement is not required.

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7.0 LIST OF PREPARERS

The following table includes a list of preparers of this EA.

Name	Affiliation	Title	Responsibilities
Sarah McIlroy, P.E.	Stantec	Principal	EA Report Reviewer
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Robert Shurell	Stantec	Project Manager	Project Manager/Report Reviewer
Kimberly Smith	Stantec	Environmental Planner	Prepared EA Report
Meagan O'Deegan	Stantec	Environmental Scientist	Air Quality Conformity Analysis
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9.0 LIST OF ACRONYMS AND ABBREVIATIONS

Abbreviations	
ACM	Asbestos Containing Materials
ADA	Americans with Disabilities Act
AST	Aboveground Storage Tank
Building 100	Nursing Tower and Community Living Center
Building 24	Metal Health Services Building
BMP	Best Management Practices
CAA	Clean Air Act
CEQ	The Council on Environmental Quality
CFR	Code of Federal Regulations
CLC	Community Living Center
CO	carbon monoxide
CUP	Central Utility Plant
CWA	Federal Clean Water Act
DAHP	State of Washington Department of Archaeology and Historic Preservation
DEOP	Washington Department of Environmental Occupational Health
EA	Environmental Assessment
EHR	Exceptionally High Risk
EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FAA	Federal Aviation Administration
FONSI	Finding of No Significant Impact
GCA	General Conformity Analysis
GSF	gross square feet
IBC	2006 International Building Code
LBP	Lead Based Paint
LEED	Leadership in Energy and Environmental Design
LID	Low Impact Design
MH&R	Mental Health Services and Research building
MTCA	Model Toxic Control Act
MWTA	Medical Waste Tracking Act
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act

Abbreviations	
NO_2	Nitrogen dioxide
NPDES	National Pollution Discharge Elimination System
NT	Nursing Tower
O	Ozone
O&M	Operation and Maintenance
OSHA	Occupational Safety and Health Administration
Pb	Lead
PCB	Polychlorinated Biphenyl
PM_{10} or $PM_{2.5}$	Particulate Matter
PSCAA	Puget Sound Clean Air Agency
Qvr	Recessional Outwash
Qvt	Vashon Till
RCRA	Resource Conservation and Recovery Act
SCI	Spinal Cord Injury
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SO_2	Sulfur Dioxide
SPCC	Spill Prevention, Control, and Countermeasure
SPU	Seattle Public Utilities District
SWPPP	SWPPP
TSCA	Toxic Substance Control Act
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VA	Department of Veterans Affairs
VAPS	Puget Sound VA Medical Center
VAPSHCS	Seattle Division of VA Puget Sound Health Care System
WDE	Washington Department of Ecology
WDFW	Washington Department of Fish and Wildlife

Appendix A: Project Construction Phasing Plans

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UNDERGROUND UTILITY INSTALL/REROUTES:
Provide utility modifications necessary to clear underground parking footprint / excavation area. Includes reroute of existing SD, SS, water, and new installation of elec and telecom conduits.

LOT A MODIFICATIONS:
Modifications to Lot A for temporary access during Phase 1. Includes new drop-off area, vehicle turn around, protected pedestrian way from parking area to hospital main entry and lot re-striping.

SHORING AT WEST OF UNDERGROUND PS:
Provide shoring and protection at edges of sitework for underground Parking Structure

EAST WING UNDERGROUND PARKING STRUCTURE:
To be finished in this phase, but not occupiable until Phase 2

ENTRY DRIVE TURNAROUND GRADING AND CONSTRUCTION:
Remove existing surface improvements, grade earth to required elevations and slopes, and install retaining walls. Complete finish grading and construct entry roadway sequence, pedestrian sidewalks

TEMPORARY "ESSENTIAL" ACCESS:
Re-direct vehicular route for ambulance drop-off, emergency department, SCI patients, and other "essential" access.

RE-ROUTE UNDERGROUND UTILITIES:
Install utility lines under new entry drive to connected future utility lines along west property line (to be installed in Phase 2).

SITE UTILITIES TO B16:
Install utilities to B16 for electrical upgrade. Sequenced work to allow for limited (one-way) vehicular access to Parking Lot F, Credit Union and Engineering for duration of this work.

SEQUENCE CLOSURE OF MAIN ENTRY INTERSECTION:
Maintain vehicular access at all times while site improvements, paving, and curbs occur at intersection. Parking Lot B may be partially used to re-direct traffic around North Drive / South Drive intersection while site improvements occur.

CONTRACTOR STAGING AND WORK AREA:
Contractor to set up in SW in Lot B

B16 ELECTRICAL UPGRADES:
Install new generators in B16. Connect to conduits placed below roadways.

TEMPORARY HOSPITAL "ESSENTIAL" ENTRY:
Direct pedestrian access from Lot A and temporary drop-off area to the north of Emergency Department. Provide access for emergency department, SCI patients, and other "essential" persons.

PEDESTRIAN ACCESS:
Temporary pedestrian walkway along West side of Emergency Department to allow access to Hospital Entry and Medical Mall.

RE-LOCATE MAIN HOSPITAL ENTRY TO SOUTH:
Re-route all "non-essential" drop-off area and main pedestrian access to the south entry of Building 1.

1 PHASE 1: LOT A ACCESS, UNDERGROUND PARKING STRUCTURE, ENTRY DRIVE
N.T.S.

Revisions:	Date

CONSULTANTS:

ARCHITECT
STANTEC | THE DESIGN PARTNERSHIP

Drawing Title	Project Title: Building 101 Mental Health Services and Parking Structure, VAPSHCS Seattle Division, MENTAL HEALTH AND RESEARCH BUILDING	Project Number: 663-405	Office of Construction and Facilities Management
Drawing Scale: N.T.S.	Location: 1660 SOUTH COLUMBIAN WAY, SEATTLE, WA 98105	Building Number: B101 Mental Health Services	Department of Veterans Affairs
Approved: Project Director	Date: JANUARY 18 2012 / Checked: KH / Drawn: JP	Drawing Number	

MH&R CONSTRUCTION:
Building superstructure, cladding, and roofing construction.
Connect utilities to infrastructure installed in previous phases.

COMPLETE PASSENGER LOADING AND PLAZA CONSTRUCTION:
Grade to required elevations and slopes, and install retaining walls.
Complete finish grading and construct canopies, bus shelter, etc.
Complete this work prior to Parking Structure occupancy.

EAST WING UNDERGROUND PARKING STRUCTURE

WEST TOWER PARKING STRUCTURE CONSTRUCTION:
Construct superstructure of garage, including cladding, lighting, elevators and all other systems required for occupancy. Occupy before completion of MH&R. Provide temporary power and other required utilities as necessary for occupancy prior to MH&R completion.

WEST LOOP ROAD CONSTRUCTION:
Complete final grading at west loop road, install curbs and surfacing to construction finish grade. Contractor will use the new West Loop Road route to access construction area.

