Finding of No Significant Impact
U.S. Department Of Veterans Affairs
Proposed Construction and Operation of an Outpatient Clinic
Salt Lake City, Utah

The U.S. Department of Veterans Affairs (VA) proposes to award a lease to a private entity to construct an outpatient clinic (OPC) for VA to lease and operate in Salt Lake City, Utah. As required by the National Environmental Policy Act of 1969 (NEPA; 42 U.S. Code § 4321 et seq.), VA prepared an environmental assessment (EA) evaluating the Proposed Action. The Final EA was completed in September 2025 and is incorporated by reference.

Purpose and Need

The purpose of the Proposed Action is to provide outpatient health care services to area Veterans. The Proposed Action is needed to provide additional capacity within the VA Salt Lake City Health Care System by addressing space gaps and operational inefficiencies at existing clinics. These issues were identified through the VA Strategic Capital Investment Planning process. By expanding its capacity, VA would be able to provide area Veterans with timely access to state-of-the-art health care and mental health services in a modern facility commensurate with current and projected demands.

Proposed Action

VA's Proposed Action is to award a lease to a private entity to construct an OPC on one of four potential sites in Salt Lake City, Utah. The private entity would construct the OPC on a "build-to-suit" basis for VA to lease for up to 20 years. The private entity would design and construct the OPC in compliance with applicable VA design requirements and applicable federal, state, and local regulations, as well as meeting Green Building Initiative Green Globes certification, which would minimize energy-related emissions using energy-efficient systems where feasible. Prior to construction, the private entity would be responsible for obtaining all applicable federal, state, and local permits from appropriate government authorities. Construction would take approximately 18-24 months, with operation of the OPC to follow.

Construction would involve clearing the existing development within the proposed limits of disturbance, followed by grading, excavation for the building foundation and utilities, and installation of new utility connections to public utility services for potable water, sanitary sewer, stormwater, electricity, and telecommunications. It would also include the construction of the OPC and parking garage, as well as paving for roads, parking, and new entrances. The OPC is anticipated to provide approximately 113,000 square feet of interior space and be no more than three stories high. On-site parking for approximately 600 vehicles would be provided through a combination of ground-level parking and a two-level parking garage. Construction would require the use of diesel-fueled off-road equipment (backhoes, loaders, graders, paving equipment), transport of building materials to the site using on-road multi-axle delivery vehicles, travel to and from the site by construction workers, asphalt paving, and vertical construction of the OPC and associated infrastructure.

Upon completion of the construction phase, the VA Salt Lake City Health Care System would administer and staff the OPC, with approximately 128 staff members expected. The new Salt Lake City OPC would provide enhanced primary care services, compensation and pension examinations, women's clinic, residency program, compensation and pension, whole health, pathology and laboratory medicine, pharmacy service, clinic management, primary care mental health integration, primary care service administration, business service/health administration service program, engineering service, logistics service, police service, and canteen services. Primary care and Women's Health services currently provided at the George E. Wahlen VAMC would be relocated to the new OPC, along with supporting staff.

Alternatives

The EA evaluated four Action Alternatives (each corresponding to a different site and conceptual design) and the No Action Alternative.

- **Alternative 1**: 2191 South 300 West, South Salt Lake, UT
- **Alternative 2**: 3300 South 1300 East, Millcreek, UT
- **Alternative 3**: 3711 South State Street, South Salt Lake, UT
- **Alternative 4**: 2300 South 300 West, South Salt Lake, UT
- **No Action Alternative:** Under the No Action alternative, VA would not award a lease to a private entity for a new Salt Lake City OPC, and the Proposed Action would not be implemented. The existing VA clinics would continue to be overburdened and unable to meet the growing medical needs of the Veteran population in the Salt Lake City area. The No Action alternative does not meet VA's purpose or need for the Proposed Action.

Potential Environmental Effects

The potential environmental effects associated with implementing the alternatives as analyzed in the Final EA are summarized in the following outline. The terms "effects" and "impacts" have the same meaning in this EA. For Alternatives 1, 3, and 4, the EA showed that the implementation of any of the Action Alternatives would result in no significant adverse impacts on the quality of the natural or human environment. For Alternative 2, further investigation is required to characterize contamination at the Alternative 2 site. Limited soil and groundwater sampling was conducted after the Phase I Environmental Site Assessment (ESA) and the Recognized Environmental Condition (REC) identified at the site is unresolved. Therefore, the significance of impacts resulting from this historic release is unknown at this time. The following summary describes impacts common to each Action Alternative and provides an additional summary of impacts that are unique to one or more Alternative.