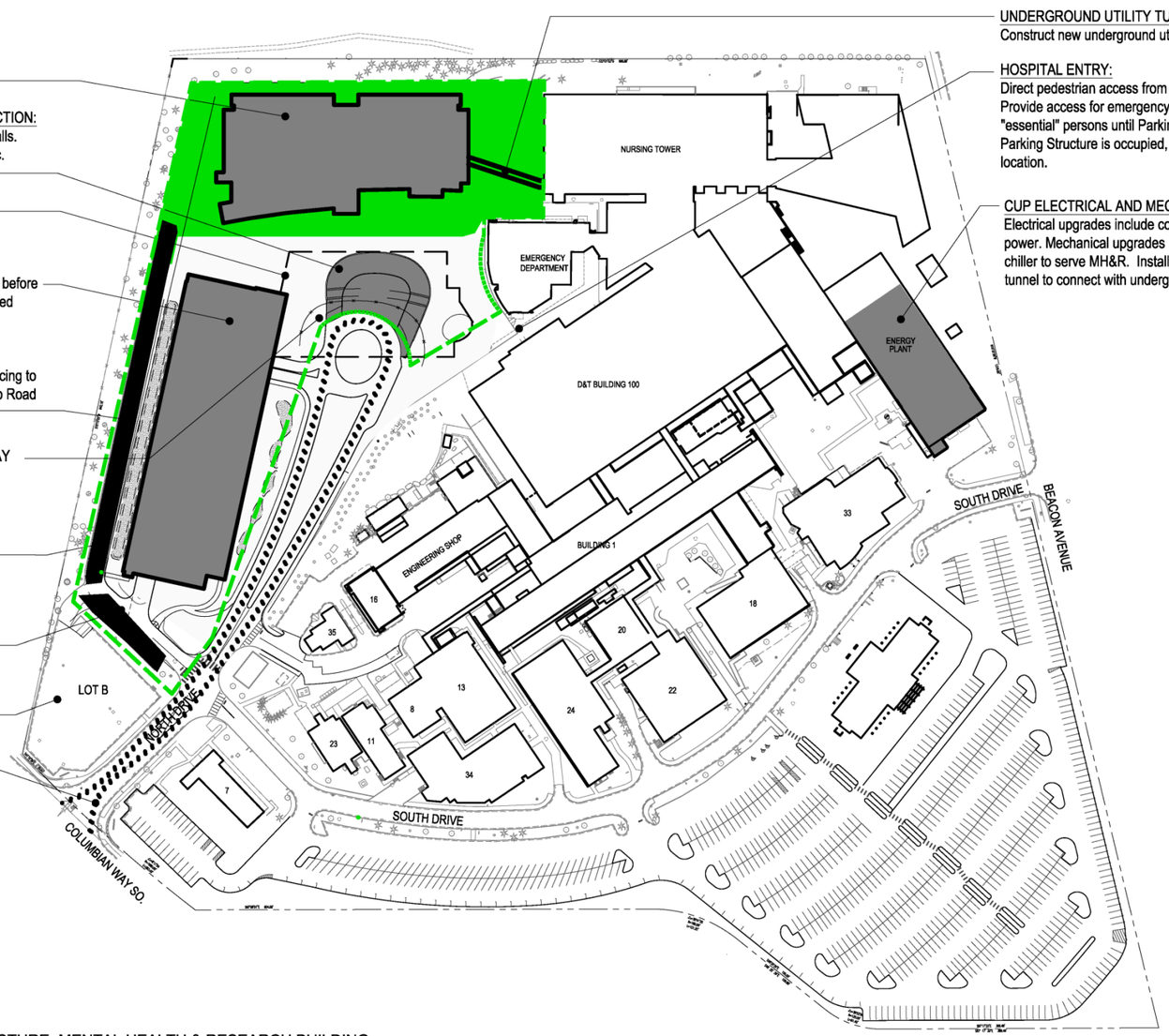
TEMPORARY ASPHALTIC CONCRETE DROP-OFF WALKWAY

UNDERGROUND UTILITIES AT WEST LOOP ROAD:
Install utility lines under existing parking lot to serve MH&R and PS along west property line.

REROUTE TELECOM LINE:
Reroute existing telecom (Qwest) service pathway to campus at south edge of Parking Structure. New service must be connected prior to demolition of (E).

CONTRACTOR STAGING AND WORK AREA

DROP-OFF ROUTE



UNDERGROUND UTILITY TUNNEL:
Construct new underground utility tunnel to MH&R.

HOSPITAL ENTRY:
Direct pedestrian access from new drop-off area to the hospital. Provide access for emergency department, SCI patients, and other "essential" persons until Parking Structure is complete. Once the Parking Structure is occupied, re-locate main hospital entry to this location.

CUP ELECTRICAL AND MECHANICAL UPGRADES:
Electrical upgrades include connection to existing standby power. Mechanical upgrades include addition of new boiler and chiller to serve MH&R. Install conduit in underground utility tunnel to connect with underground utility loop.

1 PHASE 2: PARKING STRUCTURE, MENTAL HEALTH & RESEARCH BUILDING
N.T.S.

CONSULTANTS:

ARCHITECT

Drawing Title

Project Title
Building 101 Mental Health Services and Parking Structure
VAPSHCS Seattle Division
MENTAL HEALTH AND RESEARCH BUILDING