- **Aesthetics**: No significant adverse impacts. Temporary, negligible adverse impacts during construction; permanent, negligible beneficial impacts during operation due to modern facility and professional landscaping.
- **Air Quality**: No significant adverse impacts. Temporary, negligible adverse impacts from construction emissions; permanent, negligible adverse impacts from operation. Emissions would remain below Clean Air Act General Conformity thresholds.
- **Wildlife and Habitat:** No significant adverse impacts. Sites are developed and do not support listed species or critical habitat. Environmental impacts unique to each Action Alternative are:
    - **Alternatives 1 or 4**: No impact—sites contain no suitable habitat
    - **Alternative 2**: Permanent, negligible adverse impact due to removal of sparse trees
    - **Alternative 3**: Permanent, negligible adverse impact due to removal of approximately 1.5 acres of vegetation, including large trees.
- **Floodplains, Wetlands, and Coastal Zone**: No significant adverse impacts. None of the sites contain wetlands and Salt Lake City is not in a coastal zone. Environmental impacts unique to each Action Alternative for floodplains are:
    - **Alternatives 1 and 4**: Located in the 500-year floodplain (Zone X); permanent, negligible adverse impact due to redevelopment within a floodplain.

  - **Alternatives 2 and 3**: Outside 500-year floodplains; no impact.
- **Cultural and Historic Resources**: No significant adverse impacts. Environmental impacts unique to each Action Alternative are:
  - **Alternative 1**: One National Register of Historic Places-eligible site (Denver & Rio Grande Western Railway); UT State Historic Preservation Office (SHPO) provided Section 106 concurrence of no adverse effect to the historic site, pursuant to 36 CFR 800.5(b).
  - **Alternatives 2, 3, and 4**: No historic properties affected; UT SHPO provided Section 106 concurrence of no historic properties affected, pursuant to 36 CFR 800.4(d)(1).
- **Geology and Soils**: No significant adverse impacts. Temporary, minor adverse impacts during construction; no impacts during operation.
- **Hydrology and Water Quality**: No significant adverse impacts. Temporary, negligible adverse impacts during construction; permanent, negligible adverse impacts during operation.
- **Land Use**: No impacts. All alternatives are consistent with local zoning and land use plans.
- **Noise and Vibration**: No significant adverse impacts. Temporary, negligible to minor adverse impacts during construction; permanent, negligible impacts during operation. Environmental impacts unique to each Action Alternative are:
  - **Alternative 1 and 4**: No impacts to vibration-sensitive receptors due to distance.
  - **Alternatives 2 and 3**: Temporary, minor adverse impact on vibration-sensitive receptors, minimized by distance and assessed further in final design phase.
- **Solid Waste and Hazardous Materials**: No significant adverse impacts from Alternatives 1, 3, and 4. Temporary, minor adverse impacts during construction; permanent, negligible impacts during operation. Regulated building materials, including asbestos and lead-based paint, would be abated and disposed of per applicable federal and state laws. Environmental impacts unique to each Action Alternative are:
  - **Alternative 1**: No RECs.
  - **Alternative 2**: REC from former dry cleaner; volatile organic compounds in soil and groundwater. Further investigation is required to characterize contamination at the Alternative 2 site. Limited soil and groundwater sampling was conducted after the Phase I ESA and the REC identified at the site is unresolved. Therefore, the significance of impacts resulting from this historic release is unknown at this time.
  - **Alternative 3**: RECs from former underground storage tanks (USTs) and oil-water separator; petroleum hydrocarbons above screening levels; mitigation may include excavation, vapor barriers, and institutional controls. Private entity would coordinate with UT Department of Environmental Quality (UT DEQ); develop and implement a UT DEQ-approved Corrective Action Plan to remediate contaminated soil and groundwater; implement groundwater monitoring and an Environmental Covenant and Site Management Plan for any contamination remaining in place; and work toward or achieve a No Further Action designation from UT DEQ.
  - **Alternative 4**: Presence of stained soil around an electrical transformer is a de minimis condition, but not a REC. The transformer was confirmed not to contain polychlorinated biphenyls.

- **Traffic, Transportation, and Parking**: No significant adverse impacts. Temporary, negligible impacts during construction; permanent, negligible to no impacts during operation. Traffic studies show acceptable levels of service would be maintained. Environmental impacts unique to each Action Alternative are:
    - **Alternatives 1, 2, and 3**: No impact—the level of service (LOS) remains "A" or "C" through 2044.
    - **Alternative 4**: One intersection degrades from LOS "A" to "B" during p.m. peak hours; permanent, negligible adverse impact
- **Utilities**: No significant adverse impacts. Temporary, negligible impacts during construction; permanent, negligible impacts during operation. Utility demand would be within system capacity.
- **Community Services**: No significant adverse impacts. Permanent, beneficial impact by improving access to health care for Veterans.
- **Socioeconomics**: No significant adverse impacts. Temporary, negligible beneficial impacts during construction from spending on materials and workers; permanent, negligible beneficial impacts during operation from incidental spending on local services and amenities.
- **Public Controversy**: No substantial controversy is anticipated. Community support for improving Veterans' timely access to modern, state-of-the-art health care services is anticipated.