Project Number
663-405

Building Number
B101 Mental Health Services

Drawing Scale

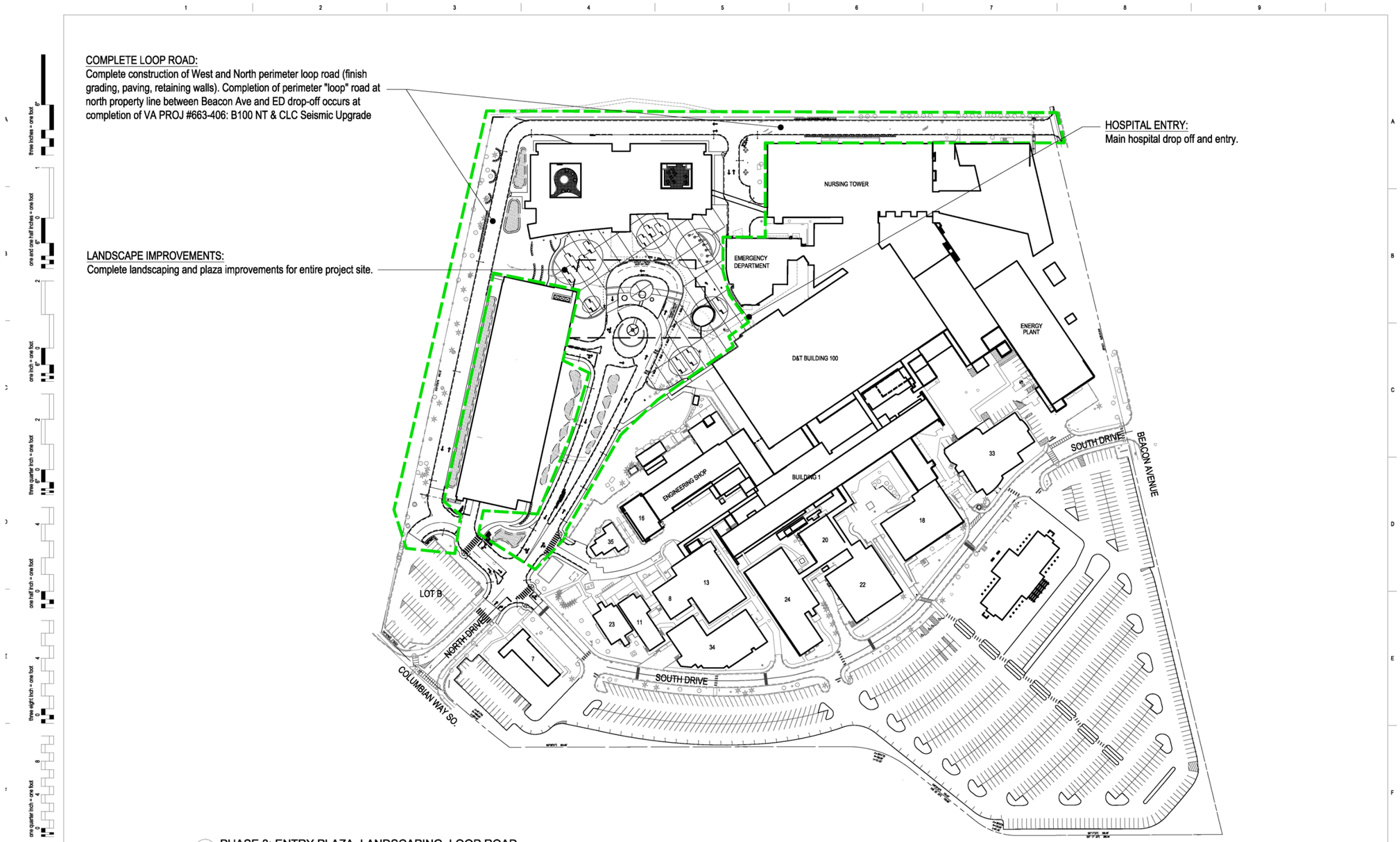
Location

Drawing Number

Office of Construction and Facilities Management

BUILDING 101 MENTAL HEALTH SERVICES & CORRECT SEISMIC DEFICIENCIES IN BUILDING 100 NURSING TOWER AND COMMUNITY LIVING CENTER
VETERANS AFFAIRS PUGET SOUND
HEALTH CARE SYSTEM
SEATTLE, WASHINGTON

MITIGATION
July 2012



1 PHASE 3: ENTRY PLAZA, LANDSCAPING, LOOP ROAD
N.T.S.

CONSULTANTS:

ARCHITECT

Drawing Title

Project Title
Building 101 Mental Health Services and Parking Structure
VAPSHCS Seattle Division
MENTAL HEALTH AND RESEARCH BUILDING

Project Number
663-405

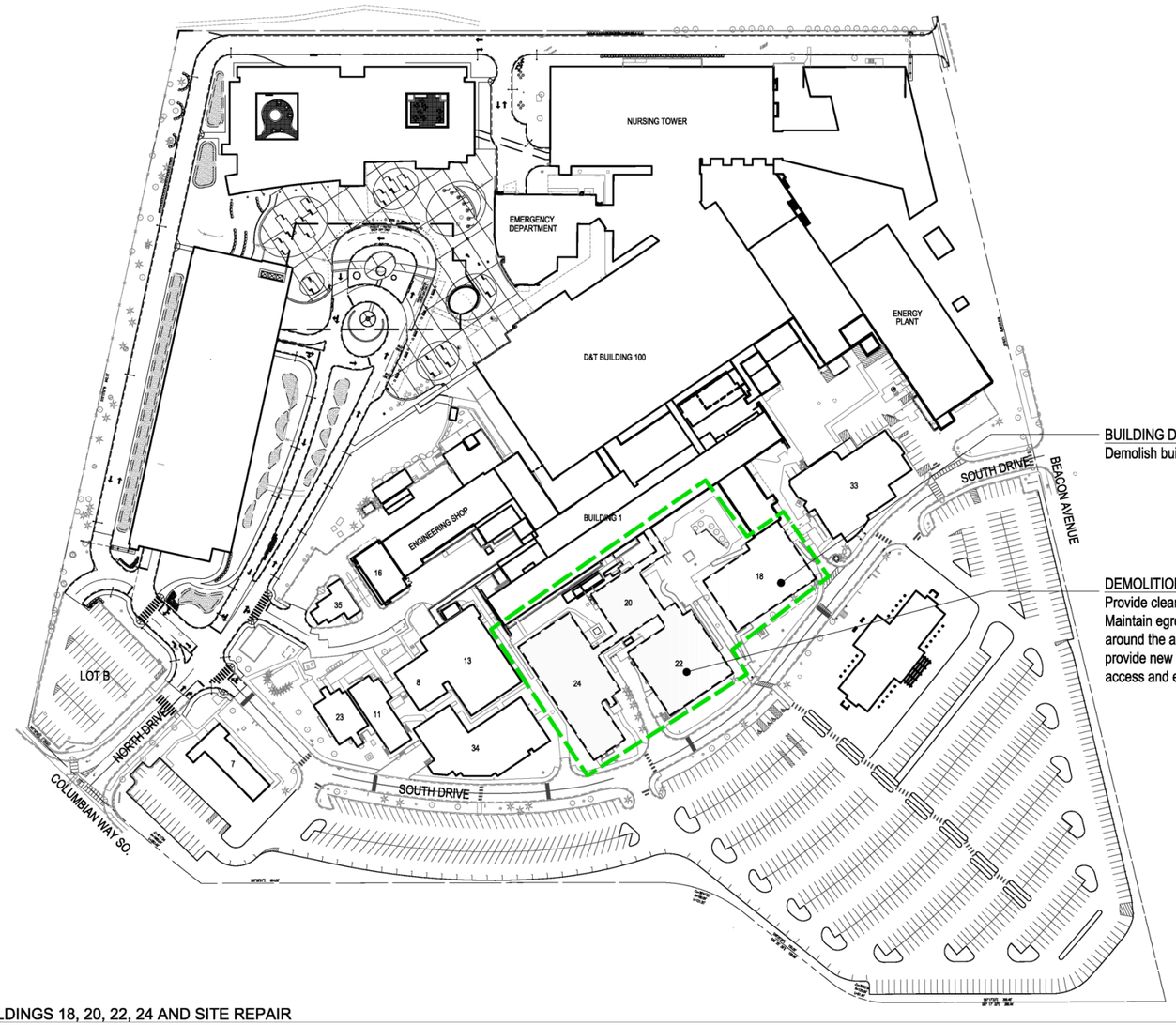
Building Number
B101 Mental Health Services

Drawing Scale

Location

Drawing Number

Office of Construction and Facilities Management



BUILDING DEMOLITION:
Demolish buildings 18, 20, 22, and 24.

DEMOLITION SITE FILL AND REPAIR:
Provide clean compacted fill at demolition site. Maintain egress and pedestrian access in and around the area. Reroute power for and provide new lighting to ensure pedestrian access and egress from remaining buildings.

1 PHASE 4: DEMOLISH BUILDINGS 18, 20, 22, 24 AND SITE REPAIR
N.T.S.

CONSULTANTS:

ARCHITECT

Drawing Title

Project Title
Building 101 Mental Health Services and Parking Structure
VAPSHCS Seattle Division
MENTAL HEALTH AND RESEARCH BUILDING

Project Number
663-405

Building Number
B101 Mental Health Services

Office of Construction and Facilities Management

Appendix B: Air Quality Conformity Modeling Results

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Urbemis 2007 Version 9.2.4

Summary Report for Annual Emissions (Tons/Year)

File Name:

Project Name: VA Hospital General Conformity Analysis

Project Location: California State-wide

On-Road Vehicle Emissions Based on: Version : Emfac2007 V2.3 Nov 1 2006

Off-Road Vehicle Emissions Based on: OFFROAD2007

CONSTRUCTION EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10 Dust	PM10 Exhaust	PM10	PM2.5 Dust	PM2.5 Exhaust	PM2.5	CO2
2012 TOTALS (tons/year unmitigated)	0.54	4.36	1.78	0.00	0.00	0.21	0.22	0.00	0.20	0.20	452.96
2013 TOTALS (tons/year unmitigated)	2.11	15.59	7.57	0.00	0.60	0.79	1.39	0.12	0.73	0.85	1,899.07
2014 TOTALS (tons/year unmitigated)	1.84	13.91	6.75	0.00	0.01	0.65	0.66	0.00	0.60	0.60	1,907.86
2015 TOTALS (tons/year unmitigated)	1.33	9.67	5.16	0.00	0.00	0.47	0.47	0.00	0.43	0.43	1,514.50
2016 TOTALS (tons/year unmitigated)	0.99	5.88	3.88	0.00	1.39	0.30	1.69	0.29	0.28	0.57	1,042.54

AREA SOURCE EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
TOTALS (tons/year, unmitigated)	0.01	0.00	0.14	0.00	0.00	0.00	0.25

Page: 2

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OPERATIONAL (VEHICLE) EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
TOTALS (tons/year, unmitigated)	0.00	0.00	0.01	0.00	0.00	0.00	0.05

SUM OF AREA SOURCE AND OPERATIONAL EMISSION ESTIMATES

	ROG	NOx	CO	SO2	PM10	PM2.5	CO2
TOTALS (tons/year, unmitigated)	0.01	0.00	0.15	0.00	0.00	0.00	0.30

URBEMIS Project Air Quality Form 2012

Project Name	Seattle VA Phase I
Form Completed by (name)	David Carr
Average # of Trips Per Day	4.12
Total # of Acres	1.4

Required	
Percent on Paved Roads	98
Percent on Unpaved Roads	2
Total	100%
Vehicle Type	Fleet %
Heavy-Heavy Truck 33,001-60,000 lbs	
Med-Heavy Truck 14,001-33,000 lbs	35
Lite-Heavy Truck 10,001-14,000 lbs	
Lite-Heavy Truck 8501-10,000 lbs	30
Lite Truck < 3750 lbs	
Lite Auto	
Lite Truck 3751-5750 lbs	25
Medium Truck 5751-8500 lbs	
Large flatbed	10
Total	= 100%

Total Acres= 60792 square feet of effected area.
Ref Table A Assumptions:
218754 Square feet vertical wall surfaces seismic Strengthening. Convert Load bearing members and Wall surfaces to Volume – 218754 ft squared X .5' = 4051 Cubic yards.

Required				
Construction Data				
	Taking Place? (Y/N)	Starting Date	Ending Date	If yes, please see:
Demolition	YES	June 2012	June 2015	Fill Out Table A & D
Mass Site Grading	No			Fill Out Table B & D
Fine Site Grading	No			Fill Out Table C & D
Trenching	No			Fill Out Table D
Paving	No			Fill Out Table D
Bldg Construction	Yes	June 2012	June 2015	Fill Out Table D
Arch Coating	Yes	June 2012	June 2015	Fill Out Table D

TABLE A	Demolition	
Total Volume of All Buildings		
Total Width	Total Length	Total Height
467	470	.5
Maximum Daily Volume of Buildings to be Demolished Concurrently		
Max. Width	Max. Length	Max. Height
18	15	0.5
Truck Hauling of Demolished Materials		
Truck Capacity (cubic yards)	Miles Per Rounds Trip	
18	52	

TABLE B	Mass Site Grading
Soil Hauling	
Total Imported soil (cubic yards)	
Total Exported Soil (cubic yards)	
Haul Truck Capacity (Cu. Yds./ Truck)	
Round Trip Distance (miles)	

TABLE C	Fine Site Grading
Soil Hauling	
Total Imported soil (cubic yards)	
Total Exported Soil (cubic yards)	
Haul Truck Capacity (Cu. Yds./ Truck)	
Round Trip Distance (miles)	

TABLE D Equipment Used During Project Construction

Equipment	# in use during:							Average # Hours in Use Per Day
	Demolition	Mass Site Grading	Fine Site Grading	Trenching	Paving	Bldg Construction	Arch Coating	
Aerial Lifts	4					4		4
Air Compressor	2					2	1	6
Bore/Drill Rigs								
Cement and Mortar Mixers								
Concrete/ Industrial Saws	3							2
Cranes	1					1		2
Crawler Tractors								
Crushing/ Processing Equip								
Dumpers/ Tenders								
Excavators								
Forklifts	2					2		4
Generator Sets								
Graders								
Off Highway Tractors								
Off Highway Trucks								
Other Equipment								
Other General Industrial Equipment	2					2		8
Other Material Handling Equipment	1					1		8
Pavers								
Paving Equipment								
Plate Compactors								
Pumps								
Rollers								
Rough Terrain Forklifts								
Rubber Tired Dozers								
Rubber Tired Loaders								
Scrapers								
Skid Steer Loaders								
Surfacing Equipment								
Sweepers/ Scrubbers								
Tractors/ Loaders/ Backhoes								
Trenchers								
Water Trucks								
Welders	1					1		

URBEMIS Project Air Quality Form 2012

Project Name	Phase II Mental Health & Research and Parking Structure
Form Completed by (name)	David Carr
Average # of Trips Per Day	4.27
Total # of Acres	2

Required	
Percent on Paved Roads	95
Percent on Unpaved Roads	5
Total	100%

Vehicle Type	Fleet %
Heavy-Heavy Truck 33,001-60,000 lbs	35
Med-Heavy Truck 14,001-33,000 lbs	10
Lite-Heavy Truck 10,001-14,000 lbs	10
Lite-Heavy Truck 8501-10,000 lbs	10
Lite Truck < 3750 lbs	20
Lite Auto	2
Lite Truck 3751-5750 lbs	2
Medium Truck 5751-8500 lbs	1
Large flatbed	10
Total	= 100%

Required				
Construction Data				
	Taking Place? (Y/N)	Starting Date	Ending Date	If yes, please see:
Demolition	YES	April 2013	MAY 2013	Fill Out Table A & D
Mass Site Grading	YES	MAY 2013	JUNE 2013	Fill Out Table B & D
Fine Site Grading	YES	MARCH 2016	APRIL 2016	Fill Out Table C & D
Trenching	YES	APRIL 2013	JULY 2013	Fill Out Table D
Paving	YES	MAY 2016	MAY 2016	Fill Out Table D
Bldg Construction	YES	JUNE 2013	JUNE 2016	Fill Out Table D
Arch Coating	YES	MAY 2014	JUNE 2016	Fill Out Table D

TABLE A	Demolition	
Total Volume of All Buildings		
Total Width	Total Length	Total Height
450	200	0.2
Maximum Daily Volume of Buildings to be Demolished Concurrently		
Max. Width	Max. Length	Max. Height
40	100	0.2
Truck Hauling of Demolished Materials		
Truck Capacity (cubic yards)	Miles Per Rounds Trip	
18	52	