For Alternatives 1, 3, and 4, the project-specific protection and mitigation measures listed in Attachment A are incorporated into the Proposed Action and would ensure the potential adverse impacts would be less than significant. VA would require the private entity to construct and operate the Proposed Action in accordance with these measures. However, for Alternative 2, further investigation is required to characterize soil and groundwater contamination identified during the Phase I ESA and address this unresolved REC. Therefore, the significance of impacts resulting from this historic release is unknown at this time at the Alternative 2 site, and protection/mitigation measures for Alternative 2 are not included in Attachment A.

Public Comment and Agency Consultation

VA published a scoping notice on the VA website and in *The Salt Lake Tribune* on December 22 and 25, 2024, to solicit input for the Draft EA. The scoping notice was also emailed to stakeholders including federal, state, and local agencies, federally recognized Tribes, and community organizations. The Draft EA was completed and made available for a 30-day public review and comment period. A Notice of Availability announcing a 30-day review and comment period for the Draft EA was published in the *Salt Lake Tribune* on July 18 and 20, 2025 and also emailed to stakeholders. Comments received during scoping and on the Draft EA were considered in the Final EA.

VA conducted Section 106 consultation under the National Historic Preservation Act with the UT SHPO and federally recognized Tribes. The SHPO concurred with VA's findings of no adverse effect for Alternative 1 or no historic properties affected for Alternatives 2, 3, and 4.

Finding of No Significant Impact

Based on the analyses in the Final EA, which is summarized and incorporated by reference herein, VA concludes that implementing the Proposed Action under Alternatives 1, 3, or 4 would have no significant adverse impact on the quality of the natural or human environment within the meaning of Section 102(2)(C) of NEPA. Therefore, preparation of an environmental impact statement is not required.

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Date: 2025.09.09 14:16:44 -06'00'

Jason Sturm
Environmental Engineer
Environmental Program Office
VA Office of Construction & Facilities Management

LINDSAY KILLIAN Digitally signed by LINDSAY KILLIAN
Date: 2025.09.09 16:19:24 -06'00'

Lindsay Killian
Director, Lease Execution
Office of Real Property
VA Office of Construction & Facilities Management

Attachment A: Best Management Practices, Management, Minimization, and Mitigation Measures Incorporated into the Proposed Action

ATTACHMENT A

Best Management Practices, Management, Minimization, and Mitigation Measures Incorporated into the Proposed Action

Resource	Minimization and Avoidance Measures
Aesthetics	The OPC facility and grounds would be professionally managed to maintain its appearance for the duration of VA's lease.
Air Quality	Design and operate the OPC to achieve Green Globes certification. To the extent practicable, for construction equipment greater than 150 horsepower, the private entity would aim to meet U.S. Environmental Protection Agency (USEPA) Tier 4 emissions standards, or Tier 3 standards if Tier 4 equipment is not available at the time of construction; tune and maintain all construction equipment in accordance with the equipment manufacturer's recommended maintenance schedule and specifications; use low-sulfur diesel or biodiesel in construction equipment; minimize off-site tracking of loose soil and the generation of dust by implementing construction best management practices.
Wildlife and Habitat	**For Alternative 3 only:** The private entity would monitor the development of South Salt Lake's forestry regulations, which are still under development, and coordinate with city staff to ensure compliance with any applicable requirements prior to tree clearing at the Alternative 3 site.
Floodplains, Wetlands, and Coastal Zone	**Floodplains**. The Alternative 1 and Alternative 4 sites are located within the 500-year floodplain. The private entity would design the OPC to meet Green Globes certification. The Green Globes program encourages implementing flood-resilient design features, such as elevating mechanical systems or using flood-resistant materials, and using low-impact design techniques, such as bioswales and permeable paving, to help infiltrate stormwater generated at the site.
Geology and Soils	The private entity would design and construct the OPC development according to applicable seismic design requirements per VA, International Building Code, and Greater Salt Lake Municipal Services District criteria. Prior to construction, private entity would apply for coverage under the Utah Department of Environmental Quality (UT DEQ) Utah Pollutant Discharge Elimination System (UPDES) General Construction Stormwater Permit. Soil erosion and sedimentation minimized by implementing UPDES permit-required BMPs specified in *Best Management Practices for Construction Sites.* To minimize the potential impact of incidental releases of construction vehicle fluids (such as diesel or hydraulic fluids) to soil quality, the private entity would implement spill and leak prevention and response procedures, including maintaining a complete spill kit at the site and train workers on the proper use of the equipment. Releases of regulated quantities of petroleum-based fluids would be reported to VA and UT DEQ and cleaned up per UT DEQ regulatory requirements.