TABLE B	Mass Site Grading
Soil Hauling	
Total Imported soil (cubic yards)	200
Total Exported Soil (cubic yards)	3000
Haul Truck Capacity (Cu. Yds./ Truck)	12
Round Trip Distance (miles)	50

TABLE C	Fine Site Grading
Soil Hauling	
Total Imported soil (cubic yards)	1000
Total Exported Soil (cubic yards)	200
Haul Truck Capacity (Cu. Yds./ Truck)	12
Round Trip Distance (miles)	50

TABLE D Equipment Used During Project Construction

Equipment	# in use during:							Average # Hours in Use Per Day
	Demolition	Mass Site Grading	Fine Site Grading	Trenching	Paving	Bldg Construction	Arch Coating	
Aerial Lifts						4	2	6
Air Compressor	1			1		2	2	8
Bore/Drill Rigs						1		8
Cement and Mortar Mixers			1			1		2
Concrete/ Industrial Saws	1		1	1		2		3
Cranes						2		8
Crawler Tractors	1	1	1					6
Crushing/ Processing Equip	1							8
Dumpers/ Tenders	2	1	1	1	1			7
Excavators	1	1		1				6
Forklifts				1		2		8
Generator Sets						2		8
Graders	1	1	1					6
Off Highway Tractors								
Off Highway Trucks								
Other Equipment	1		1	1	1	2	1	8
Other General Industrial Equipment						2		6
Other Material Handling Equipment		1				2		6
Pavers					1			8
Paving Equipment					1			5
Plate Compactors			1	1	1			4
Pressure Washers							1	4
Pumps		1		1				4
Rollers			1	1	2			8
Rough Terrain Forklifts				1		1		8
Rubber Tired Dozers								
Rubber Tired Loaders	1	1	1	1				8
Scrapers		1	1					8
Signal Boards				1				8
Skid Steer Loaders								
Surfacing Equipment								
Sweepers/ Scrubbers								
Tractors/ Loaders/ Backhoes	2	2	1	2				8
Trenchers								
Water Trucks	1	1	1	1	1			8
Welders				1		2		4

URBEMIS Project Air Quality Form 2012

Project Name	Phase III Building Demolition
Form Completed by (name)	David Carr
Average # of Trips Per Day	11.28
Total # of Acres	2

Required	
Percent on Paved Roads	96
Percent on Unpaved Roads	4
Total	100%
Vehicle Type	Fleet %
Heavy-Heavy Truck 33,001-60,000 lbs	80
Med-Heavy Truck 14,001-33,000 lbs	10
Lite-Heavy Truck 10,001-14,000 lbs	
Lite-Heavy Truck 8501-10,000 lbs	
Lite Truck < 3750 lbs	5
Lite Auto	
Lite Truck 3751-5750 lbs	
Medium Truck 5751-8500 lbs	5
Large flatbed	
Total	= 100%

Required				
Construction Data				
	Taking Place? (Y/N)	Starting Date	Ending Date	If yes, please see:
Demolition	YES	JULY 2016	SEPT 2016	Fill Out Table A & D
Mass Site Grading	NO			Fill Out Table B & D
Fine Site Grading	YES	AUGUST 2016	SEPT 2016	Fill Out Table C & D
Trenching	NO			Fill Out Table D
Paving	NO			Fill Out Table D
Bldg Construction	NO			Fill Out Table D
Arch Coating	NO			Fill Out Table D

TABLE A	Demolition	
Total Volume of All Buildings		
Total Width	Total Length	Total Height
390	230	3.0
Maximum Daily Volume of Buildings to be Demolished Concurrently		
Max. Width	Max. Length	Max. Height
60	75	3.0
Truck Hauling of Demolished Materials		
Truck Capacity (cubic yards)	Miles Per Rounds Trip	
18	52	

TABLE B	Mass Site Grading
Soil Hauling	
Total Imported soil (cubic yards)	
Total Exported Soil (cubic yards)	
Haul Truck Capacity (Cu. Yds./ Truck)	
Round Trip Distance (miles)	

TABLE C	Fine Site Grading
Soil Hauling	
Total Imported soil (cubic yards)	1500
Total Exported Soil (cubic yards)	
Haul Truck Capacity (Cu. Yds./ Truck)	12
Round Trip Distance (miles)	50

TABLE D Equipment Used During Project Construction

Equipment	# in use during:							Average # Hours in Use Per Day
	Demolition	Mass Site Grading	Fine Site Grading	Trenching	Paving	Bldg Construction	Arch Coating	
Aerial Lifts	1							8
Air Compressor	1							4
Bore/Drill Rigs								
Cement and Mortar Mixers								
Concrete/ Industrial Saws	2							6
Cranes								
Crawler Tractors	1		1					4
Crushing/ Processing Equip	1							8
Dumpers/ Tenders	2							8
Excavators	2							8
Forklifts	1							5
Generator Sets								
Graders								
Off Highway Tractors								
Off Highway Trucks								
Other Equipment	1							8
Other General Industrial Equipment								
Other Material Handling Equipment								
Pavers								
Paving Equipment								
Plate Compactors			1					3
Pressure Washers								
Pumps								
Rollers			1					4
Rough Terrain Forklifts	1							8
Rubber Tired Dozers								
Rubber Tired Loaders	1		1					4
Scrapers								
Signal Boards								
Skid Steer Loaders	1							4
Surfacing Equipment								
Sweepers/ Scrubbers	1		1					2
Tractors/ Loaders/ Backhoes	1		1					8
Trenchers								
Water Trucks	1		1					4
Welders	1							8

Appendix C: Cultural Resource Correspondence

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DEPARTMENT OF VETERANS AFFAIRS
Puget Sound Health Care System
1660 South Columbian Way
Seattle WA 98108-1597

DEC - 8 2008

American Lake Division
Tacoma WA 98493-5000

Seattle Division
Seattle WA 98108-1597

In Reply Refer To: 663/S-00/S-138

Allyson Brooks, Ph.D.
State Historic Preservation Officer
Department of Archaeology & Historic Preservation
1063 South Capitol Way, Suite 106
Olympia Washington 98501

Section 106 Compliance Regarding the National Register Eligibility
of the VA Puget Sound Health Care System, Seattle Division

Dear Dr. Brooks:

The VA Puget Sound Health Care System (VAPSHCS) is writing in regard to proposed construction and renovation projects at the Seattle Division. All current proposals involve interior or exterior renovations that do not require ground disturbing actions. Therefore, there are no archaeological considerations at this time.

However, because the actions concern a property fifty years of age, we are hereby submitting a finding regarding the hospital's potential eligibility for listing in the National Register of Historic Places. An historic property inventory form in both hard and CD formats is enclosed. This evaluation concludes that the hospital does not meet National Register criteria and eligibility standards for architectural values or historical associations.

At this time, the VAPSHCS requests your concurrence with a finding of non-eligibility for the Seattle Division. We believe this finding concludes any further Section 106 consultation for actions taken on the hospital buildings that do not involve ground disturbance.

If you have any questions or require additional information, please feel free to contact Mr. Edward L. Boogaerts, Projects Supervisor, FMS, at 206-764-2031.

Sincerely,

Stan Johnson
Director

Enclosures

cc: Deputy Director
Chief, Facilities
Ed Bozzacotts
Leonie Noel
Sonya Graham

STATE OF WASHINGTON

DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501
Mailing address: PO Box 48343 • Olympia, Washington 98504-8343
(360) 586-3065 • Fax Number (360) 586-3067 • Website: www.dahp.wa.gov

December 10, 2008

Mr. Stan Johnson
Director
VA Puget Sound Health Care Systems
1660 S Columbian Way
Seattle, WA 98108-1597

In future correspondence please refer to:
Log: 121008-17-VA
Property: Seattle Veterans Hospital
Re: NOT Eligible

Dear Mr. Johnson:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The above referenced property has been reviewed on behalf of the State Historic Preservation Officer under provisions of Section 106 of the National Historic Preservation Act of 1966 (as amended) and 36 CFR Part 800. My review is based upon documentation contained in your communication.

Research indicates that the above referenced property is not currently listed in the Washington Heritage Register or National Register of Historic Places. The referenced property is NOT ELIGIBLE for the National Register of Historic Places under criterion C. As a result of this finding, further contact with DAHP is not necessary. However, if additional information on the property becomes available, or if any archaeological resources are uncovered during construction, please halt work in the area of discovery and contact the appropriate Native American Tribes and DAHP for further consultation.

Thank you for the opportunity to review and comment. If you have any questions, please contact me.

Sincerely,

Russell Holter
Project Compliance Reviewer
(360) 586-3533
russell.holter@dahp.wa.gov

Historic Property Inventory Report for Seattle Veterans Hospital at Bldg 1 Beacon Ave, Seattle, WA 98108-1597

LOCATION SECTION

Field Site No. SEAVA **OAHP No.**

Historic Name: Seattle Veterans Hospital **Common Name:** Seattle Veterans Hospital - Building 1

Property Address: Bldg 1 Beacon Ave, Seattle, WA 98108-1597 **Comments:**

County	Township/Range/EW	Section	1/4 Sec	1/4 1/4 Sec	Quadrangle
King	T24R04E	21			SEATTLE SOUTH

UTM Reference
Zone: 10 **Spatial Type:** Point **Acquisition Code:** Unknown
Sequence: 1 **Easting:** 552048 **Northing:** 5267954

Tax No./Parcel No. **Plat/Block/Lot** **Supplemental Map(s)** **Acreage** 6

IDENTIFICATION SECTION

Survey Name: Seattle VA

Field Recorder: L. McCroskey **Date Recorded:** 8/18/2008

Owner's Name: Dept Veterans Affairs **Owner Address:** 1660 S Columbian Way **City/State/Zip:** Seattle, WA 98108-1597

Classification: Building **Resource Status** Survey/Inventory **Comments**

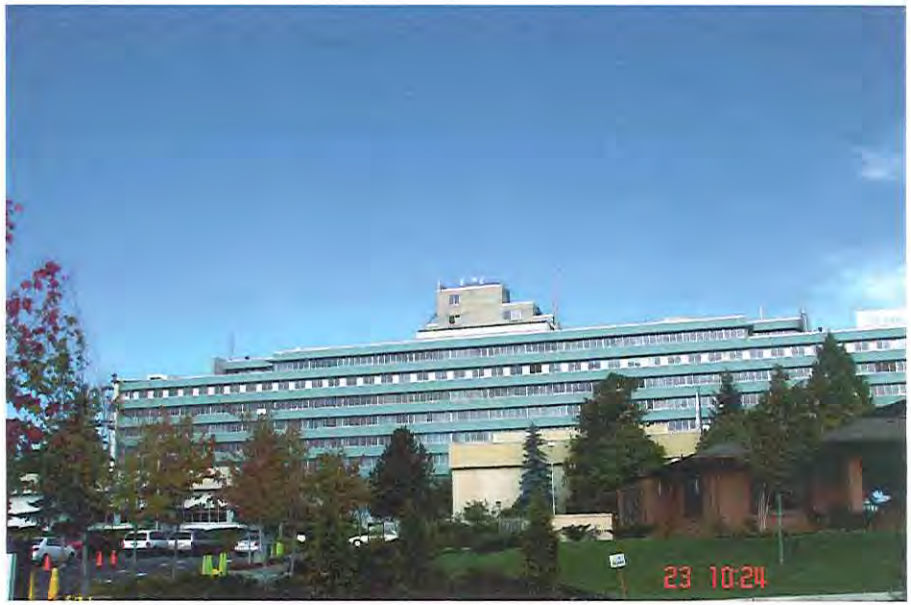
Within a District? No

Contributing?

National Register Nomination:

Local District:

National Register District/Thematic Nomination Name:



View of Building #1, lookinig Northwest **taken** 9/23/2008

Photography Neg. No (Roll No./Frame No.):

Comments:

DESCRIPTION SECTION

Historic Use: Health Care - Hospital

Current Use: Health Care - Hospital

Plan: Rectangle **No. of Stories:** 8

Structural System: Steel

Changes to plan: Moderate **Changes to interior:** Extensive **Style** Modern **Form/Type** None

Changes to original cladding: Intact **Changes to other:** Extensive

Changes to windows: Intact **Other (specify):** Setting

Cladding	Foundation	Roof Material	Roof Type
Terra Cotta Brick	Concrete - Poured	Asphalt / Composition - Built Up	Flat with Parapet Varied Roof Lines

NARRATIVE SECTION

Date Of Construction: 1949-51; 1967; 1985

Architect: U.S. Army Corps of Engineers

Builder: U.S. Army Corps of Engineers

Engineer: U.S. Army Corps of Engineers

Study Unit	Other
Health/Medicine	
Military	

Property appears to meet criteria for the National Register of Historic Places No

Property is located in a potential historic district (National and/or local): No

Property potentially contributes to a historic district (National and/or local):

Statement of Significance

The Seattle Veterans Administration Hospital is sited on 44 acres at the south end of the City of Seattle's Jefferson Park. The original builidng (#1) is a rectangular structure with a long double-loaded corridor plan that was typical of hospital construction during this period and throughout the next four decades. Begun in 1949, the facility was a somewhat delayed response to the medical care demands that followed World War II and compelled major veterans hospital construction projects throughout the nation.

Although the form, materials, and design of the Building #1 are typical of large institutional buildings constructed in the mid-twentieth century, the building is not distinguished within this context. The overrall design and architectural character are ubiquitous for the period and do not represent inovation or distinction in design,features, materials, ornament, or planning. In addition, the Department of Veterans Affairs does not include the Seattle facility in its listing of historically important hospital centers. Finally, Building #1 has lost much of its integrity of setting due to encroachments of numerous buildings and additions over the past five decades. Additional buildings added to the complex in later dates lack distinction for architectural design or historical assocation, and simply reflect period upgrades and expansion to absorb growing numbers of veteran patients.

Description of Physical Appearance

Building #1 is a steel frame building with a long rectangular footprint and rises eight stories. The original front (northwest) elevation is clad in a glazed/terra cotta brick and features ribbon window bands that delineate each floor. Original windows are aluminum frame, fixed pane types. The southeast elevation has a veneer of blue/green glazed terra cotta blocks, and also features ribbon windows at each floor. The east and west building ends are solid, unadorned concrete surfaces. The building has a number of rooftop pavilllions including a now enclosed area formerly used by psychiatric patients. Throughout the following decades after its construction, Building #1 was surrounded and encroached upon by numerous additions and new buildings.