Resource	Minimization and Avoidance Measures
Hydrology and Water Quality	As described for soils, the private entity would implement and maintain UPDES permit-required BMPs. The private entity would also implement a Spill Prevention, Control, and Countermeasure plan and train workers on how to respond to and remediate accidental releases of petroleum-based fluids to prevent impacts to groundwater. The private entity would design and construct a stormwater management system to minimize sedimentation and runoff discharge, incorporating advanced controls like oil-water separators, infiltration systems, and permeable pavement.
Land Use	Private entity to comply with South Salt Lake (Alternative 1, 3, and 4) zoning regulations.
Noise	If necessary during construction, the private entity would use shields or other physical barriers to restrict noise transmission; provide soundproof housings or enclosures for noise producing machinery; use efficient intake and exhaust mufflers on internal combustion engines that are maintained so equipment performs below noise levels specified; conduct truck loading, unloading, and hauling operations so that noise is kept to a minimum; select material transportation routes as far away from sensitive receptors as possible; shut down noise-generating heavy equipment when not in use. The private entity would avoid creating loud noises from 9 p.m. to 7 a.m. on weekdays and Saturday, and 9 p.m. to 9 a.m. on Sundays, to comply with the Salt Lake City noise ordinance, which also applies in South Salt Lake and Millcreek. Private entity to implement a hearing conservation program when construction worker noise exposure is at or above 85 decibels averaged over 8 working hours, or above 90 dBA over an 8-hour time-weighted average, including providing hearing protection.
Vibration	The private entity would assess potential construction-period vibration impacts as part of the final design phase, when construction methods and the locations of specific types of construction equipment have been refined. Measures for reducing vibration impacts to sensitive receptors would be considered in the development of construction plans for areas where construction activities causing short-term perceptible vibration could be required.

Resource	Minimization and Avoidance Measures
Solid Waste and Hazardous Materials	**Alternatives 1, 3, and 4**: Prior to the demolition of any building, the private entity would assess the buildings for asbestos-containing materials (ACM) in accordance with the USEPA National Emission Standards for Hazardous Air Pollutants and the OSHA Asbestos Construction Standard (29 CFR 1926.1101). Should ACM be present, the private entity would be responsible for proper abatement and disposal in accordance with USEPA 40 CFR 61.150 and UT DEQ Asbestos Rule R307-801. The private entity would also assess the buildings for lead-based paint (LBP) and determine the appropriate disposal requirements by testing samples using the Toxicity Characteristic Leaching Procedure. Should LBP be present, the private entity would be responsible for proper worker protection per the OSHA Lead-in-Construction standard and disposal at a USEPA-approved landfill in accordance with RCRA. **Alternative 3**: The private entity developed a proposed remedial action strategy to facilitate the redevelopment of the site and to comply with UT DEQ requirements. Under this strategy, the private entity would coordinate with UT DEQ about the proposed site redevelopment, create a Corrective Action Plan, remediate by excavating contaminated soil and using a chemical oxidant for groundwater, then submit post-excavation sampling results. If contamination remains, quarterly groundwater monitoring and possibly an Environmental Covenant and Site Management Plan would follow, with the objective of working toward or achieving a No Further Action designation from UT DEQ.
Traffic, Transportation, and Parking	**For Alternatives 1, 3, and 4:** The private entity would coordinate with UDOT for any impacts to state-managed roads and obtain UDOT Conditional Access Permit for new driveway connections to state-managed roads; UDOT Encroachment Permit for construction within the UDOT right-of-way. **For Alternatives 1, 3, and 4**: The private entity would obtain a South Salt Lake Public Way (Right-of-Way) Permit for work in the city-managed right-of-way and a South Salt Lake Traffic Control Permit for any lane closures or signage during construction.
Utilities	Private entity to apply for and obtain UDOT Encroachment Permit, and South Salt Lake Public Way Permit or Millcreek Right-of-Way Permit for work or activity on or crossing any right-of-way to extend utilities. Private entity to design and operate the OPC to achieve Green Globes certification to ensure efficient use of electricity, water, sewerage, and stormwater utilities during operation.