In 1967, Building #1 received a research wing addition at the southwest end that harmonized with the 1951 building. In 1985, a major addition to the complex occurred with the construction of Building #100, a nursing tower, nursing home, and D & T section. The newest hospital facility is the largest and most dominant structure in the complex and visually eclipses original Building #1 on the landscape. This solid concrete structure, and all subsequent building projects have created a hodge-podge of textures, materials, and designs that lack coehesion with the original hospital building.

Major Bibliographic References

Department of Veterans Affairs: http://www1.va.gov/pugetsound/page.cfm?pg=12

List of Department of Veterans Affairs Historicall Significant Buildings: http://www.va.gov/facmgt/historic/vha_listing_by_resource.asp#Historically%20Important%20Buildings

Additional Photos for: Seattle Veterans Hospital **at** Bldg 1 Beacon Ave, Seattle, WA 98108-1597

View of Building #1, with Building #34 (foreground), looking North **taken** 9/23/2008

Photography Neg. No (Roll No./Frame No.):

Comments:

View of Building #1, looking West **taken** 9/23/2008

Photography Neg. No (Roll No./Frame No.):

Comments:

View of Building #1, with adjacent Building #33, and D & T Building #110 behind, looking northwest **taken** 9/23/2008

Photography Neg. No (Roll No./Frame No.):

Comments:

View of Building #1, looking East **taken** 9/23/2008

Photography Neg. No (Roll No./Frame No.):

Comments:

Additional Photos for: Seattle Veterans Hospital **at** Seattle Veterans Hospital

View of D & T Building #100, looking East **taken** 9/23/2008

Photography Neg. No (Roll No./Frame No.):

Comments:

View of **taken**

Photography Neg. No (Roll No./Frame No.):

Comments:

View of **taken**

Photography Neg. No (Roll No./Frame No.):

Comments:

View of **taken**

Photography Neg. No (Roll No./Frame No.):

Comments:

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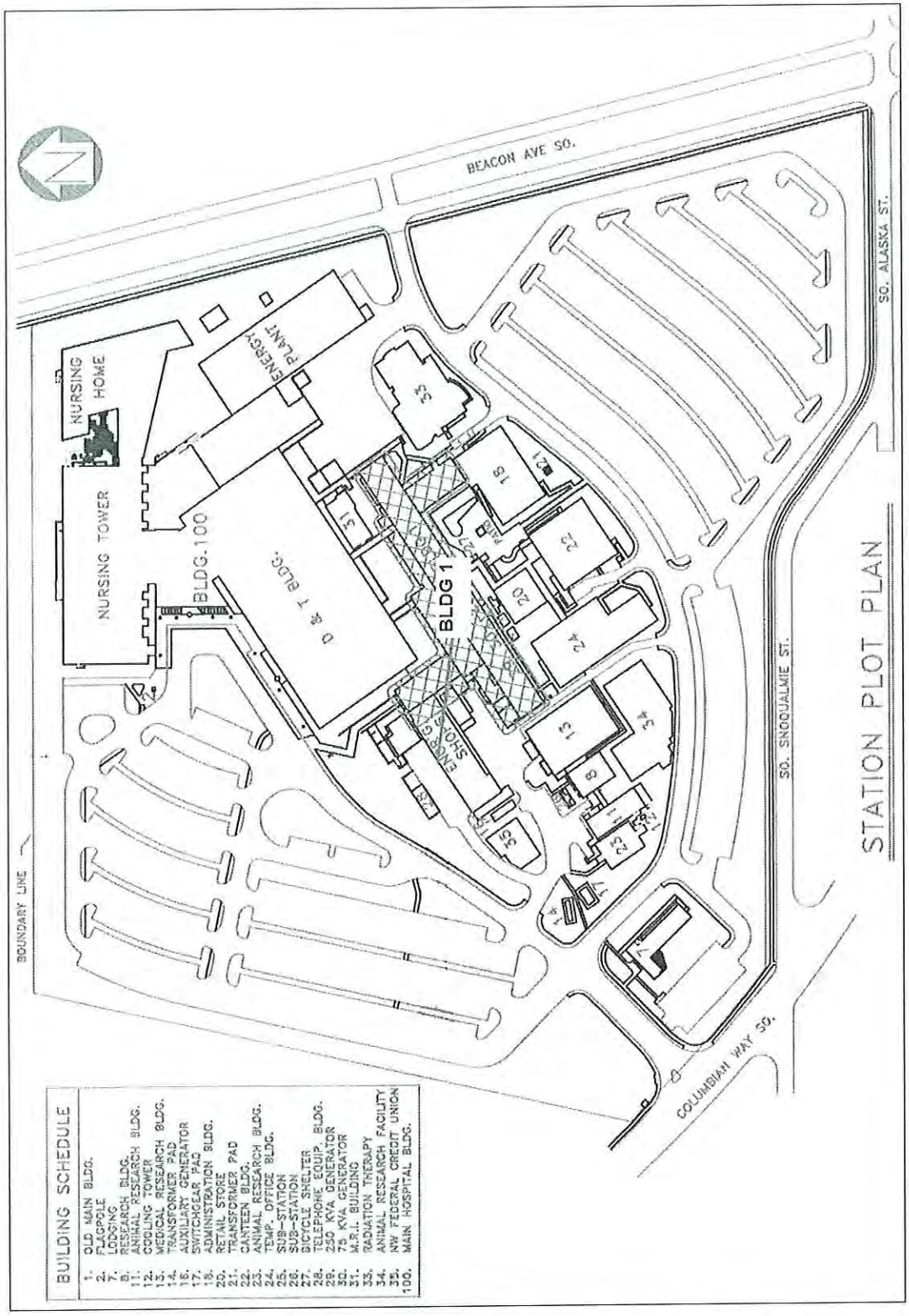

Site Sketch of Seattle Veterans Hospital, King County
Building #1 is the original hospital structure.

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Appendix D: Agency Correspondence

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Stantec Consulting Services Inc.
3875 Atherton Road
Rocklin CA 95765
Tel: (916) 773-8100
Fax: (916) 773-8448

January 30, 2012
File: 183810338

U.S. Fish and Wildlife Service
Washington Fish and Wildlife Office
Attention: Martha Jensen
510 Desmond Drive SE, Suite 102
Lacey, Washington 98503

Reference: No Impact Concurrence for Puget Sound VA Medical Center, Building 101 Mental Health Services & Correct Seismic Deficiencies in Building 100 Nursing Tower and Community Living Center Project, Seattle, Washington. Project Numbers: 663-405 & 663-406.

Dear Ms. Jensen:

On behalf of the Puget Sound Veteran Affairs (VA) Medical Center, Stantec Consulting Services Inc. (Stantec) would like to request your concurrence with our finding of no impact to endangered and threatened species for the Building 101 Mental Health Services and Correct Seismic Deficiencies in Building 100 Nursing Tower and Community Living Center Project (project) in Seattle, Washington. The project is located in the U.S. Geological Survey's 'Seattle South' 7 ½ minute quad (King County, Township 24 North, Range 4 East) at 1660 S. Columbian Way at Beacon Avenue S. as shown on Figure 1.

The project proposes to construct a new multi-story Mental Health Services and Research Building and a new 6-story parking structure (Project 663-405) in the northwest corner of the site and to conduct necessary seismic retrofits of the existing Nursing Tower (Building 100) and Community Living Center buildings (Project 663-406) at the VA Medical Center campus. The existing Mental Health Building (Building 24) and Buildings 18, 20, and 22 in the southern portion of the site will need to be demolished due to seismic deficiency and asbestos. The new structures and other project features are shown in Figures 2 and 3.

A qualified Stantec Biologist surveyed the site on August 4, 2011, to verify the absence of suitable habitat for any endangered or threatened species as listed in the attached species list. The project footprint is limited to previously landscaped and paved areas. The project site has been developed as a medical facility for over 30 years and native birds, squirrels, and other backyard animals are the only wildlife present. The new buildings will be located in the paved parking lots and landscaped areas on the northwest side of the site, retrofits will take place within the footprint of the existing buildings and demolition of the existing buildings will be limited to the paved and landscaped areas surrounding Buildings 18, 20, 22, and 24. The project will require removal of minimal trees and other landscaping to allow construction of the new buildings.

Stantec

January 30, 2012
Page 2 of 2

Reference: No Impact Concurrence for Puget Sound VA Medical Center, Building 101 Mental Health Services & Correct Seismic Deficiencies in Building 100 Nursing Tower and Community Living Center Project, Seattle, Washington.

Thank you in advance for your time. Please contact me (916-773-8100, kimberly.smith@stantec.com) or our biologist Bernadette Bezy at (530-470-0515, bernadette.bezy@stantec.com) if you have any questions regarding this project. Please inform us of your concurrence by February 29, 2012; if we do not receive a response from you by then (within 30 days), we will assume U.S. Fish and Wildlife Service concurs with our no impact determination.

Respectfully,

STANTEC CONSULTING SERVICES INC.

Kimberly Smith
Environmental/GIS Specialist
Tel: (916) 773-8100
Fax: (916) 773-8448
Kimberly.Smith@stantec.com

Attachment: Puget Sound VA Figures 1-4,
Kings County USFWS Species List

c. Sarah McIlroy, Stantec Consulting Services Inc.

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LISTED AND PROPOSED ENDANGERED AND THREATENED SPECIES AND CRITICAL HABITAT; CANDIDATE SPECIES; AND SPECIES OF CONCERN IN KING COUNTY AS PREPARED BY THE U.S. FISH AND WILDLIFE SERVICE WASHINGTON FISH AND WILDLIFE OFFICE

(Revised August 1, 2011)

LISTED

Bull trout *(Salvelinus confluentus)* – Coastal-Puget Sound DPS
Canada lynx *(Lynx canadensis)*
Gray wolf *(Canis lupus)*
Grizzly bear *(Ursus arctos = U. a. horribilis)*
Marbled murrelet *(Brachyramphus marmoratus)*
Northern spotted owl *(Strix occidentalis caurina)*

Major concerns that should be addressed in your Biological Assessment of project impacts to listed animal species include:

1. Level of use of the project area by listed species.

2. Effect of the project on listed species' primary food stocks, prey species, and foraging areas in all areas influenced by the project.

3. Impacts from project activities and implementation (e.g., increased noise levels, increased human activity and/or access, loss or degradation of habitat) that may result in disturbance to listed species and/or their avoidance of the project area.

Castilleja levisecta (golden paintbrush) [historic]

Major concerns that should be addressed in your Biological Assessment of project impacts to listed plant species include:

1. Distribution of taxon in project vicinity.

2. Disturbance (trampling, uprooting, collecting, etc.) of individual plants and loss of habitat.

1. Changes in hydrology where taxon is found.

DESIGNATED

Critical habitat for bull trout

PROPOSED

None

CANDIDATE

Fisher *(Martes pennanti)* – West Coast DPS
North American wolverine *(Gulo gulo luteus)* – contiguous U.S. DPS
Oregon spotted frog *(Rana pretiosa)* [historic]
Yellow-billed cuckoo *(Coccyzus americanus)*
Whitebark pine *(Pinus albicaulis*)

SPECIES OF CONCERN

Bald eagle *(Haliaeetus leucocephalus)*
Beller's ground beetle *(Agonum belleri)*
Cascades frog *(Rana cascadae)*
Hatch's click beetle *(Eanus hatchi)*
Larch Mountain salamander *(Plethodon larselli)*
Long-eared myotis *(Myotis evotis)*
Long-legged myotis *(Myotis volans)*
Northern goshawk *(Accipiter gentilis)*
Northern sea otter *(Enhydra lutris kenyoni)*
Northwestern pond turtle *(Emys (= Clemmys) marmorata marmorata)*
Olive-sided flycatcher *(Contopus cooperi)*
Pacific lamprey *(Lampetra tridentata)*
Pacific Townsend's big-eared bat *(Corynorhinus townsendii townsendii)*
Peregrine falcon *(Falco peregrinus)*
River lamprey *(Lampetra ayresi)*
Tailed frog *(Ascaphus truei)*
Valley silverspot *(Speyeria zerene bremeri)*
Western toad *(Bufo boreas)*
Aster curtus (white-top aster)
Botrychium pedunculosum (stalked moonwort)
Cimicifuga elata (tall bugbane)

Appendix E: Notice of Availability

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NOTICE OF AVAILABILITY

Draft Environmental Assessment
U.S. Department of Veterans Affairs

Building 101 Mental Health Services & Correct Seismic Deficiencies in Building 100 Nursing Tower and Community Living Center

Puget Sound Health Care System
VA Medical Center, Seattle, WA

The U.S. Department of Veterans Affairs (VA) announces the preparation and availability of a Draft Environmental Assessment (DEA) for the proposed construction associated with the Building 101 Mental Health Services & Correct Seismic Deficiencies in Building 100 Nursing Tower and Community Living Center located at the VA Puget Sound Health Care System at 1660 S Columbian Way in Seattle, Washington. This project will construct a new seven-story 223,000 gross square feet Mental Health and Research building, construct a new seven-level 1,000 car parking structure, demolish roughly 63,000 gross square feet of existing buildings (Buildings 18, 20, 22, and 24), and seismically upgrade building 100.

A Draft Environmental Assessment for the proposed project was prepared pursuant to the National Environmental Policy Act (NEPA) of 1969 and the implementing regulations of the Department of Veterans Affairs (38 CFR Part 26). The DEA examines the potential for environmental impacts from the proposed action. The VA intends to issue a "Finding of No Significant Impact" (FONSI) following a thirty-day comment period in accordance with the Council on Environmental Quality Regulations for Implementing NEPA, Section 1508.13 provided there are no substantive comments which warrant further evaluation.

A digital copy of the DEA will be available for viewing or downloading on Tuesday, July 10, 2012 at the following web address: http://www.pugetsound.va.gov/Notices_of_Availability.asp. Hard copies will also be available for review at the Beacon Hill Public Library at 2821 Beacon Avenue South, Seattle, WA. Comments or questions may be directed in writing to: VA Puget Sound Health Care System via mail at Mailstop S-OOPA, 1660 South Columbian Way, Seattle, WA 98108, fax at 206-764-2250, or e-mail at publicaffairspugetsound@va.gov. Please reference "Building 101 MHS and Building 100 NT & CLC EA" in any correspondence. The public comment period will begin on Tuesday, July 10, 2012 and all comments on the DEA are requested by August 8, 2012.